a.s.r.


# Annual Report

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# Annual Report

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*'a.s.r. helps customers share risks and accumulate capital for later.'*

This document is the PDF/printed version of the Annual Report 2024 of ASR Nederland N.V. (a.s.r.) and has been prepared for ease of use and does not contain ESEF information as specified in the Regulatory Technical Standards on ESEF (Delegated Regulation (EU) 2019/815). The Annual Report 2024 was made publicly available pursuant to section 5:25c of the Dutch Financial Supervision Act (*Wet op het financieel toezicht*), and was filed with Netherlands Authority for the Financial Markets in European single electronic reporting format (the ESEF package). The ESEF package is available on www.asrnl.com and includes a human readable XHMTL version of the 2024 Annual Report. In any case of discrepancies between this PDF version and the ESEF package, the latter prevails.


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# Overview of 2024

### Migration of Aegon's disability insurance policies to a.s.r.

As of 1 January 2024, all collective disability insurance policies have been transferred to a.s.r. This marked the beginning of the migration of Aegon NL's non-life portfolio to a.s.r. In May 2024, the policies of Aegon NL customers with individual income insurance (AOV) were transferred to a.s.r.

### Warm Welcome

A key initiative for a.s.r. is providing a so-called 'Warm Welcome' to clients migrating from the Aegon portfolio. a.s.r. aims to make this transition as seamless as possible, ensuring minimal effort for customers. The goal is to ensure that both customers and advisors understand the process and feel supported throughout the transition.

An example is the *'klantarena'* where a.s.r. invited a number of Aegon NL customers to hear their expectations regarding the transition of their insurance policies to a.s.r. In a *'klantarena'*, they shared their opinions and received targeted questions from colleagues.

### First IFRS 17 Reported

The publication of the financial results is done for the first time in accordance with IFRS 17 and IFRS 9, and included Aegon NL.

### Doenkracht Donderdag

On Thursday, April 18, nearly 500 a.s.r. employees across the Netherlands have volunteered at 58 different social organisations during Doenkracht Donderdag. This is the first time a.s.r. organised this collective volunteer day, inspired by Aegon NL Volunteer Work Friday.

### Campaign 'From *a* funeral to *Your* funeral'

With a.s.r. Funeral Insurance, you can choose a farewell that truly suits you and your way of life. Sharing your ideas about your funeral now provides peace of mind. Later, it gives clarity on how your funeral will look and fit your life. And always, you contribute to the world in your own way.

### a.s.r. signs Elderly and Future-Proof Living Covenant

Matthijs Hofstede, Director of Mortgages, signed the Elderly and Future-Proof Living Covenant in April on behalf of the a.s.r. and Aegon NL brands.
This initiative by the Ministry of the Interior and Kingdom Relations aims to help the elderly live in suitable housing.

### Growth Strategy and Ambitious Goals during Capital Markets Day

During the Capital Markets Day on June 27, a.s.r. has presented its strategy and goals for 2024 to 2026 to institutional investors and analysts. The acquisition of Aegon NL is a milestone in a.s.r.'s ambition to become a leading insurer in the Netherlands.
The new strategy builds on a.s.r.'s strong track record and reflects confidence in seizing growth opportunities in the market.
This was a special occasion for a.s.r. since this was the first time the CMD was held at the Utrecht office.

### Launch of Bicultural Network *Cultuurrijk*

Cultuurrijk is a network for and by colleagues who want to share knowledge and experiences about different cultures to enhance cultural and ethnic diversity within a.s.r. and increase cultural awareness. The network also contributes to incorporating cultural diversity into strategic policy, operations, and internal and external communication.

### Aegon NL's P&C policies successfully transferred

All P&C policies from Aegon NL have been successfully transferred to the system that a.s.r. uses for administering P&C policies. This successful conversion is an important step in further building a future-proof and sustainable non-life insurer that is leading in the Dutch market.

### SBTi commitment

a.s.r. joins the international Science Based Targets initiative (SBTi). By doing so, a.s.r. commits to setting scientifically based emission reduction targets in line with the Paris Climate Agreement. This step aligns with a.s.r.'s ambition to be at the forefront of sustainable insurers in Europe.

### Introduction of updated logo

On November 12, a.s.r. introduced the new application of its logo: the shortened version of the existing logo with green accents, to literally emphasise its sustainable character. The new logo will be gradually implemented until the end of 2025.

### Collaboration and knowledge sharing

a.s.r. believes in the power of independent intermediaries. That's why a.s.r. organised many sessions for intermediaries and underwriters this year. Topics included sustainability, the integration of Aegon NL, Artificial Intelligence, damage prevention, and road safety. With the introduction of 'Samen Sterk', this collaboration and knowledge sharing is further strengthened.

### a.s.r. and Nibud introduce Financial Resilience Quickscan

During the Money Week, a.s.r. and Nibud (National Institute for Family Finance Information - *Nationaal Instituut voor Budgetvoorlichting)* introduced the Nibud Financial Resilience Quickscan specifically for vocational students (MBO). This quickscan provides students with insight into their personal financial resilience. After a test period, all vocational schools can use it.

### Campaign 'Healthy Living Your Way'

At a.s.r., you can live healthily in your own way. You can do this with the Care for Yourself app, wherever, whenever, and however it suits you. The healthier we live, the better we can keep healthcare accessible for everyone. In this way, we all contribute to a more sustainable society.

### Sale of Knab completed

a.s.r. and BAWAG have met all conditions for the sale of a.s.r.'s banking activities (Knab) to BAWAG. The Dutch Central Bank and the European Central Bank have issued a declaration of no objection, and the Central Works Council of a.s.r. has given a positive advice. a.s.r. will allocate € 100 million from the proceeds for a share buyback and will add the remainder to its capital position.

### a.s.r. real estate launches renewable energy fund

a.s.r. real estate launched a renewable energy fund of approximately € 400 million. The ASR Dutch Green Energy Fund I primarily invests in solar and wind farms in the Netherlands. There is also the possibility to invest in energy storage in batteries. This way, Real Estate aims to contribute to the energy transition.

### S&P positive about a.s.r.'s creditworthiness

The largest insurance companies of a.s.r. now have an A rating. The holding company of a.s.r., ASR Nederland N.V., has a BBB+ rating. The long-term rating outlook was stable and has been revised to positive by S&P.

*'I am proud of what we have achieved together in 2024.'*

Jos Baeten

# At a glance



**Market position**

#2 (2023: #2)

**Customer base**
(in million)

4.5 (2023: 4.3)

**Employees**
(in FTE)

7,373 (2023: 7,994)

**Brands**

a.s.r.
AEGON
Loyalis een merk van a.s.r.
TKP

**Carbon footprint reduction**
(in %)

5 (2023: base year)

**Impact investments**
(in % of total AuM)

8.7 (2023: 7.1)

**Employee engagement**
(in percentile)

73 (2023: 89)

**Sustainable reputation**
(in %)

39 (2023: 39)

**Gender diversity**
(in % of total management)

32 (2023: 29)

**Net Promoter Score (NPS-r)[1]**
(-100 to 100)

-11 (2023: -9)

1 The NPS-r on a.s.r. group level is compared to the market average, where market average is equal to a score of 0.

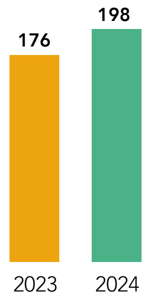
### Premiums P&C and Disability
(in € million)
3,968
2023: 3,540

### IFRS net result
(in € million)
946
2023: 1,086

### Operating result
(in € million)
1,428
2023: 973[1]

### Dividend per share
(in €)


### Solvency II ratio[2]
(in %)




### Total assets
(in € billion)
138.6
2023: 150.8[1]

### Operating return on equity
(in %)
13.1
2023: 11.6[1]

### Combined ratio P&C and Disability
(in %)
91.9
2023: 93.5

### Organic capital creation
(in € million)
1,193
2023: 874[1]

### Total equity
(in € million)
9,833
2023: 9,377

### Total capital return
(in € million)
879[3]
2023: 610

### Contractual service margin
(in € million)
5,675
2023: 5,168

### Credit rating
(S&P, IFSR)
A
2023: A

### Pension DC inflow
(in € million)
2,768
2023: 2,070

### Pension buy-out
(in € million)
69
2023: 0

### Share buy back
(in € million)
100
2023: 0

### Market capitalisation
(in € billion)
9.7
2023: 9.0

1 This 2023 figure has been restated, see section 7.3.2 for more information.
2 The Group Solvency II ratio is based on the existing Partial Internal Model for Aegon Life and Spaarkas. The other insurance entities in the Group calculate their solvency capital requirement in accordance with the Solvency II Standard Formula. The Group Solvency II ratio includes financial institutions.
3 Including € 125m share buyback announced on 19 February 2025 (in line with the medium-term targets as presented at the 2024 Capital Markets Day), which will be executed in H1 2025.

## Integration Aegon Nederland N.V.

**This section describes the progress that has been made in the integration of Aegon NL since closing in July 2023.**

The integration of Aegon Nederland N.V. (hereafter: Aegon NL) with ASR Nederland N.V. (a.s.r.) represents a pivotal step in creating a leading insurer in the Netherlands. Following the successful completion of the business combination in July 2023, the integration is well underway. This new combination, designed to leverage the unique strengths of both organisations, supports a.s.r.'s strategic goal of reinforcing its position as a leading insurer in the Netherlands, enhancing the company's ability to deliver value across non-life and life insurance, pensions, activities relating to asset management, and distribution services.

The integration to date confirms the strategic and financial merits of the combination with Aegon NL, and a.s.r. is committed to continue to deliver on the planned integration path ahead.

### Reached milestones so far

Building on the early milestones of the integration in 2023, such as securing regulatory approvals, developing a robust integration plan with enhanced cost synergies, and completing the legal merger of the Holding and Non-life entities, which marked the employer merger. Throughout 2024, a.s.r. has maintained its pace towards integrating Aegon NL.

At the start of the year, the sale of Knab was announced, leading up to the closing of the sale at 1 November 2024. Meanwhile, Mortgages finalised their agreement with the Stater platform on the business process outsourcing (BPO) of mortgage activities, and the first migrations of policies were successfully concluded within the Disability domain. Within the staff functions, the payroll migration was completed, and during the remainder of the year, most staff functions achieved their respective target operating models, including location changes, enabling the closing of the Den Haag office by the end of 2024.

In addition to these integration milestones, steps were taken to increase focus on employees, with the organisational environment and culture as key elements for becoming a leading insurer in the Netherlands. A culture programme was rolled out in every department of the organisation, focusing on creating an integrated and unified culture that attracts and retains the best talents. Ongoing initiatives such as employee surveys and culture assessments are being deployed to measure employee sentiment.

In parallel, a significant reduction was realised in the number of Transitional Service Agreements (TSAs) originally established between a.s.r. and Aegon Ltd. to ensure business continuity during the integration period. These agreements help maintain essential services, such as IT infrastructure, while integration progresses. Most remaining TSAs will be unwound in H1 2025, with IT Transitional Service Agreements (ITSAs) continuing for a longer period, until all business migrations planned for 2025 and 2026, such as Life, Pensions and Mortgages, are completed.

Lastly, in the final quarter of 2024, a.s.r. completed the transfer of all P&C and Disability insurance policies into its core IT systems, integrating both policy administration and processes. This marked Non-life as the first major business line to be fully integrated into a.s.r. During the migration of the non-life policies, both end-customers and intermediaries were actively engaged, ensuring a smooth transition from the Aegon NL landscape to a.s.r.

This year (2025) marks a new and important year of integration and is off to a good start. As per 1 January 2025 the IORP entities Aegon Cappital and ASR Premiepensioeninstelling N.V. were legally merged. Most of the in scope asset management services have been formally transferred, and since mid-January the newly produced Aegon NL label mortgages are processed through the end-state BPO with Stater, marking an important milestone for the mortgage business line integration. Meanwhile ample efforts are being directed towards trial migrations laying the foundations for Life and Mortgages migrations later this year.

### Outlook

The final phase of the integration will focus on expanding the partial internal model (PIM) to include a.s.r. Life, finalising all planned legal mergers, and completing the data and policy migration for both Individual life and Mortgages, which will enable the closing of the Leeuwarden location per the end of 2026. In terms of IT, all ITSAs will be terminated, and the associated systems decommissioned, ensuring that all systems operate on a.s.r.'s target IT architecture.

To finalise the integration, it is crucial to maintain strong governance anchored by senior management engagement and accountability. The overall integration is supervised and monitored by the Integration Management Office and various other governing bodies, which remain focused on tracking progress and ensuring that all integration efforts are completed before the end of 2026.

Key challenges include the conversion of portfolios with minimal impact on customers and business partners, while managing dependencies between business lines and staff functions, such as IT, to make sure unbundling and migration plans can be rolled out as planned.
The integration may affect prioritisation of existing business plans and put additional pressure on the organisation, which is compounded by the requirements for migrations from regulatory, accounting and internal control perspectives. Thus far, these efforts have been well balanced. Smaller planning challenges aside, a.s.r. remains well on track to deliver on the integration and remain confident in achieving overall timelines and synergy targets.

Quality assurance is safeguarded via timely involvement of the first line Risk Management, second line Risk Management and Compliance and third line Internal Audit. Integration progress is also discussed at senior management level through steering committees that report to the Management Board (MB), to ensure sufficient management awareness.

By completion of the integration, a.s.r. will have strengthened the robust and reliable company that is even better positioned for the future, while strengthening the strategic positioning of a.s.r. on all strategic pillars.

# 1. Message from the CEO

**2024 was a very successful year for a.s.r. I am pleased with the execution of our strategy and the strong financial and non-financial results achieved in 2024. Our business activities are performing well in all segments, with profitable growth in P&C, Disability, Pensions, and Mortgages. Organic capital creation and solvency are strong, and the operational return on equity of 13.1% is above target. Additionally, we offer our shareholders an attractive return with a proposed dividend for 2024 that increases by 8%. The integration of Aegon NL is more than halfway and is proceeding according to plan.**

We realised a 5.1% organic growth in non-life business and achieved a better-than-expected combined ratio, indicating effective cost control and disciplined pricing. The pension business reached significant milestones, including the announcement of our first buy-outs and growth in the Defined Contribution business and annuities.

The successful completion of the sale of Knab, on 1 November 2024, allows us to focus on our core activities and to invest in growth opportunities. We used € 100 million of the proceeds for an additional share buyback programme that was completed in December. On 19 February 2025 we announced the repurchase of € 125 million of own shares in 2025. This underscores a.s.r.'s commitment to rational capital allocation.

a.s.r. made progress on sustainability in 2024. For example, a 5% reduction of the carbon footprint and an increase of impact investments to 8.7% of our portfolio. Through our employee volunteering programme Doenkracht colleagues donated 14,000 hours to charities. For customers, the focus in 2024 was on promoting a vital and healthy lifestyle. Since January 2025 our a.s.r. Vitality programme is available to all insured workers and self-employed individuals with an a.s.r. disability, health or pensions product. This programme helps customers to increase their employability and enjoy a prolonged, healthy life.

In 2024, a.s.r. continued its digital strategy to contribute to enhancing the customer experience, achieve its digital ambition, and to increase its innovative strength. These developments are necessary to remain competitive, control costs and stay distinctive. AI plays a crucial role in this. Within a.s.r., AI is already being used to optimise productivity and better serve customers. The results are promising and offer opportunities for the coming years. a.s.r. is determined to continue applying AI to contribute to its strategic goals. Management and employees are being trained for the expected changes in their work.

I am also pleased that we were able to announce that we settled one of the longest-running cases in the Dutch insurance sector. By the end of 2023, we reached an agreement with five interest groups for Aegon and a.s.r. unit-linked insurance policyholders. Over 90% of affiliated customers have accepted their individual offer, which was the remaining condition for the agreement to take effect. a.s.r. will also implement a scheme for hardship cases and non-affiliated customers who did not receive previous compensation. This settlement provides clarity for all customers involved and reduces our risk profile.

In 2024, geopolitical tensions increased further. With the outcome of the US elections, global relationships are on the brink of significant changes. The new US government seems to be approaching its post-World War II relationship with Europe differently. This has led to a growing realisation that Europe must chart its own course in terms of economy and security. This paradigm shift presents a unique opportunity and necessity for Europe to move towards greater unity. The recent steps towards deregulation and strengthening defence could be seen as a first positive step to strengthen the competitive position of Europe, both economically and in terms of security. Also in the Netherlands, the challenges are significant. The structural shortage of affordable housing, the necessary investments in security, and the issues in the implementation of social security require decisive action from the government. a.s.r. is, like other financial institutions, willing to contribute ideas and invest in solutions.

Nonetheless, the results of 2024 provide a solid foundation for the future and confidence in sustainable growth and long-term value creation for all our stakeholders in 2025 and the years to come. I thank our customers, employees, intermediaries and shareholders for their continued support and trust in a.s.r.

**Jos Baeten**
CEO


# Business and strategy

# 2.1 The story of a.s.r.

a.s.r. is a leading insurer in the Netherlands based on market share. a.s.r. helps customers in sharing risks and accumulating wealth for the future. It offers services and products in the areas of insurance, pensions, and mortgages for consumers, entrepreneurs, and employers. Additionally, a.s.r. is active as an asset manager also for third parties. a.s.r. considers the interests of people, the environment, society, and future generations. a.s.r. is listed on Euronext Amsterdam and included in the AEX. a.s.r.'s headquarters are in Utrecht, with additional locations in Enschede, Groningen, Heerlen and Leeuwarden. a.s.r. has 7,373 employees.

a.s.r. aims to be an insurer that customers can rely on, a stable financial institution which offers shareholders the prospect of a fair return, a people-oriented employer, and a valuable member of society. Central to a.s.r.'s mission is helping customers insure risks they do not want or cannot bear themselves. This can include damage to a vehicle, home, or home contents, medical expenses, funeral costs, or providing a guaranteed income when someone is temporarily unable to work. a.s.r. also offers mortgages and services for people who want to accumulate wealth for later or for retirement, and for those who need asset management.

## Strategy

The core of a.s.r.'s strategy is long-term value creation for its key stakeholders: customers and intermediaries, employees, shareholders, and society. a.s.r. is ambitious and aims to be the leading pension provider in the Netherlands, a prominent mortgage lender, and a leader in sustainability. It sees opportunities to strengthen its position and grow further in Property & Casualty (P&C) insurance, Disability insurance, and Asset Management in the coming years. a.s.r. also aims to expand its role in the value chain with its distribution and service companies. In Individual life, Funeral, and Health insurance, a.s.r. aims to maintain its current position.

a.s.r. wants to be the best financial service provider for customers and advisors, offering simple and transparent products and services that meet their needs. a.s.r. works closely with independent intermediaries who know customers' personal situations well and can give them the best advice. It is essential to maintain and build excellent relationships with advisors, who play a crucial role in serving customers, especially in the growth markets of P&C, disability, pensions, and mortgages. a.s.r. also offers customers the ability to quickly and easily manage their affairs and new insurances in the digital a.s.r. environment.

a.s.r. is cost-efficient and financially healthy, and it handles the money that customers entrust to it with care. a.s.r. must be financially strong to meet its obligations and ensure continuity for customers and employees. a.s.r. offers shareholders the prospect of a fair return.

## Sustainability strategy

Sustainability is integrated into a.s.r.'s daily operations. The Policy on Sustainable Insurance describes how sustainability is part of the underwriting process. The ambition is to develop products and services that contribute to solving social issues and reduce negative impact. As part of the product approval and review processes a newly developed or further developed insurance product is tested before it can be introduced to the market. The Policy on Responsible Investments sets requirements for investments made. This policy includes criteria for various ESG themes to manage significant sustainability risks and limit adverse effects of investment decisions on sustainability. Existing products must also go through a product approval and review process periodically. Within this process, several criteria are reviewed, including customer interest and social interest. As a large insurer, a.s.r. wants to contribute to solving social issues and has therefore identified three focus areas where it can make the greatest impact:

1. **Financial self-reliance and inclusion:** a.s.r. helps people take responsible risks and make conscious financial choices to avoid or get out of debt. It pays attention to the inclusion of various target groups, including vulnerable groups.

2. **Vitality and sustainable employability:** a.s.r. is committed to preventing illness, absenteeism, and disability among employees, employers, and its customers. This enables people to stay healthy longer and contribute to society. a.s.r. creates opportunities for its employees to continue developing and increase their chances in the job market, both within and outside a.s.r.

3. **Sustainable living and climate:** a.s.r. helps customers live more sustainably through its insurance products and advice. As a major investor, a.s.r. invests in activities that reduce climate impact, support the energy transition, and restore biodiversity, thereby reducing climate risk. a.s.r. also pays attention to the environmental impact of its offices, transport, and procurement within its own operations. a.s.r. does it. *Nu, later en altijd.*

# Company profile

a.s.r. is a leading insurer in the Netherlands based on market share. a.s.r. helps customers in sharing risks and accumulating wealth for the future. It offers services and products in the areas of insurance, pensions, and mortgages for consumers, entrepreneurs, and employers. Additionally, a.s.r. is active as an asset manager, also for third parties. a.s.r. is listed on Euronext Amsterdam and included in the AEX. a.s.r.'s headquarters are in Utrecht, with additional locations in Enschede, Groningen, Heerlen and Leeuwarden.[1,2]

Employees
(in FTEs)

7,373 2023: 7,994

Market position

#2 2023: #2

Customers
(in million)

4.5 2023: 4.3


1 As of 1 January 2025.

2 In addition to the displayed locations on the map, a.s.r. has several more locations in: Amsterdam (Corins), Velserbroek (D&S Holding) Zaandam (Robidus). Furthermore, the intermediaries and mandated agents are spread out throughout the country.

# 2.2 How a.s.r. creates value

## Input capital

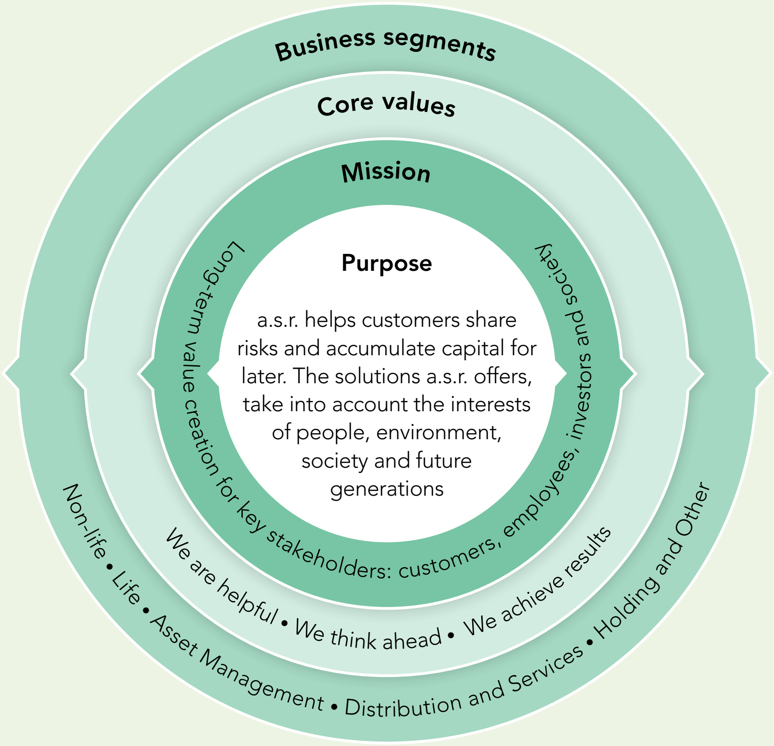
**Social and relationship**
- Customers and relations
- Loyal and high-quality independent intermediary network
- Partnerships and sector initiatives
- Volunteering hours

**Human and intellectual**
- Diverse and skilled workforce
- Training and development programs
- Code of Conduct

**Operations**
- Products and services (incl. IT)
- Office buildings
- Facilities and company vehicles

**Environmental**
- Energy, water and other natural resources

**Financial**
- Shareholder capital
- Gross written premiums
- Assets under management
- Debt




### Strategy

**Customers**
- Capital-generating business model
- Expension in value chain
- Excellence in pricing underwriting and claim handling
- Use of new technology
- Cost efficiency

**Employees**
- Employee experience
- Vitality and sustainable employability
- E-mood tool
- Employee communities
- Future-proof employment conditions

**Investors**
- Ample capital to deploy
- Solid capital generation
- Continued strategic and value accretive bolt-on M&A to add scale and specific skills
- Attractive capital return
- Focus on value over volume
- Robust solvency ratio

**Society**
Focus on:
- Financial self-reliance and inclusion
- Vitality and sustainable employability
- Sustainable living and climate

## Output capital

**Social and relationship**
- Doenkracht metrics
- Sustainable reputation score •

**Human and intellectual**
- Employee engagement •
- # hrs training per fte
- % women in leadership •
- % absenteeism

**Product and services**
- Customer satisfaction (NPS) •
- Market share
- Pension buy-outs and DC inflow •

**Environmental**
- $CO_2$ emission reduction •
- Impact investments •
- Waste minimalisation

**Financial**
- Cost synergies •
- Solvency ratio •
- Capital return •
- Return on equity •
- Organic capital creation •
- Fee-based business/revenue growth •

• Strategic targets

## Expected outcome for key stakeholders

**Social and relationship**
- Contribution to financial self-reliance
- Strong brand and reputation

**Human and intellectual**
- Sustainable employer
- Equal pay for equal work
- Diversity, Equity and Inclusion
- Healthy and vital workforce
- Respected human rights

**Product and services**
- Outstanding financial service provider
- Meet customer needs
- Repair/compensation of damage
- Income protection
- Increasing client satisfaction
- Accessibility for customers by up-to-date digital customer solutions
- Facilitate entrepeneurship

**Environmental**
- Leading sustainable insurer
- Paris-aligned investment and insurance portfolio
- Contributing to energy transition
- Nature loss statement
- Nature preservation

**Financial**
- Transparent and responsible investments
- Progressive annual dividend per share

# 2.3 Double materiality and value chain[1]

## Introduction

In line with the Corporate Sustainability Reporting Directive (CSRD), a.s.r. conducted a double materiality assessment in 2023 and 2024. A double materiality assessment is one of the first key steps in determining the reporting scope of the organisation of its most material sustainability matters.

Under the double materiality concept, a sustainability matter can be material from an impact point of view and/or from a risk and opportunity perspective. On the one hand, a.s.r. (potentially) has a positive and/or negative impact on people and the environment (inside-out). On the other hand, sustainability-related developments and events create (new) risks and opportunities for a.s.r. (outside-in).

## Material sustainability matters

a.s.r. has identified 17 material sustainability matters (hereafter: material topics). Which are linked to the strategic sustainability pillars as shown below, also with reference to the eight SDG's that are most closely connected to the strategy. For more information on the material topics see sections 6.1.4.3 and 6.1.4.4 and for the SDG's section 2.7.

### Double materiality assessment

| a.s.r. strategic pillar | Material topic | Value chain | Description | ESG topics | Impact materiality | Financial materiality | Time horizon | SDG's | Link to section |
|---|---|---|---|---|---|---|---|---|---|
| Sustainable living and climate | **Climate change** | Downstream | Adaptation: Climate change increases financial risks for a.s.r. due to more frequent natural disasters. a.s.r. enhances climate resilience through products that help customers adapt to climate risks, reducing financial uncertainty and increasing sustainability investments. In this way climate change presents a strategic opportunity for a.s.r. to develop new insurance products and services, offering a competitive edge and increased revenue. | 1 | Positive impact | Risk, Opportunity | Short term, Medium term, Long term | 13 | 6.2.1 |
| | | Upstream, Own operations, Downstream | Mitigation: a.s.r.'s own operations and value chain contribute to climate change through emissions. However, new legislation requires a.s.r. to insure adaptation measures or stop insuring buildings in certain areas, potentially causing financial burdens. Investments in renewable energy reduce greenhouse gas emissions and promote sustainability. Investing in renewable energy offers growth opportunities and new insurance products and services for a.s.r., driven by the global shift to renewables. | 2 | Positive impact, Negative impact | Risk, Opportunity | Short term, Medium term, Long term | 7, 13 | 6.2.1 |
| | **Biodiversity** | Upstream, Downstream | Direct impact drivers of biodiversity loss: a.s.r. promotes sustainable farming, enhancing biodiversity and more sustainable land use. However, its investment- and insurance activities can also lead to biodiversity loss and ecosystem threats. Improving biodiversity can increase the value and sustainability of a.s.r.'s rural real estate. | 3 | Positive impact, Negative impact | Opportunity | Short term, Medium term, Long term | 15 | 6.2.3 |
| | | Upstream, Downstream | Impacts and dependencies on ecosystem services: a.s.r.'s investments in assets and insurance of activities in certain sectors that have a high impact on ecosystem services may lead to degradation of nearby nature area. Declining biodiversity lowers rural real estate value and productivity. Customers of a.s.r. reliant on ecosystem services face higher risks potentially leading to higher insurance claims and operational challenges for affected businesses. | 4 | Negative impact | Risk | Medium term, Long term | 15 | 6.2.3 |

1 Section 2.3 is in scope of CSRD and limited assurance (ESRS 2 SBM-1).

**Value chain:** Upstream | Own operations | Downstream **Impact materiality:** Positive impact | Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## Double materiality assessment (continued)

| a.s.r. strategic pillar | Material topic | Value chain | Description | ESG topics | Impact materiality | Financial materiality | Time horizon | SDG's | Link to section |
|---|---|---|---|---|---|---|---|---|---|
| Sustainable living and climate | **Circularity** | ↗ ↘ | Resource inflows: a.s.r.'s real estate investments in secondary materials support sustainability. The healthcare sector's use of raw materials, covered by a.s.r.'s health insurance, increases waste and pollution. Growing demand for circular and recycled products offers a.s.r. new insurance opportunities, expanding their customer base and revenue. | 5 | + − | Opportunity | Short, Medium, Long | 13, 15 | 6.2.4 |
| | | ↗ ↘ | Resource outflows: a.s.r.'s dedication to material reuse in urban and infrastructure development supports the circular economy leading to a positive impact on resource lifecycle extension. | 6 | + | | Short, Medium, Long | 13, 15 | 6.2.4 |
| | | ↗ Own operations ↘ | Waste: a.s.r.'s specialised insurance proposition for recycling companies addresses the challenge of insuring enterprises that may be considered high-risk due to the nature of their business, promoting waste reduction and recycling. However, a.s.r.'s own operations and value chain activities generate significant waste, negatively impacting the circular economy. Tailored insurance for recycling businesses offers a revenue opportunity by meeting market needs. | 7 | + − | Opportunity | Short, Medium, Long | 13, 15 | 6.2.4 |
| Vitality and sustainable employability | **Working conditions own workforce** | Own operations ↘ | a.s.r. promotes a positive work environment, enhancing employee wellbeing and productivity. However, the merger with Aegon may cause job uncertainties and affect employee morale due to potential restructuring and potential redundancies. | 8 | + − | | Short, Medium, Long | 1, 3, 8 | 6.3.1 |
| | **Vitality and financial security of consumers and endusers** | Own operations ↘ | a.s.r. improves consumers' mental and physical health through financial security products and supportive services, enhancing self-reliance and well-being. a.s.r. can reduce absenteeism and improve competitive positioning by supporting client vitality and leading to fewer claims. | 13 | + | Opportunity | Short, Medium, Long | 3, 10 | 6.3.3 |
| Financial self-reliance and inclusion | **Diversity, equality and inclusion** | Own operations | Inclusive practices at a.s.r. promote equal opportunities and a supportive work environment. However, unconscious bias and lack of transparency can lead to unequal pay and limited opportunities. a.s.r.'s commitment to fair working conditions attracts talent, boosting productivity, retention, and innovation. | 10 | + − | Opportunity | Short, Medium, Long | 5, 8 | 6.3.1 |
| | **Information-related impacts for consumers and endusers** | Own operations ↘ | Clear online information helps customers make informed decisions, improving awareness. However, the complexity of a.s.r.'s products and services may make it challenging for customers to understand necessary details possibly leading to uninformed or incorrect decisions. Inadequate data security management could result in breaches, exposing customer information. | 12 | + − | | Short, Medium, Long | 10 | 6.3.3 |
| | **Social inclusion of consumers and endusers** | Own operations ↘ | Inclusive initiatives in a.s.r.'s offerings promote financial and social inclusivity, enhancing access to essential services. However, non-acceptance or higher premiums for high-risk consumers limit inclusiveness. Irresponsible marketing practices could harm a.s.r.'s reputation and revenue. | 14 | + − | Risk | Short, Medium, Long | 10 | 6.3.3 |

**Value chain:** ↗ Upstream | Own operations | ↘ Downstream **Impact materiality:** + Positive impact | − Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## Double materiality assessment (continued)

| a.s.r. strategic pillar | Material topic | Value chain | Description | ESG topics | Impact materiality | Financial materiality | Time horizon | SDG's | Link to section |
|---|---|---|---|---|---|---|---|---|---|
| Upholding standards | **Own workforce privacy** | | As a prominent employer, a.s.r. handles significant employee data, posing privacy risks if not managed securely and confidentially. | 9 | | | | | 6.3.1 |
| | **Oppressive labour practices in the value chain** | | Investments in high-risk countries can be associated with forced labour due to weaker labour laws, negatively impacting workers' well-being and rights. | 11 | | | | | 6.3.2 |
| | **Corporate culture** | | Initiatives like the Code of Conduct foster a strong corporate culture. The company's commitment to integrity is fundamental to its business operations and is ingrained in its policies and leadership structure. a.s.r.'s Policy on Responsible Investment aligns investments with ethical practices, positively impacting the investment landscape. a.s.r. faces negative impacts when it can't enforce its Policy on Responsible Investment. | 15 | | | | | 6.4.1 |
| | **Relationship with suppliers** | | a.s.r. continuously manages supplier relationships to promote fairness and sustainability, driven by a responsible procurement strategy, leading to encouragement of ethical business conduct. The commitment to ethical procurement practices enhances the stability of small and medium enterprises (SMEs). | 16 | | | | | 6.4.1 |
| | **Corruption and bribery** | | a.s.r. enforces a strict anti-corruption and bribery policy, reducing the risk of corrupt practices and enhancing stakeholder trust through ethical business practices. | 17 | | | | | 6.4.1 |

**Value chain:** Upstream | Own operations | Downstream **Impact materiality:** Positive impact | Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## Group value chain

An important step in the double materiality assessment is mapping the value chain. The value chain outlines a.s.r.'s business operations and its associated upstream and downstream relations. The value chain is divided into three sections: upstream, own operations, and downstream. The upstream value chain of a.s.r. is characterised by the products and services purchased as well as capital provided to a.s.r. The downstream value chain of a.s.r. is characterised by financial products and services provided to customers. Finally, the own operations represent the core activities of a.s.r.

### Upstream value chain

For a.s.r., the upstream part of the value chain consists of suppliers of goods, services, contractors, and capital necessary for the functioning of its business activities.

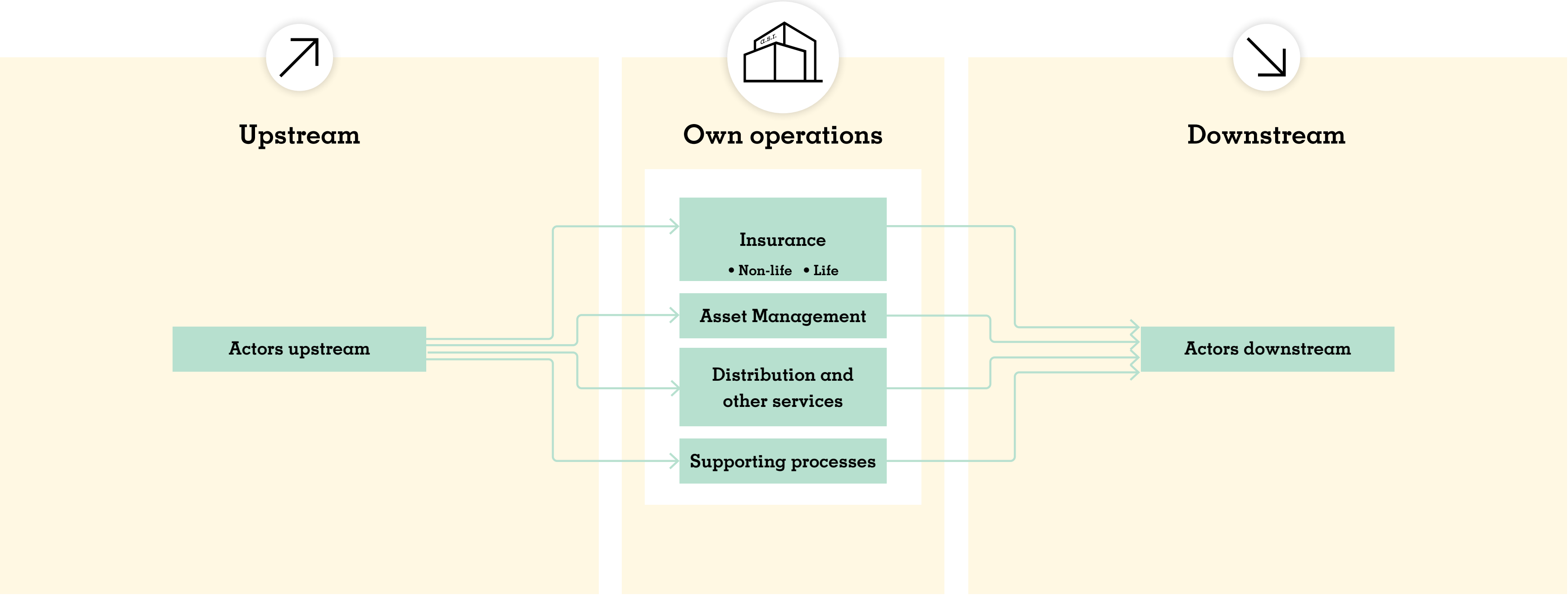
### Own operations

a.s.r.'s business activities comprise several financial services that are organised into five segments. See section 2.4. a.s.r.'s workforce engaged in these activities are supported by staff functions, such as HR, IT, Facilities, Procurement, Risk and Compliance.

### Downstream value chain

a.s.r.'s downstream value chain encompasses a broad range of actors, including customers, distributors, and waste management entities. Through independent intermediaries, mandated brokers, and online platforms, a.s.r. offers a variety of non-life and life insurance products and services to both businesses and private customers. a.s.r. recognises that its operations also indirectly affect and can be impacted by parties beyond direct customers and is actively managing these impacts. An example is employees of a.s.r.'s business customers whose pensions are arranged via a.s.r.

a.s.r. is an organisation with multiple product lines, each involving various internal and external stakeholders. The value chain for each product line has been mapped. These product line value chains can be categorised into four overarching value chains based on the characteristics of their activities: insurance, asset management, distribution and other services, and supporting processes. Descriptions of these value chains can be found in section 2.4. The consolidated value chain of a.s.r. as a group company, derived from these underlying value chains, is presented at the end of this section.



# 2.4 Business portfolio and value chains

## 2.4.1 Business portfolio

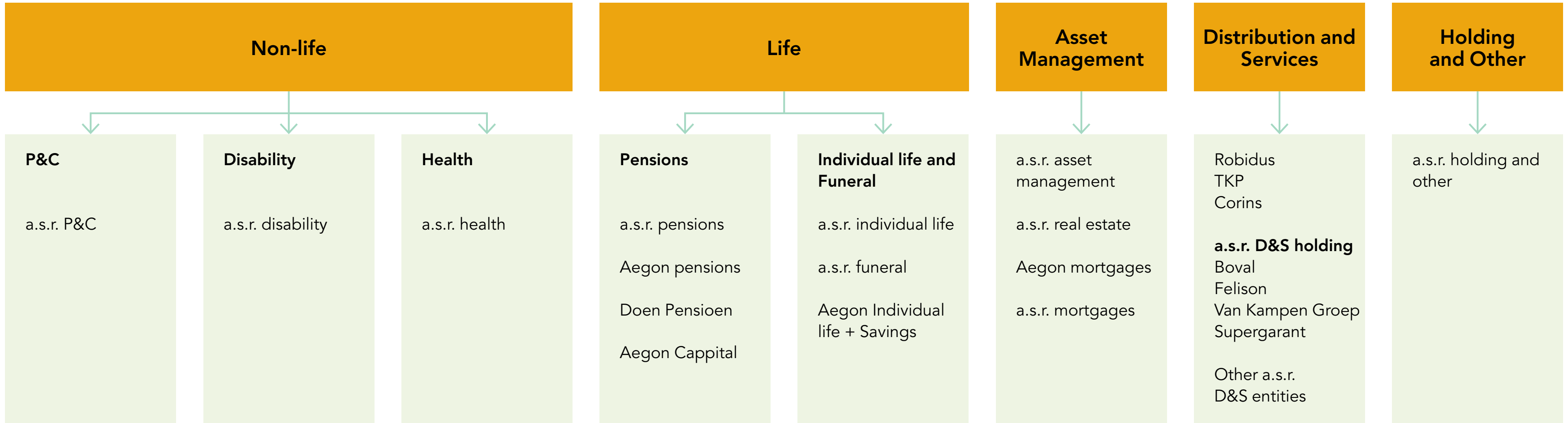
a.s.r.'s insurance segments solely operate in the Dutch market. a.s.r. has defined multiple value chains[1] based on its business lines. The following paragraphs and visual representation describe the main characteristics of a.s.r.'s multiple value chains. Based on the main activities, a.s.r. consolidated value chain is split in four value chains (insurance, asset management, distribution and services, supporting processes) which are aligned with its five segments. These segments are illustrated in the figure below. The insurance value chain consists of the Non-life and Life segments.

Business relationships are not limited to direct contractual relationships. They include indirect business relationships in a.s.r.'s value chain beyond the first tier.

- Tier 1 value chain actor: actors or parties that have a direct relationship with a.s.r.
- Tier 2 value chain actor: actors or parties that have a direct relationship with one of a.s.r.'s Tier 1 value chain actors.
- Tier 3 value chain actor: actors or parties that have a direct relationship with one of a.s.r.'s Tier 2 value chain actors.

On the following pages, four value chains are illustrated in line with the a.s.r. business segments. On these value chains the material topics as identified in the DMA (see section 2.3) are mapped to the actors in the value chains. The mapping includes the impacts, risks and opportunities identified by the relevant business lines.

For information on the strategy, products, business performance and outlook of the segments please see section 4.




1 Section 2.4 is in scope of CSRD and limited assurance (ESRS 2 SBM-1).

## 2.4.2 Underlying value chains

a.s.r. is an organisation with multiple product lines, with different internal and external stakeholders involved. After determining the value chains and conducting the double materiality assessment, the impacts, risks, and/or opportunities (IROs) were plotted on the specific part of the value chains where that IRO occurs. This is illustrated in the value chains below.

### Insurance value chain

**Non-life segment**

The Non-life segment consists of non-life insurance entities and their subsidiaries. These non-life insurance entities offer non-life insurance contracts such as disability insurance, property and casualty insurance and health insurance.

*P&C*

a.s.r. ranks among the top three Property & Casualty (P&C) insurers in the Netherlands, with a market share of 14.7% measured by GWP[1].

It offers the following products:

- Motor insurance;
- Fire insurance;
- Other P&C insurance products, such as liability, legal aid, travel and recreation, pet, and transport insurance.

a.s.r. offers P&C products for the retail and commercial markets under the brand a.s.r. and the label '*Ik kies zelf van a.s.r.*'. The a.s.r. brand focuses on the retail and commercial markets through independent advisors and mandated brokers with products such as: motor policies, fire policies and other P&C insurance products such as liability, legal aid, travel and recreation, pet insurance and transport insurance.

'*Ik kies zelf van a.s.r.*' offers direct online distribution to individuals and travel and recreational insurance via travel agents.

a.s.r. holds a majority interest in Soople and a minority interest in Fixxer. Soople helps its customers by taking on the full day-to-day maintenance of properties, including the initial contact with residents, planning, implementation and invoicing. Fixxer is a company set up in collaboration with Belfius Insurance and focuses on the management and further development of a digital service platform for customers' claims.

*Disability*

a.s.r. is the leading insurer in the disability market, offering income protection. It has an extensive range of products and services focusing on sustainable employability and on preventing and reducing absenteeism. Distribution of disability insurance products takes place mainly through insurance advisors. With the brands a.s.r. and Loyalis, a.s.r. is well positioned in the distribution channel serving self-employed individuals, SMEs, corporates and (semi-) public sectors. a.s.r. is the market leader with a market share of 39.8%.[1] Through a.s.r.'s prevention and reintegration services, a.s.r. helps its customers to ensure optimal employability for themselves and their employees.

a.s.r.'s income protection insurance business offers various products divided into the following product groups:

- Individual disability;
- Sickness leave;
- Group disability.

*Health*

a.s.r. offers basic health (medical) insurance under the Dutch Health Insurance Act (*Nederlandse Zorgverzekeringswet*) in combination with supplementary health insurance. In 2024, a.s.r. is the sixth largest provider of health insurance on the Dutch market, measured by number of customers.

The types of health cover offered in 2024 under the brand a.s.r. and the label '*Ik kies zelf van a.s.r.*' were as follows:

- Basic insurance;
- Supplementary health insurance.

**Life segment**

The Life segment consists of Pensions, Individual life and Funeral. The Life segment has a market share of 28.6%[1].

*Pensions*

a.s.r. is a major provider of defined contribution pensions (pension DC) in the Netherlands.

a.s.r. provides different propositions for building up a pension:

- The Employee pension (*Werknemerspensioen*), life cycle solutions for SMEs and large-cap companies (a.s.r. life);
- *Doenpensioen* van a.s.r. (a.s.r. IORP);
- Aegon Cappital (Aegon IORP).

A large number of customers is served by the two Institutions for Occupational Retirement Provisions (IORP): ASR Premiepensioeninstelling N.V. and Aegon Cappital B.V.

*Individual life*

Individual term life insurance is the only individual life product that a.s.r. actively sells. It guarantees payment of a stated death benefit to the insured's beneficiaries, if the insured dies during the specified term. a.s.r.'s term life products are mainly sold in combination with mortgage loans or investment accounts.

*Funeral*

a.s.r. is a top three funeral insurer in the Netherlands. a.s.r. sells funeral capital insurance policies, enabling customers to save and plan their own funerals.

### Asset Management value chain

The Asset Management segment involves all activities relating to asset management including investment property management. a.s.r. asset management conducts all of a.s.r.'s asset management activities, with the exception of direct real estate. Real estate assets are managed by a.s.r. real estate.

1 Market shares DNB 2023. Market shares 2024 are not available yet.

### Asset Management
a.s.r. asset management manages assets for a.s.r.'s own account and offers asset management services for affiliated entities as well as third parties. The investment categories include corporate bonds, government bonds, equities and mortgages. In this way, a.s.r. asset management offers bespoke investment solutions with attractive returns. a.s.r. asset management invests in countries and companies that comply with a.s.r.'s social and sustainability criteria, demonstrating that sustainability and financial returns can go together.

### Real Estate
a.s.r. real estate invests in real estate and infrastructure (real assets) on behalf of a.s.r. and third party institutional investors and manages real assets portfolios. a.s.r. owns a 50% interest in the joint venture Amvest Vastgoed B.V. The other 50% of Amvest Vastgoed B.V. is owned by PfZW (*Pensioenfonds Zorg & Welzijn*), the Dutch pension fund for the care and welfare sector.

a.s.r. real estate manages non-listed sector funds, which invest in retail and residential properties, offices, real estate on science parks and rural property in the Netherlands. a.s.r. real estate also invests in renewable energy sources such as wind farms, solar parks and estates.

a.s.r. Real Assets Investment Partners develops investment strategies, ensures their implementation and gives institutional investors control over real asset portfolios through active monitoring, reporting and engagement.

### Mortgages
a.s.r. mortgages operates in the residential mortgage market. a.s.r. also offers third party investors the opportunity to invest in mortgages. With a market share of around 11%, a.s.r. mortgages is the largest Dutch mortgage lender among insurers.

a.s.r. mortgages offers its mortgage products to customers via intermediaries, under two different mortgage brands: a.s.r. and Aegon. Under the Aegon brand, standard products (annuity, linear and interest-only mortgages) are offered to a broad customer base. In addition to standard products, the a.s.r. brand offers specialised products for distinct customer groups. This includes products for first-time buyers, potential customers who want to finance sustainable home modifications, and senior citizens.

## Distribution and other services value chain
The Distribution and Services (D&S) holding company is responsible for a.s.r.'s distribution and service entities. Companies under D&S are jointly responsible for developing a centralised strategy and promoting co-operation and synergy between the businesses. These companies retain their own unique identities and organisational structure. They continue to operate independently of a.s.r. but in line with the a.s.r. strategy. The participations of a.s.r. in the distribution and service market are Nedasco, Van Kampen Groep (VKG), Dutch ID (Boval, Felison), Supergarant and Poliservice. The results of Robidus are consolidated in the D&S figures, but it is a separate entity with its own strategy and it is not governed through the D&S holding company. The results of TKP are consolidated in the D&S segment. As a pension administrator, TKP operates as a separate business line under the Life segment.

See section 4.5 for more information about D&S and the underlying businesses.

### Customer and intermediary support
a.s.r. customer support is primarily organised per business line and assisted by the aforementioned central support desks and a.s.r.'s intermediary support desk. Customer and Intermediary support is part of the Holding and Other segment and is assigned to the Distribution & Services value chain based on their customer and intermediary business relationships.

### Services
Part of services are the Customer Due Diligence (CDD) Office, Security Affairs (*Veiligheidszaken*) and the Privacy Office.

The CDD Office coordinates the uniform compliance with the CDD Policy across business units and reports to the Anti-Money Laundering and Anti-Terrorist Financing Act Officer, the Money Laundering Reporting Officer (Compliance) and management.

Security Affairs (*Veiligheidszaken*) is responsible for various investigations into integrity among employees, contractors and intermediaries, as well as handling personnel screenings (including integrity sensitive functions).

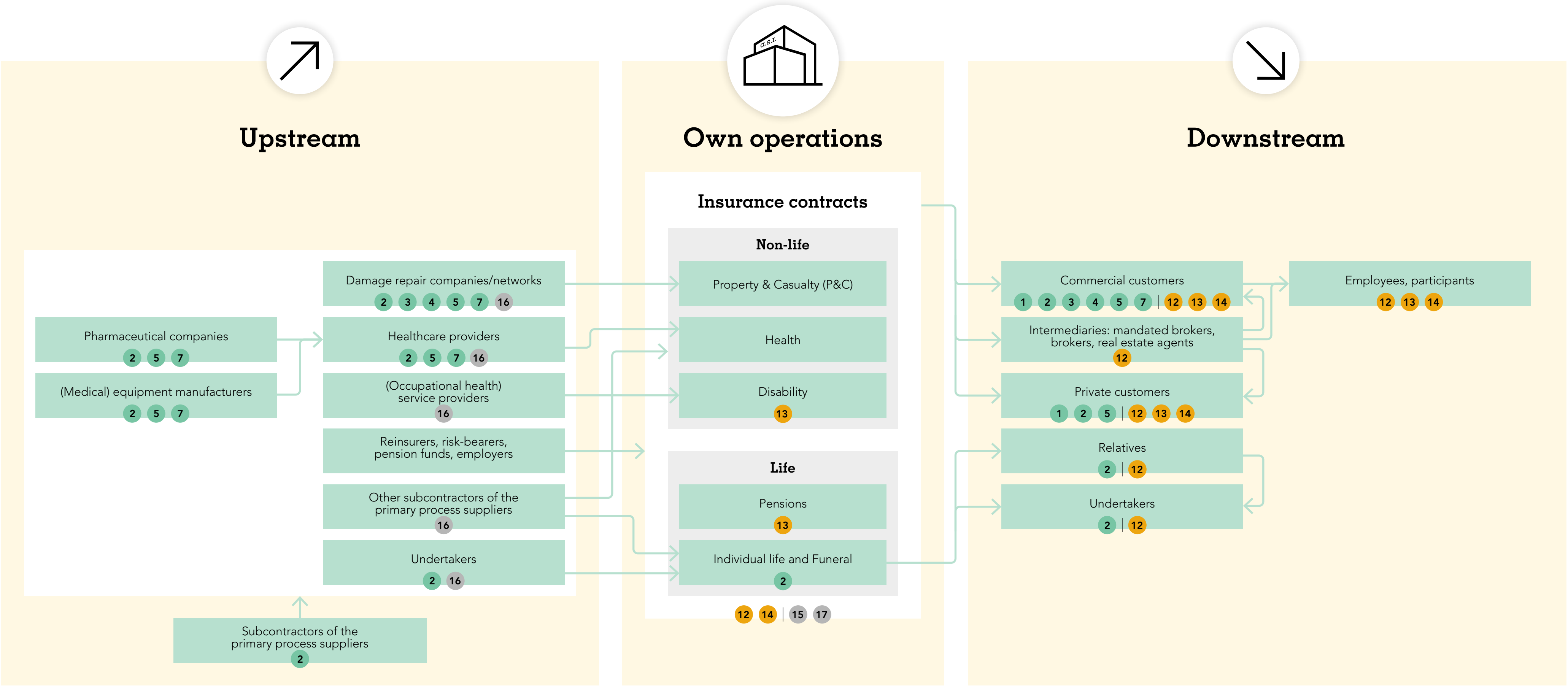
The Privacy Office coordinates the uniform compliance with the Privacy Policy across business units and reports to the Data Protection Officer and management.

## Supporting processes value chain
The Holding and Other segment (including eliminations) consists primarily of the following activities:

- Holding activities of a.s.r., including group-related activities;
- Other holding and intermediate holding companies, including:
  - ASR Vastgoed Projecten B.V., the real estate development business;
  - ASR Vooruit B.V., the investment firm that performs activities relating to private investments for customers;
  - ASR Deelnemingen N.V.

### Non-product and staff value chain
The supporting processes relate mainly to the staff functions (e.g. IT, HR, Procurement, Compliance, Risk, Facility Management) that support a.s.r.'s own operations' business processes as described in the previous paragraphs. Also included is the a.s.r. Vitality programme, in which participants are encouraged to exercise more because this contributes to their physical and mental health.

## Insurance value chain




### ESG topics

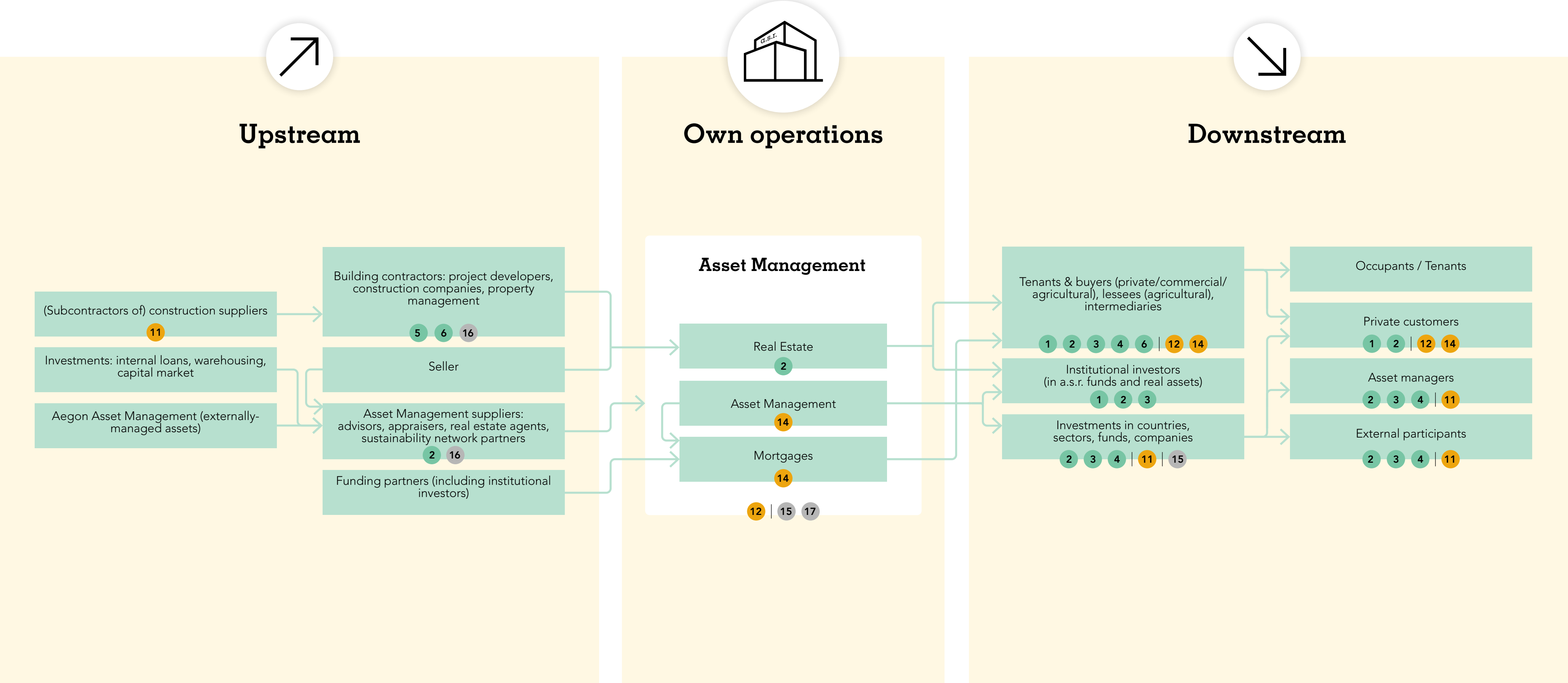
**Environmental**
1. Climate change adaptation
2. Climate change mitigation
3. Direct impact drivers of biodiversity loss
4. Impacts and dependencies on ecosystem services
5. Resource inflows
7. Waste

**Social**
12. Information-related impacts consumers/end-users
13. Personal safety of consumers and/or end-users
14. Social inclusion of consumers and/or end-users

**Governance**
15. Corporate culture
16. Relationship with suppliers
17. Corruption and bribery

The numbers in the value chain refer to the material ESG topics identified in the DMA. Please refer to section 6.1.4.3 for more information about the DMA and to section 6.1.4.4 for the underlying impacts, risks and opportunities.

## Asset Management value chain




### ESG topics

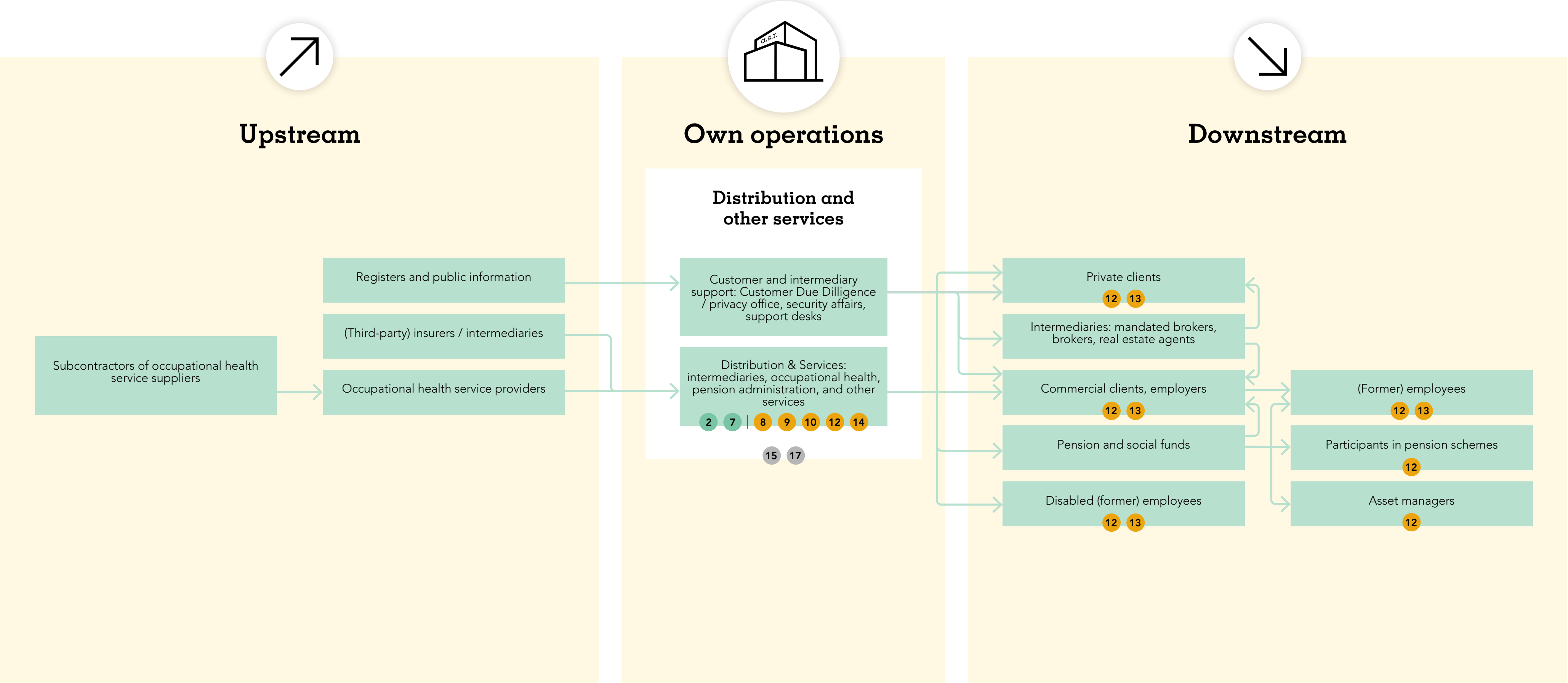
**Environmental**
- 1 Climate change adaptation
- 2 Climate change mitigation
- 3 Direct impact drivers of biodiversity loss
- 4 Impacts and dependencies on ecosystem services
- 5 Resource inflows
- 6 Resource outflows

**Social**
- 11 Other work-related rights - workers in the value chain
- 12 Information-related impacts consumers and/or end-users
- 14 Social inclusion of consumers and/or end-users

**Governance**
- 15 Corporate culture
- 16 Relationship with suppliers
- 17 Corruption and bribery

The numbers in the value chain refer to the material ESG topics identified in the DMA. Please refer to section 6.1.4.3 for more information about the DMA and to section 6.1.4.4 for the underlying impacts, risks and opportunities.

## Distribution and other services value chain




### ESG topics

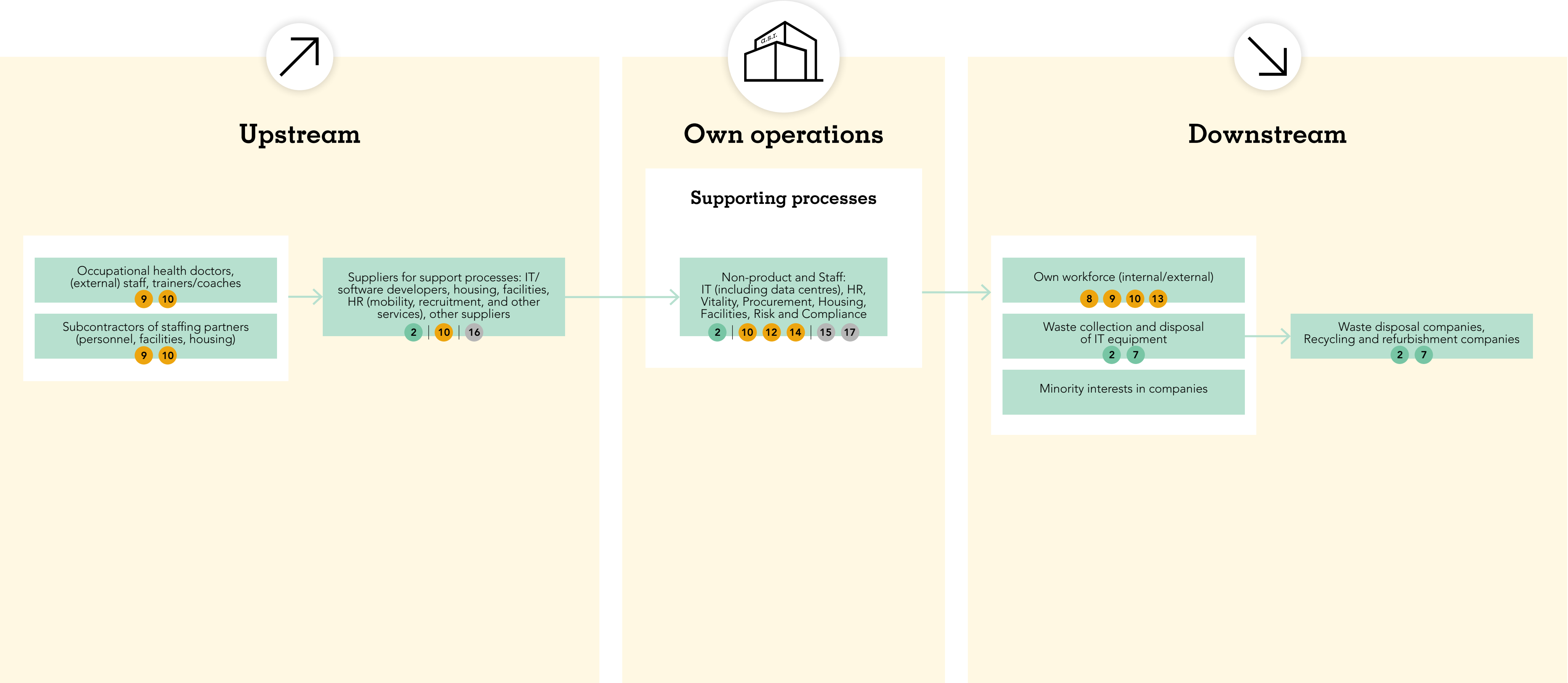
**Environmental**
- 2 Climate change mitigation
- 7 Waste

**Social**
- 8 Working conditions – own workforce
- 9 Other work-related rights – own workforce
- 10 Equal treatment and opportunities
- 12 Information-related impacts consumers/end-users
- 13 Personal safety of consumers and/or end-users
- 14 Social inclusion of consumers and/or end-users

**Governance**
- 15 Corporate culture
- 17 Corruption and bribery

The numbers in the value chain refer to the material ESG topics identified in the DMA. Please refer to section 6.1.4.3 for more information about the DMA and to section 6.1.4.4 for the underlying impacts, risks and opportunites.

## Supporting processes value chain




### ESG topics

**Environmental**
- 2 Climate change mitigation
- 7 Waste

**Social**
- 8 Working conditions – own workforce
- 9 Other work-related rights – own workforce
- 10 Equal treatment and opportunities
- 12 Information-related impacts consumers/end-users
- 13 Personal safety of consumers and/or end-users
- 14 Social inclusion of consumers and/or end-users

**Governance**
- 15 Corporate culture
- 16 Relationship with suppliers
- 17 Corruption and bribery

The numbers in the value chain refer to the material ESG topics identified in the DMA. Please refer to section 6.1.4.3 for more information about the DMA and to section 6.1.4.4 for the underlying impacts, risks and opportunites.

# 2.5 Strategic targets

On 27 June 2024, a.s.r. presented its growth strategy and ambitious goals for the 2024–2026 plan period. The successful acquisition of Aegon NL has been a key moment in a.s.r.'s ambition to create a leading insurer in the Netherlands. The new strategy builds on a.s.r.'s strong track record and expresses the confidence management has in capturing the opportunities in the Dutch market.

The solid track record in delivering profitable growth and sustainable value are underpinned by:

- Successfully building strong foundations to deliver profitable growth and create sustainable value;
- Disciplined execution of strategy, strong performance and consistent delivery on ambitious targets;
- Proven track record in rational capital allocation and delivering attractive returns.

The growth strategy focusses on:

- Clear action plan pursuing profitable organic growth and enhancing performance, whilst continuing to integrate Aegon NL;
- Further upside from our ongoing in-market bolt-on acquisition strategy in selected markets;
- Committed to delivering shareholder value through attractive returns, whilst maintaining a strong balance sheet.

## 2.5.1 Financial targets[1]

The combined business is leading in various market segments, and a.s.r. sees ample opportunities for profitable growth and to create sustainable value for all stakeholders. a.s.r. is well-positioned to benefit from the structural pension market developments and continues to pursue profitable growth in P&C and Disability, maintaining a strong combined ratio and underwriting performance. Furthermore, a.s.r. aims to supplement organic growth with strategic bolt-on acquisitions to add scale and skills. This is reflected in ambitious group and business targets.

### Solvency II ratio

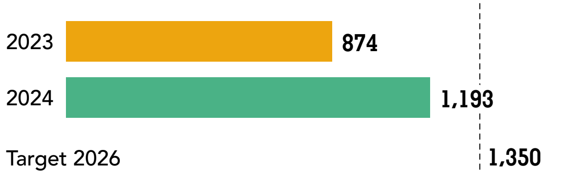
(in %)


This metric is based on the Solvency II framework and represents the solvency position of a.s.r. The Solvency II ratio is an integral part of a.s.r.'s Solvency II management ladder. This ladder represents different levels of solvency that is required for paying dividends (>140%), being entrepreneurial (>160%) in terms of organic and inorganic growth and re-risking, and considering additional capital return to shareholders (>175%).

The Solvency II ratio increased to 198% (31 December 2023: 176%). This reflects a strong contribution from the OCC (19%-points) and the sale of Knab (17%-points), and more than offsets the impact of capital distributions (-12%-points) and market and operational developments (-2%-points).

### Organic capital creation

(in € million)




The Organic capital creation (OCC) is an operating profit measure (after tax) within the Solvency II framework. The OCC reflects three key components: business capital generation, finance capital generation and net SCR impact.

OCC increased by € 319 million to € 1,193 million (2023: € 874 million), primarily driven by the additional six months' contribution from Aegon NL, growth of the business, realisation of cost synergies and impact from re-risking of the investment portfolio.

### Operating return on equity

(in %)


1 Targets are based on the assumption of normal (financial) markets, environmental and economic conditions and no material regulatory changes.

This metric reflects the return on equity within the IFRS framework: it divides the IFRS operating result by the average adjusted IFRS equity over the period.

## Capital return[1]

Total capital return comprises dividends and share buybacks.

### Dividend per share

(in €)


a.s.r. strives to pay annual dividend that creates sustainable long-term value for its shareholders. From 2022 onwards, a.s.r.'s Dividend Policy offers a progressive dividend to shareholders. This dividend is determined discretionally and not tied directly to a single financial performance metric. Following the announcement of the Aegon NL transaction in 2022 a.s.r. announced that it intends to pay a progressive dividend that would grow 'mid-to-high' single digit annually until (and including) 2025. At the Capital Markets Day on 27 June 2024 a.s.r. announced that the period will be extended until 2026.

a.s.r. proposes a final dividend for 2024 of € 1.96 per share, bringing the total dividend (including interim dividend of € 1.16 per share) to € 3.12 per share, an 8.0% increase versus 2023 (€ 2.89 per share).

The projected developments of our OCC in combination with a robust balance sheet enable the resumption of supplementary capital distribution to shareholders. Alongside a progressive dividend a.s.r. intends to provide an attractive capital return in the years ahead, a.s.r. also intends to allocate € 525 million to share buybacks over the plan period (€ 125 million over 2024, € 175 million over 2025 and € 225 million over 2026).

The share buyback refers to the € 100 million share buyback following the completion of the sale of Knab, executed in 2024. The share buyback of € 125 million announced on 19 February, 2025 (in line with the medium-term targets as presented at the 2024 Capital Markets Day) will be executed in the first half of 2025 and deducted from HY 2025 Solvency II ratio.

### Share buyback

(in € million)

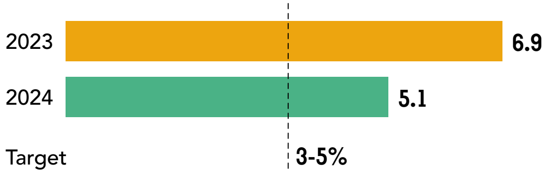

## Non-life combined ratio and revenue growth

### Combined ratio

(P&C and Disability, in %)


### Revenue growth

(in %)




The combination of these targets reflect a.s.r.'s aim for profitable growth in P&C and Disability, pairing a strong combined ratio with premium growth.

The organic growth in P&C and Disability amounted to 5.1%, at the upper end of the 3-5% target range. In P&C, organic growth was driven by price increases to mitigate claims inflation as well as volume growth. In Disability, organic growth reflects higher premiums due to link with higher wages as well as price increases.

## Pension

### Pension buy-outs[2]

(in € million)


a.s.r. aims to acquire € 8 billion of assets under management related from corporate pension funds in the period 2024 – 2027. Pension buy-outs amounted to € 69 million Assets under Management (AuM) in 2024.

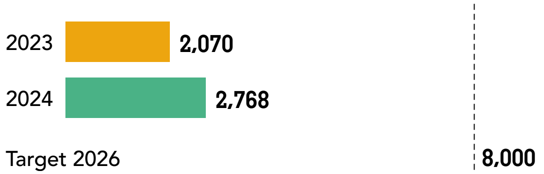
1 In general, a.s.r. expects not to pay cash dividends if the SII ratio falls below 140%. For SBB, the Solvency II ratio needs to be at least 175% with sufficient OCC to fund capital distributions and no alternative deployment of capital delivering superior returns, and to be decided annually upon discretion by the Management Board.

2 For 2024, € 1.6 billion is still formally to be approved by the Dutch Central Bank (De Nederlandsche Bank - DNB).

## Pension DC inflow and Annuities

### Pension DC inflow

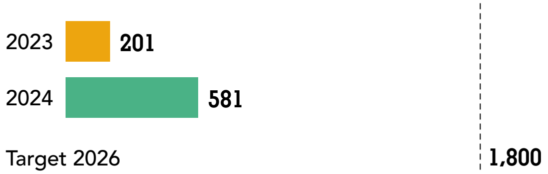
(in € million)




Pension DC inflow increased to € 2.8 billion (2023: € 2.1 billion). The annuity inflow increased to € 581 million. Both increases are mostly related to the additional six months' contribution of Aegon NL and organic growth.

### Annuities

(in € million)




As part of the Life segment, a.s.r. expects to benefit from the pension reform in the Netherlands and grow in DC pensions and annuities. Growth in the pension DC business is measured by inflow of DC products, where a.s.r. targets € 8 billion of DC inflow cumulatively in the plan period 2024 – 2026. For annuities a.s.r. targets € 1.8 billion of inflow cumulatively in the plan period 2024 – 2026.

## Fee-based business operating result

The operating result of the fee-based businesses comprise of the result from segment Asset Management and segment Distribution & Services.

### Fee-based business operating result

(in € million)


The operating result of the fee-based businesses increased by € 39 million to € 150 million (2023: € 111 million).

## Cost synergies

At the announcement of the Aegon NL transaction at 27 October 2022, an overall run-rate cost synergy target of € 185 million for the combined companies was announced. This was raised one year later at an Investor Update on 30 November 2023 to € 215 million, after further detailing the integration plan.

## 2.5.2 Non-financial targets[1]

Sustainable value creation for all the stakeholders is a key objective in a.s.r.'s strategy. On the Capital Markets Day 2024, a.s.r. announced new strategic non-financial targets that aim to contribute to a.s.r.'s ambition to be among the most sustainable insurers in Europe. The new strategic targets replace the strategic non-financial targets that were set for 2022–2024, with the exception of the target for customer satisfaction. The combination with Aegon NL was one of the reasons to set new strategic targets in 2024. Targets are based on the assumption of normal (financial) markets, environmental and economic conditions (per end of 2024) and no material regulatory changes. Targets could be affected materially by changes in these topics, including changes in the transition to net zero. See section 8.6 for a detailed description of each of the non-financial targets.

### Customer satisfaction

a.s.r. aims to be the best financial service provider. This KPI offers insights into customer experience, which is closely monitored through NPS surveys. These surveys also provide valuable feedback during the integration and migration of Aegon customers to a.s.r. products.

#### NPS-r

(-100 to 100, m.a. = market average)


*2024: Net Promoter Score-r*

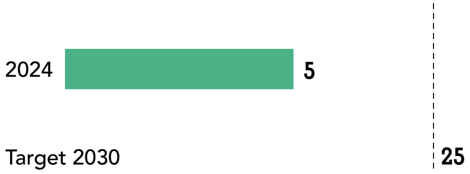
a.s.r. closely monitors customer satisfaction by continuously measuring feedback through the Net Promoter Score (NPS). And does so through various indicators, such as the Net Promoter Score for customer relationship (NPS-r), which is an analysis of the customer relationship; this extends the methodology of the Net Promoter score for contact moments (NPS-c). NPS-c only measures customer satisfaction during contact moments. Business lines continue to report on NPS-c (see section 4). The NPS-r on a.s.r. group level is compared to the market average, where market average is equal to a score of 0. The target was to achieve an NPS-r higher than the market average at 2024 year-end. The 2024 result did decrease from -9 to -11. The main attention points from customer feedback for 2025 are to continuously improve online communication, accessibility, and user-friendliness. Additionally, attention for guidance during the migration of Aegon NL processes into a.s.r. processes also continue to be an attention point.

**2025-2026: Net Promoter Score-i**

For the period 2025-2026 the target (+4 in 2026 compared to January 1, 2025) is based on the Net Promoter Score for interactions (NPS-i). NPS-i is a customer satisfaction metric based on both online and offline channels. NPS-i combines NPS-c and NPS-d. It includes contact (c) and digital (d) client interaction. This KPI gives insight in the customer experience in high impact contacts and the potential of improvement.

#### Carbon footprint reduction

(in % compared to base year 2023)[2]




Climate is a material topic for a.s.r. as it is a subject of interest to multiple stakeholders (e.g. customers, NGO's, supervisors and investors). The target is a carbon footprint reduction with 25% of the internally managed own account assets and 3rd party assets in 2030. The base year is 2023. This KPI shows the GHG emission intensity reduction in tonnes $CO_2$ equivalent ($CO_2e$) per € million invested. Emissions are in line with the GHG Protocol scope 3 category 15: investments.

The carbon footprint of the investment portfolio decreased by 5% in 2024 compared to 31 December, 2023. This is in line with the target of 25% reduction in 2030 compared to 2023. The decrease is mainly due to increase of allocations in the government bond portfolio to countries with lower emissions. For more information about a.s.r. climate ambitions, see section 6.2.1.

#### Impact investing

(in % of total AuM[3])


a.s.r. aims to contribute positively through its impact investments while also aiming to generate an attractive return. The target impact investment is 10% of own account and internally managed affiliated assets in 2027. The definition of the Global Impact Investing Network (GIIN) applies to this target: an investment that seeks to generate positive, measurable social and environmental impact alongside financial return. Per asset class specific criteria apply.

Impact investments have increased by 1.6%-point to 8.7% of the investment portfolio (31 December, 2023: 7.1%) primarily driven by an increase of green bonds in the investment portfolio.

For more information about the 2024 scope of impact investing, see section 6.5.3.5 CSRD accounting policies.

1 Source: a.s.r. Explanatory notes to Alternative Performance Measure - Non-financial targets 2024-2026.
2 Asset management: investments own account (scope 1 and 2 emissions). Real estate and mortgages: investments own account and third party assets managed by a.s.r. (scope 1, 2 and 3 emissions).
3 7.1% is an estimate since there was no full insight in the portfolio due to the integration of Aegon NL.

### Employee engagement[1]

(in percentile)


Employee engagement is crucial for the successful implementation of a.s.r.'s strategy. This KPI is widely adopted and aligns with 1,000+ organisations. The measurement via the annual Denison scan is based on four themes: Vision, Core values and behaviour, Empowerment and Knowledge development. The KPI is expressed as a percentile and compared against the benchmark.

a.s.r. wants to be an attractive employer. A strong employee engagement is important for achieving the company's targets. a.s.r. will gradually increase the target for employee engagement in the coming years to 85 in 2026. The 2024 score is a baseline measurement, as it was the first time the KPI was tracked for the combined company. The 2024 results reflect the stage of integration that a.s.r. is currently in and provide points of reference to further strengthen the joint culture.

### Sustainable reputation

(in %)


a.s.r.'s sustainable reputation is crucial for its corporate strategy and market positioning. This KPI shows the score of a.s.r. based on surveys under Dutch people in the age of 18 till 65 years. The survey measures the score on the following attributes: Honesty, Sustainability, Reliability and Socially responsible. The survey is conducted by DVJ Insights. People score from 0%-100%. The target is to attain a percentage between 38-43% per annum in the period 2024-2026. The attributes included in the survey are important elements for the positioning of a.s.r.

In 2024, steps were undertaken to improve the perception of a.s.r.'s sustainable reputation, such as the launch of new marketing campaigns. More generally, in the broader market, more companies appear to be claiming 'sustainability', and it is increasingly difficult for a company to distinguish itself on this topic as a brand.

## Gender diversity

a.s.r. strives for a workforce that is a representative reflection of society. Diversity provide insights from more angles and enriches decision making. The target is to achieve at least 40% women and at least 40% men within Supervisory Board, Management Board and Management. Management consists of senior, higher and team management. In 2024, initiatives were taken to further improve gender balance.

### Supervisory Board

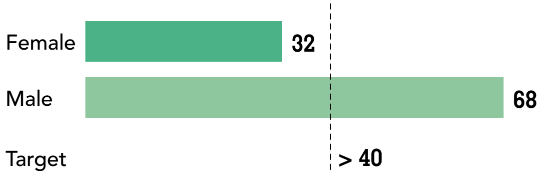
(2024, in %)


### Management Board

(2024, in %)


### Management

(2024, in %)




1 The target covers all a.s.r. employees including contractors, temporary workers and seconded workers with an a.s.r. contract and interns. Employees of subsidiaries are not in scope of this target.

# 2.6 Trends & developments

Numerous global and regional trends and developments influence the environment in which a.s.r. operates. a.s.r. aims to adapt to its evolving surroundings and commits to remaining proactive in addressing opportunities and risks associated with these changes. Section 5.4 Managing Risks and section 7.8 Risk Management elaborate on the risk management approach which is an integral part of a.s.r.'s day-to-day business operations. The trends & developments elaborated on in this section highlight the market developments most relevant to a.s.r., their impact on a.s.r.'s stakeholders, and how a.s.r. responds to these changes.

## 2.6.1 Political, financial and legislative

a.s.r. has identified three pivotal trends shaping the industry in the current political and financial market landscape:

- Geo-political uncertainty is rising due to conflicts in Ukraine and the Middle East, and recent election results affect international trade and stability.
- Economic pressure from wage increases, inflation, rising housing and energy prices, and increasing labour shortages is significant.
- Ongoing legislative changes, such as the Future Pensions Act (*Wet toekomst pensioenen* - WTP), sustainability requirements and other regulatory and reporting requirements are impacting insurers and other stakeholders.

### Impact on a.s.r. and its stakeholders

Several geo-political tensions are leading to conflicts between countries through sanctions, protectionist measures, wars, and terrorist attacks, which impact and disrupt global supply chains and markets. Additionally, the Dutch Central Bank (*De Nederlandsche Bank* - DNB[1]) has raised concerns about the growing presence of cyber threats to the financial sector due to these geo-political tensions, potentially leading to data breaches, financial losses and damage to a.s.r.'s reputation. In 2024, these global dynamics continued to evolve. Inflationary pressures have been moderate, but the economic landscape remains uncertain. Interest rates have further adjusted in response to global economic conditions, and fears of recession persist. For customers, this leads to uncertainties about security, availability of resources, and purchasing power, but also might raise concerns about the stability and profitability of a.s.r.

**Political, financial and legislative**

- Geo-political uncertainty is increasing
- Economic pressure
- Ongoing legislative changes

**Technological**

- Digitalisation and big data
- Artificial intelligence
- Cybersecurity and cyber threats

**Environmental & social**

- Climate change, resource scarcity and loss of biodiversity.
- Changing labour market
- Growing societal inequality

1 Source: DNB (2024)

The legal and regulatory landscape in which a.s.r. operates is continuously evolving with enhanced regulatory reporting requirements. Depending on the impact of legislation and regulations, the supervisory climate and the juridification of society, a.s.r. may experience effects such as increased internal costs. In the short term, the Dutch pension landscape is reforming as a result of the WTP. Changes in the regulatory and supervisory environment could lead to stricter oversight and more frequent investigations, whilst many new regulations need to be interpreted and implemented within a short period of time, while not all regulations are final yet. These developments make it more challenging for smaller market players in the insurance sector and intermediaries to ensure alignment, possibly leading to increased market consolidation, which may offer opportunities for a.s.r. to further grow its business.

### a.s.r.'s response

To asses geo-political developments, a.s.r. explores various potential economic scenarios, including stagflation, using its inhouse expertise. a.s.r. is actively exploring opportunities to further diversify its investment portfolio, such as by increasing geographical diversification in its equity and credit portfolios. Based on the level and duration of inflation and its impact on a.s.r., premium increases may be implemented. However, a.s.r. aims for a fair balance between premium increases and affordability.

a.s.r. monitors and assesses relevant developments for relevant legislative and regulatory developments and implements appropriate control measures. On key themes, programmes and/or projects are set up to ensure sound implementation, such as the implementation of sustainability (e.g. CSRD) legislation and regulations and implementation of DORA. Depending on the consequences of legislation and regulations, supervisory climate and juridification of society, and thus the impact on a.s.r. through factors such as higher internal costs, premium increases or exclusions may be implemented to offset these consequences. This will help a.s.r. to create long-term value for its main stakeholders.

## 2.6.2 Technological

Technological developments increasingly impact the world. The following three trends have the most impact on a.s.r.'s operating environment.

- Digitalisation and big data continue to drive regulatory changes to balance innovation, customer protection, and financial stability.
- Artificial intelligence (AI) promises to deliver speed and simplicity in business processes and insurers are experimenting and implementing cost-efficient technologies at a faster pace.
- Cyber security and cyber threats remain persistently high, which resulted in new or renewed cyber and information security requirements, as well as data-focused legislation, including the Digital Operational Resilience Act (DORA) and the European Artificial Intelligence Act (AI Act).

### Impact on a.s.r. and its stakeholders

Emerging technologies and digital transformations are key for competitiveness, enabling better services and improved efficiency, and offering more personalised solutions to the customer. Digital ecosystems such as embedded insurance offer new opportunities for customer reach and income diversification. AI's potential in the insurance industry includes enhanced risk predictability, improved client journeys, and process optimisation. For customers, there are both advantages and disadvantages to technological developments. Ranging from easier access to products and better customer service on the one hand, to increased risk of cybercrime on the other[1]. Customers might also feel overwhelmed or dissatisfied with the shift to digital services, which in turn might impact the customer experience.

New technology trends and legislation – ranging from AI to cyber security - present both opportunities and threats to a.s.r. Insurers are developing and implementing cost-saving technologies in areas such as claims management, underwriting, risk prediction and call centres. However, increased cloud presence and data sharing heighten cyber risks, such as data leaks, hacks and social engineering. The DNB highlights that cyber threats to the financial sector are growing and are linked to heightened geo-political tensions, which have made financial institutions more vulnerable to cyberattacks[2].

### a.s.r.'s response

Digitalisation and AI enable a.s.r. to continuously offer innovative and high-quality services to customers, thereby strengthening its position in the insurance market. Specifically, the customer contact strategy aims to create a consistent, seamless experience for all customers. Including the development of a chatbot to find relevant policy articles for claim handlers and provides draft answers to customers. Another example is a.s.r.'s Health's digitalisation strategy which has made significant progress in both digitalisation and the use of AI. See section 4.2.4.

Cyber resilience is crucial for maintaining customer trust and supporting a.s.r.'s customer-oriented strategy. a.s.r. continuously monitors and assesses cyber and information security risks, implementing control measures both internally and with IT suppliers. a.s.r. collaborates with financial institutions and public bodies, such as the National Cyber Security Centre (NCSC) and the Digital Trust Centre (DTC), to bolster the financial sector's cyber resilience. See section 3.1.3.2.

To ensure adherence to international standards and new legislation, a.s.r. invests in prevention, detection, and response technologies to enhance cyber resilience and ensure secure digital services for customers. To improve information security awareness, a.s.r. employs tools like gamification and phishing campaigns. See section 5.4.3.

1 Source: BCG (2024)
2 Source: DNB (2024)

## 2.6.3 Environmental & social

Environmental and social trends have a major impact on the world in which a.s.r. operates. a.s.r. outlines three key environmental and social trends that impact a.s.r. and its stakeholders.

- Ever increasing importance of climate change, resource scarcity and loss of biodiversity.
- In the Netherlands, a declining population growth rate and an aging population put pressure on the labour market and have fostered pension and self-employment law reforms.
- Societal inequality is growing, with lower prosperity in certain demographic groups, which is also reflected in healthcare disparities.

### Impact on a.s.r. and its stakeholders

Climate change and biodiversity loss are increasingly affecting insurable risks and investment strategies. These risks are divided into physical risks, such as extreme weather events and deforestation, and transition risks, which involve regulatory changes and technological developments. Subsequently, this can lead to higher claims and increased insurance costs, and as a result policyholders might face higher premiums. Insurers need to refine their risk models, develop new products, and align investment portfolios with sustainability goals.

The labour market remains tight due to an aging workforce and a growing demand for new skills. The rise in self-employment and freelancing affects labour market dynamics, employment ratio and the demand for pension and disability products. For self-employed individuals, the new Employment Relationships Deregulation Act (*Wet Deregulering Beoordeling Arbeidsrelaties* - DBA) can bring uncertainties on security and impact the way they look at pension and disability products.

### a.s.r.'s response

a.s.r. strives to limit its negative climate impact as much as possible, and to contribute positively to climate mitigation and adaptation. a.s.r. integrates considerations of climate change, resource scarcity, and biodiversity loss into its investments, products and services. To mitigate transition risks, a.s.r. collaborates with research institutes, universities, reinsurers, other insurers, and experts to gain knowledge about new technologies. This is for instance used in risk management, client acceptance, and pricing. It also ensures value creation for a.s.r.'s customers as part of the strategic goals. See section 2.1 for more information on a.s.r.'s strategy and section 7.8.1.3 for more information on climate-related risks.

Furthermore, a.s.r. evaluates its societal impact through investments, products, and services. a.s.r.'s Product Approval and Review Process (PARP) also assesses whether the product offering meets customer needs. See section 3.1.1 for more information on PARP. The WTP provide opportunities to deliver integrated solutions to the pension market, such as buyouts and tailored asset management solutions. For more information see section 4.3.2.

To combat societal inequality, a.s.r. aims to minimise customer cancellations due to payment arrears and related issues. The company works to prevent situations where customers encounter unaffordable cost-increasing measures and strives to avoid defaults. More on this in section 3.1.1.

# 2.7 Sustainable Development Goals

**SDG 1: End of poverty in all its form everywhere**
a.s.r. believes it is important to contribute to the prevention and resolution of financial problems. Through Doenkracht a.s.r. is creating awareness and helping people better understand their financial situation and teaching them how to deal with money issues and keep their financial situation under control. Customers in arrears who cannot pay are offered a way out. There is an a.s.r. wide process for late payments.

**SDG 3: Ensure healthy lives and promote well-being for all at all ages**
a.s.r. offers health and disability insurance to people who live and work in the Netherlands. Part of our impact investments contribute to the development of new medicines. a.s.r. aims to prevent illness. It does so by helping customers and employees improve their health and vitality, through a.s.r. Vitality and various health programmes relating to exercise, sports and sleep. In addition, a.s.r. contributes to the sustainable employability of employees of customers by guiding reintegration processes and by offering preventive services to avoid (long-term) sickness.

**SDG 5: Achieve gender equality and empower all women and girls**
a.s.r.'s commitment to diversity, equity and inclusion is described in our Diversity, Equity and Inclusion Policy. One of the strategic targets is to have 40% of the management population female in 2026. The group in scope of this targets is Supervisory Board, Management Board and topmanagement. To ensure that a.s.r. pays equal for work of equal value equal pay is verified annually. The research has shown that a.s.r. does not have a pay gap.

**SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all**
a.s.r. aims to make a positive contribution to the energy transition and combating climate change. This is done, for example through impact investments, such as the purchase of wind farms in the Netherlands. Through its participation in ASR Dutch Core Residential Fund a.s.r. has also improved the sustainability of residential units in recent years, such as insulation and investments in on-site sustainable energy generation. a.s.r. offers a sustainability mortgage as a standard product with an a.s.r. mortgage. This enables customers to make their homes more sustainable.

**SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all**
a.s.r. aims to provide equal opportunities for all its employees, regardless of gender, age, religious conviction, physical and mental capacity, background and sexual orientation. This commitment is described in the Diversity, Equity and Inclusion policy. To understand the development of cultural diversity, a.s.r. participates in the Cultural Diversity Barometer of Statistics Netherlands. Also, a.s.r. conducts an annual Denison scan. This measures perception and progress of equal opportunities in the Diversity and Inclusion module. a.s.r. aims to have a score of 85 or higher by 2026. The Policy on Responsible Investment aligns investments with ethical practices (including living wages), positively impacting the investment landscape.

**SDG 10: Reduce inequality within and among countries**
Human rights such as living wage are a key topic in the Policy on Responsible Investments. Through its investments a.s.r. strives to have a positive impact and reduce inequality in the countries and companies invested in. In addition, clear online information about products and services helps customers make informed decisions, improving awareness. However, the complexity of a.s.r.'s products and services may make it challenging for customers to understand necessary details.

**SDG 13: Take urgent action to combat climate change and its impacts**
Climate resilience is enhanced through products that help customers adapt to climate risks, reducing financial uncertainty and increasing impact investments. The Policy on Responsible Investment includes criteria on the climate impact of investments and has an exit strategy for investments in fossil fuels. a.s.r. is member of the Net Zero Asset Managers initiative, a global platform committed to decarbonising investment portfolios and contributing to the Paris Climate Agreement. Insurance can also be a powerful means of stimulating $CO_2$ reduction. Insurers can help their customers to make more sustainable choices by providing valuable information on reducing emissions, energy saving or the use of sustainable materials.

**SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss**
a.s.r. promotes sustainable farming, enhancing biodiversity and more sustainable land use. a.s.r. is signatory to the Finance for Biodiversity Pledge and developed nature targets in 2024. In 2023 a Climate- and Biodiversity report was published in line with Taskforce on Nature-related Financial Disclosures (TNFD). This report includes an initial analysis of the nature-related impacts, dependencies, risks and opportunities of the investments and of P&C. a.s.r.'s dedication to material reuse in urban and infrastructure development supports the circular economy by reducing waste, leading to a positive impact on resource lifecycle extension.

# How a.s.r. operates

# 3.1 Becoming the best financial service provider

The core of a.s.r.'s strategy is long-term value creation for its key stakeholders: customers and intermediaries, employees, shareholders, and society.

a.s.r. aims to be a trustworthy partner for its customers and business relations, both as an insurer, or as an investor. With the digitalisation of customer engagement methods and business processes, it aims for efficient operations in combination with an optimal customer experience. The information technology (IT) strategy enables a.s.r. to execute their current strategies, in terms of both new business opportunities and operational excellence.

## 3.1.1 Becoming the best insurer

a.s.r. wants to be the best financial service provider for customers and advisors, offering simple and transparent products and services that meet their needs. a.s.r. works closely with independent intermediaries who know customers' personal situations well and can give them the best advice. It is essential to maintain and build excellent relationships with advisors, who play a crucial role in serving customers. a.s.r. also offers customers the ability to quickly and easily manage their affairs and new insurances in the digital a.s.r. environment.

### Product Approval & Review Process

The Product Approval & Review Process (PARP) assesses the quality of products and their relevance for customers. In the PARP, in addition to the business lines, Risk Management, Legal Affairs, Compliance and the Actuarial Function (AF) jointly assess all product-related financial and non-financial risks for a.s.r. and its customers. The PARP ensures that a newly developed or modified product is reviewed and deemed appropriate before it is offered. It encourages continual improvement based on feedback from customers and advisors, social developments and current circumstances, such as the impact of economic conditions and changes in legislation and regulations. The PARP applies to products that a.s.r. actively offers, as well as to inactive products. In 2024, the PARP Board assessed 22 reviews (2023: 18) of existing products. The PARP regulation prescribes that products should be reviewed periodically. At a.s.r. this occurs at least every three years for active products, and inactive products are reviewed at least every five years.

In accordance with the assessment framework of the Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten* – AFM) and in line with legislation and regulations, a.s.r. set up the PARP tests based on interests of customers and society, which relate to matters including cost efficiency, usability, safety, transparency, and several criteria related to sustainability.

In 2024, a.s.r. received feedback from the AFM on two files that have resulted in informal supervisory measures being taken. Where necessary, internal actions have been taken.

In 2024, a.s.r. received no legal and regulatory fines, settlements, and enforcement actions related to incorrect, misleading, or unfair marketing, labelling, and advertising. a.s.r. has not received any reports of violations for non-compliance with statutory labelling and/or marketing codes. One of the marketing campaigns is stopped after receiving comments that the advertisement was not specific enough.

Knowledge sessions were held with PARP stakeholders to enhance the resources available for PARP. Additionally, the scenario analysis was improved with help of an external expert.

### Interests of customers

Products and services are assessed against the following criteria:

- Cost-effectiveness: an insurance product is cost-efficient if it is perceived by the designated target group as having a good price-quality ratio.
- Usefulness: a useful insurance product is one that meets the needs of the designated target group in an appropriate way.
- Safety: an insurance product is safe if it delivers what it promises and the possible outcomes are acceptable to the designated target group.

- Comprehensibility: a comprehensible insurance product is one whose quality and suitability can be adequately assessed by the intended target group.
- Ethical data use: the product is assessed against the Ethical Framework for data-driven applications, which is developed in collaboration with the Dutch Association of Insurers (*Verbond van Verzekeraars*).

## Interests of society

Products and services are assessed on their positive and/or negative impact on society, against the following criteria:

- Environmental, social and employment aspects;
- Respect for human rights;
- Combatting and avoiding bribery and corruption.

The PARP Board can also ask further questions concerning sustainability factors, and these answers are factored into underwriting decisions.

## Sustainable insurance

a.s.r. strives to achieve positive impact and minimise its negative impact as much as possible with its insurance products and services. a.s.r.'s Policy on Sustainable Insurance sets out how Environmental, Social and Governance (ESG) aspects are integrated into its core insurance processes, such as underwriting, pricing, working processes and product development. The Policy on Sustainable Insurance applies to all business units of a.s.r. that offer insurance products and services.

In 2023, a.s.r. published interim targets for 2030 for its non-life insurance portfolio, which align with achieving a net-zero economy by 2050 or earlier. More information about impacts, targets and metrics please see section 6.2.1 for climate change and 6.2.3 for biodiversity.

## Underwriting

The Policy on Sustainable Insurance offers comprehensive guidance on conducting an ESG risk inventory when onboarding new business clients and drafting new contracts. This process aims to ensure informed decisions regarding customer acceptance. The ESG risk inventory complements a.s.r.'s Customer Due Diligence Policy. ESG risks are identified when potential clients appear on a.s.r. asset management's exclusion list, operate in sensitive sectors (such as gambling, armaments, tobacco, fossil fuels and animal exploitation) or engage in conventional energy products that do not have a transition plan that aligns with the Paris Agreement. If an ESG risk is detected, the sales representative or underwriter will escalate the matter to the Underwriting Committee. This committee will then determine whether to reject the customer based on ESG risks or accept them under specific conditions. In 2024, this was done twice, resulting in one contract not being extended or accepted (2023: 5).

The Policy on Sustainable Insurance was updated in 2024, with a clear distinction between Life and Non-life coverage. For Non-life coverage, which directly supports economic activities of commercial customers, a.s.r. Non-life does not accept producers of thermal coal and unconventional oil and gas products as customers. Additionally, Non-life customers associated with the fossil fuel industry must demonstrate a transition plan that aligns with the goals of the Paris Agreement. ESG risk considerations remain for Non-life clients operating within the fossil fuel industry.

Throughout the contract period, especially during renewals and significant risk adjustments, a.s.r. periodically verifies that the customer continues to meet the risk profile and that transaction patterns align with expectations. In addition to these checks, a.s.r. engages in regular discussions with its customers about sustainability and strategies to mitigate ESG risks, such as in the Council of Action (*Raad van Doen).*

**Dilemma - Balancing transparency and conciseness in sustainability communication**

a.s.r. aspires to be a leading sustainable employer, insurer and asset manager. It seeks to play a significant role in combatting climate change and accelerating the energy transition. a.s.r. is dependent on the movement and speed of the real economy and the behaviour of investors, clients (or customers) and government policies to help facilitate and speed up the necessary transitions toward a sustainable future.

a.s.r. aims to further increase its efforts to stimulate fairness, sustainability, reliability and social responsibility in society. Topics where the Dutch public have thus far lauded the efforts of a.s.r., as reflected in a.s.r.'s reputation as a sustainable insurer. New and stricter European regulations call for more transparency and substantiation of these efforts, to prevent misleading marketing practices (or greenwashing) and be more detailed in measurable and actionable targets. It's essential to a.s.r. that its sustainability communication is accurate and understandable for a.s.r.'s customers, and that it accurately highlights the long-term value creation strategy for its key stakeholders: customers and intermediaries, employees, shareholders, and society.

New regulations challenge companies to develop a common and consistent language for communicating sustainability efforts in an honest and concrete way. Traditionally, marketing messages have been brief and general in their definitions and wording. This creates new challenges in conveying sincere sustainability efforts concisely, while still including the necessary details and substantiation.

For a.s.r., this entails working on more frequent and critical collaboration between marketing departments, the legal department, the compliance department and the business lines of a.s.r. that provide the data to substantiate its sustainability claims. To find a new, more balanced way to inform its stakeholders of a.s.r.'s efforts to facilitate necessary transitions towards a sustainable future.

In addition to discussions with customers, a.s.r. organises knowledge sessions for both intermediaries and underwriters. These sessions are designed to transfer knowledge that relates to a.s.r. products. Topics included sustainability, the integration of Aegon NL, Artificial Intelligence, damage prevention, and road safety. In 2024, many sessions were organised for intermediaries and underwriters.

During the underwriting process, a.s.r. also identifies potential customers who can positively impact sustainability. To support this, a.s.r. has a Sustainability Desk, where insurance advisors can inquire about the insurability of new sustainability initiatives. This approach ensures that new sustainable initiatives are discussed and assessed for their insurability with a.s.r. By acquiring more knowledge about risks, a.s.r. aims to make new sustainable initiatives insurable.

### Pricing

Within the framework of its regular pricing policy, a.s.r. focuses on making and keeping sustainability risks insurable and affordable. Sustainability risks, such as those relating to climate change, are explicitly integrated in the pricing process. For instance, the risk analysis for the pricing of non-life products, considers the impact of extreme weather on the cost of claims in the past, present and future.

### Working processes

a.s.r. integrates sustainability practices into its operations and processes. For example, where possible, inspections are conducted online, and the volume of printed mail is kept to a minimum. For data-driven applications, a.s.r. uses an ethical framework that is adopted in the form of binding self-regulation devised by the Dutch Association of Insurers. This framework ensures that data-intensive processes, products, services and applications affecting customers take into account ethical criteria such as the customer's autonomy and privacy, the prevention of exclusion and discrimination, and the incentivisation and monitoring of the insurability of vulnerable groups in society or socially relevant activities.

#### Products and services with sustainable features

*Financial self-reliance and inclusion*

- ***Ik denk vooruit*** (I think ahead)***:*** An online tool for customers and non-customers that provides insight into their long-term financial situation and helps people making carefully considered financial choices.
- ***Startershypotheek*** (Mortgage for starters)***:*** To make their housing costs more affordable, new entrants to the housing market can opt for a longer repayment term of up to a maximum of 40 years.
- **Funeral insurance:** For people covered by power of attorney (e.g. individuals with a mental disability). Cover can be organised without unnecessary obstacles and queries relating to health.

*Vitality and sustainable employability*

- **a.s.r. Vitality:** A well-being program that encourages customers to make healthy choices. a.s.r. Vitality is available to employers with disability or pension insurance and to individual customers with health or disability insurance.
- ***De langer mee AOV*** (Life Occupational Disability insurance)**:** An occupational disability policy for self-employed people with physically demanding jobs, which includes extra services such as coaching interviews and personal health checks.
- ***De Verzuimontzorgverzekering*** (Absenteeism insurance)**:** An Absenteeism Relief Insurance supplemented with preventive services to avoid (long-term) sickness, such as the annual prevention check and professional (reintegration) coaching in case of sickness.

*Sustainable living and climate*

- **Sustainable and circular repairs:** Customers can have damage repaired sustainably by a network of certified repair companies. If repair is not possible, items can be handed in and replaced by a refurbished or pre-owned equivalent. The percentage of sustainable repair to vehicles increased in 2024 to 77% (2023: 74%). The percentage of sustainable repair of fire damage to property increased to 43% (2023: 38%).
- ***Verduurzamingshypotheek*** (Sustainability mortgage)**:** Mortgage customers can take out an additional loan to their mortgage at a reduced interest rate to make their home more sustainable.
- **Sustainable buildings and contents insurance:** As part of its home and home contents insurance, a.s.r. covers solar panels, heat pumps and electric charging points, and offers an option to make buildings more sustainable following damage.

## Prevention of payment problems

a.s.r. makes considerable efforts to ensure that its customers are financially self-reliant. a.s.r. aims to minimise the number of customer cancellations caused by payment arrears and problems. It works to prevent situations in which customers face cost-increasing measures and to avoid default.

Through the memberships and coalitions mentioned hereafter, a.s.r. shares experience and learns from the experiences of companies in other sectors. This leads to better coordination of customer processes and enables a.s.r. to provide a better customer service.

For some years now, a.s.r. has been part of the Creditors' Coalition (*Schuldeiserscoalitie*), which works proactively to find solutions for customers with payment arrears.

In 2022 a.s.r. became a member of the Dutch Debt Relief Route (*Nederlandse Schuldhulproute* - NSR). NSR provides debt assistance through various activities. One of these is *Geldfit*, a national initiative focusing on effective referral to other financial support organisations at local level. Customers gain insight into their financial situation through a simple online test. This anonymous test offers them targeted help in getting or keeping their finances in order.

In 2024, various business units have made their information provision more accessible to customers with payment arrears, including a reference to *Geldfit*. Furthermore a.s.r. joined two initiatives aimed at making citizens of the Netherlands free of debt concerns, namely *SchuldenlabNL* and the National Coalition for Financial Health (*Nationale Coalitie Financiële Gezondheid* - NCFG). The strength of *SchuldenlabNL* lies in scaling up successful initiatives, while the NCFG involves employers in the early detection and addressing of financial problems and debts of their employees. After all, as an employer, a.s.r. also has a role in preventing (major) financial worries among its employees.

In order to give customers as much help as possible in preventing or resolving their repayment problems, employees are trained to recognise the financial problems being experienced by customers and to refer them on for advice.

## 3.1.2 Being a responsible investor

### 3.1.2.1 Asset Management

a.s.r. believes that businesses that take into account the interests of people, the environment, society and future generations will deliver more long-term value for all stakeholders, in both economic and social terms. Hence, responsible investing is essential for a.s.r.

In 2024, a.s.r. asset management published its new Sustainability Strategy and revised policy: the Policy on Responsible Investments (formerly SRI Policy). The new approach is centred on three key policy goals that underline a.s.r. asset management's commitment to contribute to a better world: reducing harm, driving change, and creating positive impact. In order to achieve these goals, a.s.r. asset management makes use of a variety of tools, including exclusions, ESG integration, active ownership and impact investing.

a.s.r. asset management safeguards full compliance of its Policy on Responsible Investments using a three-step process: internal teams implementation (investment departments), compliance process and an independent external assurance (by Forum Ethibel).

Since making a difference requires focusing time and resources, a.s.r. asset management selected four themes on which it will focus:

- Climate change and the energy transition;
- Biodiversity and natural resources;
- Health and well-being;
- Human rights.

To delve deeper into these four focus themes, a position paper on each focus theme will be published in 2025. More details on the Sustainability Strategy, the Policy on Responsible Investments and four position papers can be found on a.s.r. asset management website.

The following sections provide a more detailed overview of a.s.r. asset management's investment activities in 2024.

In 2024, a.s.r. has made a change to its Policy on Responsible Investments, allowing investments in Dutch companies or activities related to the defence industry under strict conditions. This decision follows a call from the Dutch government for institutional investors to provide capital to strengthen the European defence industry. With this policy change, a.s.r. responds to the call to contribute to a safer world and democratic values through targeted investments. a.s.r. can deviate from its exclusion policy under strict conditions. These conditions are:

- Investments may only be made in defence companies based in the Netherlands.
- Investments may only be made in companies that are not involved in the production or distribution of controversial weapons or civilian firearms.
- Investments may only be made in companies that do not supply high risk countries (as defined in the IRBC Framework on Controversial Weapons and Trade in Weapons with High-Risk Countries).
- All investments are to be made at a.s.r.'s own account and risk.
- Any investment proposal must be reviewed by a.s.r. Veiligheidszaken and approved by the Management Board of a.s.r., following the advice of the a.s.r. Sustainability Committee.
- Compliance with the conditions related to controversial weapons, civilian firearms, or high-risk countries will be monitored annually.

## Reduce harm

a.s.r. asset management has a strict exclusion policy for controversial activities and behaviour that applies to all internally managed portfolios. In 2024, a.s.r. asset management expanded its exclusion criteria for coal-fired electricity production, coal mining expansion plans, palm oil and timber production, to further align with the goals set out in the Policy on Responsible Investments. This has led to more companies being excluded in 2024 compared to 2023. Following its bi-annual screening of the investment universe on the exclusion rules, in 2024, a.s.r. asset management has excluded 795 (2023: 435) companies. The excluded companies by topic are specified in the table below.

In 2024, a.s.r. saw a steep increase in excluded companies compared to 2023. This can be attributed to the expanded exclusion criteria but mainly to a larger screened investment universe due to the integration of Aegon portfolios.

With regard to investments in sovereign debt, in 2024, a.s.r. asset management excluded 81 (2023: 81) countries that are poor performers in the annual Freedom in the World report, countries with a low ranking on the Corruption Perceptions Index or countries scoring low on the environmental SDGs. All exclusion criteria and the most recent exclusion lists can be found in the a.s.r. SRI Detailed criteria for screening and on the a.s.r. asset management website.

### Screened companies excluded by topic

| (in numbers) | 2024 | 2023 |
|---|---|---|
| Weapons | 184 | 110 |
| Gambling | 116 | 76 |
| Tobacco | 31 | 23 |
| Nuclear energy | 25 | 19 |
| Coal mining | 150 | 78 |
| Coal-fired electricity generation | 192 | 66 |
| Unconventional oil and gas | 77 | 64 |
| Conventional oil and gas[1] | 17 | - |
| Palm oil | 5 | - |
| Unsustainable timber | 24 | - |
| Global Compact violations | 45 | 17 |
| **Total number of exclusions[2]** | **866** | **453** |
| **Total companies excluded** | **795** | **435** |

1 When not Paris-aligned

2 Includes double counts due to the fact that some companies are excluded on more than one criteria.

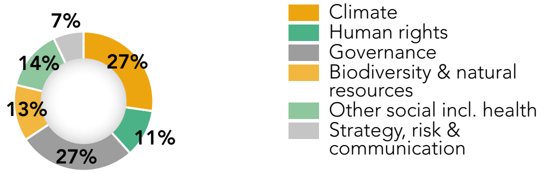
## Drive change

a.s.r. asset management believes that active ownership is key for a responsible investor. By engaging companies and exercising its voting rights, a.s.r. asset management uses its influence to drive positive change in companies.

### Engagement

In 2024, engagements were carried out on behalf of a.s.r. asset management with 921 companies on numerous ESG topics, including with companies that have shown controversial behaviour (i.e. UNGC violations), or that are facing ESG-related risks. a.s.r. asset management engaged with companies in three different ways, bilaterally, collaboratively and via a third-party engagement provider. Our engagement provider Hermes EOS contributed materially to the engagement efforts in 2024.

### Engagement by topic (in %)




In 2024, a.s.r. asset management engaged via collaborative engagement initiatives, for example through the Platform Living Wage for Financials (PLWF) with companies to enable living wages and incomes in their supply chains, and regarding our fossil fuel exit strategy through the Dutch Climate Coalition. A full list of companies that a.s.r. asset management engaged with, can be found in the engagement reports on the website of a.s.r. asset management.

**Health Engagement Alliance**

Together with VGZ, Achmea and Cardano, a.s.r. created the Health Engagement Alliance (HEAL). These companies share the same vision of the role the financial industry has to play in enhancing health worldwide. In this alliance a first focus area is the Out of Home sector due to its impact on unhealthy diets. This industry has an important role to play in creating more healthy diets, given that its current offerings are to a large extent unhealthy. Portions are growing, and the amount of fat, sugar and salt is increasing. Therefore there is a great opportunity and responsibility for this sector to start offering healthier options. In 2024, HEAL started engaging this sector to stimulate Out of Home companies to play their part in solving the worldwide health crisis.

### Other initiatives

In 2024, a.s.r. asset management joined the Investor Alliance for Human Rights. This alliance is a collective action platform for responsible investment that is founded on the respect for people's fundamental rights.

Furthermore, in August 2024, a.s.r. asset management signed the Investor and Banking Statement on Vaping, aligning with a.s.r. asset management's interests on health & well-being. There are many concerns on the negative health effects of vaping. This statement, coordinated by Tobacco Free Portfolios, addresses these concerns.

### Voting

A shareholder's right to vote is essential for the proper functioning of a corporate governance system and a.s.r. asset management exercises this right. Its Voting Policy is developed in accordance with the Dutch Corporate Governance Code and a.s.r. asset management's own Policy on Responsible Investments. This Policy is applicable to all internally managed investments in listed equities. In 2024, a.s.r. asset management has voted at 97% of the Annual General Meetings (AGMs) of the companies in its equity portfolio. Information on how a.s.r. asset management voted in 2024 can be found in the voting report and dashboard via the website of a.s.r. asset management.

**Votes against management by topic**

| (in %) | 2024 | 2023 |
|---|---|---|
| Director related | 74 | 44 |
| Audit | 1 | 2 |
| Capitalisation | 2 | 7 |
| ESG Environment | 3 | 4 |
| ESG Social | 5 | 6 |
| ESG Governance | - | 2 |
| Other | 3 | 7 |
| Remuneration | 11 | 24 |
| Shareholders rights | 1 | 4 |
| **Total** | **100** | **100** |

ISS Proxy Voting votes on behalf of a.s.r. asset management at AGMs. In March 2024 a.s.r. asset management adopted the ISS SRI module, which is stricter regarding ESG topics and in line with the revised Policy on Responsible Investments. This led to an increase in the total number of votes against management in 2024 (3,387) compared to 2023 (1,201).

## Create positive impact

In 2024, a.s.r. has set an ambitious target to allocate 10% of its assets under management to impact investments by the end of 2027, of which at least two billion euro must be allocated to social impact, linked to themes health & well-being and human rights.

a.s.r. asset management defines impact investing as an investment approach that seeks to generate intentional and measurable impact alongside financial returns. With impact investing a.s.r. asset management aims to identify and finance businesses that make a significant positive, environmental or social, real-world impact. This can, for example, be achieved by investing in sectors where capital is scarce and funding has proven difficult or by investing in disadvantaged or vulnerable groups.

In 2024, a.s.r. asset management further increased its impact investments in all asset classes. Examples of a.s.r. asset management's impact investments in 2024, which support the transition in energy, food and resources through private equity investments, are:

- SET Ventures Fund IV aims to accelerate the energy transition by investing in early-stage European technology companies focused on advancing smart energy systems, decarbonisation, and sustainable energy solutions.
- Pymwymic Healthy Food Systems Impact Fund II aims to invest in European companies driving sustainable transformation in the food system, focusing on scalable innovations that promote health, sustainability, and resilience across the food value chain.
- Infinity Recycling's Circular Plastics Fund aims to accelerate the transition to a circular economy by investing in advanced recycling technologies and companies that convert plastic waste into reusable materials, reducing environmental impact and dependence on virgin plastics.

Furthermore, with the addition of Aegon NL, the private debt impact portfolio has expanded: a.s.r. asset management is now financing social housing projects in the Netherlands with loans backed by the *Waarborgfonds Sociale Woningbouw* (WSW) guarantee, supporting affordability and sustainable housing development. See section 2.6.2 for a.s.r.'s performance on the impact investments target. For selection criteria per asset class, refer to the Policy on Responsible Investments.

### Developing a plastic footprint methodology

At a.s.r. asset management, collaboration with other parties, such as NGOs, clients and other investors, and participating in working groups are essential to achieving the company's goals.

In collaboration with the Plastic Soup Foundation and Earth Action, a.s.r. asset management launched a pilot on plastics in 2024, with the aim of creating a methodology to calculate investment portfolios' plastic pollution footprints. The developed methodology takes into account two perspectives: the negative effects of investee companies on biodiversity and ecosystems due to plastic pollution, and the negative effects on human health resulting from (micro)plastics. In 2025, a.s.r. asset management will continue to determine the plastic footprint of its full investment portfolio.

### ESG Research Centre

In 2023, a.s.r. and the University of Amsterdam (UvA) launched an ESG research centre: the Research Centre for Sustainable Investments & Insurance (RCSII). In 2024, research started in three key areas: ESG risks on real estate and mortgages, quantifying the impact of investments with AI and detecting greenwashing. The purpose of the RCSII is to actively contribute to responsible investing and insurance, benefiting a.s.r., other financial institutions and society. More information can be found on the RCSII website.

## 3.1.2.2 Real Estate

a.s.r. real estate manages non-listed sector funds, which invest in retail and residential properties, offices, real estate on science parks, agricultural land and renewable energy in the Netherlands. These funds are open to institutional investors. a.s.r. is anchor investor in these funds. As a real estate investor, a.s.r. recognises its responsibility to contribute towards liveable and sustainable buildings, towns, cities and communities. a.s.r. real estate strives to contribute to a sustainable and climate-adaptive living environment for all – now and for future generations. The ESG vision encompasses four strategic pillars that form the core of the actions:

- Reduce energy intensity & GHG emissions;
- Adapt to climate change & related risks;
- Regenerate biodiversity & ecosystems;
- Improve well-being & social equality.

### Reduce energy intensity & GHG emissions

Both urban environments and rural areas are responsible for a significant share of global $CO_2$ emissions. a.s.r. real estate cannot prevent the current effects, but it aims to limit its impact on the effects in the future. That is why a.s.r. real estate ensures that its buildings and agricultural land meet the Paris climate targets by 2045 at the latest, but preferably sooner.

Next to the asset-level reduction strategies, a.s.r. real estate installed solar panels on the roof of several buildings in its portfolio to further reduce GHG emissions. These panels vary in power output per panel, but together they achieve a total capacity of 7.971 kWp.

In the coming years, a.s.r. real estate will continue to execute asset-level reduction strategies and refine its Paris Proof roadmaps with annual energy consumption data, from the lessons learned and evolving insights.

*Investing in renewable energy*

ASR Dutch Green Energy Fund I owns four wind farms and one solar park. As a result, the fund owns 48 wind turbines and 60,000 solar panels with a combined capacity of 205 megawatts, and generates power equivalent to the annual consumption of 231,000 households per year.

a.s.r. real estate and BAM Wonen have signed an agreement to upgrade 69 dwellings in Houten dating from 1982 to Paris Proof standards. Following sustainability enhancements, the dwellings will achieve a minimum energy rating of A+++, up from the current average of D, and will meet the Paris Proof criteria. The outcome will be $CO_2$-neutral dwellings, which means residents can enjoy lower energy bills and increased living comfort. This is the first time an institutional investor has made rental housing from the 1980s Paris Proof on this scale. The ASR Dutch Core Residential Fund of a.s.r. real estate aims to ensure its entire residential portfolio is Paris Proof by 2045.

*Dwellings in Houten fitted with solar panels*

### Adapt to climate change & related risks

In recent years, society and nature have witnessed an increase in the frequency and intensity of extreme weather events such as heatwaves, torrential rain, floods and droughts. As the impact of climate change becomes more evident, the importance of a resilient portfolio becomes increasingly important as well. By understanding and anticipating the long-term risks of climate change, a.s.r. real estate strives to build a real estate portfolio that is progressively adaptable in order to ensure long-term sustainability, resilience and profitability.

a.s.r. real estate conducted comprehensive climate risk assessments for all properties in its portfolio based on the Framework for Climate Adaptive Buildings (FCAB). This assessment identifies vulnerabilities to climate-related impacts, including four major climate risks: heat, drought, flooding and extreme weather. The climate risk score is based on:

- The environmental score is an estimate of the climate effects for the immediate vicinity of a building.
- The building score is an estimate of the vulnerability of a building to the various climate effects, based on building-specific characteristics.

The combined environmental and building score results in the 'climate risk score', which is used to identify the assets that are exposed to high physical climate risks. The outcome of the climate risk assessment was used to determine the extent to which climate risks are acceptable, and what actions and adaptation solutions are appropriate to mitigate climate risks. In 2024, climate adaptation plans were made for the properties with a high or very high risk profile.

### Regenerate biodiversity & ecosystems

Biodiversity is a fundamental pillar of ecological balance and sustainability. A loss of biodiversity leads to adverse impacts on well-being and quality of life, as well as on food security, resilience to natural disasters and the availability of water and resources. The built environment disrupts important habitats for animal and plant species. a.s.r. real estate therefore aims to contribute as much as possible to conserving and enhancing biodiversity on and around properties.

*Biodiversity Framework*

a.s.r. real estate has established a Biodiversity Framework in collaboration with an external ecologist to further improve the biodiversity of its urban real estate portfolio. This framework is integrated into day-to-day operations, ensuring that biodiversity is considered in relevant aspects of asset and property management. The framework provides guidelines to increase the share of vegetated area and capitalise on nature-related opportunities.

In addition, a.s.r. real estate conducted a baseline analysis to gain additional insight into the share of non-vegetated surface area, compared to the total surface area of all urban real estate assets. The insights obtained from this analysis are being used to formulate a strategic plan and to identify promising assets to enhance the potential ecological value in the portfolio.

*Rewarding sustainable farming*
The ASR Dutch Farmland Fund has a reward system for its farmers who operate sustainably, to help safeguard the continuation of farming and challenge climate change and the loss of biodiversity. Under certain conditions, new and current lessees who comply with certain sustainability requirements such as using sustainable fertiliser can be awarded discounts of 5%-10% on the ground rent they pay for leasing land. In 2024, 83 new green lease contracts were concluded, representing 99% (1,220 of 1,225 hectares) of the new contracts. The total number of green lease contracts is 514 (9.169 of 38.237 hectares).

## Improve well-being & social equality

To ensure a future-proof living environment for all, a healthy living environment and equal opportunities are of great importance. Unfortunately, equal treatment and opportunities are not a given. With its investments, a.s.r. real estate aims to make a positive contribution to the social aspects of the living environment.

a.s.r. real estate believes that tenants who are more involved with their home, building, living environment and landlord are more satisfied and aware. a.s.r. real estate focuses on improving tenant satisfaction, health and well-being, and awareness of sustainable living, and therefore works continuously on a participation programme involving various forms of tenant participation. Activities range from taking an active role in sustainability projects and tenants' associations to ESG newsletters and events for tenants.

## Impact investments

The Global Impact Investing Network (GIIN) defines impact investments as: 'Investments made in companies, organisations and funds with the intention of generating positive, measurable social and environmental impacts alongside a financial return.' a.s.r. real estate uses this definition to calculate a quantifiable impact investment for real estate activities.

In 2024, a.s.r. real estate focused on the following real estate impact themes:

- Affordable housing;
- Dutch Science parks;
- Renewable energy;
- International non-listed real estate;
- Sustainable mobility.

*Affordable housing*
The ASR Dutch Core Residential Fund has a clear focus on affordable housing. The Fund designates rents of up to € 1,350 per month as affordable, and keeps a considerable part of the portfolio in this segment. To ensure affordable dwellings in the standing portfolio remain affordable in future, the Fund implements moderate rental increases, caps rent in line with current market trends and actively lowers living costs by implementing energy-saving measures.

*Dutch Science parks*
The ASR Dutch Science Park Fund strives to make a positive societal impact by encouraging the further development of science parks in the Netherlands by investing in real estate for the broad range of functions that are needed for science park ecosystems to thrive. By doing so, the Fund provides space for companies to work on a wide range of innovative and sustainable products and solutions that contribute to a better world.

*Renewable energy*
ASR Dutch Green Energy Fund I makes impactful investments by acquiring and managing wind parks and solar farms. In doing so, a.s.r. is contributing to the energy transition and a sustainable living environment.

*International non-listed real estate*
a.s.r.'s strategic asset allocation in real estate includes European non-listed real estate. These investments present opportunities for achieving impact through the following themes: affordable housing, green buildings and health. a.s.r. intends to increase the assets that meet the criteria of these themes over the coming years.

*Sustainable mobility*
The ASR Dutch Mobility Office Fund makes a positive environmental impact through enabling $CO_2$ emission reductions for tenant employee mobility to the Fund's office buildings. The Fund does this by investing exclusively in offices located close to public transport hubs, adding office stock on these locations, and through specific measures aimed at stimulating sustainable mobility for each of the Fund's office buildings.

## Sustainable investing – GRESB benchmark

Once again, in 2024, a.s.r. real estate's residential, office, science park and retail fund was awarded the maximum five-star rating in the GRESB benchmark. This means that the funds are among the 20% most sustainable GRESB funds in the world according to the GRESB benchmark. For the third year in a row, the ASR Dutch Science Park Fund was named Global Non-listed Sector Leader in the Technology/Science category. More data coverage on energy, greenhouse gas, waste and water data, coupled with more extensive climate risk data, helped a.s.r. real estate's funds to obtain high scores in the benchmark.

### 3.1.2.3 Mortgages

a.s.r. offers its mortgage products through two different mortgage brands: Aegon and a.s.r. From 2025, the mortgage businesses will be further integrated.

To reduce the carbon footprint of homes, a.s.r. aims to enable its mortgage customers to live in energy-efficient homes. This includes not only those who already reside in energy-efficient properties but also those whose homes have lower energy label ratings. a.s.r. strives to assist customers in making their homes more sustainable and supports customers by removing barriers to improving home sustainability. a.s.r. supports this by:

1. **Providing information**: Making homes more sustainable starts with informing residents about the possibilities. a.s.r.'s Sustainable Housing platform features blogs, roadmaps and various videos on energy saving, sustainable housing and sustainable gardening. Customers can also subscribe to a monthly newsletter with tips and examples relating to sustainable living.

2. **Financing:** Besides using their own money to make their homes more sustainable, people can get a Sustainability Mortgage from a.s.r. As standard practice, a.s.r. offers a Sustainability Mortgage of € 10,000 with every interest rate offer. The Sustainability Mortgage is offered at an interest rate discount compared to regular mortgage product. This allows homeowners who want to take out a mortgage with a.s.r. to borrow extra money for energy-saving measures, such as a heat pump, solar panels or insulation. Existing customers have the option to follow a shorter route and apply for the Sustainability Mortgage at a lower cost without advice ('execution only'). In the personal (digital) environment, they can take out a Sustainability Mortgage of up to € 10,000. By offering this, a.s.r. lowers the threshold to make customers' current homes more sustainable. a.s.r. also increased the amount that can be borrowed with the *Verduurzamingshypotheek* from € 25,000 to € 65,000 and extended the term of the mortgage from 15 years to 30 years. This lowers monthly costs for customers.

3. **Realisation:** In 2024, a.s.r. worked together with online platforms (*De Energiebespaarders, HomeQgo*) for people who want to make their homes more sustainable. The advice and service provided are free for both new and existing customers with an a.s.r. mortgage. The advice includes a comprehensive home savings check at a customer's home, advice on energy-saving measures, quotes for the possible solutions and help with the installation.

The emphasis on making homes more sustainable is paying off. Of all new mortgages taken out with a.s.r. product in 2024, almost 27% included some form of financing for sustainability. According to research conducted by a.s.r. in collaboration with Calcasa, the homes that were made more sustainable went up an average of 1.6 energy label points due to the measures financed.

## 3.1.3 Business conduct

### 3.1.3.1 Customer focus

a.s.r. focuses on creating value for its customers, including private and corporate clients, as well as institutional investors through asset management services. a.s.r.'s core mission is to help people, it does this by ensuring that every product and service a.s.r. offers adds meaningful value. By prioritising customer needs, a.s.r. fosters strong connections and continuously improves customer satisfaction. Which contributes to ensuring that every customer interaction is meaningful and that a.s.r. remains responsive to their needs.

**Customer research and social responsibility**

Consumers are increasingly concerned about social and environmental issues such as climate change and inequality. These concerns influence their purchasing decisions, including which insurance providers they choose. To stay aligned with customer expectations, a.s.r. conducts an annual research to track consumer attitudes towards corporate social responsibility. Also, a.s.r.'s reputation on sustainability is measured on a weekly basis.

Alongside this, a.s.r. uses multiple Net Promoter Score (NPS) metrics, namely the NPS-r (overall relationship), NPS-p (process level), and NPS-c (contact level), all used to measure and improve customer satisfaction. Starting in 2025, NPS-i will be implemented to evaluate satisfaction based on specific interactions, providing deeper insights into how customers experience their service with a.s.r.

**Raad van Doen: Involving customers and advisors**

The *Raad van Doen* is an online panel that engages customers, entrepreneurs and advisors in shaping the future of a.s.r. Through this panel, private and business customers and advisors provide feedback on a.s.r.'s services, helping guide product development and advocate for customer interests. The panel also allows a.s.r. to gather insights on customer expectations around sustainability in products and services.

By involving customers directly in co-creation and dialogue, a.s.r. continuously refines the offerings which ensures that evolving customer needs are met.

**Customer contact strategy: Consistent and seamless experience**

The customer contact strategy aims to create a consistent, seamless experience for all customers. To achieve this, the focus lies on three key areas:

1. Standardising communication channels: Unifying contact channels ensures a consistent customer experience and helps guide customers across various business lines and products.
2. Reducing Low-Impact interactions: By eliminating non-value-added contacts through self-service solutions, simple tasks are made easier for customers.
3. Creating High-Impact interactions: a.s.r. focuses on delivering meaningful, high-value interactions during crucial moments when customers need help the most.

These strategies help ensure that customers, advisors, and employers receive consistent, efficient service tailored to their needs.

**Operational excellence and customer focus during transition**

As a.s.r. undertakes the Aegon NL portfolio migration, NPS helps to maintain focus on customer satisfaction by measuring how changes internal processes affect the customer experience. By continuously gathering feedback, a.s.r. can make data-driven decisions that ensure operational improvements align with customer needs.

**Warm Welcome for new clients**

A key initiative for a.s.r. is providing a so-called 'Warm Welcome' to clients migrating from the Aegon NL portfolio. a.s.r. aims to make this transition as seamless as possible, ensuring minimal effort for customers. The goal is to ensure that both customers and advisors understand the process and feel supported throughout the transition.

a.s.r. measures the success of this initiative using operational KPIs such as churn rate, inbound contact rate, first-contact resolution, and self-service rate. These metrics help to assess how effectively a.s.r. supports new customers and ensures a smooth transition experience.

### 3.1.3.2 Complaints management

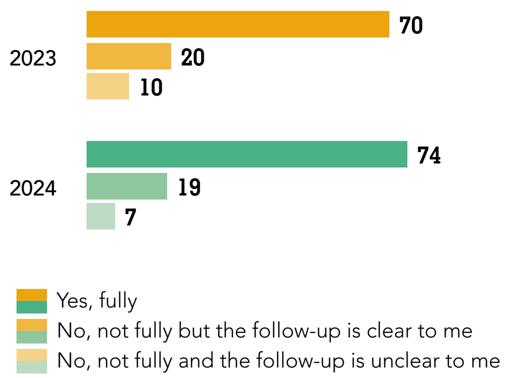
Within a.s.r., a dedicated complaints management team monitors the implementation of the a.s.r. complaints policy and oversees the complaints procedure. The actual handling of complaints is decentralised within the organisation. The key principles of complaints management are:

- a.s.r. is open to complaints and facilitates customers to submit a complaint.
- a.s.r. communicates its view and the proposed solution for the complaint in a comprehensible and transparent manner.
- a.s.r. aims to learn and improve from complaints.

a.s.r. regards the handling of complaints as a matter requiring specific knowledge and skills. Complaints handlers keep their knowledge up-to-date through continuous education, for instance by following training courses in the field of customer service. Customers assign the a.s.r. complaints handlers an average score of 8.4 out of 10 (2023: 8.1).

**Complaints handled, in customer's perspective**

(in %)




Average score complaint handling (1-10)

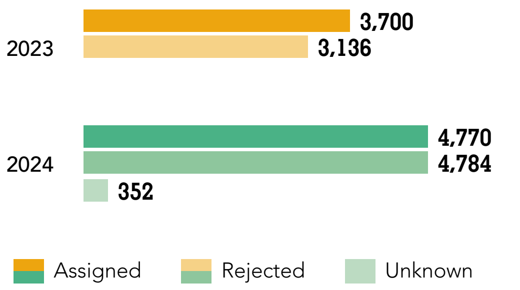
8.4

### Complaints as a source for improvements

a.s.r. aims to be the best financial service provider, with the most satisfied customers and advisors. The significant leap forward in customer satisfaction requires an acceleration in digitalisation. a.s.r.'s digital ambition is challenging, and it is therefore crucial to continuously monitor the customer experience. Input for this is partly derived from complaints from customers and advisors. As indicated above in the core principles, complaints are always an important source for improvements.

### Complaints settled[1,2]

(in numbers)




### Updated quality monitoring

Quality monitoring is embedded in a.s.r.'s Complaints Policy. Complaint handlers and complaint coordinators continuously assess each other's complaint files against the established quality criteria, translated into 20 questions about the quality of complaint handling. The criteria are derived from the external complaints procedure, the customer promise, and uniform working agreements. This contributes positively and critically to improving the quality of our products, service and performance.

**Learning from 'portal' complaints**

An interdepartmental investigation has been started into the causes of the so-called 'portal' complaints. All of these complaints, received by a.s.r. in the first half of 2024, from customers and advisors about the digital environments have been analysed. An immediate action resulting from the initial analysis is that an MT member will call back customers with a 'portal' complaint. a.s.r. places great value on the involvement of MT members in complaints handling and sees this as an opportunity to better understand the digital customer experience and the complaints of customers. With the insights gained from this initial analysis and the experiences from the callbacks, a deeper analysis will take place in 2025 to further define the pain points, opportunities, and priorities of these complaints. Doing so, complaints play a crucial role in enhancing a.s.r.'s digital customer experience.

## 3.1.3.3 IT and the digital strategy

### Innovation and Digital

Since 2020, a.s.r. has been implementing a digital strategy to enhance customer experience, achieve digital ambition and increasing its innovative strength. The digital technology choices made allowed a.s.r. to successfully implement at scale a number of improvements in customer journeys. Customers expect self-service for ‘low impact’ contacts and would like to have the possibility to interact with an a.s.r. employee for ‘high impact’ contacts. The digital strategy enables this, eliminating a high number of unnecessary calls and improving customer satisfaction at the same time.

AI in combination with Robotic Process Automation (RPA), offers enormous opportunities. a.s.r. will adopt AI as a game changing enabler to achieve strategic goals, especially in realisation of the growth ambition in a scalable, cost effective way. Currently, a.s.r. is investing in the foundations for AI and implementing a number of AI initiatives to experiment and learn as an organisation. Next step is to build a strategic portfolio of AI initiatives aligned with the overall business strategy. Examples of AI solutions in production are an AI tool for call centre agents that automates call registration and analyses, and an AI assistant for the call agents to provide the best answers to customer questions. This allows a.s.r. to continuously improve the customer interaction based on the data collected.

In addition to these examples a.s.r. implemented a number of AI solutions, all currently aimed at improving efficiency in the organisation without directly impacting customers. a.s.r. is aware that it also entails new risks and ensures that it uses data responsibly. a.s.r. embraces the ethical framework developed by the Dutch Association of Insurers for ethical, self-aware and customer-oriented handling of customer data and to promote AI.

In early 2024, the new Pension DC platform was successfully launched and policies were migrated to the new platform. With this milestone an important step was set to complete the back office rationalisation programs. During 2024, the Aegon NL integration of all Non-life policies is completed. Only integration of Pension DB and the administration for Aegon NL individual life customers need to be completed next years.

During the integration of Aegon NL, a.s.r. was able to keep the proportion of digitised customers at the same level of 54.1%. a.s.r. has successfully launched an onboarding programme for Aegon NL customers, effectively incorporating digital onboarding into the product migration process. a.s.r.’s focus for 2025 is to

Digitised customers (in %)

54.1

1 Assigned complaints are either partially or fully justified complaints. Rejected complaints are either unjustified complaints (complaints classified by a.s.r. as unjustified) and unfounded complaints (complaints that are not intended for a.s.r.).

2 The 2024 results include the Aegon NL figures (of which 572 are assigned, 1267 are rejected and 352 are unknown).

increase the NPS-i and to guide customer towards digital channels.

## Focus on IT security

a.s.r. has an Information Security Policy, which is approved by the Non-Financial Risk Committee (NFRC) and a.s.r. Risk Committee. Improvement of cyber resilience remains a continual focus point, through investments in protection, detection and response systems and awareness initiatives for employees. Cyber security is regularly on the agenda for the MB and SB. a.s.r. has a Chief Information Security Officer (CISO) who reports to the CEO, via the Director Group Risk Management. As the secretary of the NFRC, the CISO also reports directly to the COO/CTO, who is the Chair of this Committee.

There were no significant cyber security incidents involving a.s.r. systems in 2024. However, a.s.r. was indirectly involved in a hack of one of its suppliers in the domain of document printing. In almost all security incidents, social engineering provides the entry point for cybercriminals. Therefore, a.s.r. invests considerable effort in training employees to recognise possible threats, for example. with a.s.r.'s automated phishing simulation platform. a.s.r. implemented all requirements of Digital Operational Resilience Act (DORA) before the deadline of the end of 2024.

a.s.r. has received an ISAE 3000 Type II statement for the service commission of the central IT department to the various business segments for 2024. The accountant concluded that the controls related to the control objectives stated in the description of the ICT service system were adequately designed and the tested controls, necessary to provide reasonable assurance that those control objectives were achieved, operated effectively during the reporting period.

**Dilemma - Artificial Intelligence: a game changer that brings both opportunities and risks**

It is therefore crucial to find a balance between promoting AI and ensuring its responsible use. To do this as effectively as possible, a.s.r. assesses the use of AI against various ethical frameworks and closely monitors its environmental impact. This requires insight into the value chain (suppliers), effective supervision, trained employees, reliable data, a structured development process, and a modern data landscape.

Artificial Intelligence is developing at a rapid pace. a.s.r. is committed to investigate both the risks and opportunities related to AI. AI tools can help achieve strategic goals and contribute to becoming even more scalable and cost-effective. We are aware of some of the risks associated with AI, like data privacy concerns, compliance with the European AI act, ethical considerations, and energy consumption. By using a secure a.s.r.-only technical environment for its data, adopting the ethical framework of Dutch Association of Insurers (*Verbond van Verzekeraars*), and selecting vendors that strive to become climate neutral, a.s.r. is able to manage these risks effectively.

One important aspect of introducing AI is understanding the extent to which it will affect a.s.r.'s workforce. The first applications in production show that the application of AI will affect employees in various ways. For some, it will mean acquiring new skills to apply AI in their field of work. The availability of new data sources will allow for continuous improvement of customer service and process optimisation. For others, AI will eliminate routine tasks, leaving the more complex tasks to be handled by the employee. The introduction of AI in the call centre has already proven that some employees can't, and others don't want to, change their current way of working. The expectation is that AI tools will impact most, if not all, employees. Although a.s.r. has successfully applied AI in some areas, the full impact on its workforce is still unclear at this stage. Employees are key stakeholders of a.s.r., and for some employees the changes will be experienced as positive, while for others, they may be experienced as negative. The journey ahead will create uncertainty for a.s.r.'s employees. At the same time, a.s.r. is determined to continue to apply AI applications to contribute to achieving its strategic goals.

In 2025, more clarity will be provided about the expected impact on employees, both in terms of the number of people affected in certain domains and the required skills and new ways of working. The employees of a.s.r. will be provided with generic and tailormade AI training and assisted with how to deal with change and uncertainty while a.s.r. embarks on this exciting journey.

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# 3.2 Creating a vital and future-proof workforce

**Employees[1]**
(in FTE)

7,373 (2023: 7,994)

**Employee engagement**
(in percentile)

73 (2023: 89)

**eMood®**
(1–10)

7.6 (2023: 7.7)

**Nil absenteeism**
(in %)

| | |
|---|---|
| 2023 | 56.0 |
| 2024 | 56.2 |
| Target | 60 |

**Vacancies filled internally**
(in %)

51 (2023: 46)

**Employee Net Promoter Score**
(score between -100 and 100)

11 (2023: 40)

**Employee turnover**
(in %)

12.4 (2023: 8.9)

**Female | Male**
(in %)

| | |
|---|---|
| 2023 | 45 \| 55 |
| 2024 | 43 \| 57 |

1 This figure is based on the Group data. The other metrics in this chapter are excluding Corins, Robidus and a.s.r. D&S holding.

## 3.2.1 HR policy and strategy

Talented, skilled, intrinsically motivated and vital employees are the key to success for a.s.r. In order to attract and retain the skills it needs, a.s.r. offers an attractive, competitive, and flexible employment package and focuses considerable attention on employee development, engagement, sustainable employability, and vitality. It is also committed to improving diversity, equity and inclusion.

The mission of HR is to enable a.s.r. to be a leading financial service provider for now, later, and always.

The HR strategy is based on three pillars:

1. Ensuring skills and competencies are in the right place at the right time.
2. Increasing the agility of the organisation.
3. Strengthening employee engagement.

## 3.2.2 Skills and competencies

To ensure skills and competencies are in the right place at the right time, a.s.r. employs 'total workforce management', and in 2024, there was significant focus on employer branding. In recruitment and career progression, the principles of diversity, equity, and inclusion are applied. Talent development is used to develop skills and to promote talent.

### Workforce

In 2024, the total workforce decreased by 7.7% to 7,373 FTEs (2023: 7,994). All employees work in the Netherlands. The total workforce has been reduced by the sale of Knab on November 1 2024, and by reductions in line with the integration plan.

The overall employee turnover rate for 2024 at a.s.r. was 12.4%. This is significantly higher than the previous year (2023: 8.9%). Nevertheless, the employee turnover is within the norm and the employee turnover target for 2024 was reached (10%-16%). As in previous years, voluntary turnover accounted for the largest share: as nearly half (49%) of all exits consisted of employees who themselves decided to leave a.s.r. Additionally, 22% of exits took place through the Social Plan, including the '90-minute increase in travel time plan' due to a change of office location. In addition, participation in the early retirement scheme (*Regeling voor vervroegde uittreding* - RVU) continued to increase during 2024.

a.s.r. aims to fill at least 40% of all vacancies internally to retain knowledge and culture within the company, while providing employees with professional development opportunities. In 2024, 460 out of 900 vacancies were filled internally, equating to 51% (2023: 46%). The integrations of former a.s.r. and Aegon NL business units are having a positive effect on internal labour mobility. Due to the reorganisations of various departments, there were relatively high internal staff movements and increasing internal mobility in 2024.

In 2024, the external labour market remained tight. Through total workforce management, a.s.r. ensures the best solution for every capacity requirement, whether it be for a permanent employee, or a flex worker.

To attract new talent, a.s.r. focused strongly on employer branding and recruitment marketing. A large multimedia campaign was launched in the summer, along with smaller campaigns specifically designed to attract women and IT professionals to work at a.s.r.

In order to retain talent, a.s.r. focused considerable attention during the year on boosting employee loyalty and engagement.

### Diversity, equity and inclusion

A diverse, equal, and inclusive working environment is essential for a.s.r. and its employees. This approach leverages diverse qualities and perspectives for better decision-making, enhances understanding of customer needs, and ensures equal treatment of all stakeholders. It also promotes a safe, pleasant, and inclusive workplace. Our goal is to create an environment where mutual understanding, attention, and empathy are central, allowing everyone to be themselves and contribute fully. See section 6.3 for more information on diversity, equity and inclusion.

### Equal pay

a.s.r. is committed to ensuring that women and men with similar work receive equal pay. To monitor this, an annual gender pay gap analysis is conducted. In 2024, the analysis shows that the average gross hourly wage of women is 18%[1] lower than that of men at a.s.r.

However, this difference is explained by the fact that women are often in lower scales (other work) and men in higher scales and because women are on average employed for a shorter period of time. This gender pay gap over the total population is therefore called the unadjusted gender pay gap, and is not a pure comparison.

Adjusted for the above factors, there is no pay gap on average across a.s.r. The gender pay gap at a.s.r. between women and men for equal work and comparable years of experience is 0%.

See section 6.3 for more information on remuneration and equal pay.

1 Figure is excluding Corins, Robidus and TKP.

**Gross average hourly wages split by gender**

| (in €) | 31 December 2024 | | | 31 December 2023 | | |
|---|---|---|---|---|---|---|
| | Female | Male | Ratio[1] | Female | Male | Ratio[1] |
| Executive Board[2] | 400 | 432 | 0.93 | 355 | 381 | 0.93 |
| Management Board | 266 | 360 | 0.74 | 236 | 318 | 0.74 |
| Management | 54 | 63 | 0.86 | 54 | 63 | 0.86 |
| Other employees | 29 | 33 | 0.88 | 27 | 32 | 0.86 |

### Talent committee

In 2024, a.s.r. established a Talent Committee, which provides insight into (future) top talents and succession positions at higher and senior management levels. The committee monitors the development of these talents and ensures that they are known to senior management. The aim is to promote more internal talent into management positions.

### Communities

In 2024, in addition to the existing employee network for younger employees up to 40 years old, two new communities were established for LGBTQ+ colleagues and colleagues with a bicultural background. Additionally, in 2024, exploration of the need for networks for women, neurodivergent employees, and internationals was explored. The aim of these employee networks is to create connections and contribute to diversity, equity, and inclusion within a.s.r.

### Employee development

In a changing environment, continuously developing the talents of every employee is key. Therefore, all a.s.r. employees have access to a wide range of development opportunities in the a.s.r. academy, a.s.r.'s learning platform. Next to knowledge and skills training to keep professional knowledge up to date, employees can also follow courses to develop personal skills that help them to perform better and work on developing required 'skills of the future'. Examples include digitalisation training, improving communication skills, training about new legislation and other topics affecting employees' work. Additionally, they can receive advice and guidance from a talent advisor.

### Employee development programmes

There are specific development programmes for different groups of employees. Current and future top talents can take advantage of the 'Fast Track' programme, which allows them to develop more rapidly. There is a mandatory development programme for managers that aims to help them develop and maintain their professional knowledge and skills. Furthermore, a.s.r. offers various courses on sustainability in cooperation with the University of Groningen.

In 2024, 60% of all employees followed training courses (2023: 51%). In total, € 7,5 million was spent on training in 2024 (2023: € 5,6 million).

### Trainee programme

a.s.r. runs a general traineeship to attract talented graduates. This programme enables candidates to develop as specialists or to progress to management positions. In 2024, 10 trainees concluded their traineeship and accepted a permanent role within a.s.r. In September 2024, 11 trainees started the traineeship, with 10 of them being new joiners at a.s.r.

## 3.2.3 Increasing the organisation's agility

To increase its agility, a.s.r. is focusing significantly on sustainable employability and the vitality of its employees, as well as the continuous development of knowledge and skills.

### Sustainable employability

Through In Motion (*In Beweging*), an approach developed by a.s.r., all a.s.r. employees can work on increasing their market value. They can make use of a specific budget to follow courses that are not directly function-related but contribute to their sustainable employability. Employees affected by a reorganisation can activate a special development budget through a.s.r.'s social plan (*Het Andere Plan*), enabling them to take the next steps in the job market.

### Vitality and absenteeism[3]

a.s.r. places significant emphasis on physical and mental health. Employees can participate in a vitality scan, that is taken out every 1.5 years and an annual health check. To work on their physical and mental health, they have access to a wide range of training and workshops. To maintain a good work-life balance, a.s.r. offers time- and place independent working. Healthy home working is facilitated through a workplace check, a home working allowance, and the provision of workspace equipment.

1 Calculated before rounding of figures.
2 The figures for the EB and MB include CEO's compensation.
3 Section 3.2.3 Vitality and absenteeism is in scope of CSRD and limited assurance (ESRS S1).

By 2024, the absentee rate has increased to 4.5% (2023: 4.1%). At Aegon NL, the absence rate was higher than at a.s.r. The rising trend is a logical consequence of a company in transition. Interestingly, seasonal influences were less visible in 2024. Absenteeism remained relatively high throughout the year. This is due to an increase in long-term absence (> 6 weeks).

In 2024, short-term absenteeism (0 to 7 days) accounts for 17.3% (2023: 19.5%) of total absenteeism. However, extra long-term absenteeism (>365 days) has increased in 2024 to 13.9% (2023: 11.6%). Psychological absenteeism accounts with 55% for the largest share of long-term absenteeism.

The percentage of employees who did not report sick (nil absenteeism) was 56.2% (2023: 56.0%).

In 2024, managers gained access to an interactive absenteeism dashboard that provides extensive insights into the historical and current absenteeism of a team and the associated costs, and it also makes absenteeism predictions. The aim of this dashboard is to raise awareness about absenteeism and to provide managers with tools to prevent manageable absenteeism.

## 3.2.4 Strengthening employee engagement

To enhance employee engagement, a culture programme was started in 2024, centred around 'The story of a.s.r.'. Employee engagement was measured using the Denison Culture Scan and eMood®. Attractive and future-proof employment conditions are important for high engagement. In 2024, a new Collective Labour Agreement (CLA) was agreed upon for all a.s.r. employees, and The Other Plan (*Het Andere Plan*) became the social plan for all employees.

### Culture Programme

Since the pace of integrations varies, the culture programme was rolled out per business line. Although the timing and approach differ per business line, it always starts with an analysis of the local culture, establishing a local culture team and appointing connectors. Together, they take the lead in interventions. Management is crucial for a successful change, they will receive extra assistance, including through customised workshops about storytelling and the layers of interaction.

### Connectors Network

In 2024, connectors' were identified within each business unit of a.s.r. These connectors exhibit the desired behaviour in line with the core values and the five D's from 'The Story of a.s.r.' and encourage others to do the same. They engage in conversations with colleagues and, together with the local culture team, devise actions to strengthen the culture. The connector's network, which includes all connectors within a.s.r., acts as a bridge between different departments and levels, facilitating change. The connector's network meets regularly to share experiences and follows a customised development programme.

### Denison Culture Scan

In 2024, a.s.r. conducted the Denison culture scan for the eighth consecutive year. This annual survey measures the success of an organisation in several areas, including drivers of engagement. The results obtained are measured against a global benchmark of more than 1,200 large organisations.

The response rate for this culture scan, the first since a.s.r.'s merger with Aegon NL, was 66% – an average response rate for culture surveys in companies of similar size. The results show mostly above-average to good scores. Employee engagement was at 73; although this was below the 2024 target a.s.r. set of 75 or higher, the score is in the top 30% of the benchmark of participating companies. In line with the proceeding integration with Aegon NL, a.s.r. will gradually increase the target for employee engagement in the coming years, from 75 in 2024 to 80 in 2025 and 85 in 2026.

The score for customer focus was just below the benchmark average, at 46. The results reflect the stage of integration that a.s.r. is currently in and provide points of reference to further strengthen the joint culture.

### Employee Mood Monitor (eMood®)

a.s.r. employees, including contractors, are invited to participate in a weekly pulse survey on job satisfaction, vitality, and productivity. Recurring themes in eMood® include happiness, purpose, and stress. Managers receive a weekly dashboard with their teams' scores, enabling a.s.r. to stay attuned to employee well-being and fostering ongoing dialogues between employees and managers. The response to a.s.r.'s eMood® remained high, with approximately 3,500 (2023: 2,400) participants per week. This represents 50-52% of the population.

Despite the challenges for employees surrounding business unit integrations as a result of the merger, there were no significant declines in sentiment and employee engagement in 2024. With an average score of 7.6 (2023: 7.7), a.s.r. again managed to keep the mood of the organisation at a good level. The scores of the underlying elements are: vitality (7.4), productivity (7.5) and job satisfaction (7.8).

The most important follow-up to eMood® is 'the good conversation' using the dashboards that managers receive weekly. eMood® helps teams to discuss (difficult) issues, support each other or reach better working agreements. In addition to the eMood® dashboard, all managers receive weekly follow-up advice linked to that week's statement, enabling managers to offer practical tools to

Employees who completed the Denison scan (in %)

66

their employees. Finally, eMood® is used as input for (HR) policy, often tailored to the specific phase of merger-integrations and context of the business unit.

## Employee Net Promoter Score

The employee Net Promoter Score (eNPS), the extent to which employees would actively recommend a.s.r. as an employer, is also measured via the eMood®. The eNPS provides a.s.r. with an insight into loyalty to, and the perceived attractiveness of, a.s.r. as an employer. The average eNPS in 2024 was +11 (2023: +40). The eNPS-decline coincided with the employer merger between a.s.r. and Aegon NL as of October 1, 2023, in which the eNPS decreased approximately 30 points instantaneously. This reflected the uncertainty among employees inherent in merging two organisations. Throughout 2024, the eNPS gradually improved as a result of various efforts to provide a warm welcome to the new colleagues from Aegon NL. In addition, the completion of the merger-integrations of an increasing number of business units contributed to a (slow-moving) upward eNPS-trend.

## CLA and social plan

Following the merger of a.s.r. and Aegon NL, a.s.r. initiated discussions with trade unions to draft a new joint collective labour agreement (CLA). At the end of June 2024, a.s.r. and the trade unions FNV Finance, De Unie, and CNV reached an agreement with a term from 1 July 2024 to 1 April 2025. This CLA replaced The Other CLA 2023-2024 and the Aegon Transitional Protocol.

The existing a.s.r. social plan applies for all employees of the new combined organisation from 1 July 2024 for the duration of the integration and for at least three years from the date on which Aegon NL employees started their employment at a.s.r., i.e. from 1 October 2023 to 1 October 2026. For advisory requests submitted before 1 July 2024, the social plans of Aegon NL and a.s.r. are implemented side by side.

## Remuneration

a.s.r.'s Remuneration Policy is based on the principle that the average level of total remuneration is at most around the median of the reference group. Every three years (two years for the MB), an independent consultant performs a market-based comparison of the remuneration benchmark. In line with the Remuneration Policy, the remuneration of a.s.r. employees consists solely of a fixed salary. a.s.r. does not have a company-wide variable remuneration scheme. See section 5.3 for more information on remuneration.

**CLA negotiations: finding the right balance for the organisation, employees, and the trade union.**

One of the responsibilities of a.s.r. is to periodically negotiate with the trade unions to establish a collective labour agreement (CLA) that aligns with the culture of a.s.r. and takes into account what employees find important, but at the same time ensures that a.s.r. remains competitive.

Since 2018, a.s.r. has had its own collective labour agreement (CLA), known as The Other CLA (*De Andere Cao*) . This CLA was created together with the trade unions. The principles and vision of the original version – including self-management and trust – are, according to a.s.r., determinative for the subsequent editions of the CLA. a.s.r. always looks beyond just salary and aims to make sound agreements in areas such as vitality, development, and work-life balance.

Trade unions have their own (national) agenda, which in recent years has been largely focused on wage increases. As a result, the needs for a new CLA can be divergent. a.s.r. then faces the dilemma of how to reach a CLA with (a majority of) the trade unions that aligns with the principles of its own original CLA and considers the interests of employees and the organisation's competitiveness.

A point of consideration is that the union membership rate at a.s.r. is low. This raises the question of how representative the unions' demands are for a.s.r. employees or whether they are more driven by the unions' national agenda. As a result, these demands may be less suitable for an organisation like a.s.r., less aligned with what a.s.r. employees truly value, and what is required for a healthy future of the company.

To gain more clarity on this, a.s.r. has openly communicated about the latest CLA negotiations via its intranet, where employees could respond and frequently did so. This transparency has both advantages and disadvantages. An advantage is that employees can directly see which issues are being considered in the negotiations and how. Another advantage is that the involved parties can gauge the employees' sentiment from the responses and take this into account in subsequent discussions. A disadvantage is that interim communication about the process and mutual proposals without further context can lead to incorrect assumptions (expectations that are too high and/or different) that later result in disappointment. Thus, the creation of the CLA remains a process of weighing up everyone's interests and needs.

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Case

# Smooth integration

# Smooth integration

**'We are all tech savvy, driven, and overly interested in data models'**

**Tom and Jorik have been part of the Data Science & Pricing team for over a year now. This department, which creates data-driven models to analyse competitor and customer information, consists of both former Aegon NL and a.s.r. colleagues. 'Data scientists are all the same type of people. It does not matter where you come from, you understand each other, and that makes working together really easy.'**

**'Working in a larger team also takes some getting used to'**

Tom Blanke (pictured on the left) was one of the eight colleagues working at the Analytics Lab of a.s.r. This team of data scientists and data engineers took on projects for the various business lines. As a result of the merger with Aegon NL, 20 former Aegon NL colleagues have been added to the Analytics Lab, which now operates under the name Data Science & Pricing. Tom was not worried about their arrival beforehand. 'I was mainly very curious about what knowledge and expertise they have and how we can strengthen one another. It never felt like a threat.'

Even now that the former Aegon NL colleagues are here, Tom only sees advantages. 'I am part of a larger team that serves all business lines and thus elevates a.s.r. to a higher level.' One project that Tom is working on with colleagues is building a model for Disability to identify extraordinary claim behaviour to prevent or recover unjustified payments.

Jorik van der Oord (pictured on the right), one of the colleagues who joined from Aegon NL, is also enthusiastic about his new team. 'I think it has to do with the type of people; all in their late twenties to early thirties, tech savvy, driven, and overly interested in data models. Because of this, it does not matter where you come from, you understand each other, and that makes working together really easy. I felt at home very quickly.'

**Expertise**

Since Jorik and the other former Aegon NL colleagues are new to a.s.r., they have been spending quite some time connecting with the various business lines. By now, the business lines are well-informed where to find the Data Science & Pricing team. 'So well, in fact, that we are currently working on multiple assignments at the same time. It is nice to see that there is a demand for our expertise.' Jorik is currently working on a pricing tool for Pensions. 'With this, Pensions can determine the amount of the pension payment based on competitor rates. This is a very important process for the pension organisation. To me, making an impact with my work is valuable, and I am able to realise that through these types of projects.'

For Tom, working in a larger team requires a change in his way of working. 'I like to be aware of every project in detail so that I know what is happening. That is no longer realistic because we are simply working on too many projects.' In the meantime, three new colleagues have also joined the team. Jorik: 'These colleagues do not have an a.s.r. or Aegon background, and that is nice. This way, the team becomes even more mixed, and we continue to build on a shared future.'

**'I felt at home very quickly'**

# 3.3 Informing the investor community

### Market capitalisation
(in € billion)

9.7 — 2023: 9.0

### Free float
(in %)

65 — 2023: 70

### Dividend per share
(in €)

3.12 — 2023: 2.89

### Outstanding shares
(in million)

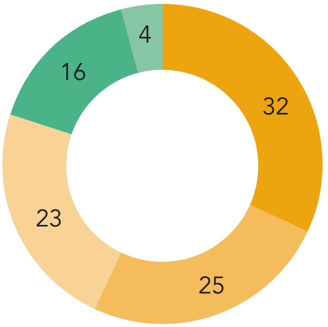
208.9 — 2023: 211.1

### Total capital return
(in € million)

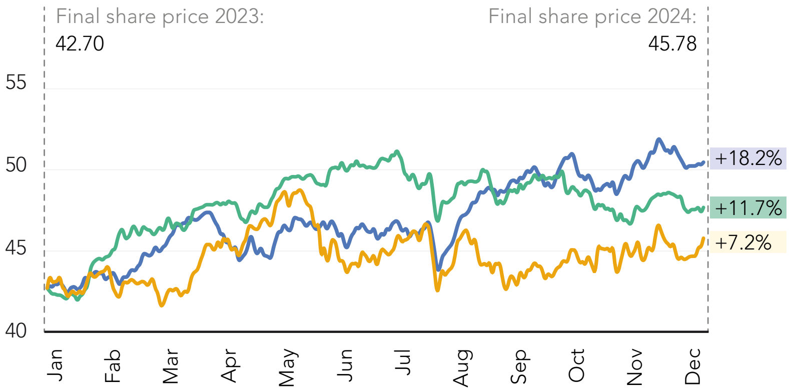
879[1] — 2023: 610

1 Including € 125m share buyback announced on 19 February 2025 (in line with the medium-term targets as presented at the 2024 Capital Markets Day), which will be executed in H1 2025.
2 Development of AEX and SXIP rebased to stock price at beginning of the year.

### Shareholders (by geography)
(in %)




### Development of share price in 2024.[2]
(in €)



a.s.r. aims to be an attractive company for investors by creating value in both the short and long term. It does so by adhering to a disciplined execution of its strategy aimed at delivering a solid performance against an ambitious set of both financial and non-financial targets.

a.s.r. attaches great value to maintaining a strong relationship with the investor community in the broadest sense and adheres to high standards relating to transparent communication and fair disclosure. The aim of a.s.r. is to provide all relevant information which can help investors make well-informed investment decisions. a.s.r. makes every effort to ensure that the information it discloses is accurate, complete and timely.

a.s.r. provides relevant insight into its financial and non-financial performance, the progress it is making with the execution of its strategy and any other relevant developments through various financial and non-financial disclosures. To that end, it regularly updates the markets through press releases, webcasts, conference calls and other forms of communication.

For many years, a.s.r. has been widely recognised for its investor relations for years. In 2024, a.s.r. was awarded with the Most Honoured Company title in the Extel Developed Europe & Emerging EMEA Executive survey. It ranked number 2 in the European insurance industry. This recognition is based on the independent votes of buy and sell-side professionals who assessed C-Suite and IR functions using more than 20 qualitative performance metrics.

## 3.3.1 Developments in 2024

On 27 June 2024, a.s.r. presented its strategy and targets for the 2024-2026 plan period during a Capital Markets Day (CMD) for institutional investors and analysts at the company's head office in Utrecht.

On 21 August, a.s.r. announced it had joined the international Science Based Targets initiative (SBTi). In doing so, a.s.r. was committing to setting science-based emission reduction targets in line with the Paris Agreement.

On 12 September, credit rating agency Standard & Poor's (S&P) affirmed a.s.r.'s ratings and revised the outlook on the credit ratings to positive on expected capital and earnings improvement.

Following a thorough strategic review of Knab's activities, in conjunction with an assessment of the proposal put forward by BAWAG, a.s.r. believes that the future of Knab and the service proposition to its customers is better served by being part of BAWAG. On 1 November, a.s.r. closed the sale of its banking activities (Knab) to BAWAG Group AG (BAWAG). This transaction was announced on 1 February, 2024.

Following the sale, a.s.r. announced on 7 November a share buyback of € 100 million, which was completed on 11 December. This share buyback is in addition to the € 525 million share buyback programme that a.s.r. announced at the CMD.

For more information about a.s.r.'s Policy on fair disclosure and bilateral dialogue, see www.asrnl.com.

## 3.3.2 a.s.r. shares

a.s.r.'s shares have been listed on Euronext Amsterdam since 10 June 2016 (symbol: ASRNL, ISIN: NL0011872643). The amount of outstanding shares of a.s.r. is 208,902,381 ordinary shares, of which Aegon Ltd. holds 29.95%. The free float as defined by Euronext Amsterdam was 65% as at 31 December 2024. Each share has one vote.

a.s.r. is included in various indices, including the AEX ESG Index as well as the MSCI World Index.

### Shareholders

a.s.r. shares are held by an international and diversified shareholder base. By the end of 2024, based on public filings and company information, institutional investors in Europe, the United States and the United Kingdom, represent approximately 24%, 21% and 15% of the outstanding shares respectively. Circa 4% of outstanding shares by year-end 2024 is held by Dutch investors of which a limited number of shares are held by retail investors.

### Major shareholders

Dutch law requires shareholders to report their holdings in Dutch-listed companies to the AFM if it exceeds 3% of total outstanding share capital (and certain higher thresholds). Following the closing of the transaction with Aegon NL on 4 July 2023, Aegon Ltd. became a major a.s.r. shareholder, with almost 30% of outstanding shares. In addition, as at 31 December 2024, Norges Bank Investment Management and Blackrock Inc. had a shareholding in a.s.r. of more than 5%.

### Shares and share price performance

At the end of 2024, the share price stood at € 45.78 (2023: € 42.70). Total shareholder return amounted to 14.5% in 2024 (including dividend reinvestment in a.s.r. shares). The Euronext AEX Index appreciated by 14.6% in 2024, while the STOXX Europe 600 Insurance Index appreciated by 24.6% in 2024.

a.s.r. is actively covered by research analysts. Seventeen sell-side equity analysts cover a.s.r. and have issued a recommendation and a price target on a.s.r., with an average price target of € 53.84 as at year-end 2024. The recommendations comprise of only buy recommendations.

**Shares ASR Nederland N.V.**

| (in numbers) | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Authorised capital | 325,000,000 | 325,000,000 |
| Issued share capital | 211,326,978 | 211,326,978 |
| Own shares held by a.s.r. | 2,424,597 | 178,816 |
| Outstanding shares | 208,902,381 | 211,148,162 |

**Share price performance**

| (in €) | 2024 | 2023 |
|---|---|---|
| Starting price as at 1 January | 42.70 | 44.35 |
| Highest closing price | 48.76 | 44.92 |
| Lowest closing price | 41.60 | 34.45 |
| Closing price as at 31 December | 45.78 | 42.70 |
| Market cap as at 31 December (€ million) | 9,675 | 9,016 |
| Average daily volume shares (numbers) | 419,134 | 623,604 |

### Dividend

a.s.r.'s Dividend policy, offers shareholders a progressive dividend with mid-to-high single digit percentage growth. During the CMD of June 2024, this policy was extended until 2026. The policy includes an interim dividend, which is set at 40% of the total dividend for the previous year and is conditional on achieving adequate financial results and solvency. The operating companies of a.s.r. remit cash to the holding. a.s.r. holds cash at the holding company to cover operating holding costs and hybrid expenses for the next 12 months (rolling forward), and cash to pay dividends.

**Dividend per share**

| (in €) | 2024 | 2023 |
|---|---|---|
| Interim dividend | 1.16 | 1.08 |
| Final dividend | 1.96 | 1.81 |
| **Total dividend** | **3.12** | **2.89** |

Based on its strong financial performance in 2024, a.s.r. proposes to pay a total dividend of € 3.12 per share, which represents a 8% increase compared with the total dividend over 2023 (€ 2.89 per share). The dividend is paid as an interim dividend of € 1.16 per share (in September 2024) and a final dividend of € 1.96 per share. The 8% increase of dividend per share reflects an increase of the total dividend amount by 7% compared to 2023, which is in line with the medium-term target of a mid to high single digit increase, and the € 100 million share buyback following the completion of the sale of Knab, executed in 2024.

Following approval by the AGM on 21 May 2025, the 2024 final dividend will be payable from 28 May 2025. The a.s.r. shares will trade ex-dividend on 23 May 2025.

**Bonds**

| | Nominal value | Coupon | First call date |
|---|---|---|---|
| Fixed to fixed Tier 2 capital securities | € 500 million | 5.125% | 29 September 2025 |
| Perpetual Restricted Tier 1 capital securities | € 500 million | 4.625% | 19 October 2027 |
| Green senior fixed rate notes | € 600 million | 3.625% | 12 December 2028 |
| Fixed to fixed Tier 2 capital securities | € 500 million | 3.375% | 2 May 2029 |
| Perpetual Restricted Tier 1 capital securities | € 500 million | 6.625% | 27 December 2031 |
| Fixed to fixed Tier 2 capital securities | € 1,000 million | 7.000% | 7 December 2033 |

## 3.3.3 Bonds

a.s.r. has six debt instruments outstanding for a total nominal amount of € 3.6 billion: two Restricted Tier 1 (RT1) bonds for € 1,000 million, two Tier 2 bonds for € 500 million each, one Tier 2 bond for € 1.0 billion and one € 600 million green senior bond. In 2024, a.s.r. issued a € 500 million restricted Tier 1 bond, which was oversubscribed by more than three times, with participation from more than 180 international investors demonstrating the widespread support for a.s.r. from institutional fixed-income investors. A € 500 million Tier 2 bond, issued in 2014, was repurchased via a tender offer of more than € 380 million in March 2024. The remainder was redeemed at the call date in September.

## 3.3.4 Ratings

### Credit ratings

a.s.r. is rated by Standard & Poor's (S&P). In 2024, a.s.r. had several meetings and conference calls with the rating agency to discuss relevant developments at a.s.r. and in the Dutch insurance market. This resulted in an update report on a.s.r. on 12 September 2024, which affirmed the ratings and revised the outlook from stable to positive. The positive outlook is based, amongst other, on the assessment of the capital and earnings analysis by S&P, which is regarded as 'excellent', up from 'very strong' based on S&P's view of the capital adequacy in the S&P capital model. The single A rating of ASR Schadeverzekering N.V. (Non-life) and ASR Levensverzekering N.V. (Life) have applied since 29 September 2008 and on Aegon Levensverzekering N.V. (life) since 23 May 2023. The BBB+ rating on the holding entity, ASR Nederland N.V. has applied since 15 May 2014.

More information on a.s.r.'s bonds and ratings can be found at www.asrnl.com.

**Credit ratings**

| Standard & Poor's | Type | Rating | Outlook | Since |
|---|---|---|---|---|
| ASR Nederland N.V. | ICR CCR | BBB+ | Positive | 12 September 2024 |
| ASR Levensverzekering N.V. | ICR / IFSR | A | Positive | 12 September 2024 |
| ASR Schadeverzekering N.V. | ICR / IFSR | A | Positive | 12 September 2024 |
| Aegon Levensverzekering N.V. | ICR / IFSR | A | Positive | 12 September 2024 |
| | | | | |
| Green Senior Bond | | BBB+ | | |
| Tier 2 Bonds | | BBB- | | |
| Tier 1 Bond | | BB+ | | |

## ESG ratings

a.s.r. is rated by various ESG benchmarks & rating agencies. These rating agencies provide a.s.r. with external recognition for sustainability and the realisation of its group targets, including non-financial targets. These agencies also benchmark a.s.r. to its peers.

a.s.r. again performed strongly in the S&P Dow Jones Sustainability Index (DJSI). With a score of 82 points (2023: 79), it remains included in the DJSI World and Europe indices. At Sustainalytics, a.s.r. is the number 4 worldwide amongst insurers.

A dedicated a.s.r. team continuously monitors developments regarding ESG ratings and methodologies as well as the interest from investors in the ESG benchmarks, and uses these insights to further improve and embed sustainability in a.s.r.'s operations.

More information on a.s.r.’s ESG ratings can be found at www.asrnl.com.

**Scores international ESG ratings and benchmarks**

| | Score low | Score high | 2024 | 2023 |
|---|---|---|---|---|
| S&P Dow Jones Sustainability Index[1] | 0 | 100 | 82 / #9[2] | 79 / #8[2] |
| MSCI | CCC | AAA | AA | AA |
| Sustainalytics ESG Risk Rating | 100 | 0 | 11.2 / #4[2] | 9.6 / #2[2] |
| Carbon Disclosure Project | D- | A | B | B |
| ISS ESG | D- | A+ | C+ (prime) | C+ (prime) |
| FTSE4Good | 0 | 5 | 5.0 | 5.0 |
| Bloomberg Gender Equality Index | N/A | N/A | included | included |
| Euronext Sustainable Europe 120 Index[3] | N/A | N/A | included | included |
| Ethibel Excellence Euro Index | N/A | N/A | included | included |
| Fair Insurance Guide (Eerlijke Verzekeringswijzer) | N/A | N/A | #1 | #1 |
| VBDO (once every two years) | N/A | N/A | N/A | #2 |
| VBDO Tax Transparency Benchmark | 0 | 35 | 31 / #14 | 31 / #11-14 |

1 DJSI Europe Index: #5, DJSI World Index: #8
2 Ranking amongst the insurance leaders in ESG worldwide
3 Previously: Euronext Vigeo Eiris (Eurozone 120)

Case

# Capital Markets Day

# Dialogue with investors

**'We show year after year that we do what we promise'**

**On 27 June 2024, a.s.r. organised a Capital Markets Day (CMD). Institutional investors and analysts were briefed on the strategy and new medium-term objectives. Jan Willem Bruintjes, Investor Relations Analyst, stated: 'Even in times of major changes, the support from our shareholders is as strong as ever.'**

**'The dialogue is important for our shareholders in their assessment of a.s.r.'**

The CMD was deliberately held at a.s.r.'s own office. Jan Willem Bruintjes said, 'This way, the participants get a better feel for the company as they visit us 'at home'.' Investors and analysts not only have the opportunity to speak to the Management Board in person, but all directors of the various business units are also available to engage in discussions and answer questions. Jan Willem added, 'This dialogue is important for our shareholders to assess a.s.r.'. Furthermore, during the CMD, a.s.r.'s management has ample opportunity to clearly explain the strategy and objectives. 'Engaging in and maintaining this dialogue is crucial because without capital providers a.s.r. cannot execute its strategy.'

These discussions are mainly about the content, but according to Jan Willem, other matters are discussed as well. 'Prior to the CMD, we organised a dinner at an external location. The atmosphere during such an evening is very informal. This also applies to the contact I have with analysts on a daily basis; we talk about home life, sports, and holidays. Since we work so closely together, it is not surprising that we share personal things alongside business matters.'

Through the merger with Aegon NL, a.s.r. has nearly doubled in size. Additionally, a significant change in the IFRS reporting regulations has recently been implemented. 'Especially during times of such changes, we at Investor Relations benefit from a stable, close relationship. We are always accessible to our shareholders via email and phone. We also ensure that our external publications are tailored to the needs of our target audience, where we try to present our own story as clearly as possible.' According to Jan Willem, this approach is paying off. 'We see that, since the IPO of a.s.r. in 2016, the support from our shareholders has remained consistently strong. And that is quite remarkable.'

This strong support is evident from recent research by Extel. In September 2024, Extel, which conducts independent surveys among investment professionals, published a study in which a.s.r. was ranked second among approximately 35 listed insurers in Europe. Jan Willem calls these scores 'really very good' for a.s.r. 'A large part of our analysts and investors participate in this research, so it provides a good reflection of this group as stakeholders.'

Our own research – a survey conducted by Investor Relations after the CMD in 2021 and again after the CMD in 2024 – confirms Extel's results. Shareholders indicate that they have great confidence in the management team, the strategy, and the capital policy. 'Year after year, we show that we do what we promise. We have now grown significantly and are evolving as a company, but our strategy has not changed much. Good products and the best service for our customers remain central, we maintain our focus on strict financial discipline, and we have a very strong relationship with our shareholders. In the coming years, we will continue to build on this foundation.'

# 3.4 Operating as a trusted company

Instances committed by employees
(in numbers)

2,053 2023: 1,634

Children and young people reached
(in numbers)

14,784 2023: 26,355

Households reached
(in numbers)

1,104 2023: 186

Time invested – Total
(in hours)

13,798 2023: 12,695

Time invested – Financial self reliance
(in hours)

4,926 2023: 5,930

Time invested – Helping by doing
(in hours)

8,873 2023: 6,765

This chapter covers topics that concern a.s.r. as an organisation. These include a.s.r.'s political engagement, role as responsible taxpayer, and Doenkracht.

## 3.4.1 Political engagement

a.s.r. operates in nearly all Dutch insurance markets and aims to maintain cordial and transparent working relationships with stakeholders in the markets in which it operates, public and private.

**a.s.r. governance of engagement efforts**
The coordination of political engagement by a.s.r. and the related outreach to key policymakers and stakeholders is overseen at Management Board level, ensuring that a.s.r.'s stated policies and ambitions are the guiding considerations for such efforts.

**Civil society participation**
In fulfilling its role within civil society and as contributor to the ‘polder model’ - the consultative policymaking process employed in Dutch politics - a.s.r. values a balanced dialogue with national interest groups, grass-roots initiatives, and legislators. According to Article 4.1 of the statutes of incorporation, a.s.r.'s interests are aligned with those of all its stakeholders, including civil society. This alignment drives a.s.r. to pursue its stated ESG goals, whether in collaboration with trade associations and other memberships or through specific a.s.r. initiatives.

On occasion, a.s.r. will independently enter the public debate on matters that are closely linked to the fundamentals of its core markets. For example, in February 2024, Dutch financial press quoted concerns by a.s.r. CEO Jos Baeten, calling for an improvement in the Dutch investor climate. In the summer of 2024, a.s.r. CEO urged via the press for government participation in reaching insurability of growing flooding risks, resulting from climate change.

Another instance took place in August of 2024, when the CEO of a.s.r. reminded the Dutch government that rigid price regulation of rental housing will be self-defeating when it leaves institutional investors without sufficient leeway to pursue the triple goals of profitability, sustainability, and affordability in Dutch rental housing markets.

**Formal exchange of views with authorities**
a.s.r. engages in direct contacts with formal government counterparts such as regulatory bodies, government agencies and policy makers. a.s.r. requires that public affairs, lobbying and political network activities all comply to the highest standards and best practices.

To this end, a.s.r. is a signatory of the Dutch Association for Public Affairs' (*Beroepsvereniging voor Public Affairs* - BVPA) Code of Conduct and the Dutch Insurers Code of Conduct. a.s.r. is registered with the EU transparency registry.

More generally, a.s.r. contributes to the political dialogue on industry standards, compliance and other policy developments via its membership and participation in the various trade associations that reflect a.s.r. strategy and operations.

In 2024, a.s.r. was a member of the following national trade associations and as such represented in their respective EU affiliations:

- Dutch Association of Insurers (*Verbond van Verzekeraars*);
- Dutch Association of Institutional Investors in Real Estate (*Vereniging van Institutionele Beleggers in Vastgoed* - IVBN);
- Dutch Association of Healthcare Insurers (*Zorgverzekeraars Nederland*);
- Dutch Fund and Asset Management Association (DUFAS);
- Association of publicly listed companies at Amsterdam Euronext exchange (VEUO).

a.s.r. participates actively within those organisations in working groups, ad hoc platforms and at board level. This strong participation allows a.s.r. to monitor and enhance the alignment of the positions expressed by associations with the a.s.r.'s long-term strategy. At the same time, memberships of industry associations provide a platform to develop and share industry best practices.

Two Executive Board members of a.s.r. have a chair position within an industry association.

Due to its membership of the Dutch Association of Insurers, a.s.r. is also represented in the Confederation of Netherlands Industry and Employers (VNO-NCW). As the preeminent platform for Dutch employers and trade associations, VNO-NCW is formally assigned eight of 36 seats in the Dutch Social and Economic Council (SER), the deliberative body that provides official advice on social economic issues to the Dutch government and parliament.

**Membership fees to trade associations**
In 2024, the total membership fees to these trade associations amounted to € 5.14 million (2023: € 2.96 million). Fees to these trade associations is based on a percentages of the premiums volume, assets under management and type of stock exchange listing.

- Dutch Association of Insurers (*Verbond van Verzekeraars*): € 4,577,403 (2023: € 2,269,000);
- Dutch Association of Healthcare Insurers (*Zorgverzekeraars Nederland*): € 439,490 (2023: € 601,000);
- IVBN: € 80,000 (2023: € 50,000);
- DUFAS: € 34,498 (2023: € 29,000);
- VEUO: € 9,378 (2023: € 6,958).

In line with its Code of Conduct, a.s.r. does not contribute financially to political parties.

## 3.4.2 Socially responsible taxpayer

a.s.r.'s tax policy supports its ambition to be a financially reliable and stable organisation. And as a member of society, a.s.r. ensures that it pays its fair share of tax. a.s.r. subscribes to the Tax Governance Code developed by the employers' organisation VNO-NCW and aligns with its principles. The tax policy is also aligned with the Dutch Corporate Governance Code. Moreover, the tax policy is underpinned by the broader principles including sustainability, ESG alignment (CSRD/SFRD/EU taxonomy), and adherence to internal codes of conduct and external governance frameworks.

### Tax strategy

a.s.r. aims to be a socially responsible taxpayer by adhering to professional tax compliance practice. a.s.r. does not engage in aggressive tax planning or structures. Business considerations always take precedence and serve as the primary trigger for structuring decisions in general.

a.s.r.'s tax policy is published at asrnl.com. a.s.r.'s tax strategy has been approved and endorsed by the Management Board (MB). The Audit & Risk Committee (A&RC) of the Supervisory Board (SB) supervises the tax policies pursued in line with the Dutch Corporate Governance Code. The tax policy and tax risks are discussed annually in the A&RC.

### Tax control

Group Tax plays a central role in a.s.r.'s tax function and therefore has an important role in embedding the tax strategy in the organisation's day-to-day operations. Group Tax is responsible for the establishment, maintenance and testing of the Tax Control Framework that is part of the broader Risk Management Framework, which in turn sets out the various processes, risks and existing control measures.

### Relationship with the Dutch Tax Authority

a.s.r. maintains an open, transparent, and trust-based relationship with the Dutch Tax Authority, formalised through the Individual Monitoring Plan (IMP) under horizontal monitoring. This cooperative framework ensures that a.s.r. proactively engages with the tax authorities to address complex tax issues and complies with all applicable tax laws and regulations in a timely manner.

### Tax rulings

In some cases, it is desirable for a.s.r. to obtain certainty from the tax authorities in advance concerning the application of (often complex) tax legislation and regulations. In such cases, a.s.r. will ask the tax authorities for a prior tax ruling on a tax position which a.s.r. has adopted. With operations almost exclusively within the Netherlands, no international tax rulings are applicable for a.s.r.

Almost all tax payments are made to the Dutch tax authorities with the exception of payments relating to insurance tax for, in particular, non-life insurance in respect of which the tax jurisdiction is in other countries (Belgium & Germany) and withholding taxes deducted from foreign investment income.

### Pillar 2

a.s.r. has assessed the potential exposure to Pillar 2 and does not expect the impact of the Pillar 2 income taxes to be material. a.s.r. could reduce any top-up tax to zero during the first five years by applying a combination of the domestic group exemption and the Transitional CbCR Safe Harbour rules. a.s.r. will continue to monitor the developments of Pillar 2 legislation, the applicability of the domestic group exemption and the applicability of the CbCR Safe Harbour rules on the group's financial position. For further explanation, please see section 7.6.12.

### Stakeholder engagement

Tax matters are a regular topic in a.s.r.'s stakeholder dialogues. a.s.r. engages both internal and external stakeholders to discuss key tax-related issues, ensuring full understanding of their perspectives and concerns. The outcomes of these dialogues are used to refine a.s.r.'s tax strategy and are reported to the Executive Board. The key outcomes are also included in the Annual Report and provide input for the sustainability reporting.

## 3.4.3 Doenkracht

As a major insurer, a.s.r. aims to contribute to solving societal issues. One of the three themes where a.s.r. can make the most impact is financial self-reliance and inclusion. With Doenkracht, a.s.r. seeks to enhance people's financial self-reliance.

The two main themes of the Doenkracht department are financial self-reliance and helping through action. a.s.r.'s helping through action involves actively supporting social organisations and projects through volunteering and financial contributions.

The Doenkracht programme of a.s.r. regarding financial self-reliance consists of:

- An educational offering aimed at preventing financial problems.
- Projects and programmes focused on alleviating (imminent) financial problems.

a.s.r. achieves this with the help of specialised partners and, where possible, in combination with the expertise of its employees as volunteers.

With the Doenkracht programme, a.s.r. combines the activities of Aegon NL's *Stap vooruit* programme with those of the a.s.r. foundation.

### Developments in 2024

The poverty rate in the cities where a.s.r. is located is relatively high. Both Enschede (4.3% of the population is defined as poor), Groningen (5.3%), Heerlen (4.7%), Leeuwarden (4.3%), and Utrecht (4.1%) are in the highest cohort of municipalities with the most poverty in the Netherlands[1].

**Prevention**
The Amsterdam University of Applied Sciences and Impact House have researched how financial education helps prevent financial problems. The goal is to learn how change occurs and to prove in the long term that the approach works. Therefore a.s.r. has, together with three partners, designed a Theory of Change (ToC) to clarify how education leads to behavioural change and to identify the effective elements in the approach.

**Alleviation**
In the reporting year, four partners in Groningen, Leeuwarden, and Utrecht helped 157 participants alleviate their own financial problems. This part of the Doenkracht programme started on 24 April with the signing of partnership agreements. a.s.r. funds the projects and supports the partners with training and impact coaching. Strengthening the capitals[2] of participants is important in this context. The effects that a.s.r.'s Doenkracht aims to achieve are encapsulated in its Theory of Change.

### Impact in 2024

a.s.r. measures the impact of the Doenkracht programme in various ways to ensure that the initiatives genuinely contribute to financial self-reliance and social engagement.

- Feedback and Evaluations: a.s.r. collects feedback from participants to determine the effectiveness and areas for improvement of programmes.
- Collaboration with Partners: Collaboration with educational and social organisations helps a.s.r. monitor and evaluate the impact, including data collection and impact studies.
- Volunteering: The involvement of a.s.r. employees in volunteering is measured, including the number of hours and the results.
- Educational Material: The use and effectiveness of educational material are evaluated to assess the contribution to the financial education of young people.

By combining these methods, a.s.r. can make adjustments where necessary to enhance its effectiveness.

1 Source: CBS (2024)
2 Capitals include the following: Societal: better supported by society in financial resilience, Social: access to a broader social network for support, Human: more confidence in their basic financial skills, Psychological: more motivation to undertake action, Economical: identifying new work (experience) or starting a course.

Case

# Doenkracht Donderdag

# Proud employees, satisfied social partners

**Across the Netherlands, a total of 518 a.s.r. employees were socially active on Thursday April 18 2024, during Doenkracht Donderdag. Doenkracht Donderdag is an initiative of a.s.r.'s social programme Doenkracht, where employees join forces with local partners to have a positive impact on society.**

'It is incredibly valuable that thanks to a.s.r. we can organise extra activities'

It was the first time that a.s.r. organised this collective volunteer day, inspired by Aegon NL, where Volunteer Friday was a well-known concept. During Doenkracht Donderdag, as many employees as possible roll up their sleeves at various social organisations, primarily in and around the five cities where a.s.r. has an office. Doenkracht Manager Marijke Troost: 'These organisations can really use the help of volunteers. Whether it is cleaning tasks, repair work, or social activities like walking and playing games with residents of a nursing home. Even though the activity only lasts a few hours, the saying 'many hands make light work' certainly applies here.'

## Day camp

One of the social organisations that received help on Doenkracht Donderdag is Sherpa. To give clients a holiday feeling, the care institution for people with disabilities wanted to set up a day camp. Timo Kroeze, coordinator at Sherpa: 'Here they can play games, have coffee, and go on a scavenger hunt. Setting this up just takes a lot of time, and there are fewer and fewer hours available for these kinds of extras in healthcare. That's why we were very happy with the help during Doenkracht Donderdag. A group of a.s.r. employees came to set up a large tent, do some gardening, and assemble picnic tables. There was also someone from a.s.r. who connected with our clients through a professional clown act. It is incredibly valuable that thanks to a.s.r. we can organise these kinds of extra activities.'

## Win-win situation

At a.s.r., many colleagues already participate each year in a social team activity (*Maatschappelijke Team Activiteit* - MTA) with their own team, on a date that suits them. Marijke: 'Doenkracht Donderdag allows employees to work together with colleagues they don't meet on a daily basis. You choose the volunteer work that appeals to you the most. As a result, there is collaboration across locations. Working together with colleagues in this way and contributing to a social cause leads to proud and engaged employees.'

According to Marijke, it is a win-win situation: 'With the participation of all those 518 employees, we can perform over 2,200 hours of social work in one day for Sherpa and 57 other social organisations. At the same time, employees get the chance to get to know each other and the area around their office better.'

## Annual event

Due to its great success, it has been decided to make Doenkracht Donderdag an annual event. Timo is happy about this: 'I am already looking forward to the next edition of Doenkracht Donderdag. Fortunately, thanks to the amiable co-operation with a.s.r. throughout the year, we don't have to wait a year to treat our clients. It is wonderful how often we receive a.s.r. teams here who give our clients a great day as part of a MTA. I hope we can continue to do this for many years to come.'

'Across the Netherlands, a total of 518 a.s.r. employees were socially active on the first Doenkracht Donderdag'

# 4 Business review

# 4.1 ASR Nederland N.V.


| | | |
|---|---|---|
| Premiums and DC volume (in € million) | 10,376 | 2023: 8,825 |
| Operating expenses (in € million) | 1,413 | 2023: 1,107[1] |
| Operating result (in € million) | 1,428 | 2023: 973[1] |
| Operating return on equity (in %) | 13.1 | 2023: 11.6[1] |
| Dividend per share (in €) | 3.12 | 2023: 2.89 |
| Result before tax (in € million) | 1,447 | 2023: 1,278 |
| Solvency II ratio (standard formula, in %) | 198 | 2023: 176 |
| Organic capital creation (in € million) | 1,193 | 2023: 874[1] |

1 This 2023 figure has been restated, see section 7.3.2 for more information.

The a.s.r. group consists of operating and holding companies. The operations of a.s.r. are divided into six operating segments. The Non-life and Life segments perform all insurance activities. Asset Management, Distribution and Services, and Holding and Other perform the other activities.

## 4.1.1 Financial performance

### Premiums and DC volume[1]

Total premium and Defined Contribution (DC) inflow increased by 17.6% to € 10,376 million (2023: € 8,825 million). This increase is driven by strong organic business growth in P&C, Disability and Pensions and the additional six months' contribution from Aegon NL, more than offsetting the lower inflow in Health.

### Operating expenses

The operating expenses increased by € 306 million to € 1,413 million (2023: € 1,107 million) primarily due to the larger cost base including Aegon NL. The internal number of FTE's decreased to 7,374 (2023: 7,994), mainly as a result of the business integration and the sale of Knab.

The expense ratio of P&C and Disability decreased by 0.2%-points to 8.1% (2023: 8.3%) mainly due to synergies realised as a result of the integration of Aegon businesses onto the a.s.r. target operating platforms and strong organic growth.

Expenses for non-ordinary activities, classified as incidental items and therefore not included in operating expenses, increased by € 43 million to € 245 million (2023: € 203 million).This increase primarily relates to integration costs for the business combination a.s.r. and Aegon NL, as well as costs related to the implementation of the partial internal model and pension reform in the Netherlands. This increase is partly offset by lower restructuring costs.

### Operating result

The operating result increased by € 455 million to € 1,428 million (2023: € 973 million) driven by a strong increase in all business segments, reflecting profitable growth and an additional six months' contribution of Aegon NL. Please see section 7.10 for the definition of operating result.

### Operating result per segment

The operating result of the Non-life segment increased by € 91 million to € 469 million. This increase reflects pricing improvements, business growth, less claims due to favourable weather conditions and the addition of Aegon NL. These developments are also reflected in the combined ratio. The combined ratio of Non-life (excluding Health) improved 1.7%-points to 91.9% (2023: 93.5%).

The Life segment operating result increased by € 385 million to € 1,076 million. This is reflected in both the Operating Insurance Service Result (OISR) and Operating Investment and Finance Result (OIFR), mainly driven by the additional six months' contribution of Aegon NL and a positive impact from higher excess returns.

The operating result of the Asset Management segment increased by € 21 million to € 100 million, mainly driven by the additional six months' contribution of Aegon NL's mortgage business.

The operating result of the Distribution and Services segment increased by € 17 million to € 50 million mainly driven by business growth and the additional six months' contribution of Aegon NL entities.

The Holding & Other segment (including eliminations) operating result decreased by € 61 million to € -268 million, mainly due to increased interest charges (mostly related to the green senior bond, issued in December 2023 and the perpetual Restricted Tier 1 security, issued in March 2024), higher indirect costs and the negative impact from the inclusion of business activities that were previously labelled as a start-up.

### Result before tax

The result before tax increased by € 169 million to € 1,447 million (2023: € 1,278 million) primarily as a result of revaluation effects on the investment portfolio, due to decreasing swap rates. As the operating result includes normalised investment returns, this revaluation impact is part of the investment and finance result related incidental item amounting to € 173 million (2023: € 611 million). This was in addition to the increase of the operating result of € 455 million. 2023 was impacted by the provisioning related to the agreement with claim organisations on the unit-linked life insurance transparency file.

The discontinued operations reflect the net result of the Banking segment (Knab), an impairment on intangible assets and the result of the sale of Knab, in total amounting to € -121 million.

The IFRS result attributable to holders of equity instruments amounted to € 946 million (2023: € 1,086 million), with an effective tax rate of 26.5% (2023: 21.5%).

### Operating return on equity

The operating return on equity increased by 1.5%-points to 13.1% (2023: 11.6%), meeting the target of >12% and reflecting stronger growth of the operating result compared to growth in equity.

### Solvency II ratio and organic capital creation (OCC)

The Solvency II ratio increased to 198% (31 December, 2023: 176%). This reflects a strong contribution from the OCC (19%-points) and the sale of Knab (17%-points[2]), and more than offsets the impact of capital distributions (-12%-points) and market and operational developments (-2%-points).

OCC increased by € 319 million to € 1,193 million (2023: € 874 million), primarily driven by the additional six months' contribution from Aegon NL, growth of the business, realisation of cost synergies and impact from re-risking of the investment portfolio.

1 'Premiums and DC volume' is equal to the premiums invoiced plus the customer funds deposited by the insured DC-products and the IORP-products which, by definition, are not premiums.
2 Based on eligible own funds and required capital figures as at 30 June 2024.

## Dividend and capital distribution

a.s.r. proposes a final dividend for 2024 of € 1.96 per share, bringing the total dividend (including interim dividend of € 1.16 per share) to € 3.12 per share, an 8.0% increase versus 2023 (€ 2.89 per share). The 8.0% increase of dividend per share reflects an increase of the total dividend amount by 7.0% compared to 2023, which is in line with the medium-term target of a mid to high single digit increase, and the € 100 million share buyback following the completion of the sale of Knab, executed in 2024.

The total capital distributions will amount to € 754 million and consists of dividend (€ 654 million) and a share buyback (€ 100 million). The total dividend amount increased by 7.0% compared to 2023, which is in line with the medium-term target of a mid to high single digit increase. The share buyback refers to the € 100 million share buyback following the completion of the sale of Knab, executed in 2024. The share buyback of € 125 million announced on 19 February 2025 (in line with the medium-term targets as presented at the 2024 Capital Markets Day) will be executed in the first half of 2025 and deducted from HY 2025 Solvency II ratio.

# 4.2 Non-life

| Premiums received (in € million) | Operating expenses (in € million) | Operating result (in € million) | Result before tax (in € million) | Combined ratio (P&C and Disability, in %) |
|---|---|---|---|---|
| 5,458 | 394 | 469 | 487 | 91.9 |
| 2023: 5,375 | 2023: 355[1] | 2023: 378[1] | 2023: 271[1] | 2023: 93.5 |

P&C brands

a.s.r. · CORINS (een merk van a.s.r.)

Disability brands

a.s.r. · Loyalis (een merk van a.s.r.)

Health brand

a.s.r.

1 This 2023 figure has been restated, see section 7.3.2 for more information.

The Non-life segment consists of non-life insurance entities and their subsidiaries. These non-life insurance entities offer non-life insurance contracts such as disability insurance, property and casualty insurance and health insurance.

## 4.2.1 Financial performance

### Premiums received

Premiums increased by € 84 million to € 5,458 million, reflecting solid organic growth in P&C and Disability and the additional six months' contribution from Aegon NL, partly offset by a decline in Health. The organic growth in P&C and Disability amounted to 5.1%, at the upper end of the 3-5% target range. In P&C, organic growth was driven by price increases to mitigate claims inflation as well as volume growth. In Disability, organic growth reflects higher premiums due to link with higher wages as well as price increases. In Health, premiums received decreased by 19% due to a decline of 175 thousand customers in the 2024 policy renewal season. The 2025 policy renewal season resulted in a net growth of the customer base of 70 thousand customers.

### Operating expenses

Operating expenses increased by € 39 million to € 394 million, mainly driven by the addition of Aegon NL as well as organic growth in P&C and Disability. The expense ratio of the segment, excluding Health, decreased by 0.2%-points to 8.1%, which reflects the realisation of cost synergies.

### Operating result

The operating result of the Non-life segment increased by € 91 million to € 469 million. This increase reflects pricing improvements, business growth, favourable weather conditions and the addition of Aegon NL.

The 2024 P&C result benefited from the absence of weather-related calamities, in 2023 the impact of these events was also limited. In addition, large claims were at a lower level compared to last year. Profitability improved as the portfolio is gradually reflecting the premium increases that were introduced over the past 12 months across our retail and commercial portfolios. In Disability, the result for 2024 has improved due to growth of the portfolio and improved pricing. The 2023 Disability result was negatively impacted by one-off strengthening of provisions in Group disability due to alignment of non-economic assumptions between sub portfolios. In Health the operating result decreased in comparison to 2023 due to the decline of the portfolio. The operating investment and finance result within the Non-life segment decreased by € 12 million to € 143 million.

### Combined ratio

The combined ratio for the segment excluding Health improved by 1.7%-point to 91.9%, at the lower end of the target range of 92-94%. This is mostly related to favourable developments in P&C.

In P&C, the combined ratio decreased to 90.7% (2023: 93.6%) which is a result of a lower level of large claims, premium increases that gradually become applicable to a greater share of the portfolio as well as the absence of weather-related calamities versus the low level in 2023. In Disability, the combined ratio improved by 0.5%-point to 93.0%, partly due to one-off strengthening of provisions in 2023 but also due to improved pricing, mainly related to group disability.

The combined ratio of Health increased by 0.3%-points to 99.1% which reflects the deterioration of the average claims profile related to switching customers and the declining customer base in 2024.

### Result before tax

Result before tax increased by € 216 million to € 487 million, reflecting a higher operating result as well as a positive impact from incidental items. The investment related incidentals amounted to € 48 million in 2024 (2023: € 29 million), related to positive revaluations following a decrease of swap rates in 2024. Non-investment related incidental items amounted to € -31 million (2023: € -136 million), primarily reflecting the impact of hedging for pre-recognition interest rate movements and restructuring provisions.

## 4.2.2 P&C

a.s.r. offers P&C products for the retail and commercial markets under the brand a.s.r. and the label '*Ik kies zelf van a.s.r.*'. In 2024, Aegon NL's portfolio was migrated to the a.s.r. P&C administration to create a single claims organisation in which customers and intermediaries of Aegon NL are retained as much as possible (within target). The Aegon NL's portfolio is well diversified (proportionally more fire then motor). The a.s.r. brand focuses on the retail and commercial markets through advisors and mandated brokers. '*Ik kies zelf van a.s.r.*' offers direct online distribution to individuals and travel and recreational insurance via travel agents. Additionally, the managing general agent Corins operates as an independent entity on the Dutch co-insurance market. Corins represents a panel of reputable international insurers and reinsurers, underwriting commercial and industrial risks.

In 2023, a.s.r. invested in more sustainable (repairs) insurance with two new partnerships. a.s.r. holds a majority interest in Soople and a minority interest in Fixxer. In 2024, a.s.r. expanded the partnership with Fixxer and opened an extra location for Soople in Vianen. Soople helps its customers by taking on full day-to-day maintenance of properties, including the initial contact with residents, planning, implementation and invoicing. By becoming co-owner of Soople, a.s.r. can conduct sustainable repairs for customers and ultimately add to this service sustainable maintenance and other sustainable services.

Fixxer is a new company set up in collaboration with Belfius Insurance and focuses on the management and further development of a digital service platform for claims of customers.

The combined ratio decreased to 90.7% (2023: 93.6%) primarily driven by the impact of a lower level of weather-related calamities, cost synergies of the Aegon NL portfolio, less major damages and a positive impact on the discounting of incurred claims. Premium increases were implemented in the retail portfolio and in the commercial portfolio.

### Combined ratio P&C

(in %)


## Market

The Dutch P&C market is fairly consolidated. The three top P&C insurers have a combined market share of 60.6%[1] (2022: 61.6%), a.s.r. ranks among the top three Property & Casualty (P&C) insurers in the Netherlands, with a market share of 14.7% in 2023 (2022: 14.6%), measured by GWP.

Consolidation has also occurred among the distribution partners and mandated brokers. Inflation has had a big impact on the P&C market in the last three years. Higher claims and expenses led to higher premiums.

Per 1 July 2024 the new Dutch law (*Wijzigingsbesluit financiële markten 2023 actieve provisietransparantie bij schadeverzekeringen*) for retail P&C insurance came into effect. Advisors will therefore be required to actively inform customers of the average amount of commission per product and per person. This could provide a stimulus for change in the distribution landscape.

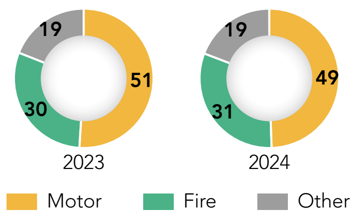
## Products

a.s.r. offers a wide range of P&C products in the retail and commercial markets. This includes products in the following categories:

- Motor policies provide third party liability coverage for motor vehicles and commercial fleets, property damage and physical injury as well as coverage against theft, fire and collision damage.
- Fire policies provide cover against various property risks, including fire, flood, storms and burglary. Private cover is provided on both a single-risk and a multi-risk basis, with multi-risk policies providing cover against loss of, or damage to, dwellings and damage to personal goods.
- Other P&C insurance products such as liability, legal aid, travel and recreation, pet insurance and transport insurance.

### Product share P&C (measured by GWP)

(in %)




## Strategy and achievements

a.s.r. has a strong track record of being a profitable P&C insurer, with a good customer satisfaction score. Long-term growth is typically driven by the increase of the gross domestic product (GDP). a.s.r. is strongly represented among advisors, mandated brokers and in the co-insurance market, via Corins. In the direct channel, a.s.r.'s revenue ('*Ik kies zelf van a.s.r.*') is stable and profitable.

Simplifying and modernising the IT landscape is an important part of the strategy. This enables further digitalisation of the chain, improvement of services to customers and advisors, and cost reduction. Through further digitalisation/AI, the personal online environment My a.s.r. (*Mijn a.s.r.*) for customers has been expanded and a few activities are digitalised (such as speech to text and document handler).

The NPS-c measures customers satisfaction during contact moments. The 2024 NPS-c score of 39 is slightly lower compared to last year (2023: 41), this is partially due to the integration of Aegon NL.

### NPS-c P&C

(score: -100 to 100)


## Outlook for 2025

The portfolio of Aegon NL is migrated to the a.s.r. P&C administration to create a single claims organisation in which customers and intermediaries of Aegon NL are retained as much as possible (within target). The decommissioning of the Aegon NL platform will be finished at the beginning of 2025.

a.s.r. expects further growth of the P&C portfolio, by 3-5% per annum, with growth opportunities primarily in the commercial market. Inflation is continuously monitored in relation to the claims and pricing of the products.

In order to strengthen its position in the commercial market, a.s.r. will improve and simplify the business proposition. Additional measures will be implemented towards further digitalisation/AI of the chain in order to improve a.s.r.'s customer service. '*Mijn a.s.r.*', will be expanded, and further digitalisation/AI of the claims handling process is planned.

1 Source: Market shares DNB (2023), market shares 2024 are not available yet. The 2022 figure has been adjusted to include Aegon NL.

## 4.2.3 Disability

a.s.r. is the leading insurer in the disability market and it is focusing on organic growth. It has an extensive range of products and services for sustainable employability and preventing and reducing absenteeism.

The combined ratio is 0.5% better than FY 2023 mainly due to better performance of the collective portfolio and significant growth from the merger of the Aegon portfolio alongside organic growth. As the Insurance Contract Revenue grows with the increased operating result, the COR decreases slightly.

**Combined ratio Disability**

(in %)


### Market

Distribution of disability (income) insurance products takes place mainly through insurance advisors. With the brands a.s.r. and Loyalis, a.s.r. is well positioned in the distribution channel serving self-employed individuals, SMEs, corporates and (semi) public sectors. a.s.r. is the market leader with a market share of 39.8% in 2023 (2022: 39.4%[1]) in terms of the gross written premiums (GWP). The income insurance market grew slightly in size to € 4.65 billion[2].

### Products

a.s.r.'s income protection insurance business offers various products divided into the following business lines:

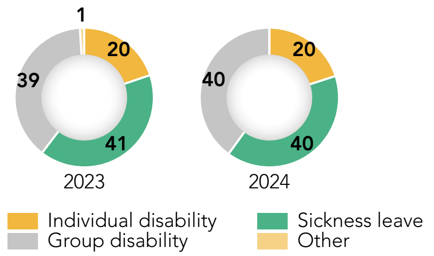
- Individual disability:
  - Products for self-employed individuals to protect against loss of income in the event of illness or disability until retirement age.
  - Products for employees to protect payment of fixed expenses and against loss of income above the maximum daily wage due to illness and disability.
- Sickness leave:
  - Products to protect employers during obligatory continued payment of wages for employees absent for up to two years.
- Group disability:
  - Products for employers to protect against the financial impact of self-insurance status for continued payment of employees absent for more than two and up to 12 years.
  - Products for employees to protect against loss of income in the event of (partial) disability, in accordance with the rules and guidelines of the Work and Income according to Labour Capacity Act (*Wet Werk en Inkomen naar Arbeidsvermogen* - WIA).

a.s.r. provides a wide range of prevention and reintegration services for customers of both a.s.r. and Loyalis. a.s.r.'s customers face societal developments that lead to high workloads and the need to keep themselves and their employees employable and vital. With its services, courses, training programmes and a.s.r. Vitality, a.s.r. helps business owners and employers to keep themselves and their staff employable in the present as well as in the long term. a.s.r. believes that, next to quality insurance products, this focus on and attention for employability is important on an individual level as well as for employers and society as a whole.

a.s.r. adapts its products and services to changes in the social security system and monitors political developments so that employers can focus on keeping their employees employable and meeting government requirements.

**Product share Disability**

(in %)




### Strategy and achievements

a.s.r. aims to keep all its Disability customers employable and insured and strives to serve customers with best-in-class insurance products, prevention and reintegration services, and an excellent level of service. Customers (self-employed individuals and employers) have a need to stay employable and to retain their employees. However, if that is not possible for a certain period, they have the desire to be assured of an income. Through a.s.r.'s prevention and reintegration services, a.s.r. helps its customers to ensure optimal employability for themselves and their employees. This helps reducing absenteeism among customers and to control the cost of claims, keeping risks affordable and insurable.

a.s.r. focuses on further improving its service by digitalising customer processes, reducing paper flows, thereby offering convenience and personalised customer service. Examples include the 'Services Store' (*Dienstenwinkel*) with prevention and reintegration services, further development of '*Mijn a.s.r.*' and the integration of a.s.r.'s back-office with salary systems for uniform and user-friendly participant administration and links with Health & Safety Service agents.

1 The 2022 figure has been adjusted to include Aegon NL.
2 Source: Market shares DNB (2023). This does not include foreign providers licensed for the Dutch insurance market. 2024 market shares are not available yet. Based on the market survey of Baken adviesgroep, the market share of non-Dutch based insurers amounts to approximately 3%.

In 2024, the Aegon NL income insurance portfolio was integrated within the a.s.r. organisation. The former Aegon NL clients can therefore now benefit from digitalised processes and integration with salary systems. They can also benefit from the prevention and reintegration services that are offered to all a.s.r. clients, including the former Aegon NL clients.

In 2024, the preparations to make a.s.r. Vitality available to all insured workers and self-employed individuals in a.s.r.'s Disability insurance books were completed. In doing this, a.s.r. emphasised the importance of its vitality programme in enhancing the employability of its customers.

In addition to a.s.r.'s professionalism and the skills of its employees, a.s.r.'s service is characterised by speed, quality and a personal approach. a.s.r. aims to build long-term relationships with its customers and insurance advisors. Customer appreciation is a key performance indicator, which is measured, through an NPS-c, among other methods.

The NPS-c measures customers satisfaction during contact moments, see the results in the graph.

a.s.r. is satisfied with the stable high level of customer satisfaction, especially in the view of the integration of the former Aegon portfolio and the effort this required from the internal organisation.

**NPS-c Disability**

(score: -100 to 100)


## Outlook for 2025

In 2024, the Dutch government organisation Employee Insurance Agency (*Uitvoeringsinstituut Werknemersverzekeringen* - UWV) was faced with considerable operational challenges. This could impact the way politicians look at the social security system, although it is difficult to predict if and how this might happen. As a.s.r. is the leading insurer in the Disability market, it provides ideas and options to lessen UWV's workload, whilst maintaining a fair and high-quality social security system. a.s.r. keeps track of developments to understand their potential impact on operations and business, ensuring timely responses.

For the next years a.s.r. expects further revenue growth (of between 3 to 5%) of the portfolio by serving customers with best-in-class products and customer service. Uncertain factors include the impact of economic and geopolitical developments on inflation, interest rates, wage development and the economy. a.s.r. continues to focus on the ecosystem of long-term employability, with the aim of continued market leadership. It does this by leveraging its professionalism, knowledge of the social security market, and prevention and reintegration services, whilst offering excellent service to customers, advisors and intermediaries and pursuing further value chain integration.

# 4.2.4 Health

In 2024, a.s.r. was the sixth largest provider of health insurance in the Netherlands, based on the number of customers, with a market share of 3.5%[1] (2023: 4.3%). The four largest insurers had a joint market share of 85% (2023: 84%). a.s.r. offered health insurance under the brand a.s.r. and the label '*Ik kies zelf van a.s.r.*'.

The combined ratio of Health remained approximately stable at 99.1% (2023: 98.9%).

**Combined ratio Health**

(in %)


## Markets

Two types of products are offered on the Dutch health insurance market: basic cover and supplementary cover. In the highly regulated healthcare market, all Dutch citizens are required to obtain basic health insurance based on an annual contract. The government determines the content of the basic cover, but the insurer can introduce certain variations to differentiate their products. Variation can be introduced in how claims are processed and the number of contracted medical providers whose treatment is eligible for cover.

Insurers are obliged to accept anyone who is legally required to obtain basic health cover as a policyholder. A state-managed risk equalisation system protects an insurer in case its customer base typically shows behaviour that is detrimental to its health situation, leading to higher costs for the insurer, and therefore balances risks across the industry. The compensation paid to insurers depends on the anticipated costs, based on the characteristics of their customer base. This risk equalisation system is constantly being adjusted.

In 2024, the number of policyholders that switched to another health insurer was the second highest since the introduction of the Health Insurance Act in 2006. The highest percentage was in 2023, when 8.5% switched; in 2024, 7.4% switched health insurer. Unlike basic health insurance, supplementary health cover is not compulsory. The number of insured people who choose supplementary insurance continues to decline. In 2024, 81.5% of policyholders on the Dutch market opted for supplementary health insurance (2023: 82.5%). Within a.s.r.,

1 Source: Vektis Zorgthermometer (2024)

the number of policyholders opting for supplementary health cover remained stable 96.2% in 2024 (2023: 96.3%).

## Products

The types of health cover offered in 2024 under the a.s.r. brand and the label *'Ik kies zelf van a.s.r.'* were as follows:

- Basic insurance with a broad coverage of medical costs, as prescribed annually by the government. a.s.r. offers three types of basic health cover:
  - Contracted care policy, in which the insurer remunerates costs directly to contracted care providers.
  - Non-contracted care policy, in which the customer is reimbursed for medical care payments, including for treatment from non-contracted care providers.
  - A combination of the two, applied through a combination of both policies.
- Supplementary health insurance to cover specific risks not included under basic health insurance, such as the costs of dental treatment, physiotherapy, orthodontic treatment and medical support abroad.

The most popular basic health cover on the Dutch market is the contracted care policy[1]. At year-end 2024, 78% of total policyholders applied for contracted care policy.

## Strategy and achievements

In 2024, the strategic direction of a.s.r. health was confirmed and the multi-year strategy was further completed in response to developments in the market and society, to provide future-proof healthcare, i.e. cover that is and will remain efficient, affordable and accessible. Furthermore, with the current strategic direction a.s.r. aims to maintain a stable customer base, and to refrain from further growth.

Regarding themes within CSRD related to healthcare purchasing, a.s.r. collaborates with other healthcare providers via the Dutch Association of Healthcare Insurers (*Zorgverzekeraars Nederland*). This way, a.s.r. limits the administrative burden on the healthcare field as much as possible, for this report but also for subsequent years.

1 Source: Vektis Zorgthermometer (2024)

a.s.r. health has developed various initiatives to promote future-proof health care, partly by encouraging policyholders to maintain a healthy lifestyle. During 2024, the 'Take care of yourself' app (*Zorg voor jezelf app*) has been developed and was launched on January 1st, 2025. With the app, a.s.r. provides an online doctor, a dietician, a mental coach, and healthcare programmes that could contribute to a healthy lifestyle suitable for each individual.

The NPS-c measures customers satisfaction during contact moments, see the results in the graph.

### NPS-c Health

(score: -100 to 100)


With an NPS-c of 42 in 2024 (2023: 35), customer satisfaction within Health improved. The improvement was a result of the change management with continuous focus on improving customer value, including digitalisation initiatives and the use of AI to enlarge customer convenience and satisfaction.

Customer-driven service remains a key element of a.s.r.'s strategy and is thus constantly being improved. a.s.r. Health has made great progress in digitalisation and the use of AI with the digitalisation strategy. a.s.r. Health was the first within a.s.r. to implement a Gen AI driven application called 'Speech 2 Text', which transfers phone conversations into written text. Furthermore, a.s.r. Health is also working on a language-help robot (Lingo), a quality measurement robot (Coach), and a Chat-in-app function.

## Outlook for 2025

a.s.r. expects customers to remain price-sensitive in 2025 due to the high level of inflation, which persisted throughout 2024. As a result, premiums will again be decisive in the choices made by customers during the premium review season.

In 2025, a.s.r. will continue to take steps to keep health care future-proof in the form of continued accessibility, appropriateness and sustainability.

Case

# From complaint to satisfied customer

# From complaint to satisfied customer

**'Loyalis ultimately provided good input'**

**Years ago, Wouter Walraven took out a disability insurance policy with a.s.r. through his employer. 'It did not cost much, and it gave me peace of mind. But when I needed a payout, my peace of mind quickly disappeared.' Due to a backlog at Loyalis, he heard nothing back for a long time.**

'As a contract manager at the municipality of Tilburg, I suffered a burnout. I gradually built up my return to work, and eventually, in my third year of illness – this was last year – I worked 20 hours a week.' During that time, his wife filed for divorce, and it was uncertain whether Wouter could get a mortgage on his single income so he could continue to live in the house. 'Then it occurred to me that perhaps it would be possible to get the desired mortgage with a supplement from the disability insurance.'

So, he submitted a request for a payout. A long time passed without a response. 'I picked up the phone to Loyalis to file a complaint. I was promptly put on hold, and during those few minutes, I sent my complaint via the website. But that turned out to be premature, because the Loyalis employee wanted to solve the case immediately.

Within a few days, Loyalis contacted Wouter, first apologising for the long delay. Loyalis was dealing with a large backlog, resulting in long response times. 'It was nice to hear that, of course, but when you have to rely on your disability insurance, you are by definition in a vulnerable position, so a processing time of several months then really is too long.'

Wim Vliex, senior manager at Loyalis, agrees. 'Of course, we want to help all our customers well, knowing that they often call on us in difficult circumstances. A temporarily high workload presents us with a dilemma. Employees then look at which customer questions need to be addressed with priority. This gentleman's case was one of them, because his call made it clear how dire his situation was.'

As a result, Wouter looks back positively on the approach. 'First of all, I needed to know quickly what payout I was entitled to at that moment, which they managed. Secondly, I needed clarity for the long term. Loyalis also worked with me on this, as they were willing to issue a written commitment for the future to the mortgage lender.'

Ultimately, the divorce took so long that Wouter was only able to apply for the mortgage very recently. 'In the meantime, I started working under a new contract in a different position at the council and am now fully fit for work again. I still receive a payout from Loyalis due to the difference in my salary then and now. Together with my current income, I manage. This has brought a very difficult period for me to a close, fortunately.'

**'You are by definition in a vulnerable position, so a processing time of several months then really is too long'**

# 4.3 Life

Premiums received and DC inflow
(in € million)
4,937
2023: 3,530

Pension DC inflow
(in € million)
2,768
2023: 2,070

Pension buy-out
(in € million)
69
2023: 0

Operating result
(in € million)
1,076
2023: 691[1]

Operating expenses
(in € million)
467
2023: 401

Result before tax
(in € million)
1,151
2023: 969[1]

Pensions brands

a.s.r. AEGON

Funeral brand

a.s.r.

Individual life brands

a.s.r. AEGON

1 This 2023 figure has been restated, see section 7.3.2 for more information.

The Life segment comprises the life insurance entities and their subsidiaries. The life insurance entities offer financial products such as life insurance contracts and life insurance contracts on behalf of policyholders. The Life segment also includes ASR Premiepensioeninstelling N.V. (a.s.r. IORP) and Aegon Cappital B.V. (Aegon IORP) which offer investment contracts to policyholders that bear no insurance risk and for which the actual return on investments allocated to the contract is passed on to the policyholder. Furthermore, ASR Vooruit B.V., the investment firm that performs activities related to private investing for customers, is included.

## 4.3.1 Financial performance

### Premiums and DC volume[1]

Premium and DC inflow in the Life segment increased by 40% to € 4.9 billion (2023: € 3.5 billion) driven by the additional six months' contribution of Aegon NL and growth in pension DC and annuities.

Pension DC inflow increased to € 2.8 billion (2023: € 2.1 billion). The annuity inflow increased to € 581 million. Both increases are mostly related to the additional six months' contribution of Aegon NL and organic growth.

Pension buy-outs amounted to € 69 million Assets under Management (AuM) in 2024. The announced buy-out transaction with the Pension fund for Dentists and Dental-specialists (*Pensioenfonds Tandartsen en Tandarts-specialisten* - SPT) on 19 December 2024 of € 1.6 billion AuM is not yet included in this figure. The transaction is subject to the approval of the Dutch Central Bank (DNB), which is expected in the first half of 2025. The realised inflow and progress in pension buy-outs brings a.s.r. well on track to deliver on the growth targets in the Pension business.

AuM of Pension DC increased to € 26.7 billion (31 December 2023: € 21.9 billion), driven by growth in the number of participants, net inflow and positive market revaluations. The number of active participants in pension DC increased by 6% to over 552 thousand (2023: 521 thousand) driven by commercial success of the different DC propositions (including IORP).

### Operating expenses

Operating expenses increased by € 66 million to € 467 million (2023: € 401 million). The increase primarily relates to the additional six months' contribution of Aegon NL and IT project expenses in Pensions.

### Operating result

The operating result increased by € 385 million to € 1,076 million (2023: € 691 million) primarily driven by the additional six months' contribution of Aegon NL.

The Operating Insurance Service Result (OISR) including other result increased by € 160 million to € 442 million, mainly driven by the additional six months' contribution of the Aegon NL portfolio. The Operating Investment and Finance Result (OIFR) increased by € 225 million to € 634 million mainly driven by the additional six months' contribution of Aegon NL and a higher investment margin. The investment margin was positively impacted by re-risking initiatives, favourable spread developments and higher equity and real estate valuations.

### Result before tax

The IFRS result before tax increased to € 1.151 million (2023: € 969 million) due to the increase of the operating result, partly offset by incidental items. Investment related incidental items amounted to € -15 million, in 2023 (€ 510 million) these items were impacted by market developments. Non-investment related incidental items amounted to € 90 million (2023: € -232 million) mainly due to changes in future services driven by non-economic assumption updates. 2023 was impacted by the provisioning related to the agreement with claim organisations on the unit-linked life insurance transparency file.

## 4.3.2 Pensions

a.s.r. is an important player in the changing Dutch pension market, well-positioned to capture the opportunities from the market on the back of new pension legislation. The portfolio consists of Defined benefit (DB) as well as Defined contribution (DC) schemes, with an overall market share of 32%. The total customer base consists of some 66 thousand schemes with 2.4 million participants.

a.s.r. offers a full range of pension products, including various DC options for employers and both fixed and variable pension products for employees at retirement. For employers with DB schemes, a.s.r. provides the option to purchase indexations of these rights. Additionally, for pension funds that prefer not to transfer their accrued rights to the new system under the Future Pensions Act (*Wet toekomst pensioenen* - WTP) but wish to transfer them to an insurer, a.s.r. offers a pension buy-out product.

Distribution of pensions takes place via independent advisors. a.s.r. maintains an important relationship with the advisory channel.

A large number of customers is served by the two Institutions for Occupational Retirement Provision (IORP): ASR Premiepensioeninstelling N.V. and Aegon Cappital B.V. These two IORPs are separate legal entities and are merged per 1 January 2025.

### Market

Since the WTP came into effect on 1 July 2023, the pensions market is in full swing. The main purpose of this act is to enable all pensions to become contribution-based with individual pension capitals. Communications and advice on customer options and choices form important parts of the WTP.

All existing contracts must be adapted to this act before 1 January 2028. New contracts will be subject to the new regulations immediately. Consequently, all DB schemes will be converted into DC schemes in the coming years, however existing DB claims will remain in place.

1 'Premiums and DC volume' is equal to the premiums invoiced plus the customer funds deposited by the insured DC-products and the IORP-products which, by definition, are not premiums.

In order to prepare for these changes, a.s.r. has developed a new administration system for all its DC products, with the aim of further digitalisation of communications and guidance on choices, while managing these products in a cost-efficient way. Customers expect to be able to arrange their financial affairs themselves, online, and a.s.r. aims to facilitate this. Together with TKP, a.s.r. also works on integrating the administrations of the two DB portfolios of a.s.r. and Aegon, resulting in an efficient platform for DB schemes in the future.

### Strategy and achievements

With a strong market position and a wide range of pension solutions, a.s.r. leverages substantial scale and skill benefits. Such as its extensive experience in participant activation and option guidance, which are crucial factors in the transition to the Future New Pension Act (*Wet toekomst pensioenen* - WTP). Furthermore, a.s.r. is well positioned and ready to capture the opportunities that arise from the market for buy-outs of pension funds.

The current pensions strategy consists of five focus points:

- Customer: a.s.r.'s customers, employers and their employees receive uniform customer service and support. Whilst implementing new legislation, transformations, and integration work, a.s.r.'s primary focus remains on the customer.
- Transformation: a.s.r. is creating a scalable pension company and building a joint culture that puts the participant at the centre. Additionally, a.s.r. is taking the first steps in the use of (generative) AI.
- Sustainable value creation: a.s.r. creates value for customers, shareholders, employees, and society. a.s.r. aims for sustainable returns.
- Partners: a.s.r. collaborates with its partners with a long-term focus, developing, training, and innovating to transform pensions together.
- In Control: a.s.r. complies with all current legislation and regulations at all times and is in control of performance and processes.

To effectively manage the major transformation projects within a.s.r. pension, a transformation board has been established.

Additionally, Plexus, the future-proof IT solution for Pensions, went live for new business at the end of 2023. At the beginning of 2024, the Employees' Pension product was successfully migrated to the upgraded landscape. In 2024, a.s.r. successfully converted the first 1,000 schemes to a Future Pensions Act-proof scheme. In 2025, work will continue on optimising the landscape and the underlying customer processes. The remaining migrations within the DC proposition will follow to Plexus.

a.s.r. has confirmed the first buy-out, in which a pension fund transfers its assets and liabilities to a.s.r. a.s.r. recently announced the second buy-out of approximately € 1.6 billion which is subject to the approval of the DNB. The transfer of both pension funds will increase the assets and liabilities of a.s.r. by almost € 1.7 billion. Next to these realised transfers, a.s.r. is well positioned for further buy-outs.

The NPS-c measures customers' satisfaction during contact moments. The 2024 NPS-c result remained stable at 61 (2023: 62).

**NPS-c Pensions**

(score: -100 to 100)


### Outlook for 2025

In 2025, a.s.r. will continue to focus on growing the business and retention of existing customers, while executing on the integration of the a.s.r. and Aegon NL pension businesses.

The implementation of the WTP is in full swing, and a.s.r. will support its customers with the transition to the new legislation.

## 4.3.3 Individual life and Funeral

The Individual life and Funeral business unit combines the management of a.s.r.'s Individual life and Funeral insurance portfolios.

In 2024, preparations for the integration of Aegon NL Life with a.s.r. life were central. The conversion of the Aegon NL Life insurance portfolio to the a.s.r. target platform is planned for 2025. The implementation of the settlement agreement between a.s.r. and the representatives of Unit Linked insurance policies was also an important activity (see section 5.4.3.4.7 for more information). Both topics required a lot of capacity. The main objectives for 2024 were achieved, both financially and in terms of employee and customer satisfaction (NPS-c).

### Market & product – Individual life

In 2024, a lot of media attention was paid to the importance of a financial safety net in the event of death, for homeowners, renters and self-employed individuals. The Dutch Association of Insurers (*Verbond van Verzekeraars)* encourages this awareness.

Term individual life insurance is the only individual life product that a.s.r. actively sells. Per Q3 2024 the market share of a.s.r. of the individual life insurance market was 1.13%. In 2024, production of our policies sold has increased by 46% compared to the previous year, and the goal is to grow profitable to a market share of 10% by 2027.

### Market & product(s) – Funeral

a.s.r. sells funeral capital insurance policies, allowing customers to plan their own funeral with the amount paid out to their beneficiaries.

The market share for funeral insurance dropped to 14.3% (2023: 16.6%), partly due to fierce competition online. After the brand transition from Ardanta to a.s.r. Funeral Insurance in 2023, online production initially declined because a.s.r. was not directly associated with funeral products. In 2024, the first brand campaigns were launched on television and online to increase name and brand recognition. The intermediary channel brought in most of the new production in 2024.

## Strategy and achievements

In financial terms, the combined Individual life and Funeral business also made a stable contribution to a.s.r.'s results in 2024. The scalability of the organisation ensures that costs move in line with portfolio movements. For a.s.r. Individual life and Funeral, customer service is provided through alignment with the digital agenda and with the support of a flexible workforce (temporary workers).

Since Q3 2024, a.s.r.'s individual term life insurance has been included in the Mortgage Data Network (HDN). This platform enables advisors and providers to allow consumers to easily and securely purchase their mortgage and mortgage-related products.

Customer satisfaction for Individual life (NPS-c of 47, 2023: 53) and Funeral (NPS-c of 53, 2023: 48) is above the a.s.r. target of +44. The decrease of the NPS-c score for Individual life is partially due to the onboarding of new colleagues, who are less experienced. The increase of the NPS-c score of Funeral is in line with the continues attention to improves customer satisfaction. Within the Funeral domain, intermediaries give their collaboration with a.s.r. a score of 8.1. The first AI initiatives, such as speech-to-text and Copilot, were implemented in Individual life in 2024, with Funeral to follow.

### NPS-c Individual life

(score: -100 to 100)


### NPS-c Funeral

(score: -100 to 100)


## Outlook for 2025

a.s.r. reached a settlement agreement with the representatives of interest groups with a unit-linked insurance policy from Aegon NL and a.s.r. One of the conditions of the agreement is that 90% of the affiliated customers of these interest groups must agree on this final settlement. On 19 February 2025 it was announced that the unit-linked settlement agreement that was reached in November 2023 with the five customer protection groups is final. More than 90% of the affiliated customers have accepted a personal offer. As a result the collective actions that these consumer protection organisations have initiated in the past, will be cancelled.  a.s.r. will proceed with the implementation of an arrangement for unaffiliate customers that have not previously received compensation.

The conversion of the Aegon NL Life portfolio will be completed per the end of 2025. Also, in 2024, the Internal Model Approval Process for a.s.r. life has started. This process will be continued during 2025.

a.s.r. remains vigilant for acquisition opportunities to extend or at least maintain the portfolios for both Individual life and Funeral.

# 4.4 Asset Management



Total assets managed by Asset Management
(in € billion)
74.7
2023: 71.8

Real Estate portfolio
(in € billion)
8.2
2023: 7.6

Mortages
(Assets under administration, in € billion)
86.6
2023: 84.2

Operating result
(in € million)
100
2023: 78

Operating expenses
(in € million)
242
2023: 172

Asset under management for third parties
(in € billion)
34.8
2023: 29.3

Asset Management brand
a.s.r.

Real Estate brand
a.s.r.

Mortages brands
a.s.r. AEGON

The Asset Management segment involves all activities relating to asset management including investment property management. These activities include among others ASR Vermogensbeheer N.V., ASR Real Estate B.V. and AEGON Hypotheken B.V.

## 4.4.1 Financial performance

### Operating result

The operating result increased by € 21 million to € 100 million by a net positive contribution of the inclusion of the Aegon NL mainly driven by the addition of the mortgage business.

### Assets under Management

Assets under management for third parties increased by € 5.5 billion to € 34.8 billion (2023: € 29.3 billion), which was driven by positive revaluations and net inflows in the DC products. In addition, our real estate funds experienced positive revaluations as well as net inflow of capital from existing participants in primarily the ASR Core Residential Fund and ASR Dutch Farmland Fund, which were partly offset by negative revaluations in the ASR Property Fund and the ASR Dutch Prime Retail Fund.

### Mortgage origination

Mortgage origination increased by € 3.7 billion to € 9.2 billion, of which € 0.8 billion was related to Knab. Growth was driven by the additional six months' contribution of the Aegon NL portfolio and increasing demand in the housing market.

The mortgages under administration amounted to € 86.6 billion (2023: € 84.2 billion), of which € 11.1 billion was related to Knab. The quality of the mortgage portfolio remains very strong. Payment arrears of more than two months are less than 0.1% for the overall mortgage portfolio and credit losses are negligible.

### Operating expenses

Operating expenses increased by € 69 million, mainly as a result of the higher cost base related to Aegon NL.

### Result before tax

The IFRS result before tax decreased by € 54 million to € 72 million (2023: € 126 million) reflecting an increase of the operating result being offset by negative impact from incidental items compared to 2023, which were driven by the net positive impact from the Aegon NL transaction and the exchange of investment portfolios.

## 4.4.2 Asset Management

ASR Vermogensbeheer N.V. (Asset Management) conducts all of a.s.r.'s asset management activities, with the exception of direct real estate. Real Estate assets are managed by a.s.r. real estate, see section 4.4.3.

### Market

The asset management market is consolidating rapidly, as a result of increased legislation, stricter supervision, international competition and the realisation of economies of scale. The number of independent Dutch asset managers has been shrinking for years, while a need for specific knowledge of the Dutch market remains. This provides opportunities for a.s.r., as a focused Dutch asset manager that is close to the market, personal and solution-oriented. Furthermore, the Dutch pension landscape is changing due to the implementation of the future pension law (*Wet toekomst pensioenen* - WTP). As a provider of insurance, pension administration and asset management services, this offers possibilities for a.s.r. to offer integrated solutions for the pensions market, for example via buyouts, defined contribution propositions or tailored asset management solutions.

### Products

a.s.r. manages separate accounts for customers outside of a.s.r. The product range includes corporate bonds, government bonds, equities and balanced mandates. a.s.r. provides bespoke solutions with a sound return on investment. a.s.r. primarily invests in assets and markets that it really understands, in countries and companies that comply with a.s.r.'s social and sustainability criteria, demonstrating that sustainability and financial returns can go together. For example, a.s.r. introduced a global impact equity fund in 2023 (Article 9 SFDR). a.s.r. also offers funds and other solutions in various asset classes that may be implemented in different life cycles, which can be used for defined contribution and other pensions solutions.

### Strategy and achievements

a.s.r. manages assets for its own account and offers asset management services for affiliated entities as well as third parties. a.s.r. believes that, in the long-term, companies that embed sustainability, quality and risk-spreading in their policies generate economic and social value, at a lower risk. a.s.r.'s strategy is based on this principle. a.s.r. aims to create sustainable value for its stakeholders, now and in the future. For that reason, a.s.r. seeks not only financial, but also social returns, through investments that are checked for environmental aspects and human rights, and by opting for impact investments, which are long term. For example, a.s.r. does not invest in cryptocurrencies or conduct day trading. As a result, a.s.r. may miss short-term returns, but this is consistent with its focus on the results for the longer term.

Furthermore, a.s.r. is taking into account Solvency II requirements, is cost-efficient, and generates fee income from the management of mutual funds. These funds are also used within defined contribution pensions products such as '*Werknemerspensioen*' and '*Doenpensioen*'.

a.s.r. invests for its third-party customers in the same way as it does for its own balance sheet. The current investment climate, characterised by declining inflation, rising geopolitical uncertainties and modest economic growth, is challenging. One of the ways that a.s.r. protects its investment returns is through effective diversification, investing in a combination of liquid assets like bonds and equities and 'real assets', such as real estate. Since the business combination with Aegon NL, a.s.r.'s focus has been on managing the general account portfolios of the insurance entities, as well as the affiliated and third-party portfolios, especially in the pensions business.

### Transfer of funds

As part of the business combination with Aegon NL, a.s.r. transferred the management of the ASR (Separate Account) Mortgage Fund, ASR Private Debt Fund I and ASR Renewable Infrastructure Debt Fund to Aegon Asset

Management on 1 July 2024. The services to clients will remain unchanged.

## Outlook for 2025

In 2025, a.s.r. will continue to serve its clients through a combination of integrated asset management solutions and individual asset categories, such as fixed income and equities. As part of its sustainability strategy, a.s.r. has set an ambitious impact target with investments that generate a measurable favourable social or ecological impact, in addition to financial returns. a.s.r. will also continue to increase the managed assets of affiliated portfolios and external customers, especially in the pensions market, where the new pensions law will be pivotal.

# 4.4.3 Real Estate

a.s.r. real estate invests in real assets (real estate, infrastructure, forestry and agricultural land) for institutional investors. a.s.r. has been investing in real assets for over 130 years.

As a real estate investor, a.s.r. recognises its responsibility in contributing towards liveable and sustainable buildings, towns, cities and communities. a.s.r. strives to contribute to a sustainable and climate-adaptive living environment for all – now and for future generations.

The real estate portfolio at year end totalled € 12.4 billion (2023: € 11.6 billion), divided into € 9.4 billion (2023: € 9.1 billion) on behalf of a.s.r., and € 3.0 billion (2023: € 2.6 billion) on behalf of institutional investors. The total inflow of new capital from institutional investors amounted to € 0.3 billion (2023: € 0.3 billion). The asset advice by a.s.r. real assets investment partners totalled € 5.5 billion (2023: € 5.5 billion), all on behalf of institutional investors.

## Market

The Dutch economy recovered in 2024, driven by slightly lower inflation, real wage growth and lower policy interest rates. The labour market continued to be tight. Furthermore, investment volumes grew on a year-on-year basis. Equity-driven and private investors were particularly active while most institutional investors continued to wait. Occupier markets were continuously supported by high employment rates and delayed new build real estate supply. Ongoing trends (for example, hybrid working and omnichannel shopping) intensify real estate market polarisation. This means prime assets retain demand and value, while secondary locations face declining interest and value. Regulatory certainty under the Affordable Rent Act and certainty about (historical) rent indexation under European consumer protection laws have eased investor caution, opening up room for residential returns to recover alongside rising owner-occupier prices. Despite regulatory uncertainty, farmland returns remained solid due to the ongoing shortage.

**Dilemma - Should a.s.r. continue investing in residential rental properties or not? Balancing between return on investment and affordable rent.**

The Netherlands faces an immense challenge in the housing market, requiring significant investments in sustainability and necessary infrastructure. By 2034, no less than one million new homes need to be built in the purchase and rental segments combined. This will require approximately € 400 billion in investments. It is therefore important to encourage the involved parties to expand the housing stock.

Since the Affordable Rent Act came into effect on July 1 2024, landlords can no longer set the rent for residential properties in the mid-segment themselves. They are bound by government regulations that cap rental prices. This seems like good news for tenants, but the question is whether landlords can recover their operating costs and achieve their intended return on investment with lower rental income from these properties. There is a risk that landlords will choose to sell these rental properties because the investment is not sufficiently profitable. This is already happening as well. As a result, the number of properties for sale increases, and there are fewer and fewer rental properties. Unfortunately, buying a property is not an option for many tenants because they cannot get a mortgage. This group of house hunters then slips through the net.

For developers and builders, the capping of rental prices for mid-segment rental properties has made it much more difficult to make new housing projects profitable. The revenues from these projects are now (largely) capped, and the construction costs to realise these homes are increasing. As a result, fewer rental properties will be delivered in the coming years, and at a slower pace. This will not solve the shortages in the housing market.

Through its investments, a.s.r. fulfils two important social roles regarding the residential property market: on the one hand, it is important that there are sufficient and affordable rental properties available. On the other hand, investments in housing must be profitable in relation to the obligations that a.s.r. has towards its clients. Naturally, a.s.r. will continue to invest in its existing residential property portfolio and in new rental properties. However, due to the Affordable Rent Act, this will proceed at a much slower pace in the coming years than a.s.r. would like.

## Products

a.s.r. real estate manages non-listed sector funds, which invest in retail and residential properties, offices, real estate on science parks, agricultural land and renewable energy in the Netherlands. These funds are open to institutional investors. a.s.r. is anchor investor in these funds.

a.s.r. real assets investment partners is part of a.s.r. real estate but operates independently. For institutional clients, including a.s.r., it develops investment strategies, implement these through manager selection processes and ensure the monitoring, reporting and engagement of globally diversified real assets investments.

## Strategy and achievements

On behalf of institutional investors, a.s.r. real estate invests responsibly in high-quality real assets that fit within a clearly defined strategy. This provides the optimal balance between long-term return on investment and value creation, benefiting not only a.s.r.'s clients but also society as a whole. See section 3.1.2 for more information about the real estate ESG vision and four strategic themes.

On 1 July 2024, the ASR Dutch Green Energy Fund I was launched to contribute to the energy transition. Currently, the fund has a size of approximately € 400 million with the ambition to grow to € 800 million and invests mainly in solar and onshore wind farms in the Netherlands.

This year, a.s.r. celebrated the 125th anniversary of the De Utrecht estate in the province of Noord-Brabant in the Netherlands. This estate, covering approximately 2,500 hectares, has been owned by a.s.r. since 1899 and is open to the public. In addition to nature, recreation, forestry and agriculture, the estate also provides space for housing, mobility and energy.

In October, the new mixed-use construction project Wonderwoods was delivered to the ASR Dutch Mobility Office Fund and the ASR Dutch Core Residential Fund. The project, consisting of two towers with 300 trees and 75,000 plants and shrubs, is a green eye-catcher in a central location in Utrecht in the Netherlands. Wonderwoods provides space for living, working and relaxation.

Furthermore a.s.r. real assets investment partners has been appointed as real estate oversight manager for the Dutch Pension fund for Housing corporations (SPW). On behalf of SPW, it will convert the existing real estate portfolio into a predominantly European unlisted portfolio, and ultimately actively manage it. SPW's new portfolio will have a size of at least € 1 billion with a firm focus on Dutch residential properties, while also allowing for globally listed real estate shares.

More information can be found on the a.s.r. real estate website and the a.s.r. real assets investment partners website.

## Outlook for 2025

The Dutch economy is expected to gradually normalise in 2025 with lower inflation, showing slight economic growth and continuing low unemployment levels. Also, the European Central Bank (ECB) is expected to gradually further cut their policy interest rates which will lessen the impact of interest rates on real estate yields. This helps to increase the attractiveness of real estate investments and the occupier market activity. Due to continued polarisation, the demand will stay focused on primary retail city centres and streets, dominant district shopping centres and inner city high-quality office assets in the five largest Dutch cities. Ongoing shortage of both rental dwellings and farmland will support residential and farmland returns. As a result of increased science park vacancy rates in especially outdated office buildings, more opportunities arise for high-quality and modern research and development (R&D) buildings on the more attractive science parks.

# 4.4.4 Mortgages

a.s.r. operates in the residential mortgage market and provides mortgage loans to retail customers for its own account and external investors. The mortgage loans for the a.s.r. brand are issued by ASR Levensverzekering N.V. and for the Aegon brand by Aegon Hypotheken B.V. and Aegon Levensverzekering N.V.

## Market

The Dutch mortgage market shows significant growth in 2024 due to continued tightness of the Dutch housing market, which boosts housing prices and mortgage coupons that have, on average, declined throughout the year. While mortgage interest rates stood at around 4–4.5% in 2023, these fell to below 4% in 2024. Combined with increasing wages in 2024 this led to an increase in the number of mortgage applications and has subsequently contributed to rising housing prices.

## Products

a.s.r. offers its mortgage products via intermediaries to its customers through two different mortgage brands: Aegon and a.s.r.

Under the Aegon brand, standard products (a.o. annuity, linear and interest-only mortgages) are offered to a broad customer base. In addition to standard products, the a.s.r. brand offers specialised products for distinct customer types. This includes products for first-time buyers, sustainable home modifications, and senior citizens. With these products, a.s.r. aims to make the housing market more affordable to young and elderly people and offer more customers the option to make their homes more sustainable.

## Strategy and achievements

a.s.r. is focused on becoming a leading sustainable mortgage company in the Netherlands. In 2024, a.s.r. was able to further grow its fee business through higher assets under administration while simultaneously enabling asset strategies in which mortgages are used as an attractive investment for a.s.r.'s own account as well as for external investors.

The Aegon-branded products will be fully integrated with the a.s.r.-branded products in 2026. Throughout 2024 preparations have been made for integrating the a.s.r. and Aegon product portfolio.

a.s.r.'s mortgage business showed strong results in 2024, with rising production volumes on the back of higher market volumes. Despite these strong results, investor appetite for mortgages remained at lower levels than previously, further impacted by the proposed transfer of the servicing of mortgages on Knab's balance sheet as part of the deal with BAWAG Group AG. This year a.s.r. has made improvements in its sustainability mortgage proposition by extending the maturity from 15 to 30 years and increasing the maximum amount from € 25,000 to € 65,000. By implementing these changes, the sustainability mortgage, which is priced lower than a.s.r.'s standard mortgage propositions, allows more clients to invest in sustainable home improvements. Additionally, extending the repayment period to 30 years helps reduce monthly instalments.

### NPS-c Mortgages

(score: -100 to 100)


## Outlook for 2025

In 2025, a.s.r. expects a stabilising mortgage market due to a limited number of permits granted for new-build housing and a continuing low refinancing market. However, large interest rate shocks can have a significant impact on the Dutch housing market. In a stabilising mortgage market, a.s.r. aims to at least maintain its market share. a.s.r.'s mortgage businesses will be further integrated. Starting in January 2025, a part of the Aegon-branded products will be offered through the Stater platform, where a.s.r.-branded products are also offered. During the integration, the ambition is to maintain customer service levels.

The AuM of the mortgage portfolio is expected to decline due to the sale of the Knab mortgage portfolio to BAWAG Group AG. Nonetheless, it is expected that the declining operating result due to the sale of the Knab mortgage portfolio is offset by increasing cost efficiency.

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# 4.5 Distribution and Services



Total income
(in € million)
377
2023: 237[1]

Operating expenses
(in € million)
319
2023: 191[1]

Operating result
(in € million)
50
2023: 33[1]

Distribution and Services brands

VKG Boval felison SuperGarant poliservice ROBIDUS nedasco verzekeringen TKP

1 This 2023 figure has been restated, see section 7.3.2 for more information.

The Distribution and Services segment includes activities relating to the distribution of insurance contracts. The participations of a.s.r. in the distribution and service market are Van Kampen Groep (VKG), Nedasco, Dutch ID (Boval, Felison), Supergarant, Poliservice and D&S Participaties. The results of Robidus are consolidated in the D&S figures, but it is a separate entity with its own strategy and it is not governed through the D&S holding company. The results of TKP are consolidated in the D&S segment. As a pension administrator, TKP operates as a separated business line under the Life segment.

## 4.5.1 Financial performance

### Fee income

Fee income increased by € 141 million to € 377 million (2023: € 237 million). This increase was mainly driven by the additional six months' contribution of Aegon NL entities. In addition, the increase in fee income was a result of organic business growth and small acquisitions.

### Operating expenses

Operating expenses increased by € 128 million to € 319 million (2023: € 191 million), mainly due to the additional cost base of Aegon NL and several smaller acquisitions. The increase was also due to organic business growth and expenses to strengthen the business.

### Operating result

The operating result of the Distribution and Services segment increased by € 17 million to € 50 million for 2024 mainly driven by the additional six months' contribution of Aegon NL entities and business growth.

### Incidental items

The incidental items amounted to € -33 million (2023: € -24 million), primarily driven by additional investments by TKP for the regulatory pension reform and the amortisation of intangible assets.

### Result before tax

The IFRS result before tax increased by € 8 million to € 16 million, reflecting a higher operating result partly offset by higher incidental expenses.

## 4.5.2 Market

Developments in the distribution sector in 2024 show that the distribution landscape remains fluid. Ongoing consolidation and growth of larger distribution companies remain the key developments in this market. The general trend of further growth in the market share of distribution companies continued in 2024; the top 50 distribution companies further increased their market share through organic growth and acquisitions. Hybrid distribution models of insurance products, such as intermediaries and online, also remain. a.s.r. is on top of these developments in order to facilitate, and support the independent intermediary channel.

### Strategy and achievements

The D&S business, combined with organic growth of the distribution businesses acquired in previous years, strengthened a.s.r.'s market share in the distribution landscape. The business activities of these distribution companies grew compared to 2024.

The top holding company Distribution and Services Holding B.V. is responsible for the distribution businesses since 2022. This top holding directs and coordinates the businesses and their management. All companies under this top holding are working to realise a.s.r.'s strategy and ambition to be a major player in the Dutch distribution market.

### Van Kampen Groep

Van Kampen Groep (VKG) is one of the major full-service providers in the Dutch market. It provides financial advisors with access to a wide range of financial services for retail and business customers, combined with quick and efficient handling. In 2024, VKG focused on optimising the operational processes, the cost basis and on building a future-proof IT environment and system.

### Nedasco

Nedasco is one of the large full-service providers in the Dutch market. It offers a wide range of products and financial services from different insurers. Nedasco is active in both the commercial and the private segments and combines service with fast and efficient handling, often using automated processes. The company has achieved organic growth in recent years, primarily in the P&C and income segments.

### Dutch ID

Dutch ID's activities (Boval and Felison brands) are based on its mission: to let businesses conduct business (*laat de ondernemer ondernemen*). This is reflected in the sectoral service strategy, in which knowledge of industry, trade and customers is used to provide the best possible service to SMEs. This is implemented in conjunction with (sectoral) organisations such as the Netherlands Agricultural and Horticultural Association (*Land- en Tuinbouw Organisatie Nederland* - LTO), evofenedex, and the Dutch Transport Operators' Association (*Transport en Logistiek Nederland*). a.s.r.'s mission is also reflected in the service strategy. In line with this strategy, Dutch ID plays an active role in the changing field of service provision, technological development and views on the insurance value chain. Owing to its versatility and flexibility, Dutch ID has built a strong position as a service provider in this playing field and further strengthened its market share in 2024, primarily through the growth of its income portfolio at its subsidiary Felison.

### SuperGarant

SuperGarant operates as an advisor and underwriting agent, offering services based around four main themes: insurance, absence management, training and other services.

## Poliservice

Poliservice B.V. is a financial services provider with retail and business customers throughout the Netherlands. These services consist mainly of advising and mediating in insurance, savings, income and pensions, and mortgages. In 2024, the portfolio of employee insurance was transferred from Poliservice to a.s.r.'s consulting firm. This aligns with the positioning of Poliservice as an independent intermediary.

## D&S Participaties

D&S Participaties focuses on taking over portfolios and financial services organisations in the Netherlands, in order to further expand the share of a.s.r. in the distribution landscape.

## Outlook for 2025

In 2025, D&S will focus on implementing its strategy. D&S expects to increase market share through two key points. Firstly, by taking over portfolios through acquisitions, and secondly, by expanding existing portfolios at the present entities through commercial activities.

Synergy between the entities will also be strengthened further, enhancing overall service. This will be achieved through joint activities, knowledge-sharing, and the creation of a single IT landscape.

## Robidus

Robidus is an independent subsidiary of a.s.r. It is not a part of D&S Holding and therefore has its own strategy and its own Supervisory Board.

Robidus is a broker for income insurances and a service provider with a firm position in the market for large and corporate employers. It helps organisations with the execution of social security regulations. Robidus operates as a financial risk advisor and offers claim and case management services around three main themes: employability, absence, and disability and occupational health. Robidus has an autonomous growth plan based on employees with in-depth knowledge and an entrepreneurial mindset.

Due to its position and services in between the Employee Insurance Agency (*Uitvoeringsinstituut Werknemersverzekeringen* - UWV), insurers, employers and employees, Robidus plays a vital role in people's lives to enable them to earn and protect their own income. Current problems with UWV put pressure on the system of social security. Robidus participates in several pilots initiated by the ministry of social affairs to improve the execution of the system. For clients, Robidus is focusing on developing practical solutions to prevent customer employees from becoming absent. Crucial initiatives to reduce pressure on the system in the end.

## TKP

TKP administers pension rights for 16 large corporate and industry-wide pension funds and other pension providers. Additionally, TKP takes care of the communication for these clients: from mandatory pension statements to customer contact and digital customer service. All these participants rely on TKP for correct and timely pension payments and clear and accessible pension information and communication.

In 2023 and 2024, the emphasis was on transitioning to the new pension system. The focus in the coming years is on a controlled and reliable transition to the new pension system. The first pension fund client is expected to switch to a new pension scheme on 1 May 2025. The other clients are expected to switch on 1 January 2026, 1 July 2026, 1 January 2027, 1 July 2027 and 1 January 2028.

The results of TKP are consolidated in the D&S segment. As a pension administrator, TKP operates as a separated business line under the Life segment.

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# 4.6 Holding and Other



Operating result
(in € million)
-268
2023: -207[1]

Operating expenses
(in € million)
-9
2023: -13[1]

Result before tax
(in € million)
-280
2023: -96[1]

1 This 2023 figure has been restated, see section 7.3.2 for more information.

The Holding and Other segment consists primarily of the holding activities of a.s.r. (including the group related activities), other holding and intermediate holding companies, the real estate development business (ASR Vastgoed Projecten B.V.), ASR Vitaliteit & Preventieve Diensten B.V (Vitality) and the smaller participations of ASR Deelnemingen N.V.

## 4.6.1 Financial performance

### Operating result

The Holding & Other segment (including eliminations) operating result decreased by € 61 million to € -268 million. The decrease is mainly the result of an increase in debt expenses, higher indirect costs and the impact from the inclusion of business activities that were previously labelled as a start-up.

The increase in debt expenses (€ 32 million) was mainly the result of the € 600 million green senior bond issued in December 2023, with a fixed rated coupon of 3.625%, and the € 500 million perpetual restricted Tier 1 security issued in March 2024, with a fixed rated coupon of 6.625%, which has been partly offset by the redemption of a Perpetual Tier 2 security, with a fixed rated coupon of 5%, in two parts during 2024 (€ 380 million in March and € 120 million in September).

### Operating expenses

Operating expenses increased by € 4 million to € -9 million (2023: € -13 million). Holding operating expenses before eliminations increased mainly due to higher indirect costs and the negative impact from the inclusion of business activities that were previously labelled as a start-up, and were more than offset by the impact from eliminations related to intercompany investment operating expenses.

Expenses for non-ordinary activities, classified as incidental items and therefore not included in operating expenses, increased by € 49 million to € 150 million. This increase mainly relates to the integration of Aegon NL, partly offset by a decrease in project costs related to IFRS 17/9.

### Result before tax

The result before tax decreased by € 183 million to € -280 million (2023: € -96 million), reflecting lower operating result and the impact of the bargain purchase of € 153 million on the Aegon NL transaction in 2023 as part of non-investment related incidentals. Investment related incidental items amount to € -154 million (2023: € 102 million) and mainly relate to the elimination of the investment result on non-qualifying plan assets from a.s.r.'s own pension scheme.

5

# Governance

# 5.1 Corporate governance

## 5.1.1 Corporate Governance

This chapter describes a.s.r.'s corporate legal structure and governance. ASR Nederland N.V. is a public limited company, listed on Euronext Amsterdam and is subject to Dutch corporate law. ASR Nederland N.V. is the parent undertaking of the ASR Group (the 'Group') and has a two-tier board structure. See sections 5.1.3 and 5.1.4 for more information on the board governance structure.

### Corporate structure

ASR Nederland N.V. is the Group's ultimate holding company.

A personal union exists between the statutory boards of ASR Nederland N.V. on the one hand and the insurance entities ASR Levensverzekering N.V., Aegon Levensverzekering N.V., Aegon Spaarkas N.V. and ASR Schadeverzekering N.V. on the other hand, through cross-memberships of the Executive and Supervisory Boards of ASR Nederland N.V. and the other entities. A personal union also exists between the Executive Board of Aegon Hypotheken B.V. and ASR Nederland N.V.'s EB.

ASR Premiepensioeninstelling N.V. is an Institution for Occupational Retirement Provision (IORP). ASR Vermogensbeheer N.V. and ASR Real Estate B.V. are licensed Alternative Investment Fund Managers (AIFM) subject to the AIFM Directive. ASR Vooruit B.V. operates as an investment firm, pursuant to the MiFID (Markets in Financial Instruments Directive) and has a license as an insurance intermediary (pursuant to the Dutch Financial Services Act (*Wet op het financieel toezicht*). D&S Holding B.V. operates as an intermediate holding company for most of the entities within the segment Distribution & Services.

For the full ASR Nederland N.V. structure, see section 7.4.1.

## 5.1.2 General Meeting of Shareholders

In line with the articles of association of ASR Nederland N.V., at least one Annual General Meeting (AGM) is held each year, no later than 30 June. The main purpose of the AGM is to discuss and decide on matters as specified in the articles of association and under Dutch law, such as the adoption of the financial statements. The articles of association also outline the procedures for convening and holding general meetings and the decision-making process. The draft minutes of the AGM will be published on www.asrnl.com no later than three months following the AGM. Shareholders are given three months to respond to the draft minutes. The minutes of the AGM are subsequently adopted and signed by the Chair of the Supervisory Board (SB) and the company secretary.

In 2024, the AGM was held on 29 May. Shareholders had the option to attend the AGM physically or virtually. A total of 83.5% of the total issued share capital with voting rights was represented, either physically or represented by a proxy-holder with voting instructions. The agenda of the AGM included the following voting items:

- 2023 remuneration report (advisory vote);
- To adopt the financial statements for the 2023 financial year;
- To pay a dividend;
- To reappoint KPMG Accountant N.V. as external auditor for the financial years 2025 up to and including 2029;
- To grant discharge to each (former) Member of the EB and SB for the 2023 financial year;
- To extend the authorisation of the EB to issue ordinary shares and/or to grant rights to subscribe for ordinary shares;
- To extend the authorisation of the EB to restrict or exclude statutory pre-emptive rights;
- To acquire the company's own shares;
- To appoint Bob Elfring as a Member of the Supervisory Board;
- To reappoint Joop Wijn as member and Chair of the SB.

All agenda items were approved by the AGM. The next AGM will be held on 21 May 2025.

### Consultation with shareholders

Contacts with shareholders are conducted entirely in line with the policy on fair disclosure and bilateral dialogue, as published on the website at asrnl.com. The Group's Disclosure Committee supervises compliance with laws and regulations in relation to the disclosure of price-sensitive information.

### Transactions with majority shareholders

No transactions with majority shareholders, as referred to in best practice provision 2.7.5 of the Corporate Governance Code, took place in 2024. In connection with the Aegon NL transaction in 2023, ASR Nederland N.V. and Aegon Ltd. entered into a Relationship Agreement, in which the two parties agreed certain governance arrangements relating to ASR Nederland N.V. The terms of the Relationship Agreement were approved by the SB and are customary in the market, as required by best practice provision 2.7.5 of the Corporate Governance Code. For more information on the Relationship Agreement, see the convocation of the January 2023 AGM.

## Anti-takeover measures

Stichting Continuïteit ASR Nederland (the Foundation) was established on 26 May 2016 under Dutch law in connection with a.s.r.'s listing on Euronext Amsterdam. The Foundation has an independent board consisting of three members. The role of the Foundation is to promote the interests of a.s.r., its business and stakeholders, and protect against possible influences that could threaten the continuity, independence, strategy and / or identity of a.s.r. or its associated business to the extent that they could conflict with the aforementioned interests. If the interests of a.s.r., its business, stakeholders or continuity were to be undermined, the Foundation would be entitled - provided certain conditions under the call option agreement are met - to exercise a call option right on preference shares such that the number of preference shares acquired under the call option would never exceed the total number of shares forming the issued capital of a.s.r. at the time the call option was exercised, minus the number of preference shares already held by the Foundation (if any) at the time and minus one. See section 8.2.4 for more information about the Foundation.

## 5.1.3 Executive Board and Management Board[1]

The EB is the statutory board in accordance with Dutch corporate law and as described in the articles of association. The EB is collectively responsible for the day-to-day conduct of business at a.s.r. and for its strategy, structure and performance. In carrying out its duties, the EB is guided by a.s.r.'s interests, which include the interests of the businesses connected with it, which in turn include the interests of customers, employees, investors and society.

The EB is accountable to the SB and the AGM regarding the performance of its duties.

Certain resolutions made by the EB require the approval of the SB and/or the AGM. These resolutions are outlined in the articles of association and the rules of procedure of the EB and Management Board (MB). Both documents can be viewed at www.asrnl.com.

## Composition of the Executive Board

The articles of association specify that the EB must consist of a minimum of two members, including at least a Chief Executive Officer (CEO) and a Chief Financial Officer (CFO). Only candidates found to meet the fit and proper test under the Dutch Financial Supervision Act are eligible for appointment. In accordance with Article 2.2 of the Rules of Procedure of the EB and MB and Article 7.1 of the Rules of Procedure of the SB, the SB appoints the members of the EB and may suspend or dismiss an EB member at any time. In case a.s.r.'s current CEO, due to his earlier resignation or dismissal, does not serve his full term until the 2026 AGM, the appointment of the successor will require a unanimous vote of the SB (Schedule 8, part 2, Relationship Agreement). The SB notifies the AGM of proposed (re)appointments. During 2024, the composition of the EB remained unchanged, consisting of the following three members:

- Jos Baeten, CEO;
- Ewout Hollegien, CFO;
- Ingrid de Swart, COO/CTO.

## Management Board

The MB was established in 2023 and meets every week. The MB conducts the day-to-day business at a.s.r. and implements and realises the business strategy.

## Composition of the Management Board

Article 2.4 of the Rules of Procedure of the EB and MB specifies that the MB consists of all EB members, the CRO, the CHRO and the COO Life. MB members not being EB members are appointed, suspended and dismissed by the EB, with due observance of the DEI Policy. The SB is involved in the recruitment and selection of MB members, as prior coordination with the SB is required. During 2024, the composition of the MB remained unchanged, consisting of:

- The members of the EB;
- Rozan Dekker, CRO;
- Jolanda Sappelli, CHRO;
- Willem van den Berg, COO Life.

**Executive Board**

| Name | Years on Board | Date of initial appointment | Date of reappointment | Appointed until | Years of experience in insurance industry |
|---|---|---|---|---|---|
| Jos Baeten | 16 | 26 January 2009 | EGM 2023 | AGM 2026 | 44 |
| Ewout Hollegien | 3 | 1 December 2021 | - | AGM 2025 | 17 |
| Ingrid de Swart | 5 | 1 December 2019 | AGM 2023 | AGM 2027 | 25 |

1 Section 5.1.3 is in scope of CSRD and limited assurance (ESRS 2 GOV-1).

# Management Board

## Executive Board

### Jos Baeten

**CEO**
Male, Dutch, 1958

Responsible for
- Audit
- Services
- Corporate Communications
- Legal
- Company secretary

Additional positions
- Chair of the Executive Board of the Dutch Association of Insurers *(Verbond van Verzekeraars)*
- Member of the Supervisory Board of Efteling B.V.
- Member of the Advisory Board of the Nyenrode Executive Insurance Program
- Member of the Supervisory Board of DAF Trucks N.V.

### Ewout Hollegien

**CFO**
Male, Dutch, 1985

Responsible for
- Asset Management
- Real Estate
- Group Finance & Risk Reporting
- Balance & Performance Management

Additional positions
- Chair of the Financial Economic Affairs committee of the Dutch Association of Insurers *(Verbond van Verzekeraars)*
- Member of the Supervisory Board of Amvest Vastgoed B.V.

### Ingrid de Swart

**COO/CTO**
Female, Dutch, 1969

Responsible for
- Disability
- Distribution and Services
- P&C
- Health
- Mortgages
- Customer Experience & Digital
- IT&C
- a.s.r. Vitality

Additional positions
- Member of the Supervisory Board of HumanTouch Holding B.V.
- Member of the Supervisory Board of Salta Group B.V.

### Willem van den Berg

**COO Life**
Male, Dutch, 1977

Responsible for
- Pensions
- Individual life
- Funeral
- TKP

Additional positions
- Member of the investment committee of the Erasmus MC Foundation

### Rozan Dekker

**CRO**
Female, Dutch, 1972

Responsible for
- Group Risk Management
- Compliance

Additional positions
- Member of the Supervisory Board of the Economic Research Foundation
- Member of the Supervisory Board and chair of the of the Audit and Risk Committee of Knab N.V.

### Jolanda Sappelli

**CHRO**
Female, Dutch, 1963

Responsible for
- Human Resources

Additional positions
- Chair of the Education and Labour Market committee of the Dutch Association of Insurers *(Verbond van Verzekeraars)*

More information about the biographies see www.asrnl.com >

## Permanent education

In 2024, specific permanent education sessions were attended by the SB, EB, and the MB, for the purpose of further education. A session, organised by representatives of the Pensions business unit, Asset Management and TKP, focused on the Future Pensions Act (*Wet toekomst pensioenen* - WTP). During this session the SB, EB and MB were educated on the developments and opportunities due to the WTP and the status of implementation of this legislation. Another session focused on sustainability. This session was led by the Sustainability team and professors of the University of Groningen, whom provided an update on (legislation regarding to) sustainable entrepreneurship, (governance regarding to) CSRD and on the a.s.r. Policy on Sustainable Insurance. Furthermore a session was held to educate the SB, EB and MB on US GAAS. In this session, led by Group Finance and Legal, an introduction of Generally Accepted Auditing Standards (US GAAS), the legal aspects and the impact on a.s.r. were given. As a US listed entity, Aegon Ltd. is audited under US GAAS . Due to Aegon Ltd.'s shareholding in ASR Nederland N.V., US GAAS regulatory requirements have become (partly) applicable to a.s.r. A session led by the Data Office provided an update on developments with respect to Generative AI and the application within a.s.r. The final session focused on two subjects, the Major Model Change for the MR1 Interest Rate model ('MMC MR1') and the Strategic Asset Allocation ('SAA') and investment plan 2025. In the first part of the session the SB, EB, and the MB were educated by Group Risk Management on the MMC MR1, it's background and implications. The second part of the session, organised by representatives of Asset Management, focused on an analysis of the current investment policy and optimisation opportunities.

## Evaluation

In 2024, the EB and MB conducted a comprehensive self-evaluation to assess its composition, role, and functioning. The self-evaluation session was conducted on the basis of a questionnaire and interviews. The outcome of the questionnaire was discussed with the MB and the company secretary. The evaluation highlighted the strength of the MB in its diversity, complementarity of roles, and effective communication. The MB operates as a cohesive team, demonstrating effective collaboration even in complex and large dossiers. The open and transparent communication within the MB allows for the discussion of sensitive issues and encourages members to challenge each other constructively. The collaboration with the SB has also been rated positively, with the SB effectively fulfilling its sparring partner role. The MB's decision-making processes are seen as effective and balanced, with a strong focus on the interests of key stakeholders, including customers, employees, shareholders, and society. The MB plans to continue fostering an open culture where diverse perspectives are valued and constructive challenges are encouraged. The MB's commitment to structured meetings, high participation, and productive discussions will remain a cornerstone of its operations, contributing to the overall success and growth of a.s.r.

The performance of the EB was also assessed by the SB as part of the scope of the annual assessment process; see section 5.3. In this context, interviews are held twice a year with the individual EB members (by two SB members on each occasion) in which the results of the aforementioned self-evaluation are included.

The performance of MB members not being EB members was assessed by the CEO, with prior input from the SB. The assessment takes place through interviews held twice a year with the individual MB members, in which the results of the aforementioned self-evaluation are included.

## Remuneration

See section 5.3 for information on the Remuneration Policy for EB members and their individual remunerations.

# 5.1.4 Supervisory Board[1]

The SB has three roles: the supervisory role, the advisory role and the employer's role for the EB. The SB supervises the policy pursued by the EB and MB, as well as the general course of affairs at a.s.r. and its group entities. Specific powers are vested in the SB, including approving certain EB decisions.

## Composition of the Supervisory Board

Article 2.1 of the Rules of Procedure of the SB specifies that the SB must consist of at least three members and no less than the number of members required to give effect to the nomination rights in respect of SB members under the Relationship Agreement. The SB currently consists of seven members: Joop Wijn (Chair), Gerard van Olphen, Sonja Barendregt, Gisella Eikelenboom, Daniëlle Jansen Heijtmajer, Lard Friese and Bob Elfring.

In line with the Dutch Corporate Governance Code, SB members are appointed by the AGM for a four-year term. They can be reappointed for a single additional four-year term and subsequently reappointed for a period of two years, which may be extended by two years at most. Reappointments following an eight-year period must be justified in the SB report.

All the SB members have passed the fit and proper test required under the Dutch Financial Supervision Act.

## Diverse representation

The SB has drawn up a projected profile for its size and composition, taking into account the nature of a.s.r.'s business, its activities and the desired expertise and background of its members. The SB profile can be viewed at www.asrnl.com.

Due to a combination of experience, expertise and independence of the individual members, the SB has the skills to assess the main aspects of the a.s.r. strategy and policies. The diversity of its members ensures the complementary profile of the SB. a.s.r. will continue to aim for an adequate and balanced composition of the SB in any future appointments by taking into account the DEI Policy and all relevant selection criteria such as executive experience, experience in finance and experience in the political and social environment.

1 Section 5.1.4 is in scope of CSRD and limited assurance (ESRS 2 GOV-1).

## Independence and conflicts of interest

In 2024, the SB was able to carry out its tasks independently pursuant to principles 2.1.7 to 2.1.9 of the Dutch Corporate Governance Code, in accordance with article 39 (1) Directive 2014/56/EU all SB members are independent as defined in the Corporate Governance Code, with the exception of Lard Friese (due to his position as CEO of Aegon Ltd.).

In order to prevent (potential) conflicts of interest, relevant SB members in respect of whom a potential conflict of interest could arise, have refrained from participation in and decision-taking with respect to Knab in the SB.

According to the Dutch Civil Code, a member of the SB of a listed company may not hold more than five supervisory board positions or equivalent roles within large Dutch companies and large Dutch foundations. This regulation ensures that supervisory board members can dedicate sufficient time and attention to their responsibilities. The members of the SB of a.s.r. comply with these requirements.

Furthermore no transactions were entered into in 2024 in which there were conflicts of interest with SB and/or EB members that are of material significance to a.s.r. and/or to the relevant board members.

## Evaluation and permanent education

The SB is responsible for assessing the quality of its own performance. It therefore performs an annual self-assessment and discussion of its own performance and that of its committees and members. A self-assessment with external facilitator is carried out every three years, this last occurred in 2023.

The self-assessment for 2024 was carried out without external facilitator and was based on a questionnaire and a plenary SB evaluation session with the company secretary. The following aspects were assessed:

- Role and composition of the SB;
- Effectiveness of processes (information-gathering and decision-making);
- Role as an employer;
- Advisory role and strategy.

The outcome of the assessment was discussed by the members of the SB and the company secretary, and at a later stage with the members of the EB and MB.

The evaluation highlighted the SB's strong composition and functioning, including its diverse expertise, and constructive internal dialogue. The functioning and role distribution among the committees are well-regarded, and the oversight priorities are sufficiently clear. The SB looks back on a successful year marked by the integration of Aegon NL, closely monitoring the process and fulfilling its role as a sparring partner effectively. The onboarding process of the new SB member, Bob Elfring, was smooth and efficient. The meetings of the SB are well-prepared and efficiently conducted, with active participation from all members. Overall, the SB is committed to continuous growth and professionalisation and ensuring effective governance and oversight. For permanent educational sessions attended by the SB, please see section 5.1.3.

**Supervisory Board**

| Name | Years on Board | Date of initial appointment | Date of reappointment | End of current term of appointment[1] | End of the term of appointment at AGM[2] |
|---|---|---|---|---|---|
| Joop Wijn | 4 | 28 October 2020 | 29 May 2024 | AGM 2028 | 2032 |
| Herman Hintzen | 8 | 1 January 2016 | - | AGM 2024 | - |
| Gerard van Olphen | 5 | 30 October 2019 | 31 May 2023 | AGM 2027 | 2031 |
| Sonja Barendregt | 7 | 31 May 2018 | 25 May 2022 | AGM 2026 | 2030 |
| Gisella Eikelenboom | 5 | 30 October 2019 | 31 May 2023 | AGM 2027 | 2031 |
| Daniëlle Jansen Heijtmajer | 2 | 4 July 2023 | - | AGM 2027 | 2028[3] |
| Lard Friese | 2 | 4 July 2023 | - | AGM 2027 | 2028[3] |
| Bob Elfring | 1 | 29 May 2024 | - | AGM 2028 | 2036 |

1 SB members are reappointed or must resign no later than the next AGM held after this date.
2 Based on the possibility of an appointment for a maximum of 12 years (two times four years and two times two years in accordance with principle 2.2.2 of the Dutch Corporate Governance Code).
3 Duration of appointment term in accordance with the relationship agreement between a.s.r. and Aegon Ltd.

# Supervisory Board

## J. (Joop) Wijn
Male, Dutch, 1969

**Appointments within a.s.r.**
- Chair of the Supervisory Board
- Chair of the Nomination & ESG Committee
- Member of the Remuneration Committee

**Additional positions**
- Member of the Supervisory Board and Member of the Audit Committee, the Risk Policy and Compliance Committee, the Sustainability & Technology Committee of NIBC Bank. Nominated by Blackstone Group for which he is an advisor
- Member of the Supervisory Board of Euronext Amsterdam N.V.

## G. (Gerard) van Olphen
Male, Dutch, 1962

**Appointments within a.s.r.**
- Vice-chair of the Supervisory Board
- Member of the Audit & Risk Committee
- Member of the Nomination & ESG Committee

**Additional positions**
- Chair of the Supervisory Board of Volksbank N.V.
- Chair of the *'Belanghebbenden Orgaan Beroepsregle-mentering'*

## S. (Sonja) Barendregt
Female, Dutch, 1957

**Appointments within a.s.r.**
- Member of the Supervisory Board
- Chair of the Audit & Risk Committee

**Additional positions**
- Member of the Supervisory Board and Chair of the Audit & Risk Committee of Robeco Holding N.V.
- Member of the Supervisory Board and Chair of the Audit and Risk Committee of Robeco Institutional Asset Management B.V.
- Chair of the Oversight Committee Robeco Indices B.V.

## G. (Gisella) Eikelenboom
Female, Dutch, 1970

**Appointments within a.s.r.**
- Member of the Supervisory Board
- Chair of the Remuneration Committee
- Member of the Nomination & ESG Committee

**Additional positions**
- Vice-chair of the Supervisory Board and Chair of the Remuneration Committee of Waarborgfonds Sociale Woningbouw
- Chair (a.i.) of the Supervisory Board of BUNQ
- Member of the Supervisory Board of MUFG BANK (Europe) N.V
- (Deputy) council member of the Enterprise Chamber of the Amsterdam Court of Appeal
- Member of the Strategic Audit Committee of the Ministry of Foreign Affairs
- Chair of the Chapter Zero Netherlands Foundation
- Chair of the Supervisory Board of the 100Weeks Foundation

## D. (Daniëlle) Jansen Heijtmajer
Female, Dutch, 1960

**Appointments within a.s.r.**
- Member of the Supervisory Board
- Member of the Nomination & ESG Committee

**Additional positions**
- Global Director Finance, Enterprise Risk Management & Shared Services FrieslandCampina
- Member of the Supervisory Board and Chair of the Audit Committee of Uber Payments B.V.
- Member of the EMCF Curatorium of Amsterdam Business School
- Member of the Advisory Board Economics & Business of the University of Amsterdam

## E. (Lard) Friese
Male, Dutch, 1962

**Appointments within a.s.r.**
- Member of the Supervisory Board
- Member of the Audit & Risk Committee

**Additional positions**
- CEO and Chairman of the Executive Committee, and Executive Director of the Board of Directors of Aegon Ltd.
- Vice Chairman of the Board of Directors of The Geneva Association
- Member of the Supervisory Board of Pon Holdings B.V

## B. (Bob) Elfring
Male, Dutch, 1959

**Appointments within a.s.r.**
- Member of the Supervisory Board
- Member of the Audit & Risk Committee
- Member of the Remuneration Committee

**Additional positions**
- Chair of the Supervisory Board of Vuyk Holding B.V.
- Member of the Supervisory Board, Audit Committee and Remuneration Committee of Royal BAM Groep N.V.

More information about the biographies see www.asrnl.com

| Independence (in %) | Female members (in %) | Male members (in %) | Average age (in years) |
|---|---|---|---|
| 86 | 43 | 57 | 61 |
| 2023: 86 | 2023: 43 | 2023: 57 | 2023: 61 |

## Attendance

| | Joop Wijn[1] | Gerard van Olphen[1] | Herman Hintzen[2] | Sonja Barendregt | Gisella Eikelen-boom[1] | Daniëlle Jansen Heijtmajer | Lard Friese | Bob Elfring[3] |
|---|---|---|---|---|---|---|---|---|
| Supervisory Board | 13/13 100% | 13/13 100% | 6/7 85% | 15/15 100% | 13/13 100% | 15/15 100% | 15/15 100% | 8/8 100% |
| Audit & Risk Committee | - | 7/7 100% | 2/3 67% | 7/7 100% | - | - | 7/7 100% | 4/4 100% |
| Remuneration Committee | 4/4 100% | - | 2/3 67% | - | 4/4 100% | - | - | 1/1 100% |
| Nomination & ESG Committee | 5/5 100% | 5/5 100% | - | - | 5/5 100% | 5/5 100% | - | - |

## Competencies

| | Joop Wijn | Gerard van Olphen | Sonja Barendregt | Gisella Eikelenboom | Daniëlle Jansen Heijtmajer | Lard Friese | Bob Elfring |
|---|---|---|---|---|---|---|---|
| General business management strategy | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Finance (balance, solvency & reporting) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Financial markets / Disclosure, communication | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Audit, risk, compliance, legal & governance | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Insurance (Life, Non-life and Asset Management) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| M&A | ✓ | ✓ | - | - | - | ✓ | ✓ |
| IT / Digital & innovation | ✓ | ✓ | - | - | ✓ | ✓ | - |
| Social / Employment | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | - |
| Sustainability / Climate change / Policies | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

1 In total there were 15 meetings of the SB. In order to prevent (potential) conflicts of interest, Joop Wijn, Gerard van Olphen and Gisella Eikelenboom, have refrained from participation in two meetings with respect to Knab.
2 At the 2024 AGM (29 May 2024) Herman Hintzen resigned as a member of the SB. Therefore, he did not attend any meetings after this date, and is not part of the overview on the previous page.
3 At the 2024 AGM (29 May 2024) Bob Elfring was appointed and he attended all 8 meetings after this date.

## 5.1.5 Diversity, equity and inclusion[1]

a.s.r. aims for diverse representation within the EB, MB and SB and an inclusive culture in which differences are recognised, valued and utilised. a.s.r.'s Diversity, Equity and Inclusion Policy (DEI Policy) is published on the website at asrnl.com. The EB, MB and SB believe that diverse representation, equity and belonging reinforce the success and relevance of a.s.r. as a socially desirable insurer and are necessary to create business models and develop (new) products that serve the society as a whole. See section 3.2.2 for further information on the DEI Policy and a.s.r.'s targets in this area.

The current composition of the MB and SB meets the gender target of 2024 of having at least 35% female and 35% male members in the MB and SB. a.s.r. will aim for an adequate and balanced composition of the MB and SB in its future appointments by taking into account its DEI Policy and all relevant selection criteria such as executive experience, experience in finance and experience in the political and social environment.

## 5.1.6 Sustainability governance[2]

a.s.r. strives to embed sustainability in its core processes and activities. In order to contribute to the transition to a sustainable and inclusive society within a.s.r., this transition to a sustainability society has been earmarked as a strategic topic. Within the EB, the CEO is ultimately responsible for a.s.r.'s sustainability strategy at group level.

The Sustainability Workforce, coordinated by the corporate sustainability team, supports the EB in its responsibility for the development and implementation of a.s.r.'s sustainability strategy and policies. This workforce includes delegates from the business as well as staff functions. The corporate sustainability team reports quarterly on a set of sustainability KPIs and targets to the MB, which evaluates the results achieved and takes action where necessary.

The EB also sets strategic sustainability targets as part of the total set of financial and non-financial (including sustainability-related) KPIs.

Each year, the SB, with advice from the Nomination & ESG Committee, discusses and approves the strategic non-financial targets and progress made in these specific areas. a.s.r.'s sustainability team coordinates the implementation together with the workforce. All members of the workforce subsequently promote these strategy, policies and targets within their own focus areas.

Furthermore, the Sustainability Committee, an advisory body for dealing with a.s.r.-wide sustainability issues and dilemmas, is embedded in a.s.r.'s governance. The committee deals with dilemmas and conflicting interests in the field of sustainability (including ESG and CDD/KYC), making decision-making regarding these sustainability issues more transparent for the EB, MB and SB. Also the Sustainability Committee advises the EB on sustainability related policies at group level. These policies are evaluated periodically and updated when deemed necessary. The Sustainability Committee includes representatives from several departments including Communications, Risk, Legal, Sustainability and the business lines. The Committee meets at least every quarter; an emergency procedure applies to agenda items that cannot be postponed until the next quarterly meeting.

### CSRD governance

Since 2023, in anticipation of the Corporate Sustainability Regulation Directive (CSRD) implementation, a project structure is set up with a central project team and several working groups, including representatives from the relevant product lines and staff functions. The MB is periodically informed on the project status, is involved in key discussions and decision-making on for instance the Double Materiality assessment and target-setting, and is ultimately responsible for monitoring and managing the impacts, risks, and opportunities. The MB is supported by second and third line representatives for ensuring a critical review and monitoring the project risks and progress and by topical experts, including sustainability experts on group level and product line level, for ensuring that the impacts, risks, and opportunities are handled with sufficient expertise. The internal quarterly business review updates the MB, among other information, on the actions, targets and progress related to the impacts, risks and opportunities as identified in the Double materiality assessment.

## 5.1.7 Corporate governance codes and regulations

The current articles of association are published on the Corporate Governance section of asrnl.com. The Rules of Procedure of the SB, EB and MB are also available on this site.

### Dutch Corporate Governance Code

Since its listing on Euronext Amsterdam, a.s.r. has been required to comply with the Dutch Corporate Governance Code. a.s.r. complies with all the principles and best practices of the Dutch Corporate Governance Code, with the exception of those that are not applicable. In the Corporate Governance section of the corporate website, a.s.r. has published a detailed comply or explain list indicating which principles and best practices do not apply to the organisation.

The a.s.r. Code of Conduct is the guideline for behaving with due care and integrity. As required by best practice provision 2.5.2 of the Corporate Governance Code, the EB ensures compliance herewith by itself and employees. The EB informs the SB of its findings and observations regarding the operation of and compliance with the a.s.r. Code of Conduct.

### Code of Conduct

The a.s.r. Code of Conduct is the guideline for behaving with due care and integrity. As required by best practice provision 2.5.2 of the Corporate Governance Code, the EB ensures compliance herewith by itself and employees. The EB informs the SB of its findings and observations regarding

1 Section 5.1.5 is in scope of CSRD and limited assurance (ESRS 2 GOV-1).
2 Section 5.1.6 is in scope of CSRD and limited assurance (ESRS 2 GOV-1, GOV-2).

the operation of and compliance with the a.s.r. Code of Conduct.

## Professional oath

On 1 January 2013, the Dutch financial sector introduced a mandatory oath for EB and SB members of financial institutions licensed in the Netherlands. With regard to insurance companies, in addition to the EB and SB members, individuals holding a management position immediately below the EB who are responsible for employees who could have a significant influence on the risk profile of the insurance company are also required to take the oath. This requirement was subsequently expanded to include employees whose activities can substantially affect the risk profile of the undertaking and employees directly involved in the provision of financial services

Notwithstanding the requirements mentioned the above, a.s.r. has decided that all employees and other individuals carrying out activities under its responsibility must also take the oath. New employees, including temporary and external employees, must take the oath within three months of joining the company.

## Disclosure of sustainability-related information

In accordance with the requirements of the CSRD, a.s.r. provides extensive sustainability-related information in its Management Report, for the first time as per the financial year 2024. In previous years, a.s.r. provided (more limited) non-financial information in accordance with the requirements of the Non-Financial reporting Directive (NFRD). In addition, from 1 January 2022, large companies of public interest must publish information about how and to what extent their activities are associated with economic activities (eligibility) that qualify as environmentally sustainable as defined in Regulation (EU) 2020/852 (EU Taxonomy Regulation). As of 1 January 2023, the Taxonomy Regulation also requires companies to disclose to what extent their economic activities are aligned with two of the six environmental objectives, i.e., climate mitigation and climate adaptation. See section 6 for the information required regarding the disclosure of sustainability-related information.

# 5.2 Supervisory Board report

## 5.2.1 Meetings of the Supervisory Board

In 2024, the SB convened seven regular meetings, one of which was an offsite meeting with the EB and MB, and eight extra meetings related to specific topics, such as the Knab transaction and Capital Markets Day (CMD). The SB members were available for consultation between scheduled meetings. Regular work meetings were also held in the absence of the EB and MB, at which matters such as the self-evaluation of the SB and the evaluation of the EB members were discussed.

The SB has a good working relationship with the EB and MB. The Chair of the SB is in regular contact with the CEO, and several members of the SB are periodically approached outside meetings to give advice on various topics. The SB as a whole also receives bi-monthly updates from the EB outside meetings on various developments within the company, such as business developments and (potential) M&A transactions. See section 5.1.4 for information about the attendance at SB and SB committee meetings.

### Highlights

The SB looks back on a successful year marked by the integration of Aegon NL. The SB closely supervises this process and is satisfied that integration activities are on track. Several milestones were achieved during the year, such as the completion of conversions, harmonisation of processes and the progress made in implementing the partial internal model for a.s.r. The SB wishes to express its appreciation for the way in which the EB, MB and all employees have shown dedication and commitment to accomplishing this integration.

On 1 February 2024, a.s.r. announced that it had reached an agreement to sell Aegon Bank (Knab) to BAWAG Group AG. Following a thorough strategic review of Knab's activities and an assessment of BAWAG's proposal, the EB and SB concluded that Knab's and its service proposition to customers would be better served by being part of BAWAG. Intensive efforts were made towards the closing, which was successfully completed on 1 November 2024. This transaction marks an important step for Knab and a.s.r., maximising value for all stakeholders involved.

At the 2024 Annual General Meeting (AGM), Herman Hintzen resigned as a member of the SB. Additionally, the reappointment of Joop Wijn was approved during this AGM. Although the departure of Herman Hintzen meant parting with a valued and skilled member, the arrival of Bob Elfring has simultaneously strengthened the SB with an excellent member who brings extensive experience and expertise.

Another milestone was achieved on 27 June 2024, the Capital Markets Day (CMD), when a.s.r. presented its strategic vision and targets for the 2024–2026 plan period. The new strategy builds on a.s.r.'s strong track record and expresses the confidence the EB has in capturing the opportunities in the Dutch market; this is supported by the SB. The combined business is leading in various market segments, and the EB sees ample opportunities for profitable growth and to create sustainable value for all stakeholders.

Other important topics in 2024 included the implementation of the final settlement for unit-linked life insurance customers of Aegon and a.s.r., geopolitical developments and the preliminary questions submitted by the Court of Amsterdam to the Supreme Court on rent modification clauses.

### Strategy based on long-term value creation

Each year, the EB presents various matters to the SB for approval, such as the (quarterly) figures, the multi-year budget, the investment plan and the risk appetite. These matters were all discussed and approved by the SB in 2024. Throughout the year, the progress of a.s.r.'s strategy, the realisation of sustainable value creation against the ambitious group and business targets for 2022–2024 and the setting of new business targets for 2024-2026 were discussed in detail. For a.s.r. as a multi-line insurer, this involves the portfolio strategy (see section 2.4) and the strategy for targeted acquisitions.

In implementing the strategy, a.s.r. adheres closely to a strict financial discipline in which value over volume is a key principle. A focus on cost and upholding financial solidity is essential for the continuation of a.s.r.'s strong performance. Maintaining a strong balance sheet with financial flexibility offers scope for profitable growth. a.s.r. will continue to invest capital responsibly. As a result of the Aegon NL transaction, focus will also be on successfully integrating the two companies.

Sustainable value creation is an important part of a.s.r.'s strategy and, as such, an integrated part of the business processes. In the EB, the CEO is ultimately responsible for sustainable value creation. Targets, plans, progress and results are regularly discussed in the EB and MB and reported to the SB. Within the SB, sustainable value creation is integrated into the overall agenda. During the permanent education sessions of the EB, MB and the SB, attention is paid to current developments. This also includes the implementation of upcoming legislation and regulations.

In 2024, SB discussions covered the following topics:

- Review, oversight and involvement in the development of the overall strategy, including a.s.r.'s long-term value creation and growth in various business areas, such as P&C, Disability, Mortgages, Asset Management, Real Estate, Pension DC, developments regarding Health and key topics such as brand, reputation, sustainability and vitality;
- Digitalisation of customer service (GenAI);
- Closing of the Knab transaction;
- Integration activities as a result of the Aegon transaction;
- Setting Financial and Non-Financial targets for 2024–2026 and the preparation for CMD;
- Corporate governance and composition of the SB, EB and MB;
- EB, MB and senior management succession planning;
- EB and SB remuneration, including the evaluation of the Remuneration Policy;
- HR and culture: reports on employee surveys, sustainable employability, DEI and compliance with the a.s.r. Code of Conduct;
- Cyber security, innovation and technological developments;
- NPS-c and NPS-r reports and developments in the field of customer service, including the focus on reducing the number of customer complaints in 2024. Furthermore the NPS-i was discussed in the context of (setting) the CMD targets;
- Financial and Enterprise Risk Management, including cyber security, Solvency II requirements and related EIOPA and DNB guidance, the Risk Appetite Statements and the ORSA;
- Annual and quarterly results, dividends, capital generation, share buy backs and the Solvency II capital position;
- Investor relations;
- Multi-year budget, including the medium-term financial and non-financial targets framework, and Capital & Dividend Policy;
- Legal, regulatory and supervisory topics, including the relationship with the Dutch supervisory authorities, as well as compliance issues;
- Tax policy and developments.

## M&A
Although the EB and SB remain interested in other suitable acquisition opportunities, the focus in 2024 was on successfully integrating a.s.r. and Aegon NL.

## Financial performance
The SB discusses the financial performance each quarter, covering standing issues such as developments in the premiums received, DC inflow, fee income, COR, Operating Result, long-term cost development, OCC and Solvency II ratio. The SB is pleased with a.s.r.'s financial performance in 2024. The Solvency II ratio increased to 198% (31 December 2023: 176%), reflecting a robust contribution from the OCC and the sale of Knab, which compensated for the effects of capital distributions and market and operational changes. The company has exhibited significant growth across all business segments, particularly through the successful integration with Aegon NL. These achievements demonstrate that a.s.r. is well-positioned to create sustainable value for customers, employees, and shareholders. The impact of various scenarios were calculated and discussed, including the development of interest rates and mortgage spread, management actions were identified and discussed in detail.

## External auditor
As of 1 January 2020, KPMG is a.s.r.'s independent auditor. As part of the audit process, KPMG issued a management letter in December 2024 and a 2024 Audit report in March 2025 to the EB and SB.

KPMG has established that a.s.r. made significant steps in integrating the Aegon NL entities. High priority was given to the migration of systems. In addition, emphasis was placed on further harmonising key assumptions that previously differed between a.s.r. and Aegon NL. The IFRS 17 & 9 implementation has transitioned to a business-as-usual phase.

The business line Pensions is experiencing significant changes, including the integration of Aegon NL, new pension reforms, and the implementation of target landscape of DC business, Plexus. Although this will require significant management attention in the coming period, KPMG is of the opinion that the current governance and level of challenge of countervailing powers provide an adequate basis for further improvements within the business line Pensions.

Based on the inspection of various documentation, including the project plan, progress reports, KPMG determined that a.s.r. has implemented DORA in a structured manner. The governance regarding DORA is set up adequately, and progress of the DORA process is well monitored.

KPMG has also monitored the CSRD implementation within a.s.r. Although the CSRD has not yet been transposed into Dutch law, management has committed to complying with the current requirements of the CSRD and ESRS. Given the inherent uncertainties associated with the CSRD – such as developing framework, limited interpretations, and the need for estimations and judgments - KPMG has decided to include an emphasis of matter paragraph in assurance reports to highlight these uncertainties. This is in line with market practice, as agreed between audit firms and with the NBA.

KPMG has reported some observations regarding the existence and effectiveness of the risk and control framework. Notwithstanding these observations, KPMG noted that a.s.r. has consistently focused on improving its internal control organisation. KPMG has also provided an update on observations made in previous year.

## Risk management and solvency
At the end of 2024, the SB approved the risk appetite for 2025 for a.s.r. and its supervised entities. a.s.r.'s risk appetite is primarily based on the Solvency II regime and a prudent approach to risk management, which is translated into standards for solvency, liquidity, efficient processes and achievable returns. The SB was satisfied with the execution of the risk management framework. The level of solvency remains acceptable and adequate, thanks

to the organisation's prompt and effective response to external developments based on the chosen risk appetite and associated risk-mitigating measures. The risk appetite is an important criterion in making tactical and strategic decisions. The SB appreciates the prudent approach taken to comply with Solvency II and other regulations and regularly engages in dialogue with the EB concerning its views on the targets and intervention level relating to Solvency II ratios.

### Culture and customer interest

The SB devotes attention to the development in customer satisfaction, based on the NPS-c report, the NPS-r report and the customer complaints report, amongst others. The SB observes that significant efforts are being made within a.s.r. to continuously improve the NPS scores.

### Contacts with the Works Council

In 2024, all SB members attended one or more regular consultative meetings of the Central Works Council (COR a.s.r.). In addition to these meetings, the COR a.s.r. maintained regular contact with the Works Council-nominated SB members, Gisella Eikelenboom and Daniëlle Jansen Heijtmajer. The SB also held bilateral meetings with the COR a.s.r., which on several occasions were also attended by one or more members of the EB.

Taking into account the interests of a.s.r. and its employees, the COR a.s.r. thoroughly prepares when addressing the wide range of issues it is presented with. It engages in constructive dialogue with the EB and issues balanced, well-considered opinions and recommendations. This also applies to the numerous requests for advice regarding the integration, which are proceeding as scheduled. The SB wishes to express its gratitude for the continued engagement with the Works Council and the dedication shown by its members.

### Contacts with external regulators and auditors

The SB periodically met with the DNB and AFM in 2024. The independent external auditor, KPMG, attended the SB meetings, at which the annual and interim financial results were discussed. During these meetings, the auditor elaborated on the audit reports and answered specific questions.

## 5.2.2 Supervisory Board Committees

The SB operates through three specialised committees, each dedicated to addressing specific issues and preparing agenda items for the full SB's decision-making process. The Chair of each committee presents a summary of key discussion points and recommendations at the subsequent SB meeting. The minutes from these committee meetings are accessible to all SB members. The three committees are:

- Audit & Risk Committee;
- Remuneration Committee;
- Nomination & ESG Committee.

### Audit & Risk Committee

The Audit & Risk Committee (A&RC) advises the SB and prepares decision-making on matters such as supervision of the integrity and quality of financial reporting and the effectiveness of internal risk management and control systems. This includes the application of information and communication technology, including cyber security risks.

The composition of the A&RC is such as to represent the specific business know-how, financial, accounting and actuarial expertise relating to the activities of a.s.r.

The A&RC held six regular meetings and one extra meeting in 2024. In accordance with the A&RC Rules of Procedure, meetings are also attended by the CFO, the CRO, the Director of Group Risk Management, the Director of Group Finance & Risk Reporting, the Manager of Compliance, the Director of Audit and the independent external auditor.

After each financial quarter, the committee discussed the financial results based on detailed financial, risk, compliance and internal and external audit reports and analyses. Progress on the recommendations of the internal and external auditor as well as of the Audit Function was monitored. The full 2024 reporting year was discussed in the first quarter of 2025, based on the quarterly internal finance report, the press release, the Annual Report, the financial statements, the Board report and the actuarial report.

The A&RC issued positive opinions on the Annual Report and on the financial statements to the SB. It discussed and adopted the external auditor's letter of engagement and the audit plan for 2024. The external auditors' independence and additional fees were reviewed each quarter. The external auditor's management letter, highlighting key internal control observations, was discussed. The external auditor's audit results report was also discussed and special attention was given to the reported key audit matters. The A&RC approved the updated charters and annual plans for 2025 of the Actuarial and Risk Management Function and the Compliance Function. It advised the SB to approve the updated charter and the audit plan 2024 of the internal Audit Function; this advice was followed.

Specific topics discussed by the A&RC included:

- Progress on the integration activities as a result of the Aegon NL transaction, specifically the impact on financial reporting;
- Areas of attention as a result of the application of IFRS 17/9;
- Progress on implementing the partial internal model as a result of the Aegon NL transaction;
- Use and limitations of the current PIM;
- Cyber risks and IT security;
- Compliance with rules and regulations.

a.s.r.'s solvency position was reviewed and discussed each quarter. Specific attention was paid to the impact of the Aegon transaction, inflation and interest rates and the development of operating costs. The A&RC discussed the risk scenarios and the outcomes of the Own Risk and Solvency Assessment (ORSA). In all the ORSA risk scenarios, the solvency ratio remains within the boundaries set by a.s.r., demonstrating the robustness of a.s.r.'s solvency and the effectiveness of certain management actions.

a.s.r.'s risk appetite is based on a prudent approach to risk management, which is translated into qualitative business guidelines for non-financial risks (NFR) matters and requirements for solvency, liquidity and returns for the financial risk (FR) matters. The A&RC also discussed a.s.r.'s updated Capital and Dividend Policy, after which the SB approved the updated Policy.

The A&RC regularly monitored the status of the risk appetite during the year through a.s.r.'s Integrated Risk Dashboard and the status report on the management of risk priorities. At the end of the year, the A&RC was informed of the outlines of the reinsurance programme for 2025.

## Remuneration Committee

The Remuneration Committee (RC) advises the SB on matters including the Remuneration Policy for the EB and SB and the terms and conditions of employment of the EB, and the RC reviews the remuneration of senior management.

The RC held four regular meetings in 2024. Its meetings were also attended by the CEO (except when issues relating to the EB were discussed), the CHRO and the company secretary. The RC solicits support and advice from departments, including Group Risk Management, Investor Relations, Communications, Compliance, Audit and Human Resources. Where needed, it consults independent legal and pay & benefit experts.

In line with the policy, the RC advised the SB on target setting and performance appraisals, and the RC also prepared the annual Remuneration Disclosure.

The 2023 Remuneration Report was submitted to the AGM for an advisory vote; 98.19% of the votes cast were for the report and 1.81% were against. The results demonstrate the shareholders' continued broad support for a.s.r.'s Remuneration Policy.

## Nomination & ESG Committee

The Nomination & ESG Committee (N&ESGC) advises the SB on its duties and prepares the SB's decision-making in this respect. The N&ESGC advises the SB on ESG topics, selection and appointment procedures and the composition of the EB and SB; it also prepares the (re)appointment of its members. The N&ESGC held five regular meetings in 2024. Its meetings were also attended by the CEO (except when issues relating to the EB were discussed), the CHRO and the company secretary.

The N&ESGC discussed various topics in 2024. For instance, the retirement schedule of the SB was reviewed. In the lead-up to the AGM of 2024, the proposed appointment of Bob Elfring and the reappointment of Joop Wijn was discussed. Other topics discussed by the N&ESGC were the revision of the DEI Policy, the 360 degree feedback tool for the EB, MB and senior management and target setting regarding the *Wet Ingroeiquotum en streefcijfers*, which is a Dutch law aiming to make the ratio of women to men at the top and sub-top more balanced. The N&ESGC also discussed the annual appraisals of senior management. Furthermore, the N&ESGC was informed on the results of the Denison Culture scan. For more information, please see section 3.2.

The N&ESGC discussed the various developments and related legislation regarding ESG and what this means for a.s.r., such as progress on the targets of the various themes, with a focus on the strategic pillars from the strategic framework for sustainability and internal and external developments in this area such as climate change and biodiversity. The N&ESGC also discussed about the double materiality analysis and the progress on the non-financial targets.

## Financial statements and dividend

The EB prepared the Annual Report 2024 and discussed it with the SB in the presence of the external auditor. The 2024 financial statements will be submitted for adoption by the AGM on 21 May 2025. a.s.r. will propose a dividend of € 3.12 per ordinary share (including the interim dividend paid).

## Appreciation

The SB wishes to express its appreciation to Herman Hintzen for his invaluable contributions during the eight years he was a member of the SB. The SB also wishes to acknowledge the members of the EB, MB and senior management for their outstanding leadership of a.s.r. and for delivering strong operational results. Finally, the SB extends its heartfelt thanks to all a.s.r. employees for their unwavering commitment in 2024. Collectively, we are building a robust and sustainable insurance leader in the Netherlands, aiding customers in sharing risks and accumulating capital for the future.

Utrecht, The Netherlands, 25 March 2025

Joop Wijn (Chair)
Gerard van Olphen
Sonja Barendregt
Gisella Eikelenboom
Daniëlle Jansen Heijtmajer
Lard Friese
Bob Elfring

# 5.3 Remuneration report

## 5.3.1 Introduction

The Supervisory Board (SB) continuously reviews and evaluates the Remuneration Policy of a.s.r. In accordance with the obligations imposed by law and the Dutch Corporate Governance Code for the implementation of the Remuneration Policy, the Remuneration Policy is submitted to the General Meeting (at least) once every four years. The current Remuneration Policy was adopted at the AGM of 2023.

The Remuneration Policy of a.s.r. is clear, comprehensible and focused on sustainable long-term value creation for the company. In addition, the policy reflects the interests of a.s.r.'s stakeholders. Four perspectives underpin the Remuneration Policy. Please see section 5.3.2 for more information.

a.s.r. believes that its current Remuneration Policy continues to meet the requirements of the Shareholder Rights Directive II, as incorporated into Dutch law. The Remuneration Policy explains how it contributes to a.s.r.’s strategy, sustainability and the interests of stakeholders. The identity and positioning of a.s.r. as well as the remuneration relationships within a.s.r. were considered by providing a framework based on four perspectives: the organisational perspective, the internal perspective, the external perspective and the stakeholder perspective.

During the 2024 AGM, shareholders cast their advisory vote on the 2023 remuneration report. The remuneration report received the support of over 98% of the shareholders. This is consistent with the approval rate of the Remuneration Policy from the previous year, which exceeded 99%.

## 5.3.2 Remuneration Policy[1]

The Remuneration Policy pertains to the remuneration of the Executive Board (EB) and the SB. The Remuneration Policy consists of:

- A fixed salary within a salary scale (no variable remuneration system);
- In principle EB members progress through the scales in the same way as a.s.r. employees;
- Part of the fixed salary is paid out in shares.

The following four perspectives are used as a basis for the Remuneration Policy:

1. The organisational perspective: how a.s.r. presents itself as a company;
2. The internal perspective: consistency in the internal salary structure;
3. The external perspective: competitive with the external market;
4. The stakeholders’ perspective: taking into account the views of different stakeholder groups on remuneration: customers, shareholders, employees, and society.

### The organisational perspective

It is a.s.r.’s view that society may expect it to be a valuable insurer which handles the funds entrusted to it and the environment in which it operates in a responsible way. With respect to the remuneration of the EB, society may expect this to be in line with a.s.r.’s profile, and that both the Remuneration Policy and the level of executive remuneration are reasonable from that perspective.

In line with this perspective, a.s.r. has a fixed salary only and no group wide variable remuneration scheme. a.s.r. is of the opinion that such a scheme is not in line with the company’s culture. The opinion of society towards variable remuneration in the financial sector is also relevant in this respect.

### The internal perspective

All a.s.r. employees have job-weighted salaries within defined salary scales that they progress through over time. The remuneration of EB members is determined by the various roles within the EB and fall within certain salary scales. The link between roles and salary scales is consistent throughout the organisation. For all employees including the EB, the maximum of a salary scale is at most around the median of the reference group.

In principle, EB members progress through the salary scales in the same way as employees. For employees, an annual growth of 3% of the maximum of the scale is applied (provided there is upward room in the scale). For EB members, the SB has the mandate to adjust this growth path upwards or downwards (growth between 0% to 6%), taking into account a.s.r.’s performance and the principles of the Remuneration Policy. The SB accounts for this in the annual remuneration report.

The a.s.r. Collective Labour Agreement (CLA) applies to the EB with regard to salary indexation.

### The external perspective

a.s.r. pays its employees a salary in line with the market. Market conformity is tested against a reference group. The reference group for the EB consists of Dutch financial

1 Section 5.3.2 is in scope of CSRD and limited assurance (ESRS 2 GOV-3).

institutions and Dutch listed companies, many of which have a social profile and of which at least half must be financial institutions including insurers. To be included in the reference group, the non-financial institutions must meet at least two of three criteria for comparable size with a.s.r. These criteria are: turnover, market capitalisation and number of employees. All remuneration data of companies in the reference group must be published individually. a.s.r.'s position is approximately in the middle of this reference group.

The SB also periodically tests the median against a Europe Control group, consisting of at least 10 European financial institutions. The Europe Control group serves as an additional check of the median that follows from the reference group, so that European developments in this area can also be monitored. The Europe Control group has no direct effect on the median or the remuneration set.

The 2023 reference group for other employees is the financial services industry. For some positions within Group Asset Management and Real Estate, the reference group is the asset management market. To prevent the salary scales of employees and the EB from diverging too much, partly as a result of the difference in reference groups, salary scales of the EB are validated against the reference group of other employees bi-annually. If the gap widens too much, this may be a reason to adjust the maximum of the salary scales of the EB members. The ratio between the remuneration of the CEO and the average remuneration of a.s.r.'s employees must be less than 20.

## The stakeholders' perspective

The structure of the Remuneration Policy was reviewed against the views of shareholders, customers, employees and society. The views and interests of these different stakeholder groups are taken into account as much as possible.

Customers must be able to rely on a solid insurance company that offers understandable products and services at a reasonable price. Customers must be able to rely on the company to handle the funds entrusted to it with care; this includes a reasonable Remuneration Policy. Society expects a financial institution that contributes to society as a whole. Employees expect a reliable employer that ensures the long-term continuity of the company. Employees expect adequate remuneration for their efforts. With regard to board remuneration, they expect their remuneration and any changes to fit the character of the company and to be explainable. Shareholders benefit from a solid company that offers attractive returns. Shareholders expect alignment of the board with their interests, with executive remuneration keeping pace with the company's performance. The Remuneration Policy should be such that high-quality board members can be retained and attracted.

## Periodical review

The Remuneration Committee reviews the principles of the Remuneration Policy against the four perspectives (at least) once every four years. The Remuneration Policy is submitted for a vote (at least) once every four years at an AGM. The market comparison (remuneration benchmark) is carried out once every two years by an external and independent consultancy firm.

The performance of each EB member is reviewed annually, based on a set of financial and non-financial targets approved by the SB. The targets for 2024 can be summarised as follows:

- Shareholder: realisation of the financial targets and the financial KPIs in the multi-year budget and realisation of the Aegon NL integration on time and on budget;
- Customer: creating a plan in 2024 to transition low-impact customer contacts to digital self-service environments. Also, a.s.r. aimed to achieve an NPS above the market average. Additionally, a.s.r. aimed to enhance its customer-driven positioning, reflected in positive NPS and reputation scores, while reducing service and performance complaints;
- Employee: maintaining the Denison scan score at 2023 levels, unless the baseline measurement indicates adjustments. Focus on improving eMood® scores throughout the year;
- Keep diversity and inclusion on the agenda demonstrating exemplary behaviour;
- Society: further expansion of the positioning of a.s.r. as a sustainable long-term value-creating insurer and socially conscious financial institution. This is measured by different ratings and benchmarks.

These targets are complemented by specific strategic priorities for each EB member, such as the integration of a.s.r. and Aegon NL, CSRD compliant reporting by the end of 2024, developing a vision on AI and establishing a clear AI ambition and roadmap for each business unit. Targets are discussed periodically during various evaluation meetings between the SB and (members of) the EB. Based on the evaluation of a.s.r.'s financial and non-financial targets, as well as the EB's performance in line with the Remuneration Policy, the SB has the discretion to adjust the salary growth of EB members within a range of 0% to 6%.

## Contractual aspects

EB members work on the basis of an indefinite contract for services. Each contract ends by operation of law as soon as a party ceases to be an EB member. A contract can also be terminated with a notice period of six months for a.s.r. and three months for an EB member. The contracts also contain a provision for dismissal due to a change of control.

The following conditions apply to severance pay for policymakers (which includes EB members):

- The maximum severance pay is 100% of the (fixed) annual remuneration;
- Severance pay is not awarded in the event of the company's failure;
- No severance pay is awarded that can be classified as variable;
- Severance pay may not be awarded to any employee (including EB members) in the following cases:
  - If an employment relationship is terminated prematurely at the employee's own initiative, except where this is due to serious culpable conduct or neglect by the employer.
  - In the event of serious culpable conduct or neglect by the employee and/or an urgent reason for instant dismissal applies.

## Pay ratio

a.s.r. is transparent concerning the remuneration of the EB, not only in terms of actual amounts, but also in accordance with Dutch law and the Dutch Corporate Governance Code as compared with the average remuneration of all employees of a.s.r. As laid down in the Remuneration Policy, the ratio between the remuneration of the CEO and the average remuneration of the employees at a.s.r. should at all times be less than 20. The current pay ratio is 1:16.9.

The increase of the pay ratio compared to 2023 is a result of:

- The rise of the CEO's remuneration (in accordance with the Remuneration Policy amended during the AGM of 2023 and due to the annual salary increase);
- Due to integration processes and organisational efficiencies, a relatively high turnover of employees, in particular in management positions, in 2024 compared to 2023.

The SB considers that the pay ratio is reasonable. Compared to the remuneration of other executive directors of comparable companies, this pay ratio is among the lowest.

**Pay ratio**[1]

| (units specified below) | 2024 | 2023 |
|---|---|---|
| Annual total compensation for the highest-paid individual (in €) | 1,971,000 | 1,470,000 |
| Average annual total compensation for all employees (in €) | 117,000 | 111,000 |
| Average pay ratio (in %) | 16.9 | 13.2 |
| Average pay ratio difference compared to previous year (in %) | 28.0 | 14.8 |

1 The average pay ratio is not in scope of CSRD and limited assurance. For the median pay ratio, in scope of CSRD and limited assurance, please refer to section 6.3.1.3.

## Pensions

The calculation of annual pension expenses is based on the total pension rights granted during a term of service at a.s.r. Pension expenses include:

- Pensions based on a maximum pensionable salary cap (€ 137,800, fiscal maximum);
- Compensation for the maximum pensionable salary cap (to be used for pensions at the employee's discretion);
- Pension benefits related to historically awarded pension rights;
- VPL (early retirement and life cycle - *VUT, Prepensioen en Levensloop*).

All components of EB remuneration are included in the basis used for calculating pension benefits. EB members have the same pension scheme as a.s.r. employees.

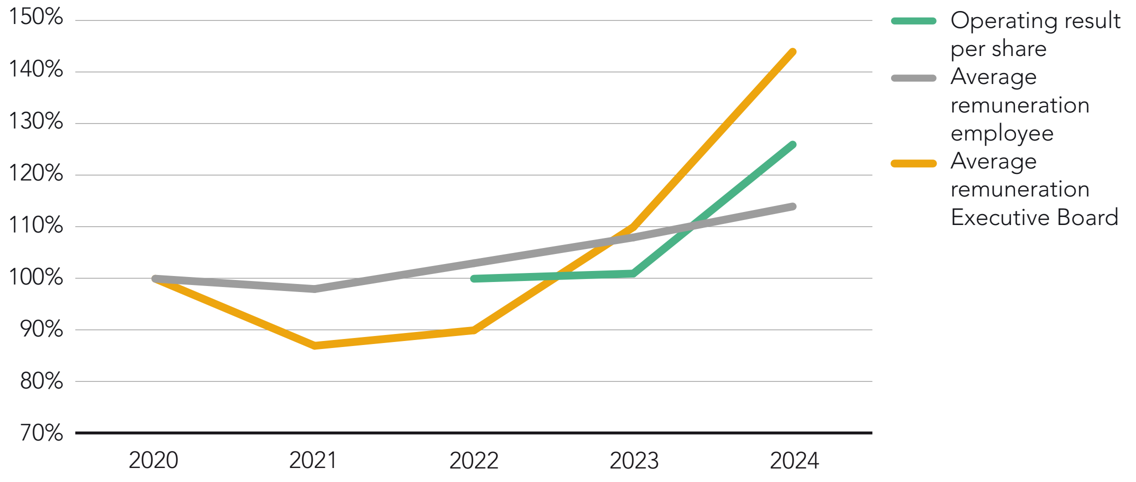
The indexation of the defined benefit plan granted to EB members in 2024 is as following: Jos Baeten € 286,256 and over 2023 € 253,853, Ewout Hollegien € 6,273 and over 2023 € 4,880 and Ingrid de Swart € 894 and over 2023 € 751. In addition, the indexation granted in 2024 to former EB

## 5.3.3 Executive Board

The remuneration of current EB members is in accordance with the Remuneration Policy.

Neither a.s.r. nor any Group company provides any loans, advances or guarantees on behalf of an EB member.
The comparative chart below shows the remuneration and company performance over the last five reported financial years. Company performance is expressed in terms of operating result per share. The average remuneration of employees (who are not EB members) is also shown, and this is also used to calculate the pay ratio. Finally, the average EB remuneration (CEO and CFO) is presented.

The full Remuneration Policy can be found at www.asrnl.com.




1 Please note the Operating result per share figure is including Aegon NL. The Average remuneration employee figure is excluding Aegon NL. This is in line with the overall scope of this Annual Report.

members who are participants in the defined benefit plan is € 72,599 and over 2023 € 1,256,396.

## Remuneration in 2024

Based on the benchmark and in line with the Remuneration Policy, the CEO's salary scale is currently between € 1,023,840 and € 1,462,628. For the CFO and the COO/CTO, a salary scale of € 793,869 to € 1,134,099 applies. The benchmark is set every two years. The positioning, scale maximum and resulting bandwidth of the scales are then assessed and may be adjusted in relation to the resulting median.

The reference group 2024, which consists of 16 companies and the Europe Control group currently consists of 16 financial companies.

2024 was an outstanding year for a.s.r. The results remained robust, and several milestones were achieved. One of the highlights was the successful closing of the Knab transaction. Additionally, significant steps were taken in the integration process, such as the migration of Non-Life and several staff departments, which was completed entirely according to plan, ensuring continuity of service and a warm welcome for customers. In accordance with the recommendation of the Remuneration Committee, the SB has decided to grant a salary increase of 3% to all members of the EB as of 1 January 2025.

Furthermore, under the CLA (applicable from 1 July 2024 until 1 April 2025), a.s.r. employees were given an indexation of their salary of 4.75% from 1 July 2024. This increase also applies to EB members.

## Remuneration in a.s.r. shares

As from 1 July 2023, part of the (fixed) remuneration of the EB members is paid in a.s.r. shares, being 20% of the fixed cash remuneration. For the current CEO, an exception applies until the end of his term of appointment (2026 AGM): 30% of his fixed cash remuneration is paid in a.s.r. shares. All shares must be held for at least five years. Furthermore, EB members (as long as they are employed) must hold at least 100% of their fixed gross annual salary in shares before they are allowed to sell any shares. Any sale of shares is subject to the a.s.r. regulations on the handling of private transactions in financial instruments and applicable law. The following table shows how much remuneration for each EB member was paid in a.s.r. shares in 2024.

## Participation in a.s.r. shares

Until the amendment of the Remuneration Policy as per 1 July 2023, EB members were committed to purchasing a certain percentage of their remuneration in a.s.r. shares (75% for the CEO and 50% for other EB members) and holding these shares for at least five years. The shares are not variable remuneration, nor a remuneration in shares.

The number of shares that are allocated (granted) to EB members are calculated as a function of (1) the defined percentage of the fixed salary at allocation date and (2) the applicable stock price at Euronext. The applicable stock price is defined as the opening stock price on the 1st trading day after the salary-payment date in each month. The salary payment dates are pre-defined in the salary payment schedule and set by the Human Resources department. The shares are purchased by the EB at a discount of 18.5%. The average grant price of the shares was € 36.57, which is equal to the opening stock price on the Euronext Amsterdam stock exchange on the 1st trading day after the salary-payment date in each month. The shares are in a lock-up period of five years.

The participation of shares of the EB can be found in the table on the next page.

**Reference group**

| Organisation | Index |
|---|---|
| Aalberts N.V. | AMX |
| ABN AMRO Bank N.V. | AEX |
| Achmea B.V. | Not listed |
| Aegon Ltd. | AEX |
| ASM International N.V. | AEX |
| Coöperatieve Rabobank U.A. | Not listed |
| De Volksbank N.V. | Not listed |
| IMCD N.V. | AEX |
| ING Groep N.V. | AEX |
| JDE Peet's N.V. | AMX |
| Koninklijke KPN N.V. | AEX |
| Koninklijke Vopak N.V. | AMX |
| NN Group N.V. | AEX |
| OCI N.V. | AMX |
| Signify N.V. | AMX |
| Van Lanschot Kempen N.V. | AMX |

**Europe Control group**

| Organisation |
|---|
| Ageas SA/NV |
| Bâloise Holding AG |
| Beazley plc |
| Direct Line Insurance Group plc |
| Gjensidige Forsikring ASA |
| Grupo Catalana Occidente, S.A. |
| Hannover Rück SE |
| Helvetia Holding AG |
| Hiscox Ltd |
| Phoenix Group Holdings plc |
| SCOR SE |
| Storebrand ASA |
| Tryg A/S |
| Unipol Gruppo S.p.A. |
| UnipolSai Assicurazioni S.p.A. |
| Wüstenrot & Württembergische AG |

### a.s.r. shares EB

| (in numbers / %) | As at 1 January 2024 | Participation in a.s.r. shares in 2024 | Granted and vested in 2024 | As at 31 December 2024 | In % of gross annual salary[1] |
|---|---|---|---|---|---|
| Jos Baeten | 12,684 | - | 4,800 | 17,484 | 46.1 |
| Ewout Hollegien | 2,892 | - | 2,438 | 5,330 | 21.4 |
| Ingrid de Swart | 5,889 | - | 2,613 | 8,502 | 30.1 |
| **Total** | **21,465** | **-** | **5,051** | **31,316** | **N/A** |

### 2024 remuneration for members of the Executive Board

| (in € thousands) | | | | Fixed remuneration | Variable remuneration | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Executive Board member | Base salary in cash | Base salary in shares | Fees | Fringe benefits[2] | One-year variable | Multi-year variable | Extraordinary items | Pension expense[3] | Total remuneration | Fixed portion of the total remuneration |
| Jos Baeten, CEO | 1,159 | 348 | - | 16 | - | - | - | 449 | 1,971 | 100% |
| Ewout Hollegien, CFO | 882 | 176 | - | 31 | - | - | - | 122 | 1,212 | 100% |
| Ingrid de Swart, COO/CTO | 946 | 189 | - | 35 | - | - | - | 214 | 1,384 | 100% |
| **Total** | **2,987** | **713** | **-** | **82** | **-** | **-** | **-** | **785** | **4,567** | **100%** |

### 2023 remuneration for members of the Executive Board

| (in € thousands) | | | | Fixed remuneration | Variable remuneration | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Executive Board member | Base salary in cash | Base salary in shares | Fees | Fringe benefits[2] | One-year variable | Multi-year variable | Extraordinary items | Pension expense[3] | Total remuneration | Fixed portion of the total remuneration |
| Jos Baeten, CEO | 1,033 | 157 | - | 15 | - | - | - | 264 | 1,469 | 100% |
| Ewout Hollegien, CFO | 756 | 80 | - | 24 | - | - | - | 100 | 960 | 100% |
| Ingrid de Swart, COO/CTO | 846 | 86 | - | 24 | - | - | - | 161 | 1,117 | 100% |
| **Total** | **2,635** | **323** | **-** | **63** | **-** | **-** | **-** | **525** | **3,547** | **100%** |

1 Base salary in cash and shares
2 Variations arise as a result of the fiscal treatment of lease vehicles depending on the price and private use of the car, personal allowance and social security.
3 The post-employment defined benefit plan of a.s.r. ended 31 December 2020. A new defined contribution plan started from 1 January 2021. The defined benefit obligation will continue to exist, but no further regular annual premium contributions will be paid to the plan. All members of the Executive Board participate in the defined contribution plan. The annual pension expenditure is based on a premium table. Further changes in the cost of pension benefits are mainly due to the impact of age. The pension costs include defined contribution pensions based on maximum pensionable salary cap, compensation for the maximum pensionable salary cap (to be used for pensions at the employees' discretion in total), and VPL. The amount presented is excluding amounts related to the indexation of the defined benefit plan, as they are not expenses in the current year.

## 5.3.4 Supervisory Board

Remuneration paid to SB members is not linked to the financial performance of a.s.r. and none of the SB members own a.s.r. shares. SB members are entitled to the following remuneration, as adopted by the 2023 AGM:

- A base fee for each SB Member and the Chair;
- A committee fee for each Member and Chair of a committee of the SB.

An overview of the remuneration for the SB is shown in the table.

SB Members who also serve on the SB of ASR Basis / Aanvullende Ziektekostenverzekeringen N.V. receive an additional € 6,000 per annum. SB members who also serve on the SB of PPI, Cappital or Robidus receive an additional € 5,000 per annum. No additional fees are paid to EB Members who are also members of the SB of a Group company.

### Remuneration of Supervisory Board members in 2024

The remuneration of current and former members of the SB is in accordance with the Remuneration Policy established during the 2023 AGM.

Neither a.s.r. nor any Group company provides loans, advances or guarantees on behalf of an SB member. A basic principle of a.s.r.'s current Remuneration Policy (both for the EB and the SB) is that remuneration should be at most around the median for the reference group. The reference group for the SB is the same as the reference group for the EB. The current remuneration of the SB is in accordance with the remuneration.

**Supervisory Board fees**

| (in €) | 2024[1] | 2023 |
|---|---|---|
| **Supervisory Board** | | |
| Chair | 90,000 | 75,000 |
| Member | 60,000 | 50,000 |
| **Audit & Risk Committee** | | |
| Chair | 15,000 | 15,000 |
| Member | 10,000 | 10,000 |
| **Remuneration Committee** | | |
| Chair | 10,000 | 10,000 |
| Member | 5,000 | 5,000 |
| **Nomination & ESG Committee** | | |
| Chair | 10,000 | 10,000 |
| Member | 5,000 | 5,000 |

1 Change in SB fees applicable per 1 July 2024.

## 2024 remuneration for members of the Supervisory Board

| (in € thousands) | Fixed remuneration | | | |
|---|---|---|---|---|
| | Base salary | Fees | Total remuneration | Fixed portion of the total remuneration |
| Joop Wijn[1] | 83 | 15 | 98 | 100% |
| Herman Hintzen[2] | 21 | 6 | 27 | 100% |
| Sonja Barendregt[3] | 55 | 21 | 76 | 100% |
| Gisella Eikelenboom[4] | 55 | 31 | 86 | 100% |
| Gerard van Olphen[5] | 55 | 18 | 73 | 100% |
| Daniëlle Jansen Heijtmajer[6] | 55 | 5 | 60 | 100% |
| Lard Friese[7] | 55 | 10 | 65 | 100% |
| Bob Elfring[8] | 34 | 9 | 43 | 100% |
| **Total** | **413** | **115** | **527** | **100%** |

## 2023 remuneration for members of the Supervisory Board

| (in € thousands) | Fixed remuneration | | | |
|---|---|---|---|---|
| | Base salary | Fees | Total remuneration | Fixed portion of the total remuneration |
| Joop Wijn[1] | 63 | 15 | 78 | 100% |
| Herman Hintzen[2] | 43 | 15 | 58 | 100% |
| Sonja Barendregt[3] | 43 | 21 | 64 | 100% |
| Gisella Eikelenboom[4] | 43 | 26 | 69 | 100% |
| Gerard van Olphen[5] | 43 | 15 | 58 | 100% |
| Daniëlle Jansen Heijtmajer[6] | 25 | 3 | 28 | 100% |
| Lard Friese[7] | 25 | 5 | 30 | 100% |
| **Total** | **283** | **100** | **382** | **100%** |

1 Fees in 2024 are amounts received as Chair of the N&ESGC (€ 10,000) and Member of the RC (€ 5,000). Fees in 2023 are amounts received as Chair of the N&ESGC (€ 10,000) and as Member of the RC (€ 5,000).
2 Herman Hintzen resigned during the 2024 AGM. Therefore, he received fees until 29 May 2024. Fees in 2024 include amounts received as Member of the A&RC (€ 4,168, reflecting a partial year) and the RC (€ 2,083, reflecting a partial year). Fees in 2023 are amounts received as Member of the A&RC (€ 10,000) and the RC (€ 5,000).
3 Fees in 2024 are amounts received as Chair of the A&RC (€ 15,000) and as Member of the Supervisory Board of ASR Basis/Aanvullende Ziektekostenverzekeringen N.V. (€ 6,000). Fees in 2023 are amounts received as Chair of the A&RC (€ 15,000) and as Member of the SB of ASR Basis/Aanvullende Ziektekostenverzekeringen N.V. (€ 6,000).
4 Fees in 2024 are amounts received as Chair of the RC (€ 10,000), and as Member of the N&ESGC (€ 5,000), as Member of the SB of ASR Basis/Aanvullende Ziektekostenverzekeringen N.V. (€ 6,000 ), as Member of the SB of PPI (€ 5,000), and as Member of the SB of Aegon Cappital (€ 5,000). Fees in 2023 are amounts received as Chair of the RC (€ 10,000), as Member of the N&ESGC (€ 5,000), as Member of the SB of ASR Basis/Aanvullende Ziektekostenverzekeringen N.V. (€ 6,000), and as Member of the SB of PPI (€ 5,000).
5 Fees in 2024 are amounts received as Member of the A&RC (€ 10,000), as Member of the N&ESGC (€ 5,000). Gerard van Olphen was appointed to the SB of Robidus on 1 July 2024. Fees in 2024 include amounts received as Member of the SB of Robidus (€ 2,500, reflecting a partial year). Fees in 2023 are amounts received as Member of the A&RC (€ 10,000) and as Member of the N&ESGC (€ 5,000).
6 Fees in 2024 include amounts received as Member of the N&ESGC (€ 5,000). Fees in 2023 include amounts received as a Member of the N&ESGC (€ 2,500, reflecting a partial year, since she was appointed as of 4 July 2023).
7 Fees in 2024 include amounts received as a Member of the A&RC (€ 10,000). Fees in 2023 include amounts received as a Member of the A&RC (€ 5,000, reflecting a partial year, since he was appointed as of 4 July 2023).
8 Bob Elfring was appointed to the SB on 29 May 2024. Fees in 2024 include amounts received as Member of the A&RC (€ 5,833, reflecting a partial year) and as Member of the RC (€ 2,917, reflecting a partial year).

# 5.4 Managing risks

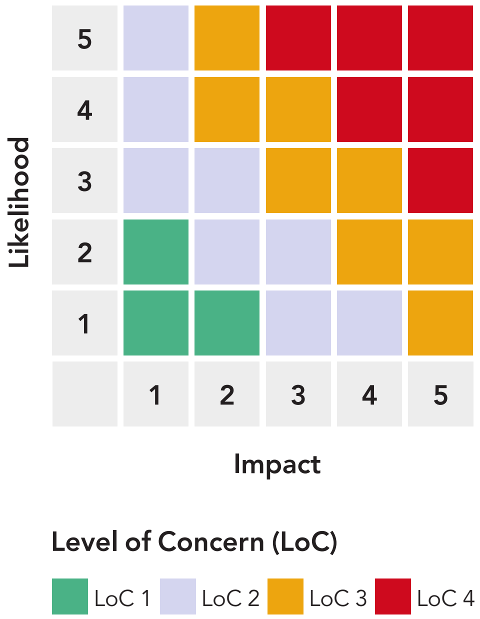
Risk management is an integral part of a.s.r.'s day-to-day business operations. a.s.r. applies an integrated approach to managing risks and ensuring that business targets are met. Value is created by striking the right balance between risk, return and capital whilst ensuring that obligations to stakeholders are met.

## 5.4.1 Risk governance

### 5.4.1.1 Management of strategic risks and emerging risks

a.s.r.'s risk priorities and emerging risks are defined as a.s.r.'s main strategic risks. a.s.r.'s risk priorities are existing risks with impact on the achievement of the strategic objectives. a.s.r.'s emerging risks are new or existing risks with a potentially major impact on the achievement of the strategic objectives. Emerging risks often result from large-scale events that are outside a.s.r.'s direct control. a.s.r.'s risk priorities and emerging risks are defined annually by the MB, based on strategic risk analyses. Group Risk Management (GRM) monitors developments in risks and actions of the risk priorities and emerging risks centrally. Relevant updates are reported to the MB on a half-yearly basis. See section 5.4.3 for a.s.r.'s risk priorities and emerging risks.

To gauge the degree of individual strategic risks and emerging risks, what risks have been rolled up to the a.s.r. risk priorities and emerging risks, a.s.r. uses a risk scale (see figure below) based on likelihood and impact. The degree of risk is expressed as the Level of Concern (LoC). For each strategic risk, the LoC is determined for the gross and net risks. For each emerging risk, the LoC is determined for the gross risk. Gross risk is the degree of risk when no (control) measures are in place. Net risk is the degree of risk with mitigating (control) measures in place. If the degree of a net risk is not within a.s.r.'s risk appetite, then additional actions are taken in order to bring the risk priority within the risk appetite.




### 5.4.1.2 Management of financial risks

Financial risk appetite statements (RAS) are in place to manage a.s.r.'s financial risk profile within the limits; see section 7.8.1.1.1. a.s.r. aims for an optimal trade-off between risk, return and capital. Steering on risk, return and capital takes place via decision-making through the entire product cycle, from the product approval and review process (PARP) to the payment of benefits and claims. At a more strategic level, decision-making takes place through balance sheet management. A robust solvency position takes precedence over profit, premium income and direct investment income.

Risk tolerance levels and limits are disclosed in the financial RAS and are monitored by the Financial Risk Committee (FRC). The FRC evaluates financial risk (FR) positions against the RAS on a monthly basis. Where appropriate, a.s.r. applies additional mitigating measures. In 2024, the Actuarial Function (AF) performed its regulatory tasks by assessing the adequacy of the Solvency II technical provisions, giving an opinion on reinsurance and underwriting, contributing to the Risk Management Framework and supporting the Risk Management Function (RMF). The AF report on these topics was discussed by the MB, FRC and A&RC. See section 7.8 for further information.

### 5.4.1.3 Management of non-financial risks

Non-financial risk appetite statements (RAS) are in place to manage a.s.r.'s non-financial risk profile within the limits; see section 7.8.1.1.1. a.s.r. aims for an optimal trade-off between risk, return and capital. For non-financial risk, a.s.r. has prepared statements relating to strategy, processes, information and technology, projects, reporting and model, and integrity. Employees should use these statements as a framework for risk management decisions.

Risk tolerance levels and limits are disclosed in the non-financial RAS and are monitored by the Non-Financial Risk Committee (NFRC). The non-financial risk profile and internal control performance of each business line is discussed with senior management in the business risk committees each quarter. The Non-Financial Risk Committee (NFRC) monitors and discusses on a quarterly basis whether non-financial risks (NFR) are adequately managed. Where appropriate, a.s.r. applies additional mitigating measures.

## 5.4.2 Risk appetite

Risk appetite is defined as the level and type of risk a.s.r. is willing to bear in order to meet its targets while maintaining the right balance between risk, return and capital. a.s.r.'s risk appetite contains a number of qualitative and quantitative Risk Appetite Statements (RAS) and gives direction to the management of both financial risks (FR) and non-financial risks (NFR). The statements highlight the organisation's risk preferences and limits and are viewed as key elements for the realisation of a.s.r.'s strategy.

According to the annual risk management cycle in 2024, to ensure alignment with a.s.r.'s overall strategy and risk strategy, the RAS and RAS limits were evaluated and updated by the MB and approved by the SB. See section 7.8.1.1.1 for a.s.r.'s RAS.

## 5.4.3 Identified risks

The risks identified are clustered into:

- Strategic risks;
- Emerging risks;
- Financial risks;
- Non-financial risks.

### 5.4.3.1 Strategic risks

In 2024, a.s.r.'s risk priorities were:

- (Geo)political instability and economic uncertainty;
- Climate change and biodiversity loss;
- Risks related to cyber/information security;
- Risks related to the integration of Aegon NL;
- Risks related to Artificial Intelligence;
- Consequences of legislation and regulations, supervision and legalisation of society.

#### 5.4.3.1.1 (Geo)political instability and economic uncertainty

Geopolitical tensions have led to conflicts between countries, ranging from sanctions and protectionist measures to wars, terrorist attacks, and cyber threats. These include the conflicts in the Middle East and the war in Ukraine.

The political landscapes in Western countries are also becoming less predictable. This brings a risk of reduced budgetary fiscal discipline. Demographic developments (ageing population, migration) can lead to labour market shortages, resulting in wage increases. The aforementioned factors can impact general economic development, particularly interest rates, inflation, and investment returns. The monetary policy of central banks also influences this.

a.s.r. monitors and assesses relevant developments for possible risks, and implements appropriate control measures:

- In the annual Strategic Asset Allocation (SAA) study, a.s.r. examines several possible economic scenarios (including deflation and stagflation) for the future development of the balance sheet and solvency. In the interim, follow-up analyses can be carried out. If necessary, this results in adjustments to the investment policy, in order to reduce solvency risks. Actions are monitored by the Central Investment Committee;
- In the Preparatory Crisis Plan, recovery measures are identified which can be applied in various economic scenarios;
- Managing market risk budgets provides automatic adjustments to the investment portfolio;
- Depending on economic developments, the interest rate hedge or the inflation hedge can be adjusted, taking into account the indirect effects from other asset classes;
- Depending on the level and duration of inflation premium increases can be implemented to offset inflation.

#### 5.4.3.1.2 Climate change and biodiversity loss

Climate change and biodiversity loss affect insurable risks and investments. Climate and biodiversity related risks are divided into physical and transition risks. Physical risks can be acute, such as extreme weather events (climate) or deforestation (biodiversity), or chronic, when they arise from gradual changes such as water shortages, rising temperatures or rising sea levels (climate), or decline in the quality of air, water and soil (biodiversity). The transition requires changes in legislation and regulations, adapted supervision and technological developments, and it results in changes in customer preferences or needs and market changes.

In addition to physical and transition risks, there is a reputational risk if a.s.r. fails to achieve its objectives or communicates overly assertive sustainability claims. In 2024, and earlier, a.s.r. has nuanced sustainability claims in various areas to align with current societal expectations, including adjusting fund names and investment policies.

a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures:

- In order to identify key developments and anticipate them in a timely manner, a.s.r. business units have assigned responsibilities in governance and participate in various collaborations and alliances. a.s.r. performed a double materiality assessment in 2023 and 2024. See section 6.1.4.3. Climate change and biodiversity loss are both recognised as material risks, but they also provide opportunities; see section 6.1.4.4. Note that financial risks related to climate change and biodiversity loss occur only in the medium- and long-term horizons.
- Climate change and biodiversity loss are taken into account in the investment's portfolio, and the products and services that a.s.r. develops and offers. To mitigate transition risks, a.s.r. cooperates with several research institutes, reinsurers, other insurers, and experts to gain as much knowledge as possible about new technologies and solutions. These alliances enable a.s.r. to determine the right price and conditions to insure these risks responsibly.

- Climate change and biodiversity loss are increasingly prominent in questions from stakeholders, ESG benchmarks and ratings. In order to continue to adequately address the risks related to mitigation and adaptation of climate change and biodiversity loss, a.s.r. continuously monitors its policy and mitigating measures and adjusts those where necessary.

#### 5.4.3.1.3 Risks related to cyber/information security

Technological development brings both opportunities and threats. Through the ongoing digitalisation and automation the IT risks related to cyber threats and information security remain persistently high at a.s.r. and its (IT) suppliers. This is partly due to the complexity and possible impact of cyberattacks.

Over the past year, geopolitical tensions and, consequently, cyber threats have increased. So far, this heightened threat has not led to targeted actions against insurers. Indirect damage from, for example, attacks on critical infrastructure cannot be ruled out, such as sabotage – including the destruction of undersea cables (internet infrastructure) – and the spread of disinformation and misinformation through the manipulation of social media. Cyber risks develop due to the increased use of new technologies, such as artificial intelligence (AI) in deepfake technology.

a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures:

- a.s.r. has implemented a system of measures based on international standards. a.s.r. actively monitors the threat landscape and invests in prevention, detection, and response skills and technology to strengthen its cyber resilience, ensuring customers can rely on a.s.r.'s secure digital services. a.s.r. has a test program in which various security tests are conducted, including recent ART tests in 2024. ART stands for Advanced Red Teaming and is conducted based on Threat Intelligence. The test simulates the tactics, techniques, and procedures of real hacker groups and focuses on critical functions and underlying systems of the institution. Findings from these tests are followed up as part of the regular security roadmap of a.s.r.
- a.s.r. provides a framework for the desired control of business continuity through its Business Continuity Management (BCM) Policy. a.s.r. has a system of measures and provisions in place to ensure the continuity of (critical) business operations, even when these are carried out by outsourcing partners. With the help of BCM, a.s.r. prepares for (and manages) any potential calamity that could threaten business continuity, as well as mitigating the impact on business continuity. Important measures taken include backup and restore, and an emergency scenario for telephony (customer contact). In the event that a.s.r. is hit by a severe, all-encompassing ransomware attack, business continuity can be restored with an 'offline backup'.
- a.s.r. deploys an information security awareness programme, to improve employee awareness and behaviour regarding information security. Specific tools such as gamification and phishing campaigns are used to enhance the necessary mindset and skillset.
- a.s.r. is actively involved in partnerships with financial institutions and public governing bodies, such as the Dutch Association of Insurers (*Verbond van Verzekeraars*), the National Cyber Security Centre (NCSC), the Digital Trust Centre (DTC), Insurance-ISAC, Insurance-CERT, and the DNB Threat Intel Based Ethical Red-team (TIBER-NL) programme. The aim is to share information to improve the financial sector's resilience to cyber risks.

#### 5.4.3.1.4 Risks related to the integration of Aegon NL

The integration of Aegon NL has an impact on a.s.r.'s strategy, organisation, processes, systems, products, services and suppliers. In addition, attention is given to the further development of a common culture. For the progress that has been made in the integration of Aegon NL see section 'At a glance'.

From a strategic perspective, the focus is on the swift and successful integration of Aegon NL. Knab was sold in 2024. For Aegon Life, Spaarkas and a.s.r. a Partial Internal Model (PIM) is used. Through the combination, a.s.r. has acquired the knowledge and experience and will also bring the a.s.r. Life businesses to this PIM. This offers the opportunity to further optimise capital efficiency.

In 2024, the integration of P&C, Disability and several staff departments was completed. The management of integration risks went well in 2024. For 2025, the integration of Individual life, Pensions, Mortgages, and the staff departments Group Finance and D&IT will continue. The integration is expected to be completed by 2026. The Aegon brand will continue to be used for life, pension and mortgage products until mid-2026 at the latest. a.s.r. relies on the successful execution of the merger based on current experiences and progress.

Unforeseen financial and non-financial risks may arise due to possible (cumulative) risks and the complexity of the integration, for example, in the areas of insurance and financial systems, the reporting process, and cyber/information security. Additionally, there is a risk of financial loss due to lower (intended) synergy benefits.

a.s.r. monitors and assesses relevant developments for potential risks and implements appropriate control measures:

- a.s.r. conducted a risk analysis prior to the acquisition of Aegon NL and took mitigating measures where necessary before the closing of the transaction.
- The responsibility for steering the integration lies with the management board in collaboration with the executive board. The Integration Management Office (IMO) supports the steering groups, monitors overall progress, and ensures coordination and adjustments through the steering groups.
- The Value Office is responsible for additional coordination and monitoring of achieving the stated synergy objectives. The responsibility for the execution of the integration lies with the business units. The role of first and second-line Risk and Compliance functions is secured in the governance.
- HR supports the business units in managing personnel risk with retention measures and the rollout of a culture programme. HR also monitors the outcomes of eMood®.

#### 5.4.3.1.5 Risks related to artificial intelligence

Artificial Intelligence (AI) offers opportunities to process large amounts of data, create new content, and make faster and better decisions. AI impacts the entire value chain of a.s.r., including customer service, claims handling, and risk management. AI improves the quality and efficiency of a.s.r.'s services. This contributes to increasing productivity and enhancing a.s.r.'s competitive position.

It is important for a.s.r. to stay informed about AI developments and to integrate AI into the business strategy while managing the associated risks. Effective use of AI requires among others good governance, trained employees, and reliable data. a.s.r. must continuously adapt to changing AI regulations, which necessitates ongoing monitoring and adjustment of AI systems.

a.s.r. monitors and assesses relevant developments for potential risks and implements appropriate control measures:

- a.s.r. applies proven technology and has formulated ambitious goals for specific business units regarding AI developments. a.s.r. develops generic use cases where possible and fosters a culture of innovation.
- a.s.r. collaborates with (new) partners and experts where possible to share knowledge and experience and effectively apply AI developments.
- a.s.r. has a modern IT landscape for AI initiatives and a generic process to ensure the controlled, phased, and managed rollout of models, safeguarding privacy, information security, and ethical frameworks.
- a.s.r. mitigates data-related risks through data governance and quality policies. a.s.r. actively seeks datasets that can help and improves internal housekeeping.
- The development of products where solidarity is an integral part of product development and monitoring the impact of AI on insurability.

#### 5.4.3.1.6 Consequences legislation and regulation, supervision and legalisation of society

a.s.r. faces new and/or amended laws and regulations with which it must comply. Examples include Solvency II, sustainability requirements (such as through the CSRD and EU Taxonomy Regulation), financial reporting standards and the Future Pensions Act (*Wet toekomst pensioenen* - WTP). In addition, new or renewed cyber and information security requirements are introduced, as well as data-focused legislation, including the Digital Operational Resilience Act (DORA) and the European Artificial Intelligence Act (AI Act). An increase in legislation and regulations in the data, cyber and information security fields is ongoing with the potential future Financial Data Access (FiDA) Regulation and the European Digital Identity (EUDI) Regulation. In addition, a.s.r. must continuously ensure that its websites remain accessible to its customers. Many new regulations need to be interpreted and implemented within a short period of time, and not all regulations are final yet. Developments affect a.s.r.’s capital requirement and solvency position. The Solvency II ratio is expected to benefit due to the recently published amendments to the Solvency II Directive that will take effect in 2027.

Additionally, the regulatory environment in the financial sector is becoming increasingly stringent and data-driven. In general the implementation and continuous tightening of control measures to comply with laws and regulations leads to continuous pressure on the organisation.

Additionally, political decisions can influence the strategic direction of a.s.r. These developments lead to more personal responsibility and choices for citizens. This places greater demands on providers to support and guide their customers (digitally) in this regard, also digitally.

To mitigate the risk, a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures:

- On themes, programmes and/or projects are set up to ensure sound implementation.
- Depending on the consequences of legislation and regulations, supervisory climate and juridification of society, and thus the impact on a.s.r. through factors such as higher internal costs, premium increases or exclusions may be implemented to offset these consequences.
- To continue meeting data requests and reporting obligations from laws and regulations, a.s.r. invests in data environments, such as data warehouses, dedicated data teams, and data (control) processes to ensure data quality.

### 5.4.3.2 Emerging risks

In 2024, the emerging risks identified for a.s.r. were:

- Changes in society;
- New pandemics and infectious diseases;
- Quantum computing.

Note: a.s.r.’s emerging risks are new or existing risks with a potentially major impact on the achievement of the strategic objectives, in which the level of risk is hard to define. Therefore, a net risk score is not applicable.

#### 5.4.3.2.1 Changes in society

A lack of social cohesion poses a risk. Society shows fragmentation (increasing tensions), polarisation (social division), and individualisation (decrease in solidarity). Social dynamics of the changing welfare state (social system) also play a role. There are circumstances that make some people more adaptable to these changes than others. Changes in society are intensifying, and the long-term consequences are inherently uncertain and potentially large. Causes include:

- Demographic developments, including urbanisation, ageing, more singles and single-parent families and migration. Moreover, inequality can also be triggered by government intervention.
- Financial developments, including increasing disparities between rich and poor, resulting in greater political uncertainty, like populism.
- Social developments, including increasing differences between the theoretically educated and the more practically educated, and changes in income security through contract forms and jobs. In addition, conspiratorial thinking is on the rise.

The role insurers have in society is changing, as these new developments impact the way an insurer invests, markets its products and delivers its services. An insurer is required to complete supporting processes and systems and meet the data-driven requirements of customers and regulators in light of this changing society.

a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures:

- a.s.r. periodically monitors the progress of claims and determines what impact the company has on the changing society through its investments, products and services. To identify developments and anticipate them in a timely manner, a.s.r.'s business units have formulated responsibilities in governance and participate in various collaborations.
- a.s.r. continuously improve processes, systems, products and services, including insurability and insurance rates, and data quality for data-driven applications.

#### 5.4.3.2.2 New pandemics and infectious diseases

The impact of the COVID-19 pandemic on a.s.r.'s strategic objectives, operational processes and financial performance has proved to be relatively limited. There is a risk that society will face new, impactful infectious diseases or changing patterns of infectious disease in the future. There is also another uncertainty in zoonoses (infectious diseases that can pass from animals to humans), which can lead to new diseases or variants of known diseases that can be harmful to health. Possible causes of future outbreaks include climate change and population growth. People may also experience long-term symptoms after infection. Future pandemics and emerging infectious diseases are inevitable, and the long-term consequences are inherently uncertain and potentially large.

a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures:

- a.s.r. has developed policies and procedures, measures and steering information to manage the impact of new pandemics. These resources and the lessons learned from the COVID-19 pandemic provide input for managing the impact of any new pandemic. A crisis organisation has been set up within a.s.r. and will be activated when necessary.
- a.s.r. contributes to the government's approach by following basic measures to prevent any spread of disease. In a broader sense, strategic developments such as continuously strengthening the physical and mental fitness of employees and encouraging exercise and a healthy lifestyle among customers and employees (via a.s.r. Vitality) contribute to increasing the resilience of a.s.r. and its environment.
- In exceptional situations, the government can activate Article 33 of the Health Insurance Act (*Zorgverzekeringswet* - ZVW) (disaster scheme), which reduces or eliminates the risk for health insurers. This scheme was also activated during the COVID-19 pandemic.

#### 5.4.3.2.3 Quantum computing

Quantum computing is revolutionising computations by offering substantially more computing power, impacting applications like scenario analyses, AI models and cryptographic encryption. Experts estimate that by 2030, quantum computers could be powerful enough to break current cryptographic standards.

On 3 December 2024, the General Intelligence and Security Service (*Algemene Inlichtingen- en Veiligheidsdienst* - AIVD) released an updated handbook to prepare organisations for the quantum computing threat. The AIVD identifies post-quantum cryptography (PQC) as the most promising solution to mitigate compromising information security.

a.s.r. monitors and assesses relevant developments for possible risks and implements appropriate control measures. a.s.r.'s security standard has been adjusted accordingly, and PQC will be applied wherever possible, in line with legislation. The General Data Protection Regulation (GDPR) states that cryptography must take into account the state of the art, and Digital Operational Resilience Act (DORA) requires the application of 'leading practices and standards' for cryptography.

### 5.4.3.3 Financial risks

In addition to strategic and non-financial risks, a.s.r. has recognised several financial risks. In 2024, the most relevant of these were:

- Economic uncertainty;
- Solvency II.

#### 5.4.3.3.1 Economic uncertainty

Currently, financial risks arise in particular from the war in Ukraine and Middle East (see section 5.4.3.1.1for a description of the risk '(Geo)political instability'). High(er) inflation may persist longer than initially expected. Central banks have raised interest rates to limit inflation. Lower consumer and investor confidence could hurt the economy. For residential property, there are court cases relating to the indexation of the rent as included in standard contracts (in line with the Council for Real Estate (*Raad voor Onroerende Zaken* – ROZ) standards), which is market practice and applied in a.s.r.'s portfolio. Based on the verdict of the Dutch Supreme Court, a.s.r. does not expect a material risk on the valuation of the property portfolio.

#### 5.4.3.3.2 Solvency II

On January 8, 2025, the amendments to the Solvency II Directive have been published in the Official Journal of the European Union. The changes contained in the amended Directive must be incorporated into national legislation by 29 January 2027, and become applicable to insurers as of 30 January 2027.

The amendments consist of various changes to the Solvency II framework, affecting most notably the liability discount curve, the risk margin and the volatility adjustment (VA), the Dynamic volatility Adjustment (DVA) and the long term impact of the climate change transition plan on the SII requirements. The amendments to the Solvency II Directive will require amendments to the Solvency II Delegated Regulation and/or the introduction of additional delegated acts and guidelines, to be developed by EIOPA.

In addition to the revisions to the Solvency II Directive, an agreement was reached on the Insurance Recovery and Resolution Directive (IRRD). The IRRD provides for recovery and resolution a framework for insurance companies at

European level and to be implemented by EU member states, comparable to the Act on Insurance Recovery and Resolution, currently in force in the Netherlands.

See section 7.8 for more details on the financial risk management.

### 5.4.3.4 Non-financial risks

In addition to strategic and financial risks, a.s.r. has recognised several non-financial risks. In 2024, the most relevant of these were:

- Outsourcing;
- Data quality;
- Artificial Intelligence;
- Model risk;
- Financial Reporting;
- Sustainability regulations and reputational risks;
- Unit linked insurance.

See section 7.8.1.1.6 for more information about the process of identifying, measuring, managing, monitoring, reporting and evaluating those risks.

#### 5.4.3.4.1 Outsourcing

Outsourcing risk continues to be relevant for a.s.r., especially in view of risks relating to cybercrime and dependence on suppliers. The risks related to outsourcing are managed and reported as part of the overall operational risk profile. An outsourcing framework is in place to define responsibilities, processes, risk assessments and mandatory controls. a.s.r. collaborates with a service provider to collect and validate supplier information. The insight obtained from this database supports the implementation of regulatory developments for suppliers, such as CSRD and DORA.

#### 5.4.3.4.2 Data quality

For a.s.r., adequate management of data quality and consequently generation and reporting of reliable information is of the utmost importance. This allows internal and external stakeholders (for example, customers, investors and supervisors) to make well informed decisions, and it mitigates the risk of financial losses, inaccurate risk assessments and reputational damage eroding the trust and loyalty of external stakeholders. In addition, robust data management contributes to a.s.r.'s ambition to further develop the use of AI.

Currently, the primary data management initiatives focus on data management enhancements related to Environmental, Social and Governance (ESG) data, financial data (partial internal model, IFRS and Solvency II) and master customer data. a.s.r. manages data quality by taking mitigating actions.

#### 5.4.3.4.3 Artificial Intelligence (AI)

AI implementation leads to several operational risks. Key risks include data quality issues, which can lead to inaccurate predictions, and model risk, where AI models may produce biased or unpredictable results. Cybersecurity threats and regulatory compliance challenges also pose significant concerns, which are mitigated by maintaining an AI repository to track implementation status and risk exposure, and incorporating AI Act specifics into the policy framework.

Additionally, the integration of AI with existing processes and IT can be complex, addressed through a centralised AI development process that incorporates privacy, safety, and ethics, and an awareness program for all parties involved in AI systems. To ensure robustness and quality assurance for dependable and safe AI use, a.s.r. subjects all AI systems with ethical risks to an ethical framework as part of the binding self-regulation from the Dutch Association of Insurers.

#### 5.4.3.4.4 Model risk

Model risk remains a key focus area for a.s.r., particularly given the potential for adverse consequences arising from decisions based on inaccurate or misused model outputs. Models play a crucial role in determining values and risk metrics. A model is defined as a quantitative method, system or approach that applies statistical, economic, financial or mathematical theories, techniques and assumptions to process input data into quantitative estimates. It combines data and various tools, and generates output.

Model risk can result in financial loss, suboptimal business and strategic decisions or reputational damage for a.s.r. To mitigate these risks, a.s.r. has implemented comprehensive model risk policies and procedures.

#### 5.4.3.4.5 Financial reporting

In 2024 a.s.r. remained dedicated to further strengthening its internal control framework to ensure robust financial reporting and compliance with regulatory requirements. Currently, the focus is to optimise these processes to further improve reliability by enhancing the internal control framework. These measures are designed to bolster the integrity of a.s.r.'s financial reporting and align with best practices in internal control management.

#### 5.4.3.4.6 Sustainability regulations and reputational risks

a.s.r. operates under a comprehensive and evolving number of sustainable public disclosure requirements. Starting from reporting year 2024 a.s.r. is required to report conform the CSRD. The CSRD requires a.s.r. to publicly provide information on material sustainability topics, including its climate change transition plan. A climate change transition plan will be legally required for a.s.r. when the Corporate Sustainability Due Diligence Directive (CSDDD) starts at the end of July 2027. The CSDDD will also legally require a.s.r. to conduct additional due diligence regarding sustainable matters in its upstream supply chain and its own operations.

Several operating entities within a.s.r. (financial market participants) are subject to product-level and entity-level disclosure requirements under the Sustainable Finance Disclosure Regulation (SFDR).

Climate change and biodiversity loss also create reputational risks. Litigation in relation to the transition to a low-carbon economy is on the rise. This includes complaints and/or litigation on transition planning and holding companies responsible for reducing greenhouse gas emissions as well as complaints and/or litigation in relation to sustainability claims and targets, including greenwashing and mis-selling claims. There is a risk that a.s.r. may also become subject to claims and/or litigation in this regard. a.s.r. closely monitors these developments and takes action if and where needed.

### 5.4.3.4.7 Dutch unit-linked products

**Compensation schemes**

Since the end of 2006, individual unit-linked life insurance products (*beleggingsverzekeringen*) have received negative attention in the Dutch media, from the Dutch Parliament, the Dutch Authority of the Financial Markets (*Autoriteit Financiële Markten* – AFM), consumers and consumer protection organisations. In 2008, a.s.r. reached an outline agreement with five consumer protection organisations to offer compensation to unit-linked policyholders in case the cost charge and/or risk premium charge exceeds a defined maximum. A full agreement on implementation of the compensation scheme was reached in 2012 (a.s.r. compensation scheme). In July 2009, Aegon reached an agreement with *Stichting Verliespolis* and *Stichting Woekerpolis* to reduce charges and risk premiums for customers of its unit-linked insurance policies in the Netherlands (Aegon compensation scheme). These agreements of a.s.r. and Aegon have been fully executed.

**Settlement of 29 November 2023**

a.s.r. reached a final settlement on 29 November 2023 regarding unit-linked life insurance customers of a.s.r. affiliated to the consumer protection organisations *Consumentenclaim*, *Woekerpolis.nl*, *Woekerpolisproces*, *Wakkerpolis* and *Consumentenbond*. The reason to settle was driven by an initiative to resolve long-lasting and historical disputes concerning unit-linked life insurances and decisions of the Court of Appeal of The Hague regarding unit-linked insurance products initiated by the above mentioned claim organisations. All collective proceedings of the consumer protection organisations against a.s.r. will be terminated. The settlement involves approximately € 250 million. The settlement applies to all a.s.r. products of customers affiliated to one of the above consumer protection organisations. It was also agreed that no new lawsuits will be filed. The settlement is not an acknowledgement of too high costs, risk premiums and/or charges, nor is it a reliable estimate of the contingent liability as previously disclosed.

On 19 February 2025 it was announced that the agreement that was reached in November 2023 with the five customer protection groups is final. More than 90% of the affiliated customers have accepted a personal offer. As a result, the collective actions that these consumer protection organisations have initiated in the past, will be cancelled once the settlement has been fully executed. Also, these consumer protection organisations will not initiate new claims against a.s.r. In 2023, a.s.r. made an additional provision of € 50 million for an arrangement for unaffiliated customers that have not previously received compensation. The provision recognised by a.s.r. to finalise the unit-linked life insurance claims amounts to € 300 million as a result of the settlement offer made in 2023, in addition to the € 36 million recognised in the insurance liabilities as remaining portion of the previous agreements, provided for in previous years.

With the recent settlement with the consumer protection organisations and the additional provision for unaffiliated customers, a.s.r. has taken big steps in resolving the unit-linked life insurance file and limiting the risks involved. By finalising this settlement, the risks regarding the unit-linked insurance file have been significantly reduced. Only a limited number of individual legal proceedings are currently pending.

# 5.5 Ensuring compliance

The Compliance department is a centralised function within a.s.r., headed by the Compliance key function-holder. Being part of the second line, Compliance is considered a key function in line with the Solvency II regulation. The Compliance key function holder is hierarchically managed by and reports to the Chief Risk Officer (CRO), a Member of the Management Board (MB). The CRO ensures that the Compliance annual plan proposed by the Compliance key function holder is adopted by the MB.

The compliance key function holder also has an escalation line to the CEO, the Chair of the Audit & Risk Committee (AR&C) and/or the Chair of the Supervisory Board (SB) in order to safeguard the independent position of the compliance function and to allow it to operate autonomously.

To enhance and ensure sound and controlled business operations, Compliance is responsible for:

- Encouraging compliance with relevant legislation and regulation, self-regulation, ethical standards and the internal standards derived from them (the rules) by providing advice and drafting policies.
- Creating awareness of the need to comply with the rules and desired ethical behaviour, including monitoring compliance with the rules.
- Monitoring management of compliance risks by further developing adequate compliance risk management, including, where necessary, advising on business measures and actions where necessary.
- Interaction with regulators in order to maintain effective and transparent relationships.

The Compliance key function holder reports quarterly on compliance matters and on the progress made with regard to recommended business measures and actions at a.s.r. group level and supervised entity (*Onder toezicht staande ondernemingen* - OTSO) level. The subsidiaries D&S, TKP and Robidus have their compliance officer who report to the Compliance department. The quarterly report at group and OTSO levels is presented to and discussed with members of the MB, the Non-Financial Risk Committee, the Risk Committee and with the A&RC of the SB. The report is shared and discussed with Dutch Central Bank (*De Nederlandsche Bank* - DNB), the Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten* - AFM), and the internal and external auditors.

Related to the integration of Aegon NL, Compliance established several work flows to further integrate the compliance function. Key considerations included the standardisation of policies and processes, monitoring and reports, and included good practices of Aegon NL. These activities were largely completed in 2024.

## 5.5.1 Compliance risks

a.s.r. continuously tracks evolving laws, evaluates their impact on the organisation, and determines the necessary measures to address them. These actions, combined with managing identified compliance risks, form the foundation of the annual compliance plan and monitoring activities. a.s.r. monitors business operations, including the management of reputational risks. The framework for monitoring and reviewing is based on the rules, regulations and standards of a.s.r. itself, including the a.s.r. Code of Conduct.

In 2024, a.s.r. focused on several key areas:

- Customer due diligence (CDD), including anti-money laundering and anti-terrorist financing.
- Privacy laws and regulations, including the General Data Protection Regulation (GDPR). a.s.r. considers it important for personal data to be handled with care.
- EU sustainability regulations, such as the SFDR, the EU Taxonomy Regulation and the CSRD.
- The further development and safeguarding of the Product Approval and Review Process (PARP), in collaboration with the PARP Board and the relevant business units.
- Compliance participated in conversion processes of portfolios and systems from Aegon to those of a.s.r.

In addition, a.s.r. continued to work on further improving ongoing monitoring activities by reviewing the compliance risk and monitoring framework and its translation into the business units' risk control matrix (RCM). This effort also aims to integrate behaviour and culture as part of optimising the NFR. a.s.r. aspires to increasingly incorporate behaviour into its monitoring surveys. A thorough understanding of behaviour and culture, combined with the analysis of process design and monitoring, provides a comprehensive view of the control environment.

The CDD Office is continuously working on an improvement plan for CDD-related risks, using insights and good practices from Aegon NL.

## 5.5.2 Privacy[1]

a.s.r. is committed to using the collected personal data responsibly and diligently to create value for both customers and the organisation. Sustainable growth can only be achieved by effectively safeguarding the privacy of customers, employees, and other individuals. This involves a conscious approach to handling personal data, along with a thorough understanding and adherence to relevant regulations.

### Governance and organisation

A robust governance structure is essential for effective personal data protection. The privacy governance model is outlined in the a.s.r. Privacy Policy. The Executive Board (EB), in particular the CTO, is responsible for compliance with data protection regulations. In 2024, a central Privacy Office was established to manage privacy policies and strengthen the privacy compliance in the first line. A privacy risk and control framework was developed (as part of the compliance risk and monitoring framework) to help monitor privacy-related risks.

The Data Protection Officer (DPO) independently monitors and promotes privacy compliance within a.s.r. by advising and raising awareness. The DPO operates alongside the Compliance department. The DPO has the authority to escalate critical privacy compliance matters to the highest levels of the organisation, including the CEO, the Chair of the A&RC and/or the SB.

#### a.s.r. standards for the processing of personal data

a.s.r. always informs data subjects clearly and in advance about how and why a.s.r. processes their personal data. This is done through several types of privacy notices. a.s.r.'s general Privacy Statement is published on the website at www.asrnl.com and includes information about a.s.r.'s contact details, the purposes of the processing, the legal basis for the processing, the recipients of the data, the retention period and the rights of the data subjects.

a.s.r. has established a clear set of standards for the processing of personal data of customers, employees, intermediaries and other parties ('data subjects'). These standards are detailed in the a.s.r. privacy policies and their translations. Furthermore, a.s.r. adheres to the Insurers and Crime Protocol (*Protocol Verzekeraars en Criminaliteit*) as well as the Financial Institutions Incident Warning System Protocol (*Protocol Incidentenwaarschuwingssysteem*) when processing data to detect fraud and abuse. These protocols were established by the Dutch Association of Insurers and Health Insurers Netherlands.

See section 3.1.3.2 for more information about IT and the digital strategy, and 5.4.3.1.3 for risks related to cyber and information security.

### Data breaches and complaints in 2024

Measuring and reporting of data breaches is a crucial way to enhance technical and organisational measures to protect personal data. It also helps mitigate the consequences of any breach for the affected individuals.

a.s.r. has a procedure in place to register personal data breaches to a Data Breach Team. This team assesses whether a data breach needs to be reported to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens* – AP) and whether data subjects need to be informed.

Raising awareness of these procedures and of the importance of taking due care when processing personal data to avoid breaches falls under the awareness programme. Compliance and the DPO report quarterly on the number and type of data breaches to the highest organisational level in a business line – the MB, NFRC, Risk Committee and the A&RC of the SB. Most breaches have been attributed to human errors, outdated postal addresses and lost mail items. a.s.r. implements measures to mitigate the causes of these breaches whenever possible, such as reviewing and improving processes.

In 2024, 134 data breaches related to Personal Identifiable Information (PII) were reported to the AP (2023: 87), this increase is partially due to inclusion of Aegon NL in the 2024 figures . According to the privacy regulations, the AP must be notified of data breaches that present a probable risk to the affected individuals. These figures exclude Corins and D&S entities, who have their own data breaches processes. a.s.r. took measures to mitigate any risks for the individuals concerned and has no reason to expect any of the reported breaches to have a serious impact for those involved.

Complaints about privacy issues enable a.s.r. in refining processes to boost privacy compliance. a.s.r. has noted a growing awareness of privacy among customers, resulting in an increase in questions and complaints. In 2024, a.s.r. received 190 complaints from customers and third parties, including three complaints from a regulatory body (2023: 149, of which one from a regulatory body). Most complaints relate to data breaches, but many relate to individuals exercising their privacy rights, such as the right of access and the right to be forgotten.

**Complaints relating to customer privacy received from customers and third parties [2,3,4]**

(in numbers)


1 Section 5.5.2 is in scope of CSRD and limited assurance (ESRS S1, S4).
2 Complaints received from regulatory bodies are also included in the figure reported for complaints received from third parties.
3 As of reporting year 2023, a more complete classification approach is applied to the figure complaints related to customer privacy received from third parties.
4 These figures are not in scope of CSRD and limited assurance.

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## 5.5.3 Integrity and ethical conduct

Integrity and ethical conduct are prerequisites to be a trustworthy company. Ethical awareness is strengthened within a.s.r. by the promotion of core values and ethical leadership, providing ethical training, embedding sound integrity policies and implementing ethical frameworks for specific business processes.

### Code of Conduct and the oath or solemn affirmation

a.s.r.'s Code of Conduct is a guideline for actions and decisions and helps the company to fulfil its duties properly, with care and integrity. It also provides clear guidelines for how employees interact with each other, how a.s.r. serves its customers and how a.s.r. takes its responsibility for the environment in which it operates. The a.s.r. Code of Conduct applies to anyone who works for a.s.r., whether on a regular basis or not. a.s.r. expects everyone to observe the Code of Conduct and to hold each other to account for compliance with its stipulations. The a.s.r. Code of Conduct can be found at www.asrnl.com.

When starting employment at a.s.r., every employee, including temporary and external employees, must take an oath or make a solemn affirmation. This demonstrates that they accept and comply with the rules of conduct, and observe ethical principles in their actions.

### Unethical behaviour

In order to guarantee sound and controlled business operations, a.s.r. has taken a number of control measures to prevent, identify and address unethical behaviour, including addressing corruption. Examples of control measures include integrity screening carried out by the investigations department prior to hiring new employees and in-employment screening. This integrity screening also extends to contracting parties. With these measures, a.s.r. seeks to prevent the risk of physical, financial or reputational damage to the company, its customers and/or business partners and other stakeholders. To complement this, a.s.r. has taken measures such as monitoring and stimulating awareness throughout the business with respect to conflicts of interest.

a.s.r. believes it is important that incidents are reported and that this can be done safely and with due care. a.s.r. has an internal reporting route for integrity incidents (included in the Code of Conduct) and a whistleblower scheme. See section 6.3.1.

a.s.r. has a policy on controlling unethical behaviour at group and business levels. a.s.r. investigates signs of unethical behaviour, including corruption and fraud, among employees, intermediaries, mandated brokers and suppliers. a.s.r. has a zero tolerance policy. Should integrity be compromised, for example through corruption and/or fraud, a.s.r. will take appropriate measures, with due regard for the applicable legislation and regulations-, and sector-based protocols. The risk of corruption is addressed in various policies, such as a.s.r.'s incentive policy and its anti-corruption policy. The latter also prohibits political contributions and charitable donations that may serve as means of bribery and corruption. Both policies are approved by the Management Board. a.s.r. uses the definition formulated by the DNB: 'The risk of corruption is the risk of financial companies in the Netherlands being involved in bribery and/or conflicts of interest which impair the integrity of, and trust in, that company or in the financial markets'. By performing systematic integrity risk analyses (SIRA's), a.s.r. maps integrity risks and determines which additional control measures must be taken if any risks fall outside the risk appetite. The SIRA contributes to the detection and prevention of involvement with violations of legislation and regulations or other socially or ethically undesirable acts. The fraud and corruption risks are part of the SIRA.

In 2024, 65 cases of alleged lack of integrity, including violation of the privacy policy, were investigated by the investigations department (2023: 86). 27 disciplinary measures (2023: 23) were taken in cases of proven lack of integrity in the conduct of an employee, intermediary or supplier. With respect to employee conduct, 16 employees were found to have violated the a.s.r. Code of Conduct. Following investigation, a lack of integrity – for example inappropriate conduct or behaviour – was proven. These employees were disciplined for the infringement of the company's principles. This resulted in addressing the undesirable behaviour, a written warning or dismissal. The investigations department reports quarterly on the number of incidents and the measures taken. Where necessary, a.s.r. will take appropriate measures as described in the Code of Conduct.

## 5.5.4 Awareness

Within a.s.r., employees increase their awareness of integrity topics through yearly training courses, presentations, dialogue and other (voluntary) means of raising awareness. By communicating important integrity topics regularly, employees can refresh their knowledge of the Code of Conduct and follow important developments. Topics that were highlighted in 2024 include ancillary business activities, incentives, privacy, customer due diligence, information security, sustainability, inclusivity and diversity, and insider trading. In addition, all a.s.r. employees are regularly presented with three mandatory questions regarding a.s.r.'s Code of Conduct, information security and cybercrime. A new tool was implemented for this purpose at the beginning of 2024.

For a select group of employees that perform CDD-related activities, a mandatory training programme and education programme concerning CDD-related legislation and regulations (including the Anti-Money Laundering and Anti-Terrorist Financing Act) is operational.

### Ethical themes

Employees are encouraged to speak up regarding integrity issues and engage in dialogue with each other about daily dilemmas within the company.

a.s.r. facilitates open dialogue on ethical dilemmas and challenges by organising ethics workshops and dilemma sessions, as well as by providing ethical guidance on relevant topics. This encourages and strengthens ethical awareness among employees. In 2024, two ethics sessions were organised to develop ethical awareness and encourage critical reflection and informed decision-making, focusing on work floor culture and behaviour, as well as critical ethical decision-making in sustainable insurance to promote necessary transitions towards a more sustainable world, amongst other things.

Complex daily dilemmas are a natural part of operations for a large insurance company. Several risk committees within a.s.r. discuss critical issues through critical dialogue regarding non-financial risks and possible instances of immoral behaviour. This dialogue aims to balance stakeholder interests and make well-informed business decisions.

a.s.r.'s Sustainability Committee advises the Management Board on complex dilemmas by discussing issues regarding the transition to more sustainable business practices and providing tools and support for business units to make ethically self-aware choices that are in line with a.s.r.'s vision and strategy. The Sustainability Committee advised on several sustainability related matters in 2024, including:

- Ethical dilemmas surrounding the use of AI, where balancing the known moral costs (such as extensive energy use and socially abhorrent labour circumstances) and moral benefits (such as cost reductions through efficiency and more complex and human-focused work) is crucial for responsible deployment and use.
- a.s.r. has made a change to its Policy on Responsible Investments, allowing investments in Dutch companies or activities related to the defence industry under strict conditions.
- Further refinement and development of the Policy on Sustainable Insurance to help business lines make careful ESG risk assessments when accepting business clients and help business sectors transition to more sustainable business models without excluding necessary economic sectors.

### Ethical data use

The ethical framework for data-driven applications for the insurance sector helps a.s.r. to establish an ethical data vision and encourages critical reflection on issues such as discrimination and exclusion, accessibility of data applications, privacy, transparency and explicability.

Ethical data use requires customer trust, a self-aware vision regarding desirable contexts of data collection to generate useful insights, and appropriate tailoring of these insights to product and service delivery to serve customer's interests. In an increasingly data-driven world, critical reflection is needed to avoid risks of discrimination and exclusion, keep applications accessible for vulnerable groups, and protect customer's autonomy and self-determination, as well as their privacy, in all relevant processes. In 2024, an ethical framework session was organised for the Data Science department of HR to promote awareness on data ethics and the use of the framework.

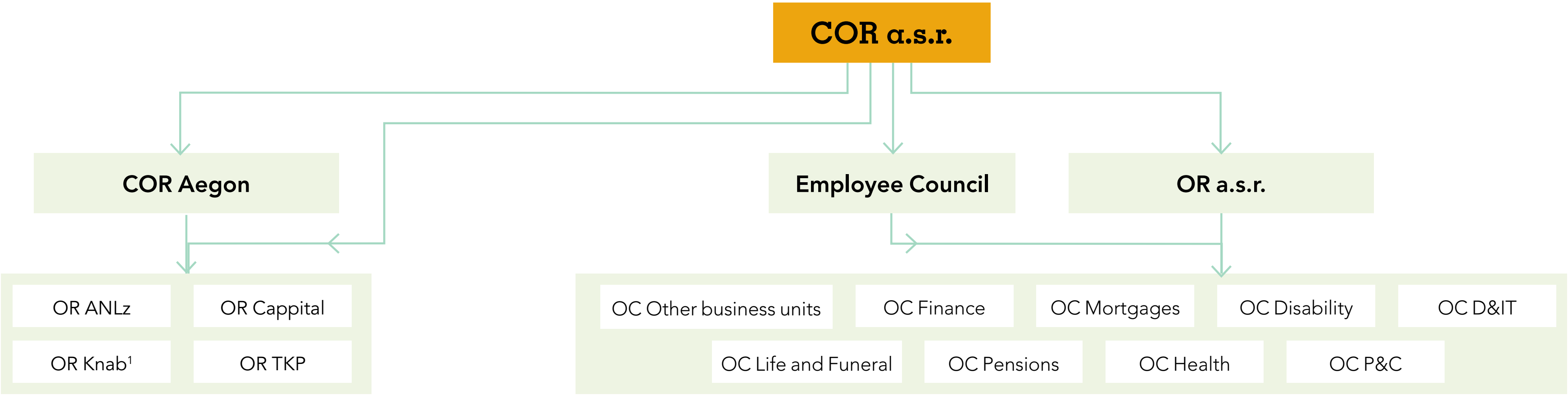
# 5.6 Employee participation

## 5.6.1 Composition of the Work Councils

As a result of the acquisition of Aegon NL, a.s.r.'s employee participation was restructured in 2023, with a structure that remained in place until the end of 2024. This structure was as follows:

- A Central Works Council for a.s.r. (*Centrale Ondernemingsraad a.s.r.* - COR a.s.r.), in which six members of a.s.r.'s Works Council (*Ondernemingsraad a.s.r.* - OR a.s.r.) had a seat together with six members of Aegon's Central Works Council (*Centrale Ondernemingsraad Aegon* - COR Aegon). The COR a.s.r. discussed issues with the Executive Board (EB) and Management Board (MB) that were relevant to the entire organisation.
- The nine subcommittees (*Onderdeelcommissies* - OCs) of the OR a.s.r., which continue to have the same set-up, namely Mortgages, Disability, Life and Funeral, Pensions, Non-life, Health, Digital & IT (D&IT ), Finance and Other business units. The OCs dealt with issues relating to their specific business units.
- Aegon's Works Councils (*Ondernemingsraden* - ORs), which are also represented on the COR a.s.r.; these are the Aegon NL, Knab, TKP and Aegon Cappital ORs. These ORs dealt with issues relating to their specific business units. The OR Mortgages has been combined with the OC Mortgages as of January 2024.
- The Employee Council, comprising the 12 members of the COR a.s.r. and representatives of the OCs.

As integration progressed throughout the year, representatives of the Aegon OR's joined the a.s.r. OCs, thereby strengthening the co-operation within and between the employee participation bodies. The COR a.s.r. also became one team in 2024, despite the different backgrounds (former Aegon and former a.s.r.) of its Members.




1 Until 1st of November due to sale of Knab

## 5.6.2 Main themes during 2024

### Integration of Aegon NL

Throughout the year, there was frequent contact between the COR a.s.r. and the EB and the MB, on the progress of the integration of Aegon NL. This was also regularly discussed with the Supervisory Board (SB). The employee participation bodies regularly discussed employee concerns with management at various organisational levels, especially as the impact of the integration was experienced differently in different places in the organisation. Amongst others, the impact of the foreseen closure of the office in Leeuwarden was a topic in several meetings between management and the COR a.s.r. and the relevant OCs and ORs. Furthermore, considerable attention was given to topics such as the development of sick leave, employee turnover and the development of the organisational culture.

Throughout the year, 18 requests for advice relating to the integration of Aegon NL were submitted to the COR a.s.r. All requests for advice relating to the integration of Aegon NL fall under the auspices of the COR a.s.r. To deal with the requests for advice, working groups were formed for each division of a.s.r., with members of the OCs, the relevant OR(s), two COR a.s.r. members and a secretary.

The working group members list their own questions and comments and then contact their colleagues from the relevant division to include their questions and concerns when assessing the application. This often leads to questions, which are subsequently discussed with the manager in question. Once the questions have been adequately addressed, the working group provides preliminary advice, which is submitted to the COR a.s.r. For some business units, the requests for advice relating to integration have (largely) been completed, while for some others, additional requests for advice are still expected throughout 2025 and beyond.

### Other topics

Both the COR a.s.r. and the Knab Works Council were involved in the advisory process surrounding the sale of Knab. In this regard, there was regular communication between both bodies.

In addition, the Works Council advised on the appointment of Bob Elfring as a Member of the SB.

Furthermore, a number of internal regulations were reviewed during the course of the year. The COR a.s.r. consented to the update of the Whistleblowing Scheme (*Klokkenluidersregeling*) and was informed about changes in the policy on dealing with inside information and private transactions in financial instruments (*Regeling omgang met voorwetenschap en privétransacties in financiële instrumenten* ). The Central Works Council also reviewed the personnel regulations in 2024.

Lastly, a considerable amount of time was spent on designing the employee participation for the future. In early 2025, the new, fully integrated structure will be implemented and elections will be held for the employee participation bodies for 2025-2027.

Works Council meetings

97

**Meetings of the Central Works Council**

| Meeting | Participants | Number of meetings |
|---|---|---|
| Regular Central Works Council meetings with a Member of the EB | Chair of EB, secretary of EB, HR Director and Works Council | 4 |
| Ad hoc meetings Works Council with a Member of the EB | Chair of EB, secretary of EB, HR Director and two Members of the Works Council | 20 |
| Regular Works Council meetings with a Member of the EB and Members of the SB | Chair of the EB, Member(s) of the SB, secretary of EB, HR Director, and Works Council | 3 |
| Works Council meetings without a Member of the EB | Works Council | 70 |

# Sustainability statements

# 6.1 General

## 6.1.1 Introduction

From the reporting year 2024 onwards, the Corporate Sustainability Reporting Directive (CSRD) came into effect, including the reporting requirements of the European Sustainability Reporting Standards (ESRS) on all material sustainability matters regarding impacts, risks and opportunities related to environmental, social and governance (ESG) matters.

The ESRS, as set out in Commission Delegated Regulation 2023/2772/EU, is the first set of ESRS. They are sector-agnostic and contain 12 distinct standards. The standards are divided into two cross-cutting standards and ten topical standards. The cross-cutting standards define the general disclosures and requirements that apply to all the topics subject to the CSRD, regardless of materiality. The topical standards provide the disclosure requirements for environmental, social and governance topics.

The Sustainability Statements also include the disclosures in accordance with article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), see section 6.2.5.

## 6.1.2 General basis for preparation

**General basis for preparation of the Sustainability statements**
As per 2024, the CSRD came into effect. Based on the CSRD, a.s.r. as a listed public-interest entity is required to report on the impact of the activities of a.s.r. on the environment and society and the risks and opportunities that arise from sustainability-related developments and events. The reporting requirements under the CSRD are also applicable to the subsidiaries of a.s.r. listed below. These entities are exempted from individual or consolidated sustainability reporting by a.s.r. and their material sustainability matters are included in the group Sustainability statements, including the mandatory elements of the sustainability matters which are deemed material for these entities but not deemed to be material at the a.s.r. group level. See section 6.1.4.5 for more information.

- ASR Levensverzekering N.V.
- ASR Schadeverzekering N.V.
- ASR Basis Ziektekostenverzekeringen N.V.
- ASR Aanvullende Ziektekostenverzekeringen N.V.
- AEGON Levensverzekering N.V.
- AEGON Spaarkas N.V.

The Sustainability statements have been prepared in the context of new sustainability reporting standards, requiring entity-specific interpretations and addressing inherent measurement or evaluation uncertainties, subject to further improvements going forward.

The Sustainability statements have been prepared on a consolidated basis. The scope of consolidation is the same as for the financial statements. See section 7.3.5 and section 7.4.

a.s.r.’s consolidated value chain has been split into four value chains: insurance, asset management, distribution & other services and supporting processes. Based on these value chains, material impacts, risks and opportunities have been identified in both the upstream and downstream value chains, as well as for a.s.r.’s own operations. For the inclusion of material upstream and downstream value chain information, see section 2.3 and section 2.4.

a.s.r. has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation, and a.s.r. has not used the exemption from disclosure of impending developments or matters in the course of negotiation.

**Time horizons**
a.s.r. has adopted the same time horizons as those outlined in ESRS, which is for the:

- Short term: the current reporting period in the financial statement;
- Medium term: from one year up to five years;
- Long term: more than five years.

**Estimates and uncertainties**
Certain quantitative metrics and monetary amounts are subject to a high level of measurement uncertainty, especially for some of a.s.r.'s upstream and downstream value chain quantitative metrics (e.g. emissions related to purchased goods & services). In such instances, a.s.r. discloses information about the sources of measurement uncertainty and provides details on the assumptions, approximations and judgments made. For more details, see section 6.5.

**Comparative figures**
a.s.r. has exercised the option not to present comparative figures in its initial reporting year. This exception is not applicable for EU Taxonomy, hence comparative figures are presented for the EU Taxonomy.

**Disclosures stemming from other legislations or generally accepted sustainability reporting pronouncements**
Disclosure requirements arising from other legislations or other sustainability reporting standards, as adhered to by a.s.r., are addressed in section 8.3.1.

**Statements on due diligence**

| Embedding due diligence in governance, strategy and business model | Sections |
|---|---|
| Information provided to and sustainability matters addressed by the AMSB (GOV-2) | 5.1.3, 5.1.4, and 5.1.6 |
| Integration of sustainability-related performance in incentive schemes (GOV-3) | 5.3 |
| Material impacts, risks and opportunities (SBM-3) | 6.1.4.4 |
| **Engaging with affected stakeholders** | |
| Information provided to and sustainability matters addressed by the AMSB (GOV-2) | 5.1.3, 5.1.4 and 5.1.6 |
| Interests and views of stakeholders (SBM-2) | 6.1.4.2 |
| Double Materiality Assessment (IRO-1) | 6.1.4.3 |
| Policies regarding material sustainability matters (Topical ESRS) | 6.2.1.3, 6.2.2.2, 6.2.3.3, 6.2.4.2, 6.3.1.2, 6.3.2.2, 6.3.3.2 and 6.4.1.3 |
| Environmental, Social and Governance (Topical ESRS) | 6.2, 6.3 and 6.4 |
| **Identifying and assessing negative impacts on people and the environment** | |
| Double Materiality Assessment (IRO-1) | 6.1.4.3 |
| Material impacts, risks and opportunities (SBM-3) | 6.1.4.4 |
| **Taking action to address negative impacts on people and the environment** | |
| Actions and resources regarding material sustainability matters | 6.2.1.3, 6.2.2.2, 6.2.3.3, 6.2.4.2, 6.3.1.2 and 6.3.2.2 |
| Environmental, Social and Governance (Topical ESRS) | 6.2, 6.3 and 6.4 |
| **Tracking the effectiveness of these efforts** | |
| Metrics regarding material sustainability matters (Topical ESRS) | 6.2.1.4, 6.2.2.3, 6.2.3.4, 6.2.4.3, 6.3.1.3, 6.3.2.3, 6.3.3.3 and 6.4.1.4 |
| Targets regarding material sustainability matters (Topical ESRS) | 6.2.1.4, 6.2.2.3, 6.2.3.4, 6.2.4.3, 6.3.1.3, 6.3.2.3 and 6.3.3.3 |
| Environmental, Social and Governance (Topical ESRS) | 6.2, 6.3 and 6.4 |

## 6.1.3 Governance

### 6.1.3.1 Administrative, management, and supervisory bodies
The governance structure of a.s.r. consists of the Supervisory Board (SB), Executive Board (EB) and the Management Board (MB). The SB has three roles; the supervisory role, the advisory role and the employer's role for the EB. The EB is collectively responsible for the day-to-day conduct of business at a.s.r. and for its strategy, structure and performance. The EB is accountable to the SB and the Annual General Meeting (AGM) regarding the performance of its duties. The MB conducts the day-to-day business at a.s.r. with the EB and implements and realises the business strategy, strengthens a.s.r.'s innovation power and improve customer focus.

See sections 5.1.3, 5.1.4, 5.1.5 and 5.1.6 for further details on the roles and responsibilities of the administrative, management and supervisory bodies (AMSB) and how they are informed about sustainability matters and how these were addressed.

### 6.1.3.2 Integration of sustainability-related performance in incentive schemes
See section 5.3 for disclosure requirements related to the integration of sustainability-related performance in incentive schemes.

### 6.1.3.3 Statements on due diligence
The core elements of due diligence are embedded in various disclosure requirements outlined in the ESRS. The table on this page contains an overview of these disclosure requirements with references to the relevant sections.

### 6.1.3.4 Risk management and internal controls related to sustainability reporting
a.s.r. applies an integrated approach for managing risks. The integrated risk management framework and governance of a.s.r. includes risk management activities related to sustainability reporting. For more information, see section 7.8.

The scope and the nature of the risks and internal controls related to sustainability reporting vary amongst the different business lines. The main risks related to reporting on sustainability matters include the (timely) availability and reliability of data, available knowledge and resource capacity and (incorrect) interpretation of the regulation.

In 2024 risks have been identified and controls have been determined to ensure the correctness, completeness and timeliness of the sustainability reporting in particular with respect to newly disclosed items. The aforementioned risks and controls have been included in the reporting manuals which have been drafted at the level of each individual product line. Furthermore, a governance structure has been in place for addressing sustainability matters, including reporting. a.s.r. is in the process of integrating the risk management activities related to CSRD sustainability reporting in its existing integrated risk management framework and governance. By having this fully integrated it will enhance organisational efficiency, strengthen reliable reporting, and ensure compliance with the regulatory requirements.

## 6.1.4 Strategy and impacts, risks and opportunities

### 6.1.4.1 Strategy, business model and value chain

The relation between sustainability disclosure requirements and a.s.r.'s strategy, business model, and value chain is disclosed in section 2.4.

### 6.1.4.2 Stakeholder engagement

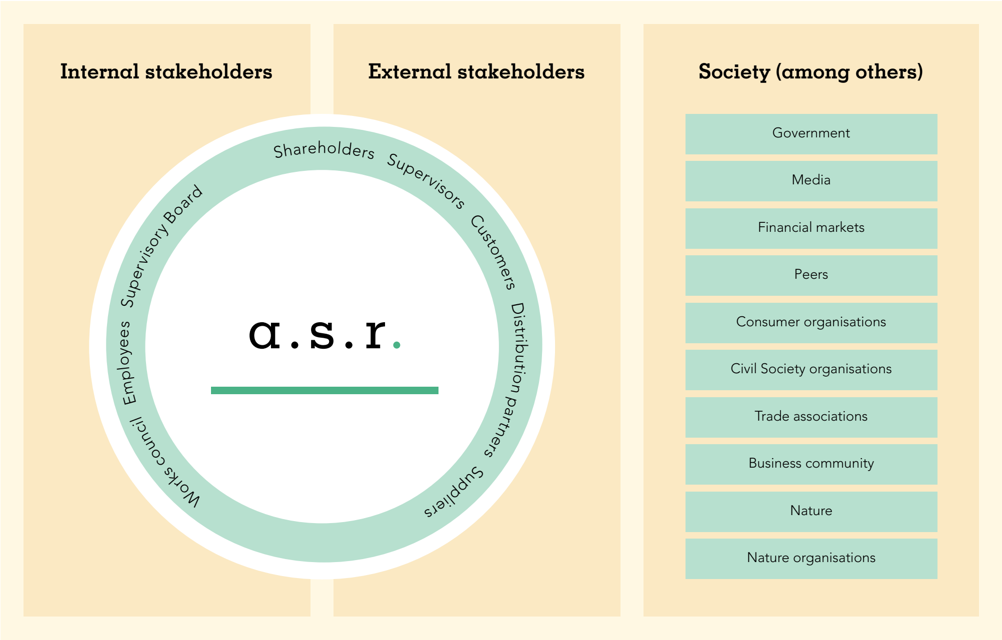
Strategic, constructive and proactive consultations with all stakeholders are of great importance to a.s.r. With regard to stakeholders, a.s.r. is in continuous dialogue with stakeholders that influence the organisation both directly and indirectly and who are most likely to be impacted by a.s.r.'s activities. a.s.r.'s main stakeholder groups are summarised in section 8.5. Next to a.s.r.'s key stakeholders – consumers, employees, shareholders and society – this includes workers in the value chain, peers and governmental organisations. Consultation is done through roadshows, customer or employee surveys, round table sessions, dialogue sessions and participation in sector initiatives. Members of the MB also regularly engage with stakeholders.

a.s.r. also continuously monitors external trends and developments to determine which topics are most relevant to the organisation and how it can contribute positively to them. Sources used for this purpose include reports by legislative and regulatory bodies, the World Economic Forum and the World Business Council for Sustainable Development. Other sources include scientific research, peer reports and media coverage.

In addition to this continuous stakeholder interaction and trend monitoring, a stakeholder dialogue was held. This dialogue was held at a.s.r.'s office in Utrecht and was divided into two sessions: one for employees, and one for external stakeholders. Members of the MB attended both plenary and breakout sessions to hear stakeholders' views, answer questions and take part in discussions. a.s.r. carefully selected the stakeholders for this dialogue, ensuring a good balance between all stakeholder groups. a.s.r. specifically invited stakeholders with a range of knowledge and experience on the organisation's three strategic sustainability themes: i) Sustainable living and climate, ii) Financial self-reliance and inclusion, and iii) Vitality and sustainable employability. Participants in the stakeholder dialogue were asked to give their views on these strategic sustainability themes in three separate breakout sessions. Participants were asked three questions:

- What are the most important challenges and barriers relating to the strategic sustainability theme?
- On which issues does a.s.r. need to focus in order to make the biggest impact?
- Which tools and partners are best suited for a.s.r.'s possibilities and ambitions?

Participants were asked to provide input on the topics most material to a.s.r.'s strategy and reporting, through a survey that stakeholders filled in after the dialogue sessions. Stakeholders were presented with a list of sustainability matters and were asked to select and rank these in order of a.s.r.'s most material impacts on people and the environment. They were also asked to rank sustainability matters representing material financial risks and opportunities for a.s.r. The outcomes of the dialogue sessions and survey results were used as input for the double materiality assessment (see section 6.1.4.3 for more information on the DMA-process). No distinction was made between the opinions of internal stakeholders and those of external stakeholders. The outcomes of the stakeholder dialogue were also used by the MB and senior management to evaluate a.s.r.'s integrated strategy, which focuses on long-term value creation for all stakeholders.




The stakeholders consulted in the stakeholder dialogue were (representatives of) customers, peers, suppliers, brokers, educational and research institutes, NGOs, media and branch organisations. A summary of the outcome of the stakeholder dialogue was shared with the MB, SB and the stakeholders that participated. The outcomes of the stakeholder survey on impact and financial materiality are included in section 8.5.

#### Cooperation with stakeholders

a.s.r.'s stakeholder policy, which aims to include the interests of relevant stakeholders when defining and further developing the sustainability strategy, was established in 2023. Effective consultation and engagement with a.s.r.'s stakeholders is important in this process: a.s.r. strives to serve stakeholders' interests to the best of its ability and build lasting relationships with them. This stakeholder policy provides guidelines and principles to maintain and strengthen these relationships, including an overview of the frequency and method of engagement for different stakeholder groups. The way a.s.r. communicates with stakeholders depends on the type of stakeholder, the topic and the purpose of the communication in question. a.s.r.'s means of communication range from personal contact to organising roadshows, customer and employee surveys, and roundtable and dialogue sessions.

a.s.r. works together with peers, social organisations and government agencies to jointly develop policies on sustainability issues and to promote the thorough implementation of such policies.

a.s.r. is an active participant of initiatives such as DNB's Platform for Sustainable Finance, the Energy Efficient Mortgages Hub Netherlands, creditors' coalition (*Schuldeiserscoalitie*), the Platform Living Wage Financials and the Partnership for Carbon Accounting Financials (PCAF). Furthermore, there is close collaboration with the Dutch Association of Insurers on Sustainability reporting. To spread knowledge and inspire others, a.s.r. actively presents its sustainability approach and sustainability activities at a wide range of events, such as seminars and meetings organised by parties including consultancy firms, the United Nations Environment Programme Finance Initiative, the Dutch Association of Insurers, the Dutch Fund and Asset Management Association and *Zorgverzekeraars Nederland*.

### Key stakeholders

a.s.r.'s key stakeholder groups are customers, employees, investors and society.

**Customers**

a.s.r. has established the *Raad van Doen*. The *Raad van Doen* is the online customer and advisor panel for all a.s.r. brands. Through this panel, customers and intermediaries are involved in improving a.s.r.'s services. It functions as a panel for a.s.r.'s strategy, as a forum for co-creation, product development and representation of customer interests, and as a sparring partner. Product lines also use members of the *Raad van Doen* to conduct research on customer expectations regarding sustainability aspects for specific insurance products and services. This can be done through questionnaires or by organising a dialogue session with members. Furthermore, as part of the Product Approval and Review Process (PARP), a newly developed or revisions to an insurance product is tested before it can be introduced to the market. Existing products must also go through the PARP process periodically. Within the PARP process, several criteria are reviewed, including customer interest and social interest. In 2024, a.s.r. continued the *Wat doen kan doen* news bulletin. In this bulletin, customers are invited to share their experiences with a.s.r.

**Employees**

a.s.r. wants to establish a professional work environment that fosters autonomy and self-management for our employees, to enable employees to make choices relating to their career and enhance their sustainable employability. a.s.r. employees value good terms of employment, enjoyable work, a good work-life balance, attention to their health and well-being, and an appreciation of the contribution they make. a.s.r. encourages and supports employees in developing themselves to enhance their opportunities in the internal and external labour market. Employees also want to be recognised for who they are and to feel included and at home. a.s.r. aims to achieve a balanced workforce and be inclusive to all employees regardless of gender, age, religion, physical and mental capacity, background and sexual orientation.

**Investors**

Investors rely on a.s.r.'s management to devise and successfully execute the best strategy to create long-term value. a.s.r. does so with a continued focus on value over volume, maintaining a strong cost discipline and only pursuing mergers and acquisitions (M&A) that tie in well with its strategy. a.s.r. also maintains a strong balance sheet and a robust Solvency II ratio with manageable sensitivities and ample financial flexibility. Investors are increasingly interested in the impact and social relevance of the companies they invest in. It is important to them that a.s.r. represents the interests of all stakeholders to create long-term value and a good return on capital.

**Society**

As well as the aforementioned stakeholders, a.s.r. has a range of other stakeholders to take into account when doing business, such as civil society organisations, the Dutch government, tax and regulatory authorities, trade unions, the media, suppliers, academics, peers and business partners. Depending on the topic and type of relationship involved, expectations and interests may vary from responsible investments and regulatory compliance to helping people to become financially reliant, inclusiveness and constructive cooperation with business partners in different contexts. Overall, these various stakeholders expect a.s.r. to create sustainable and responsible societal value.

## 6.1.4.3 Double Materiality Assessment

a.s.r. periodically conducts a Double Materiality Assessment (DMA) to determine a.s.r.'s material sustainability matters. As of the financial year 2024 and in line with the CSRD requirements, see section 2.3 for the outcomes of the DMA.

Both the impact materiality and financial materiality perspectives are considered. Impact materiality reflects the inside-out perspective: a.s.r.'s actual or potential, positive or negative impact on people and the environment over the short, medium and long term. Financial materiality reflects the outside-in perspective: the potential effects of sustainability-related risks or opportunities on a.s.r.'s financial position, performance and cash flows over the short, medium and long term. During the identification and the assessment process of the material sustainability matters, an adequate and structured bottom-up approach in close collaboration with the product lines has been adhered to. Furthermore and in accordance with the principle of the DMA, the acquisition of Aegon NL by a.s.r. was classified as a material change in the organisational and operational structure of a.s.r. and was therefore already identified as a material change in the DMA process.

Due diligence is an ongoing practice that responds to and may trigger changes in the company's strategy, business model, activities, business relationships, operating, sourcing and selling contexts. The double materiality assessment process may also be impacted over time by sector-specific standards to be adopted. In line with the stakeholder policy, a.s.r. continues to engage with its stakeholders on ESG matters to ensure that it remains focused on the most material issues. At least once a year or when a trigger occurs, a.s.r. reviews its material impacts, risks and opportunities as well as the material information to be included in the Sustainability statements. As the DMA is dynamic process, a.s.r. will monitor and update its DMA on an ongoing basis.

The following steps have been performed to determine material sustainability matters from an impact and financial perspective:

1. Engage stakeholders;
2. Identify impacts, risks and opportunities;
3. Assess impact, risks and opportunities;
4. Determine material sustainability matters.

**1. Engage stakeholders**

As part of the materiality assessment, a.s.r. has actively engaged with its stakeholders (both internal and external) to gather input on environmental, social and governance topics that may potentially be material for a.s.r. In addition to the continuous stakeholder interaction, a stakeholder dialogue was held. For a comprehensive explanation of stakeholder engagement, including which stakeholders were approached, how they were engaged and the outcomes, see section 6.1.4.2.

**2. Identify impacts, risks and opportunities**
The starting point of a.s.r.'s materiality assessment was creating a long list of sustainability matters covering environmental, social and governance topics that could potentially be material for a.s.r. This list was based on the sustainability matters as defined by the ESRS and complemented with a.s.r.-specific sustainability matters drawn from previous materiality analyses, stakeholder input and peer analysis.

To understand a.s.r.'s business activities and business relationships, a.s.r.'s value chain is used as a starting point. This value chain is an aggregation of multiple value chains, established for each product line and selected staff functions (i.e. procurement, HR, etc.). Expert judgement was applied at each step of these value chains to identify which sustainability matters are most relevant, ensuring the materiality assessment focuses on the matters with the highest impact or financial materiality.

Impacts were defined by describing the effect that a.s.r. has or could have on the environment and people, including effects on their human rights, connected with its own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. The impacts can be actual or potential, negative or positive, intended or unintended, and reversible or irreversible. They can arise over the short, medium, or long term. Impact indicates the undertaking's positive or negative contribution to sustainability.

Risks and opportunities were defined by describing the activities, products or business relationships and stakeholders concerned, and by specifying whether they result from a certain event or development, like laws and regulations, sanctions and lawsuits, shift in supply and demand, and physical or transition risks related to environmental change. Additionally, the identified impacts were considered when defining risks and opportunities. For each risk and opportunity, the potential effect on financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term was determined and whether that might occur in the short, medium, or long term.

**3. Assess impacts, risks and opportunities**
*Impacts*
As part of the bottom-up approach, the product lines, together with the sustainability manager of each product line and with the support of subject matter experts, have assessed impacts based on a set of predefined assessment criteria. As part of the assessment process for scoring the attributes scale, scope, irremediable character and likelihood, a 5-point scale has been applied. Negative impacts were assessed by determining and adding up a score for their scale (how grave the impact is), scope (how widespread the impact is) and irremediable character (whether and to what extent the negative impacts could be remediated). Positive impacts were assessed by determining and adding up a score for their scale (how beneficial the impact is) and scope (how widespread the impact is). For potential impacts, likelihood of occurrence was considered by multiplying the materiality score by its likelihood score.

Likelihood was assessed considering the time horizon and circumstances in which the impact might occur, and whether the impacts have occurred before at a.s.r. or in the insurance sector. For adverse impacts on human rights, as stipulated in the Universal Declaration of Human Rights and other UN human rights treaties, the severity of the impact takes precedence over its likelihood, so the materiality score of these impacts is high even if their likelihood of occurrence is small.

The impact was assessed by the sustainability manager and subject matter experts of the product lines. Data such as emission data or externally sourced ESG data for investments was used, when available. In cases where data was not available, external research, industry proxies and expert judgment were applied. The assessment does not consider whether policies are in place to prevent, mitigate or remediate negative impacts, like an exclusion policy for the investment universe and client acceptance policies for certain products.

*Risks and opportunities*
The product lines, together with the Risk team of each product line, have assessed the anticipated financial effect of each risk and opportunity based on a set of predefined assessment criteria for the magnitude and likelihood of the financial effect. A 5-point scale has been applied for scoring these attributes.

The magnitude of the financial effect was assessed by considering effects on the ability to use resources and the ability to rely on relationships needed in the business processes of a.s.r. and its business partners across its value chain. For resource use, a score was determined reflecting availability of, access to, and prices of resources in the short, medium and long term. For relationships, a score was determined reflecting reputational effects and potential actions by stakeholders in the short, medium and long term. For likelihood, a score was determined similarly to the assessment of impacts.

The risk assessment conducted by the product lines, together with their Risk team was based on data, if available; for example, the percentage of houses in the mortgage portfolio exposed to flooding risk or investment exposure in high-risk countries for human rights violations. If data was not available, expert judgment was applied, considering industry proxies.

The assessment does not consider whether policies are in place to pursue opportunities or manage risks, like the Policy on Responsible Investments.

**4. Determine material sustainability matters**
For each product line, through a bottom-approach and after assessing impacts, risks and opportunities, a ranked list of negative impacts, positive impacts, risks and opportunities has been created for the identified sustainability matters. By applying a threshold it has enabled a.s.r. to distinguish material sustainability matters from non-material sustainability matters. From a scoring perspective, a.s.r.'s approach entails establishing a threshold for the maximum score that can be allocated to impacts, risks and opportunities. In summary, a score below 33% is categorised as low, a score between 33% and 66% as medium, and a score above 66% is considered high.

Sustainability matters related to impacts with a medium or high score were concluded to be material from the impact materiality perspective. Sustainability matters related to risks and opportunities with a medium or high score were concluded to be material from the financial materiality perspective.

For sustainability matters related to impacts, risks and opportunities with a low materiality score, additional judgement was applied. Representatives from Sustainability, Procurement, ESG Reporting and Group Risk management assessed these sustainability matters on a case-by-case basis to draw conclusions on their materiality, taking into account consistency across product lines and the ranking of the matters by stakeholders. In case the outcome was uncertain, the matter was presented to the Remediation Board to draw a final conclusion.

The process and outcomes of the materiality assessment were reviewed and aligned with the management teams of the product lines. Subsequently, the outcome of the materiality assessment was reviewed by various governing bodies involved in sustainability reporting, such as the Quality Board and the Steering Committee, prior to having the materiality assessment approved by the MB, see section 5.1.6. Going forward, material sustainability matters will be reviewed periodically and at a minimum on an annual basis to ensure that they are up to date with relevant developments within a.s.r. and its value chains.

*Consolidation of IRO's*

Impacts, risks and opportunities have been identified bottom-up at the product line level. Each product line identified and assessed its impacts, risks and opportunities. To present a cohesive and integrated view, a comprehensive consolidation process was carried out. This process involved a detailed evaluation to determine which impacts, risks and opportunities could be merged at the sub-sub-theme level. During this consolidation process, each product line, alongside their respective management teams, played a critical role in validating and refining the merged impacts, risks and opportunities. This collaborative approach improved accuracy.

**Events after DMA process was finalised, but before year end**

In line with the ESRS, a.s.r. has considered potential triggers to update the outcomes of the DMA. Other than the sale of Knab, no such triggers have occurred.

*Sale of Knab*

In February 2024, a.s.r. sold Knab to BAWAG Group, finalising the transaction on 31 October 2024. This sale was considered during the preparation of The Sustainability Statements. Since Knab no longer forms part of a.s.r. group effective 1 November 2024, an update of the double materiality analysis was conducted. The analysis concluded that no material sustainability matters were identified from a.s.r.'s perspective regarding Knab. Consequently, Knab has been excluded from group targets set beyond 2024 and the corresponding baseline values, and no disclosures about its policies and actions are included in The Sustainability Statements.

However, Aegon Hypotheken BV will continue to manage the Knab mortgage portfolio. As a result, the greenhouse gas (GHG) emissions associated with the mortgage portfolio remain a material topic for a.s.r. and will be included in the disclosures.

Knab is included in metrics relating to the reporting period 2024, until 31 October 2024. For E1-6 Gross scopes 1, 2, 3 and total GHG emissions (Main Table) a disclosure is made to clarify what the metrics pertain to a.s.r. following the sale of Knab.

### 6.1.4.4 Impacts, risks, and opportunities

The following table provides an overview of the material impacts, risks and opportunities identified by a.s.r. The overview includes the areas within a.s.r.'s business model where these impacts, risks and opportunities are concentrated. A distinction is made between own operations and value chain. The description of the material impacts illustrates how a.s.r.'s material positive and negative impacts affect people or the environment. Additionally, the time horizons are included, with a distinction made between short term, medium term and long term. As indicated in the table below, certain staff functions hold an overarching and an oversight responsibility, extending their influence across multiple product lines. For instance HR, Compliance, IT, Services and Procurement are such departments. The organisational scope of these departments encompasses various product lines.

Each impact, risk, and opportunity has been labelled with a number in the table below. This number is used throughout the section to link the Policies, Actions and Targets with the identified material impacts, risks, and opportunities.

#### 1 Climate change adaptation

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| Positive impact | | | Downstream | Short term | Medium term | Long term | 1.1 a.s.r. enhances climate resilience through improving the climate resilience of properties and through product offerings that help customers adapt to climate risks, leading to reduced financial uncertainty for customers and more sustainability investments.<br>Product lines: Real Estate, Mortgages, P&C |
| Risk | | | Downstream | | Medium term | Long term | 1.2 Physical risks such as increased frequency and severity of extreme weather, drought, heat and flood due to climate change pose significant financial risks to a.s.r.'s insurance and real estate assets, leading to increased repair costs, operational disruptions, increased insurance claims and potentially stranded assets.<br>Product lines: Real Estate, Mortgages, P&C |
| Opportunity | | | Downstream | | Medium term | Long term | 1.3 The escalating effects of climate change present a.s.r. with a strategic opportunity to develop new insurance products and services addressing the evolving needs of consumers and businesses, driven by increasing awareness of climate risks, leading to a competitive edge and increased revenue.<br>Product line: P&C |

#### 2 Climate change mitigation

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| Positive impact | Upstream | | Downstream | Short term | Medium term | Long term | 2.1 By investing, financing and the insurance of renewable energy solutions and by offering mortgages that support the energy transition a.s.r. has a positive environmental impact by reducing GHG emissions and promoting sustainable practices, driven by active investments in and insurance of renewable energy projects like wind and solar farms, leading to significant environmental benefits.<br>Product line and staff function: Asset Management, Real Estate, Mortgages, P&C, Procurement |
| Negative impact | Upstream | Own operations | Downstream | Short term | Medium term | Long term | 2.2 a.s.r. has a negative impact on the environment and climate change through its operations and value chain, primarily due to GHG emissions from operational and value chain activities, contributing directly and indirectly to climate change and posing environmental threats.<br>Product line, staff function and/or other: Facilities, Procurement, IT, D&S Holding, Corins, TKP, Robidus, Asset Management, Real Estate, Mortgages, P&C, Health, Individual life and Funeral |
| Risk | | | Downstream | | Medium term | Long term | 2.3 The transition risks associated with e.g. new legislation and the energy transition may require a.s.r. to insure new renewable energy solutions or may require a.s.r. to stop insuring in certain sectors or certain assets. This may lead to incorrect pricing and/or to potential market risks.<br>Product line: P&C |
| Opportunity | | | Downstream | Short term | Medium term | Long term | 2.4 Investing in the renewable energy market provides a.s.r. with growth opportunities and positions it to develop new insurance products and services and mortgage products that support the energy transition, driven by the global shift towards renewable energy sources and technological innovations, leading to increased demand and higher revenues.<br>Product lines: Asset Management, Mortgages, P&C |

**Value chain:** Upstream | Own operations | Downstream **Impact materiality:** Positive impact | Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## 3 Direct impact drivers of biodiversity loss

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Downstream | Short term, Medium term, Long term | 3.1 By promoting sustainable farming practices, a.s.r. positively contributes to biodiversity and more sustainable land use, driven by an investment strategy focused on environmental stewardship, leading to enhanced biodiversity and sustainable farming practices.<br>Product line: Real Estate |
| Negative impact | Upstream, Downstream | Short term, Medium term, Long term | 3.2 a.s.r.'s investments and insurance activities may have an impact on biodiversity loss, driven by amongst others land-use change, pollution, resource overexploitation and climate change.<br>Product lines: Asset Management, Real Estate, P&C |
| Opportunity | Downstream | Long term | 3.3 Enhancing biodiversity in ecosystems can increase the value of a.s.r.'s rural, farmland and real estate property, benefiting the appeal and sustainability of the properties.<br>Product line: Real Estate |

## 4 Impacts and dependencies on ecosystem services

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Negative impact | Upstream, Downstream | Medium term, Long term | 4.1 Investments in assets and insurance of activities in certain sectors that have a high impact on ecosystem services may lead to degradation of nearby nature area.<br>Product lines: Asset Management, P&C |
| Risk | Downstream | Long term | 4.2 Declining biodiversity and ecosystem services can decrease the value of rural real estate and reduce ecosystem productivity.<br>Product line: Real Estate |
| Risk | Downstream | Medium term, Long term | 4.3 a.s.r.'s diverse customer base (which includes businesses heavily reliant on ecosystem services) faces increased physical risks due to diminishing availability of ecosystem services, driven by environmental stress and climate change impacting essential resources, leading to higher insurance claims and operational challenges for affected businesses.<br>Product lines: Real Estate, P&C |

## 5 Resource inflows

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Upstream | Short term, Medium term, Long term | 5.1 a.s.r.'s real estate investments that steer towards using secondary materials reduce the inflow of new goods, driven by encouragement of biobased and circular materials, leading to a positive impact on sustainability goals.<br>Product lines: Real Estate |
| Negative impact | Upstream | Short term, Medium term, Long term | 5.2 P&C insurance products mandate repair services which is a resource intensive activity. The healthcare sector's large footprint in raw materials usage, covered under a.s.r.'s Health insurance policies, contributes to significant material inflows, driven by production and use of single-use medical products.<br>Product lines: P&C, Health |
| Opportunity | Downstream | Medium term, Long term | 5.3 Shifting market demand towards circular, recycled, and pre-owned products presents an opportunity for a.s.r. to offer new insurance products and services, driven by increasing consumer interest in sustainability, leading to an expanded customer base and increased revenue.<br>Product line: P&C |

## 6 Resource outflows

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Upstream, Downstream | Short term, Medium term, Long term | 6.1 a.s.r.'s dedication to material reuse in urban and infrastructure development supports the circular economy leading to a positive impact on resource lifecycle extension.<br>Product line: Real Estate |

**Value chain:** Upstream | Own operations | Downstream **Impact materiality:** Positive impact | Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## 7 Waste

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Downstream | Short term, Medium term, Long term | 7.1 a.s.r.'s specialised insurance proposition for recycling companies addresses the challenge of insuring enterprises that may be considered high-risk due to the nature of their operations. By insuring them P&C facilitates these companies' ability to operate and manage waste effectively which has a positive impact on waste reduction and recycling efforts.<br>Product line: P&C |
| Negative impact | Upstream, Own operations, Downstream | Short term, Medium term, Long term | 7.2 a.s.r.'s offices and distribution and services entities generate waste in their own operations. Furthermore a.s.r.'s various business activities generate significant material, medical, electronic, and operational waste, through for instance the value chain of Health (i.e. medical supply and P&C (i.e. repair services).<br>Product line, staff function and/or other: Facilities, Corins, Robidus, TKP, D&S Holding, IT, P&C, Health |
| Opportunity | Downstream | Medium term, Long term | 7.3 Offering tailored insurance coverage to recycling businesses presents a revenue opportunity for a.s.r., driven by meeting specific market needs for high-risk industries, leading to increased revenue.<br>Product line: P&C |

## 8 Working conditions - own workforce

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Own operations | Short term, Medium term, Long term | 8.1 a.s.r. leverages its scale to foster a positive and equitable work environment, driven by a strategy to cultivate fair treatment and comprehensive well-being, leading to a resilient, satisfied and productive workforce.<br>Staff function and/or other: Corins, D&S Holding, HR, Robidus |
| Negative impact | Own operations | Short term, Medium term | 8.2 The business combination with Aegon may lead to job uncertainties, driven by organisational restructuring, leading to potential redundancies and shifts in job roles, impacting employee morale and employment stability.<br>Staff function: HR |

## 9 Other work-related rights - own workforce

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Negative impact | Own operations | Short term, Medium term, Long term | 9.1 As a prominent employer, a.s.r. is entrusted with considerable amounts of employee data. a.s.r. has a potential negative risk on the privacy of employees if the employee data is not handled in a secured and confidential manner.<br>Staff function and/or other: Corins, D&S Holding, HR, Robidus |

## 10 Equal treatment and opportunities for all

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| Positive impact | Own operations | Short term, Medium term, Long term | 10.1 Inclusive practices promote equal treatment and opportunities, driven by initiatives like enabling individuals with disabilities to work at a.s.r. and the participation desk, leading to a diverse and supportive work environment.<br>Staff function and/or other: Corins, D&S Holding, HR, Robidus |
| Negative impact | Own operations | Short term, Medium term, Long term | 10.2 Organisational practices may lead to unequal pay and limited access to opportunities, driven by unconscious bias and in transparency, leading to negative effects on workplace equality and employee well-being.<br>Staff function and/or other: Corins, D&S Holding, HR, Robidus |
| Opportunity | Own operations | Short term, Medium term, Long term | 10.3 a.s.r.'s commitment to fair working conditions attracts talented employees, driven by fair pay, training programs, and inclusive policies, leading to enhanced productivity, employee retention, and innovation.<br>Staff function and/or other: Corins, D&S Holding, HR, Robidus |

**Value chain:** Upstream | Own operations | Downstream **Impact materiality:** Positive impact | Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

## 11 Other work-related rights - workers in the value chain

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| − | ↗ | | ↘ | ◔ | ◑ | ◕ | 11.1 Investments in high-risk countries may be linked to companies that engage in forced labour and/or child labour practices, driven by less stringent labour laws, leading to serious negative impacts on workers' well-being and work rights.<br>Product lines: Asset Management, Real Estate |

## 12 Information-related impacts consumers and/or end-users

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| + | | ⌂ | ↘ | ◔ | ◑ | ◕ | 12.1 Providing clear and accessible information through online portals helps customers make informed decisions, driven by the complexity of services and products, leading to a positive impact on consumer awareness and decision-making.<br>Product line, staff function and/or other: D&S Holding, Disability, Pensions, P&C, Mortgages, Individual life and Funeral, Real Estate, Health, TKP, Robidus |
| − | | ⌂ | ↘ | ◔ | ◑ | ◕ | 12.2 The complexity of a.s.r.'s products and services may make it challenging for customers to understand necessary details, driven by intricate offerings and extensive information, leading to uninformed or incorrect decisions.<br>Product line, staff function and/or other: D&S Holding, Disability, Pensions, P&C, Mortgages, Individual life and Funeral, Health, TKP, Robidus |
| − | | ⌂ | | ◔ | ◑ | ◕ | 12.3 Inadequate data security management could lead to data breaches, driven by the necessity to store and process sensitive personal data, leading to exposure of customer information.<br>Staff function: Compliance |

## 13 Personal safety of consumers and/or end-users

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| + | | | ↘ | ◔ | ◑ | ◕ | 13.1 a.s.r. as an insurance group positively impacts the mental and physical health of consumers and end-users by providing financial security products and supportive services, driven by initiatives enhancing vitality and financial security, leading to improved self-reliance and well-being.<br>Product line, staff function and/or other: D&S Holding, Disability, Robidus, Vitality |
| 💡 | | ⌂ | | ◔ | ◑ | ◕ | 13.2 a.s.r. has the opportunity to reduce absenteeism by implementing initiatives that support vitality, driven by efforts to enhance client vitality, leading to fewer claims, lower costs, and improved competitive positioning.<br>Product line: Disability |

## 14 Social inclusion of consumers and/or end-users

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| + | | ⌂ | ↘ | ◔ | ◑ | ◕ | 14.1 Inclusive initiatives in mortgage offerings, insurance products, and investments promote financial and social inclusivity, driven by a commitment to accessibility and affordability, leading to broader access to essential services and positive societal impact.<br>Product lines: Mortgages, Pensions, Real Estate, Health, P&C, Disability |
| − | | | ↘ | ◔ | ◑ | ◕ | 14.2 Non-acceptance of certain consumers or charging higher premiums due to high-risk classification negatively impacts social inclusiveness, driven by internal acceptance policies, leading to limited access to products.<br>Product lines: Disability, P&C |
| ⚠ | | ⌂ | | | ◑ | ◕ | 14.3 Irresponsible marketing practices could harm a.s.r.'s brand and reputation, driven by potential ethical issues in marketing, leading to financial repercussions and reduced revenue.<br>Staff function: Compliance |

**Value chain:** ↗ Upstream | ⌂ Own operations | ↘ Downstream **Impact materiality:** + Positive impact | − Negative impact **Financial materiality:** ⚠ Risk | 💡 Opportunity **Time horizon:** ◔ Short term | ◑ Medium term | ◕ Long term

## 15 Corporate culture

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| + | ↘ | | 15.1 a.s.r.'s incorporation of its core values into the Policy on Responsible Investments influences its investment decisions responsibly, driven by a commitment to social responsibility and ethical practices, leading to positive impacts on the investment landscape and alignment of financial growth with ethical conduct. |
| | | | Product line: Asset Management |
| + | | | 15.2 a.s.r.'s emphasis on fostering a strong corporate culture is reflected through initiatives like the Code of Conduct, driven by a commitment to due care and integrity, leading to a positive impact on the corporate culture and work environment. |
| | | | Staff function: Compliance |
| − | ↘ | | 15.3 a.s.r. faces a negative impact when it is not able to effectively exercise influence in line with its Policy on Responsible Investments, particularly in investments linked to poor governance practices, driven by a lack of power to enforce positive changes, leading to compromised investment efforts. |
| | | | Product line: Asset Management |

## 16 Management of relationships with suppliers

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| + | ↗ | | 16.1 a.s.r. continuously manages supplier relationships to promote fairness and sustainability, driven by a responsible procurement strategy, leading to encouragement of ethical business conduct. The commitment to ethical procurement practices enhances the stability of small and medium enterprises (SMEs). |
| | | | Product line, staff function and/or other: Procurement, Real Estate, Health, P&C, Individual life and Funeral, and Disability, Robidus, TKP, D&S Holding, Corins |

## 17 Corruption and bribery

| Materiality | Value chain | Time horizon | Description |
|---|---|---|---|
| + | | | 17.1 a.s.r. enforces a rigorous anti-corruption and bribery policy, driven by a commitment to ethical business practices, leading to a reduction in the risk of corrupt practices and enhanced stakeholder trust. |
| | | | Staff function: Compliance |

**Value chain:** ↗ Upstream | Own operations | ↘ Downstream **Impact materiality:** + Positive impact | − Negative impact **Financial materiality:** Risk | Opportunity **Time horizon:** Short term | Medium term | Long term

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### 6.1.4.5 Impacts, risks and opportunities only material at subsidiary level

Pollution of water (part of ESRS E2) and working conditions (part of ESRS S2) are not deemed material for a.s.r. group but are material for a.s.r.'s subsidiaries ASR Basis Ziektekostenverzekeringen N.V. (a.s.r. health basic) and ASR Aanvullende Ziektekostenverzekeringen N.V. (a.s.r. health supplementary), which together form the product line Health. As a result of Health's small market share in the sector, the scale and scope of its potential negative impact on people and the environment is limited. For Health, these topics are material, as they align closely with the core operations and priorities of Health. The strategic importance of these topics within the health sector emphasises their qualitative materiality at this level. However, for the group as a whole, these issues do not carry the same weight, as other sustainability matters where a.s.r. has a greater ability to influence outcomes and make a more substantial impact.

The following table presents an overview of the material impacts identified, along with the corresponding policies, actions and targets. The related policies, actions and targets have been described in section 6.2.2 and section 6.3.2.4.

**Pollution of water**

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| Negative impact | Upstream | | | Short term | Medium term | Long term | Health insurance offerings (facilitating access to healthcare services and medicines) indirectly lead to the pollution of water. Specifically in relation to the disposal and excretion of medication through urination and defecation which results in trace contaminants entering water systems. |
| | | | | | | | Product line, staff function and/or other: Health |

**Working conditions - workers in the value chain**

| Materiality | Value chain | | | Time horizon | | | Description |
|---|---|---|---|---|---|---|---|
| Negative impact | Upstream | | | Short term | Medium term | Long term | Health insurance offerings (facilitating access to healthcare services) indirectly contribute to high work pressure, irregular shifts, inadequate wages and physically and mentally demanding tasks for healthcare workers, leading to potential health issues and sick leave among healthcare workers. |
| | | | | | | | Product line, staff function and/or other: Health |

### 6.1.4.6 Disclosure requirements in ESRS covered by a.s.r.'s Sustainability statements

The CSRD reference table is included in section 6.6.1.

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# 6.2 Environmental

## 6.2.1 Climate change

Climate change is one of today's greatest challenges. A transition to a net-zero economy and a society that is resilient to the effects of climate change is crucial for the liveability of our planet. a.s.r. acknowledges the importance of this transition and, as an insurer and investor, wants to contribute to it.

The following table presents an overview of the material climate-related impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

**1 - Climate change adaptation**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 1.1 a.s.r. enhances climate resilience through improving the climate resilience of properties and through product offerings that help customers adapt to climate risks, leading to reduced financial uncertainty for customers and more sustainability investments. | 1. Real Estate<br>2. Mortgages<br>3. P&C | 1. ESG Policy of Real Estate<br>2. Mortgages Transition Plan<br>3. Policy on Sustainable Insurance | 1. Assess adaptation solutions for highly exposed assets.<br>2. Increase climate adaptive thinking for residential homes.<br>3. Develop products which incentivise prevention measures. | None |
| Financial risk | 1.2 Physical risks such as increased frequency and severity of extreme weather, drought, heat and flood due to climate change pose significant financial risks to a.s.r.'s insurance and real estate assets, leading to increased repair costs, operational disruptions, increased insurance claims and potentially stranded assets. | 1. Real Estate<br>2. Mortgages<br>3. P&C | 1. ESG Policy of Real Estate<br>2. Mortgages Transition Plan<br>3. Policy on Sustainable Insurance | 1. Assess adaptation solutions for highly exposed assets.<br>2. Increase climate adaptive thinking for residential homes.<br>3. Develop products which incentivise prevention measures. | None |
| Financial opportunity | 1.3 The escalating effects of climate change present a.s.r. with a strategic opportunity to develop new insurance products and services addressing the evolving needs of consumers and businesses, driven by increasing awareness of climate risks, leading to a competitive edge and increased revenue. | 1. P&C | 1. Policy on Sustainable Insurance | 1. Develop products and services to address evolving needs. | None |

## 2 - Climate change mitigation

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 2.1 By investing, financing and the insurance of renewable energy solutions and by offering mortgages that support the energy transition a.s.r. has a positive environmental impact by reducing GHG emissions and promoting sustainable practices, driven by active investments in and insurance of renewable energy projects like wind and solar farms, leading to significant environmental benefits. | 1.Asset Management<br>2.Real Estate<br>3. Mortgages<br>4. P&C<br>5. Procurement | 1. Policy on Responsible Investments<br>2. ESG Policy of Real Estate<br>3. Mortgages Transition Plan<br>4. Policy on Sustainable Insurance<br>5. Further agreement, Code of Conduct, outsourcing policy | 1. Make impact investments, participate in industry collaborations.<br>2. Invest in renewable energy, increase on-site renewable energy generation.<br>3. Engage through sustainable living platform/partner network.<br>4. Make renewable energy initiatives insurable, develop products, engage through various platforms.<br>5. None | 1. Impact investment target<br>2. Impact investment target<br>3. Impact investment target<br>4. None<br>5. None |
| Negative impact | 2.2 a.s.r. has a negative impact on the environment and climate change through its operations and value chain, primarily due to GHG emissions from operational and value chain activities, contributing directly and indirectly to climate change and posing environmental threats. | 1. Facilities<br>2. Procurement<br>3. IT<br>4. D&S Holding, Corins, TKP and Robidus<br>5. Asset Management<br>6. Real Estate<br>7. Mortgages<br>8. P&C<br>9. Health<br>10. Funeral | 1. Environmental Policy of Facilities<br>2. Not applicable<br>3. Not applicable<br>4. Not applicable<br>5. Policy on Responsible Investments<br>6. ESG Policy of Real Estate<br>7. Mortgages Transition Plan<br>8. Policy on Sustainable Insurance<br>9. Procurement Policy of Health<br>10. Not applicable | 1. Use renewable energy, purchase market-based green electricity, promote eco-friendly transportation/hybrid working.<br>2. Not applicable<br>3. Use renewable energy for data centres, extend use of hardware.<br>4. Corins: promote eco-friendly transportation, hybrid working.<br>5. Exclude investments in certain activities/sectors, carry out active ownership.<br>6. Minimise energy consumption, reduce environmental impact, increase on-site renewable energy generation.<br>7. Offer specific mortgage products/opt-in mortgage offers.<br>8. Apply underwriting criteria, engage and support, refer to certified repairers.<br>9. Stimulate to: reduce GHG emissions/provide mobility plan/design framework for real estate action/produce GHG roadmaps.<br>10. Develop products, engage with network, support the development of industry-wide GHG calculation methodology. | 1. Emission reduction target (scope 1 and 2 - own operations)<br>2. None<br>3. None<br>4. None<br>5. Emission reduction target (scope 3 - financed emissions)<br>6. Emission reduction target (scope 3 - financed emissions).<br>7. Emission reduction target (scope 3 - financed emissions).<br>8. Emission reduction target (scope 3 - insurance associated emissions of P&C).<br>9. Joint emission reduction target (scope 1 and 2 emissions of healthcare providers).<br>10. None |

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
| --- | --- | --- | --- | --- | --- |
| Financial risk | 2.3 The transition risks associated with e.g. new legislation and the energy transition may require a.s.r. to insure new renewable energy solutions or may require a.s.r. to stop insuring in certain sectors or certain assets. This may lead to incorrect pricing and/or to potential market risks. | 1. P&C | 1. Policy on Sustainable Insurance | 1. Apply underwriting criteria. | None |
| Financial opportunity | 2.4 Investing in the renewable energy market provides a.s.r. with growth opportunities and positions it to develop new insurance products and services and mortgage products that support the energy transition, driven by the global shift towards renewable energy sources and technological innovations, leading to increased demand and higher revenues. | 1. Asset Management<br>2. Mortgages<br>3. P&C | 1. Policy on Responsible Investments<br>2. Mortgages Transition Plan<br>3. Policy on Sustainable Insurance | 1. Make impact investments.<br>2. Offer specific mortgage products/ opt-in mortgage offers.<br>3. Make renewable energy initiatives insurable. | 1. Impact investment target<br>2. Impact investment target<br>3. Impact investment target |

## 6.2.1.1 Managing impacts, risks and opportunities

**Description of the processes to identify and assess material climate-related impacts, risks and opportunities**

a.s.r. has identified and assessed several climate-related impacts, risks and opportunities. Climate related risks can be climate-related physical risks (risks related to climate hazards) or climate-related transition risks (risks related to the transition to a net-zero economy and a society that is resilient to the effects of climate change).

See section 6.1.4.3 for more information about the process to assess material impacts, risks and about the consolidation process.

**Impacts**

a.s.r.'s product lines and entities identified their impacts on climate change, in particular their GHG emissions, in expert sessions and by making use of various guidance and standards.

This resulted in the identification of short-, medium- and long-term actual and potential impacts for some of the Supporting Processes departments (Facilities, Procurement and IT), all distribution and services entities and almost all product lines (except Pensions, Income and Individual life).

**Physical risks**

a.s.r.'s product lines and entities also identified their physical risks and opportunities related to the sub-topic climate change adaptation in expert sessions and by making use of various tools.

This resulted in the identification of short-, medium- and long-term actual and potential risks for the product lines Real Estate, Mortgages and P&C.

*Real Estate*

Real Estate has made use of its Climate Risk Monitor to identify climate-related hazards in its value chain over the short, medium and long term. This is an in-house-developed tool, with which Real Estate has implemented the Framework for Climate Adaptive Buildings (FCAB) for its portfolio. This framework was drawn up by the Dutch Green Building Council (DGBC) together with a variety of financial institutions (including Real Estate), knowledge institutes, advisors and solutions to achieve a smooth and sector-wide methodology for assessing physical climate risks at property level[1].

To screen whether its assets may be exposed and are sensitive to the identified climate-related hazards, creating gross physical risks, Real Estate identified the expected climate impacts on the environment of the buildings in the portfolio and combined this with the vulnerability of the buildings themselves.

Real Estate used a long-term horizon, which is defined as 2050. This is in line with the Strategic Asset Allocation long-term time horizon, which is 25 years forward-looking.

For the assessment of the extent to which real estate objects are exposed and sensitive to the identified climate-related hazards, Real Estate made use of the FCAB to calculate the climate risk score, a combination of the environmental score and the building score. This methodology made it possible to identify and prioritise climate risks through screening (or 'red flagging') the total real estate portfolio. For the properties identified with a material risk, an in-depth analysis ('deep dive') was carried out to identify the adaptation solutions that can reduce the identified physical risks.

Identification and assessment were informed by at least high-emissions climate scenarios, as the FCAB works with the KNMI'14 projections for 2050 which contain high-emissions climate scenarios. The KNMI'23 projections will be applied when available in a resolution that meets the requirements for the analysis.

1 Source: DGBC (2024)

*Mortgages*
Mortgages has made use of the Climate Risk Monitor of Real Estate to identify the climate-related hazards in its value chain over the short, medium and long term.

To screen whether its assets may be exposed and sensitive to the identified climate-related hazards, creating gross physical risks, Mortgages identified the risks specifically for residential buildings in the Netherlands and identified the expected climate impacts on the environment of the buildings in the mortgage portfolio.

Mortgages has used a long-term time horizon, which is defined as 2050. This is in line with the Strategic Asset Allocation long-term time horizon, which is 25 years forward-looking.

For the assessment of the extent to which residential objects are exposed and sensitive to the identified climate-related hazards, Mortgages made use of the FCAB, taking only the environmental score into account. This methodology made it possible to identify and prioritise climate risks through 'red flagging'.

Identification and assessment were informed by at least high-emissions climate scenarios as the FCAB works with the KNMI'14 projections for 2050, which contain high emissions climate scenarios. The KNMI'23 projections will be applied when available in a resolution that meets the requirements for the analysis.

*P&C*
P&C made use of the findings in the report "Accelerating climate adaptation", which was published by the Working Group on Climate Adaptation Finance Sector, a multi-stakeholder working group of the Sustainable Finance Platform, to identify the climate-related hazards in its value chain over the short, medium and long term.

To screen whether its underwriting activities may be exposed and sensitive to the identified climate-related hazards, P&C also made use of the findings in the report "Accelerating climate adaptation", which provides an indication of whether the underwriting activities of insurers may be affected by climate-related hazards, thereby creating risks.

P&C has defined short-, medium- and long-term horizons in accordance with the definitions used in the Strategic Risk Analysis (SRA) and which are linked to the strategic planning horizons.

To assess the extent to which insured residential objects are exposed and sensitive to the identified climate-related hazards, P&C made use of the Dutch Association of Insurers' Climate Damage Monitor, which demonstrates the effect extreme weather events have on the claims burden of property insurers.

Identification and assessment were informed by at least high-emissions climate scenarios, as the report "Accelerating climate adaptation" works with the KNMI'23 climate scenarios, which contain high emissions climate scenarios.

*Information that applies to all the product lines that have identified climate-related physical risks*
How the identification and assessment of climate-related physical risks by the entities and product lines were informed by the climate-related scenario analysis, which includes a range of climate scenarios, is described below. As to how the climate scenarios used are compatible with critical climate-related assumptions made in the financial statements; no critical climate-related assumptions are made in the financial statements.

**Transition risks**
a.s.r.'s product lines and entities identified their transition risks and opportunities related to the sub-topic climate change mitigation in expert sessions and by making use of several tools.

This resulted in the identification of short-, medium- and long-term actual and potential transition risks and opportunities for the product lines Asset Management, Real Estate, Mortgages and P&C.

*Asset Management*
Asset Management has identified potential transition events over the short-, medium- and long-term in its value chain by using the latest climate science to identify how different sectors and companies might be impacted by various transition events, such as regulatory changes, market shifts and technological advancements, depending on the speed of the low-carbon transition.

Asset Management screened whether the investment decisions it has made may be exposed to transition events by analysing its exposure to high-risk sectors using guidance from bodies such as the European Insurance and Occupational Pensions Authority (EIOPA), complemented by research from a.s.r.'s ESG data providers on company-level exposure to transition risks. Additionally, Asset Management performed activity-based screening to identify its exposure to companies involved in activities that are incompatible with achieving the goals of the Paris Agreement. These methods collectively enabled the evaluation and management of transition risks across clients' portfolios.

To assess the extent of the exposure and sensitivity of its assets to the identified transition events, Asset Management made use of EIOPA's NACE codes associated with transition risk.

The identification of transition events and the assessment of exposure were informed by climate-related scenario analysis, considering at least a scenario consistent with the Paris Agreement, to understand what is required to limit global warming to ideally 1.5°C.

Asset Management identified assets that are incompatible or may need significant efforts to become compatible with a transition to a climate-neutral economy by using data from a.s.r.'s ESG research providers on transition risk management and exposure to activities that may be incompatible with achieving the goals of the Paris Agreement.

*Real Estate*
Real Estate has identified potential transition events over the short, medium and long term in its value chain by using various documents, research papers and sectoral guidelines, including European legislation, publications of the Dutch Central Bank (*De Nederlandsche Bank* - DNB), the Authority for the Financial Markets (*Autoriteit Financiële Markten* - AFM) and the ESG risk framework of the European Association for Investors in Non-Listed Real Estate Vehicles (INREV).

Real Estate screened whether its assets may be exposed to the identified transition events by making use to the Carbon Risk Real Estate Monitor (CRREM) and applicable legislation such as the Energy Performance of Buildings Directive (EPBC IV) and the EU Taxonomy Regulation.

To assess the extent of the exposure and sensitivity of its assets to the identified transition risks, Real Estate has identified the assets that are at transition risk based on the actual (energy intensity) and theoretical (energy label) energy performance that is available for the real estate property.

The identification of transition events and the assessment of exposure were informed by climate-related scenario analysis, considering at least a scenario consistent with the Paris Agreement, as Real Estate uses the 1.5°C CRREM Pathway consistent with the Paris Agreement to identify stranded assets based on the actual energy performance.

Real Estate has not identified any assets that are incompatible or may need significant efforts to be compatible with a transition to a climate-neutral economy.

*Mortgages*
Mortgages has identified potential transition events in the short, medium and long term by using various documents and research, including applicable legislation, publications of the DNB, the AFM and the Dutch government's National Energy and Climate Plan, including the National Climate Agreement.

Mortgages screened whether its assets may be exposed to the identified transition events, by conducting an analysis of the portfolio to determine which mortgaged assets have a potential transition risk.

To assess the extent of assets' exposure and sensitivity to the identified transition risks, Mortgages identified the assets that are at transitional risk based on the energy labels that are available for the buildings in the portfolio.

The identification of transition events and the assessment of exposure were informed by climate-related scenario analyses, considering at least a scenario consistent with the Paris Agreement, during the aforementioned research to determine the least energy-efficient houses and the steps that need to be taken to become compatible with achieving the goals of the Paris Agreement.

Mortgages identified assets that are incompatible or may need significant efforts to be compatible with a transition to a climate-neutral economy by assessing the energy labels of the buildings in the portfolio.

*P&C*
P&C has identified potential transition events over the short, medium and long term in its value chain by using the Dutch government's National Energy and Climate Plan, including the National Climate Agreement, as well as forecasts by various Dutch banks, which both contain information on the plans of the Dutch government and the various sectors in the Netherlands to transition to climate neutral.

P&C screened whether its underwriting activities may be exposed to the identified transition events, by making use of information from the Dutch Association of Insurers, as well as expert findings.

To assess the extent of the exposure and sensitivity of underwriting activities to the identified transition events, P&C calculated the share (percentage) of Insurance Contract Revenue (ICR) that is related to NACE codes, which are connected to the fossil fuel industry.

The identification of transition events and the assessment of exposure were informed by climate-related scenario analysis, considering at least a scenario consistent with the Paris Agreement, as the aforementioned National Climate Agreement is based on a scenario consistent with the Paris Agreement.

By calculating the ICR related to NACE codes, which are connected to the fossil fuel industry, P&C has identified the underwriting activities which may be incompatible or may need significant efforts to be compatible with a transition to a climate-neutral economy.

*Information that applies to all the product lines that have identified climate-related transition risks*
The identification and assessment of climate-related transition risks by the entities and product lines was informed by the climate-related scenario analysis which includes a range of climate scenarios is described below. In regard to how the climate scenarios used are compatible with critical climate-related assumptions made in the financial statements, no critical climate-related assumptions are made in the financial statements. This may be considered in the future.

**Material impacts, risks and opportunities and their interaction with strategy and business model**
For each material climate-related risk which a.s.r. has identified, an explanation of whether a.s.r. considers it to be a climate-related physical risk or a climate-related transition risk can be found in section 6.1.4.4.

The analysis of the resilience of its strategy and business model in relation to climate change is part of the resilience analysis which in its turn is part of the Strategic Asset Allocation (SAA) study. The scope of the SAA is the whole of a.s.r., and specifically the supervised entities (OTSOs). For the non-supervised entities, a static cash flow was assumed and the sensitivity to climate change of the cash flows generated for a.s.r. was not taken into account. All material climate-related physical risks and transition risks are part of the analysis on an aggregated level. One of the constraints of the model is that all climate-related risks, both physical and transitional, are evaluated in a combined manner. Also, the scenarios do not contain the climate-related tipping point effects nor biodiversity-related impacts. All company-level scenarios are based on national data from the relevant countries or regions in which a.s.r. invests or operates. For the underlying risk assessment for the product lines (e.g. Mortgages and Real Estate) the data are linked to geospatial coordinates specific to investment locations.

The resilience analysis was carried out in 2024 as part of the Strategic Asset Allocation study which takes place annually. The study uses five climate scenario analysis.

### Climate scenarios

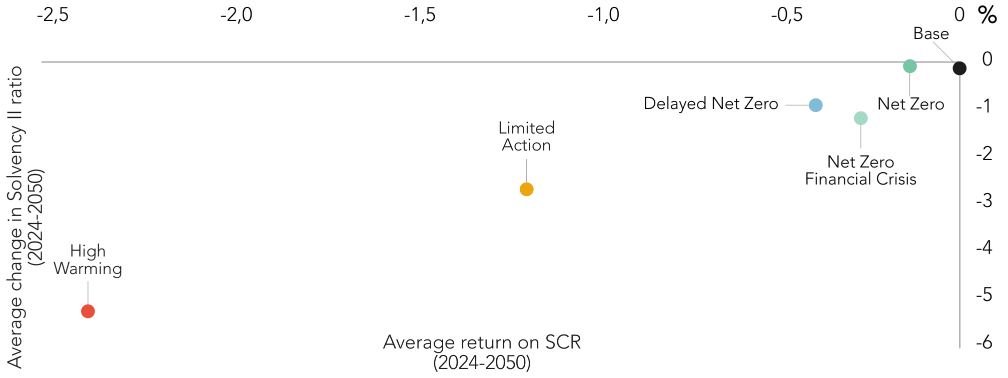
| | Net Zero | Net Zero Financial Crisis | Delayed Net Zero | Limited Action | High Warming |
|---|---|---|---|---|---|
| Calculated temperature rise 2081-2100 compared to pre-industrial average 1850-1900 | ~1.5°C | ~1.5°C | ~2.0°C | ~2.6°C | ~3.7°C |
| Bandwidth with 90% probability | +1.4 to +1.6° | +1.4 to +1.6° | +1.7 to +2.3° | +2.2 to +3.2° | +2.5 to +4.7° |
| UN IPCC AR6 scenario | SSP1-RCP1.9 | SSP1-RCP1.9 | SSP1-RCP2.6 | SSP2-RCP4.5 | SSP3-RCP7.0 |
| Assumptions | • A **highly ambitious** set of policies aimed at reducing emissions are introduced to align with net zero.<br>• The world experiences comparably **low impacts** from acute physical risk and adapts to climate change.<br>• The financial market implications arising from transition and physical risks are **not materially disruptive**. | • A **highly ambitious** set of policies aimed at reducing emissions are introduced to align with net zero.<br>• The world experiences comparably **low impacts** from acute physical risk and adapts to climate change.<br>• There are disruptive effects in financial markets as climate risks are **abruptly priced-in** in 2025. | • A **highly ambitious** set of policies are introduced, but are not implemented at the scale required to reach net zero emissions by 2050.<br>• The world is faced with **moderate impacts** from extreme weather events and temperature change.<br>• **Financial market disruption** arising from transition risks occur during the late 2020s. | • Policymakers take **limited action** to address climate change. Regulation and taxation of fossil fuel-based technologies is limited.<br>• This scenario reflects **high risk** from extreme weather events and high temperatures.<br>• These risks have **material financial market implications** in the 2020s and 2030s, due to lower expected performance. | • There are **no new low-carbon** policies enacted and some existing ones are scaled back.<br>• Multiple **climate tipping points** are reached, and many countries suffer from extreme drought and water shortages.<br>• Lost productivity and extreme weather events have **large financial market implications** in the 2020s and 2030s, due to lower expected performance. |

- The **orderly net zero scenario** assumes a temperature rise of 1.5°C. The assumptions were made that a highly ambitious set of policies aimed at reducing emissions are introduced, the world experiences comparably low impacts from acute physical risk and that the financial market implications arising from transition and physical risks are not materially disruptive.
- The **disorderly net zero scenario** assumes a temperature rise of 1.5°C. The assumptions were made that a highly ambitious set of policies aimed at reducing emissions are introduced, the world experiences comparably low impacts from acute physical risk and that there are disruptive effects in financial markets as climate risks are abruptly priced-in in 2025.
- The **delayed net zero scenario** assumes a temperature rise of 2.0°C. The assumptions were made that a highly ambitious set of policies aimed at reducing emissions are introduced but are not implemented on the scale that is required to reach net zero emissions by 2050. Also, the world is faced with moderate impacts from extreme weather events and temperature change and financial market disruption arising from transition risks occur during the late 2020s.
- The **too little too late scenario** assumes a temperature rise of 2.6°C. The assumptions were made that policymakers take moderate steps to address climate change, thus regulation and taxation of fossil fuel-based technologies is limited. This scenario reflects high risks from extreme weather events and high temperatures and these risks have material financial market implications in the 2020s and 2030s, due to lower expected performance.
- The **failed transition scenario** assumes a temperature rise of 3.7°C. The assumptions were made that there are no new low-carbon policies enacted and some existing ones are scaled back. Also, multiple climate tipping points are reached and many countries suffer from extreme drought and water shortage. The lost productivity and extreme weather events have large financial market implications in the 2020s and 2030s, due to lower expected performance.

The above mentioned key forces and drivers, taken into consideration in each scenario, are macroeconomic trends and assumptions relevant to a.s.r.

A time horizon of 25 years is applied, which is considered long-term in the context of the Strategic Asset Allocation. This endpoint was chosen in line with the Paris Agreement aim for net zero by 2050 and should therefore cover plausible risks and uncertainties. The time horizon for GHG emission reduction targets, on the other hand, focuses on the nearer term with a time horizon of six years. This deviation is a result of immediate emission reduction action being required now, whereas climate risk impact on the business is expected to have a significant impact in the longer term.

The resilience analysis has led to the following results:




The model was created in collaboration with ORTEC Finance and is aligned with state-of-the-art science by translating biophysical impacts to economic impacts of climate change. For the biophysical impacts a.s.r. uses the UN IPCC 6 climate scenarios as a basis. These impacts are then interpreted using a sophisticated non-equilibrium econometric model. In comparison to an equilibrium model, it has the advantage of not assuming optimising behaviour, not deriving historical relationships, having a bounded rationality with uncertainty, including path dependence and learning effects, and assuming endogenous money.

This resilience analysis has resulted in the conclusion that a.s.r. does not need to adjust its strategy and business model now. a.s.r. will keep assessing the resilience of its strategy and business model to climate change in the coming years. If at any time necessary, a.s.r. believes that it will be sufficiently able to adjust or adapt its strategy and business model to climate change over the short, medium and long term, including securing ongoing access to finance at an affordable cost of capital, the ability to redeploy, upgrade or decommission existing assets, shifting its products and services portfolio, or reskilling its workforce.

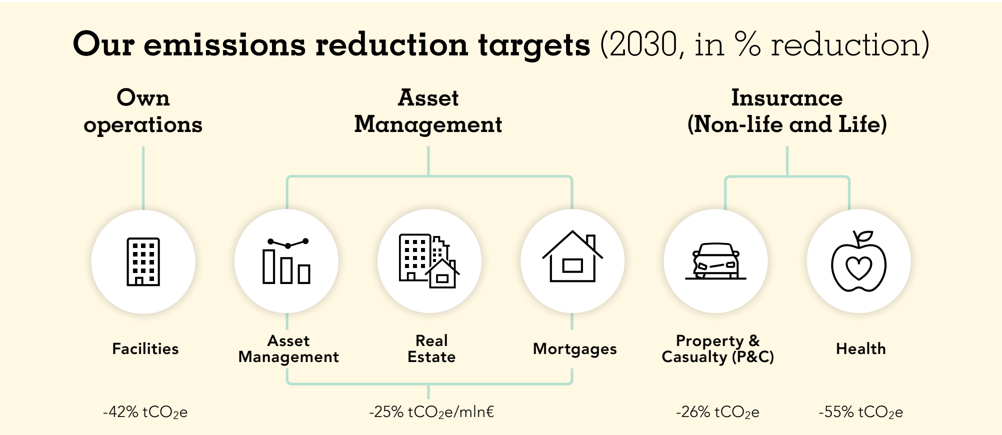
## 6.2.1.2 Transition plan

**Transition plan for climate change mitigation**
a.s.r. has determined several GHG emission reduction targets, of which currently some, but not all, are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement. a.s.r. is committed to submit near-term science-based targets compatible with limiting global warming to 1.5°C in line with the Paris Agreement, to the Science Based Target Initiative (SBTi) for validation. See section 6.2.1.4 for more information about a.s.r.'s GHG emission reduction targets.

a.s.r. has determined various decarbonisation levers and has planned key actions, varying per product line, to achieve its GHG emissions reduction targets. Levers include a.o. product development (e.g. insurance products which encourage the use of green alternatives), engagement (e.g. engagement actions which aim to stimulate customers and investees to make the energy transition) and impact investing (e.g. investments in renewable energy solutions), see section 6.2.1.3 for more information about a.s.r.'s key climate mitigation actions and decarbonisation levers.

Investments and funding may be needed to support the implementation of a.s.r.'s transition plan for climate change mitigation, including action plans of the various product lines. See section 6.2.1.3 for an explanation and quantification of the investments and funding to support the action plans of the various product lines, where significant. a.s.r. has not identified material locked-in GHG emissions in its products or services so it does not currently expect any such emissions to jeopardise the achievement of its GHG emission reduction targets or drive transition risk.

a.s.r. has economic activities that are covered by delegated regulations on climate adaptation or mitigation under the EU Taxonomy Regulation but a.s.r. has not yet established any formal objectives or plans for aligning its economic activities with the criteria established in the EU Taxonomy environmental objectives. a.s.r. does not deem this a risk for achieving its emission reduction targets though. There are no significant CapEx amounts invested during the reporting period related to coal, oil, and gas-related economic activities and a.s.r. is not excluded from EU Paris-aligned benchmarks.




a.s.r. has embedded its transition plan for climate change mitigation in and aligned it with its broader business and financial planning:

- Key elements of integrating climate considerations into its business strategy include the setting of a non-financial target for emission reduction of financed emissions, the development of central sustainability policies, setting up a central sustainability risk framework and introducing sustainable central value chain and contract management. These cascade through to the decentralised targets, policies, operational processes, risk management frameworks, and value chain and contract management of the various product lines.
- Climate-related considerations are integrated into the organisation's SAA, which includes various climate scenarios and safeguards a.s.r.'s financial performance. See section 6.2.1.1 for further information. The SAA cascades through to a.s.r.'s reinsurance schemes and investment and pricing policies of the various product lines.

Please see section 6.1.3.1 for more information on the role of the administrative, management and supervisory bodies with regard to the transition plan for climate change mitigation.

a.s.r. has already made progress on implementing its transition plan for climate change mitigation across the organisation. See section 6.2.1.4 for further information on already achieved emission reductions, how the progress of the emission reduction targets is monitored and reviewed and whether progress is in line with the initial planning.

a.s.r. has also published a more comprehensive Climate Transition Plan on its website.

## 6.2.1.3 Policies and actions

### Policies

**Policies related to climate change mitigation and adaptation**
a.s.r. has several policies in place to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation:

- The Environmental Policy Statement of Facilities;
- The Policy on Responsible Investments;
- The ESG Policy of Real Estate;
- The Mortgages Transition Plan;
- The Policy on Sustainable Insurance;
- The Procurement Policy of Health.

*The Environmental Policy Statement of Facilities* 2.2
The general objective of the Environmental Policy Statement of Facilities is for a.s.r. to maintain its own environmental performance at a socially responsible level. The policy's key content is a framework set up to reduce a.s.r.'s scope 1 and 2 emissions as well as a.s.r.'s scope 3 emissions related to its own operations.

The scope of the Environmental Policy Statement is the activities conducted in connection with a.s.r.'s office locations. The policy covers direct emissions from owned or controlled sources, indirect emissions from the generation of purchased electricity and indirect emissions that occur from business travel, employee commuting and waste.

The Environmental Policy Statement mainly addresses climate change mitigation. This is supported by actions aimed at improving a.s.r.'s environmental performance. Additionally, energy efficiency is a core aspect that the policy addresses. a.s.r. has committed to improving the energy performance of its head office, aiming to meet the Paris Proof standard by 2030. This includes reducing energy consumption for heating, cooling and ventilation to a maximum of 50 kWh per gross square metre in line with and even exceeding the Paris Proof standard. Furthermore, the policy supports the use of renewable energy wherever possible, for example by stimulating the use of the solar panels placed on and around a.s.r.'s head office.

*Procurement* 2.1 2.2

Procurement does not yet have a dedicated environmental procurement policy but it has included ESG criteria in its 'Further agreement', its Code of Conduct for Suppliers, and in its outsourcing policy.

*IT* 2.2

IT currently has no formal policy concerning climate change. However, IT's management team has a clear understanding of how decisions on power purchase and consumption impact a.s.r.'s carbon footprint. There is a clear ambition to incorporate climate change into IT's procurement policy in 2025.

*Distribution and services entities* 2.2

The distribution and services entities do not yet have environmental policies; some of them are currently in the process of developing one, where possible in line with the Environmental Policy Statement of Facilities.

*The Policy on Responsible Investments* 2.1 2.2 2.4

The Policy on Responsible Investments of Asset Management sets out a framework for integrating ESG factors into all investment decisions. A key focus of the policy is on mitigating climate-related risks and supporting the transition to a low-carbon economy. The policy outlines clear criteria for excluding investments in sectors and companies that conflict with the goals of the Paris Agreement, such as those involved in coal mining or unconventional oil and gas. The policy also includes requirements for active ownership: where a.s.r. engages with companies to encourage better climate practices, and impact investing: where a.s.r. finances sectors and projects that directly contribute to the energy transition.

The Policy on Responsible Investments applies to all assets managed by Asset Management. This includes proprietary assets of a.s.r., investment mandates managed on behalf of clients, and funds created and offered by Asset Management.

The Policy on Responsible Investments is guided by the goals of reducing harm, driving change and creating positive impact. In order to address climate change mitigation, the policy contains exclusion rules that aim to avoid investing in activities with an outsized impact on climate change or that are incompatible with the low-carbon future needed to achieve the goals of the Paris Agreement. Asset Management focuses on engaging with companies to develop climate strategies and transition plans that align their businesses with the Paris Agreement. Additionally, Asset Management supports the energy transition through investments in renewable energy and low-carbon technologies via impact investments.

*The ESG Policy of Real Estate* 1.1 1.2 2.1 2.2 2.3

The ESG Policy of Real Estate has the following strategic themes: Reduce energy intensity & GHG emissions; Adapt to climate change & related risks; Regenerate biodiversity & ecosystems; and Improve well being & social equality. The scope of the ESG Policy of Real Estate is all assets under management.

The ESG Policy of Real Estate addresses climate change mitigation as it sets out a framework to acquire low-carbon assets. The policy also addresses climate change adaptation and energy efficiency by setting up rules for renovating standing investments. Additionally, it addresses renewable energy by setting out a framework to acquire renewable energy projects such as windmill parks.

*The Mortgages Transition Plan* 1.1 1.2 2.1 2.2 2.4

The Mortgages Transition Plan sets out a framework to reduce negative impact on climate change and mitigate climate-related physical and transition risks in the portfolio. The scope of the Mortgages transition plan is Mortgages' scope 3 financed emissions (limited to scope 1 and 2 emissions of the property financed by the mortgage).

The Mortgages Transition Plan addresses climate change mitigation and energy efficiency by setting up a framework for more accessible and less costly mortgage lending to make homes more sustainable and energy efficient. Additionally, the Mortgages Transition Plan supports climate change adaptation by facilitating participation in partnerships to increase awareness and knowledge surrounding this theme.

*The Policy on Sustainable Insurance* 1.1 1.2 1.3 2.1 2.2 2.3 2.4

P&C makes use of the Policy on Sustainable Insurance. An objective of the policy is to reduce negative impact on climate change, manage climate-related physical and transition risks and seize climate-related opportunities. The Policy on Sustainable Insurance contains rules on sustainable underwriting, the policy has a key focus on insuring the energy transition and the policy sets out frameworks for sustainable product development and sustainable claims adjustment. The scope of the Policy on Sustainable Insurance is Non-life and Life insurance products and services. The most relevant parts for P&C are highlighted below.

In order to manage its impact on climate change and with regards to object related insurance only, the Policy on Sustainable Insurance contains a set of exclusion rules that aim to avoid insuring companies with an outsized impact on climate change, such as producers of thermal coal and unconventional gas and oil. Producers of conventional energy products are required to commit to the Paris Agreement target and to have a transition plan. For other companies with a substantial volume operating in the chain of the fossil fuel industry or in a sensitive sector, an ESG risk assessment needs to be carried out. Furthermore, the Policy on Sustainable Insurance addresses climate-related physical and transition risks and seizing climate-related opportunities by setting out a framework for sustainable product development.

To support the energy transition to renewable energy, the Policy on Sustainable Insurance addresses insuring companies in the renewable energy sector through the P&C's Sustainability Desk. It addresses climate change mitigation by setting out a framework for sustainable claims adjustment with a focus on repair instead of replace of damaged items by certified sustainable repair network companies. Certification entails limitations on GHG emissions during the repair process. Climate adaptation is also part of the Policy on Sustainable Insurance as it sets out a framework for sustainable product development.

*The Procurement Policy of Health* 2.2
Agreements from the joint policy in the healthcare sector which follows the GDDZ 3.0 have been translated into the Procurement Policy of Health. Consequently, the policy objectives of the Procurement Policy of Health are:

- Making healthcare real estate more sustainable;
- Working towards sustainable mobility;
- Discovering and tackling other GHG hotspots.

The Procurement Policy of Health addresses climate change mitigation by aiming to make healthcare real estate more sustainable, working towards sustainable mobility and discovering and tackling other GHG hotspots in the healthcare sector. Third-party standards that Health commits to respect through the implementation of the Procurement Policy of Health are the GDDZ 3.0.

Consideration is given to the interests of key stakeholders when setting the Procurement Policy of Health in alignment with the GDDZ 3.0 through reducing administrative burdens for healthcare providers. The current Procurement Policy has been published on 1 April 2024 and has been discussed during meetings with healthcare providers.

*Funeral*
Due to the type of insurance (largely capital insurance) and the lack of insight into how the insurance compensation is spent, it is difficult for Funeral to determine which frameworks and rules it can introduce to effectively address its impact on climate change. Funeral is committed to being able to draw up a policy that provides a framework or set of rules to prevent or limit negative impact.

*Information that applies to all the entities and product lines which have policies in place*
The management teams of the relevant product lines are accountable for the implementation of the various policies, including the monitoring of the effectiveness of the policy. Through the implementation of the various policies, a.s.r. commits to respect the Climate Commitment for the Dutch financial sector.

## Actions

### Actions in relation to climate change policies

a.s.r. has taken various key actions to manage its climate related impacts, risks and opportunities and, where applicable, achieve its policy objectives.

*Key actions of Facilities* 2.2
In collaboration with HR, Facilities has determined a set of key actions aimed at reducing its negative impact, in line with the Environmental Policy Statement. The key actions presented by outcome and in case of a climate mitigation action the decarbonisation lever, are:

- Increase energy efficiency of a.s.r.'s office locations by optimising the use of office locations and space and implementing measures to reduce energy usage;
- Increase the use of renewable energy at a.s.r.'s office locations by using renewable energy from its own solar panels and purchasing market-based green electricity;
- Reduce GHG emissions by company vehicle mobility through electrification of the lease car fleet (decarbonisation lever: electrification of transportation reduces emissions);
- Reduce GHG emissions of employee commuting by promoting eco-friendly transportation options by offering an NS-Business Card and a tax benefit for new bicycles used for commuting as well as promoting hybrid working by optimising hybrid working systems and an envisaged 0.4 workstation per FTE at a.s.r.'s head office (decarbonisation lever: low/no carbon/no transportation reduces emissions).

The scope of these key actions is direct emissions from owned or controlled sources, indirect emissions from the generation of purchased electricity and indirect emissions that occur from business travel, employee commuting and waste generated in own operations.

Facilities with the co-operation of HR implements its key actions on an ongoing basis. The reduction of carbon emissions of company vehicle mobility runs until 2028 when a.s.r.'s entire lease car fleet is expected to be fully electric.

The key climate mitigation actions of Facilities have already led to concrete results, such as a reduction in emissions of a.s.r.'s head office and vehicle fleet. In 2024, Facilities reduced its own operations GHG emissions in scope of its emission reduction target by 37% compared to the base year 2023. The expected emission reduction will continue to increase as these initiatives are further implemented.

*Procurement* 2.1 2.2
Procurement has not yet initiated key actions as they plan to adopt these after they have set up a dedicated environmental procurement policy.

*Key actions of IT* 2.2
IT has adopted a set of actions to reduce its negative impact on climate change. The key actions presented by outcome and in case of a climate mitigation action the decarbonisation lever, are:

- Increase energy efficiency by purchasing modern data centre hardware with a lower carbon footprint;
- Increase the use of renewable energy by using green energy for the data centres.
- Reduce carbon emissions by longer use of current employee hardware where possible, leading to less carbon emissions in connection to replacements of employee hardware (decarbonisation lever: extend lifetime instead of replace hardware reduces emissions).

These key actions concern the data centre hardware in Utrecht and Woerden and the end-user hardware for all a.s.r. employees. The actions are continuously carried out by IT, as there will always be changes in a.s.r.'s data centre composition and workforce composition, which require the organisation to fulfil the need to continue business as requested.

IT has already delivered concrete results in relation to its climate mitigation actions: GHG emissions of the energy consumption at the Utrecht data centre were zero in 2024 following a transition to green energy consumption. It is expected that the GHG emissions of the energy consumption at the Woerden data centre will also be reduced to zero in due course.

*Key actions of distribution and services entities* 2.2
The distribution and services entities have not yet initiated any key actions, as their environmental policies are still under development, and actions related to these policies will be implemented thereafter, with the exception of Corins, which has nevertheless adopted a set of key actions aimed at reducing its negative impact in line with a.s.r.'s Environmental Policy Statement.

*Key actions of Asset Management* 2.1 2.2 2.4
Asset Management has adopted a set of actions to manage and mitigate the material impacts, risks and opportunities related to climate change. These actions are integral to the Policy on Responsible Investments and align with the organisation's commitment to supporting the transition to a low-carbon economy. Key actions by outcome and in case of a climate mitigation action the decarbonisation lever, include:

- Manage risks by investment criteria: Asset Management, for example, excludes investments in sectors and activities that are incompatible with achieving the goals of the Paris Agreement, such as thermal coal production and coal-fired power generation. The exclusion rules and criteria are regularly reviewed and may be tightened where deemed necessary.
- Mitigate impact and manage risks by active ownership: Asset Management actively engages with companies within its investment portfolios to encourage the development and implementation of robust climate strategies and transition plans. Asset Management collaborates with like-minded peers to strengthen its engagement efforts and increase its influence with investee companies (decarbonisation lever: engagement leads to investees developing and implementing transition plans).
- Support the transition to a low-carbon economy by impact investing: Asset Management supports the transition to a low-carbon economy by making impact investments in renewable energy and other low-carbon technologies. These investments aim to contribute positively to global climate mitigation efforts.
- Support the transition to a low-carbon economy by industry participation and collaboration: Asset Management aims to stimulate positive change in the financial sector through active participation in industry bodies and collaborations focused on climate action. For example, a.s.r. is a member of initiatives such as the Dutch Climate Coalition and the Net Zero Asset Managers initiative (NZAM), where it works alongside other investors to promote policies and practices that support the transition to a net-zero economy. The scope of the exclusions and impact investing actions is a.s.r.'s own account investments, and investments on behalf of policyholders and third-party clients. Engagement activities primarily focus on investments in corporate bonds and equities. The scope of industry participation and collaboration actions is mainly within the financial sector and at research centres in universities.

Asset Management implements its climate-related actions on an ongoing basis. A number of specific climate-related actions are expected to be completed by the end of 2027. These include the completion of initial phase three engagements of the fossil fuel exit strategy, where Asset Management will engage with at least 15 companies on the demand side for fossil fuels from the manufacturing, mining, and utilities sectors to understand the sector-specific risks and opportunities posed by climate change, and to request the creation of robust transition plans.

Since 2021, Asset Management has been engaging with companies involved in the production of traditional oil and gas to establish whether they are aligned with the Paris Agreement. In line with its fossil fuel exit strategy, Asset Management completed its engagements with these companies before the end of 2024. In 2024, Asset Management also took the decision to exclude traditional oil and gas producers that do not meet its requirements for alignment with the Paris Agreement and started the process to phase out its remaining positions in these companies.

In relation to its key climate mitigation actions, Asset Management reduced its financed GHG emissions in scope of the emission reduction target by 9% in 2024 compared to the base year 2023. With regards to expected GHG reduction emissions in the real economy: Asset Management's financed emissions arise from the real-world activities of the companies and countries in which it invests. Reductions in financed emissions (i.e. GHG emissions reductions) depend primarily on external factors, such as government policy, technological advancements, and shifts in consumer behaviour. Asset Management contributes to the net-zero transition through active ownership (e.g., engaging with investee companies to create and implement robust transition plans) and impact investing (e.g. funding renewable energy projects and low-carbon technologies). These actions aim to stimulate real-world decarbonisation and support alignment with net-zero. However, the reduction of emissions in the real economy remains the primary driver of expected GHG emissions reductions and achievement of the carbon reduction target.

*Key actions of Real Estate* 1.1 1.2 2.1 2.2
Real Estate manages its climate-related impact, risks and opportunities by taking the following key actions presented by outcome and in case of a climate mitigation action the decarbonisation lever.

*Real Estate property*
- Support climate change mitigation in existing and new real estate assets: Real Estate aims to reduce the energy usage of individual assets by executing asset-level reduction plans. A Paris Proof roadmap using the Carbon Risk Real Estate Monitor (CRREM) pathways is in place for each Real Estate fund and the own account assets. The Paris Proof roadmap is based on the current energy intensity and reduction measures at the level of individual assets to reach net-zero in 2045. In addition, Real Estate focuses on acquiring or developing new properties with lower carbon footprints (decarbonisation lever: less energy usage of property reduces emissions) and office buildings located near public transport hubs (decarbonisation lever: impact investing in locations near public transport hubs reduces car trips and promotes sustainable travel),
- Advance climate change adaptation in existing and new real estate assets: Real Estate strives to build a portfolio that is progressively adapted to long-term climate-related hazards by both understanding and anticipating the long-term effects of climate change. For the assets that are exposed to high long-term physical climate risks, an assessment of adaptation solutions that could reduce the impact of the identified physical climate risks is carried out and the results are used to draw up a high-level adaptation plan, which aims to ensure these assets are resilient to climate.
- Increase energy efficiency: Real Estate engages with tenants to agree on making the leased asset more sustainable. Green leases are added to new and existing contracts, whereby tenant and landlord enter into a partnership for joint energy-reducing efforts, with the aim of bringing and keeping the energy-intensity in line with the CRREM pathway and to reach net-zero in 2045.
- Support renewable energy deployment: Real Estate aims to implement renewable energy solutions within its Real Estate portfolio. PV panels are the most suitable solution for buildings and are installed when feasible. Real Estate also procures 100% renewable energy from the Netherlands for the areas controlled by the landlord and encourages tenants to do so as well.

*Farmland and Rural estates*

- Support climate change mitigation through green leases and reduction measures by farmers: Real Estate promotes sustainable agricultural practices through green leases. By 2025, a.s.r. aims for 100% of new and at least 30% of existing ground lease agreements to be green leases. These leases incentivise farmers with annual reductions in lease payments (10% over the first three years and 5% thereafter) for meeting sustainable farming criteria. Real Estate also engages with farmers. The objective is to facilitate at least 15 farmers with emission reduction plans by 2025. This initiative involves collaborating with farmers to develop tailor-made solutions that reduce emissions and improve soil health. In 2024, The Fund began projects with 10 farmers, guided by advisors, stewards, and science experts, to create customized emission reduction plans. The Fund covers the cost of creating these plans and works jointly with farmers to seek funding for implementing necessary measures. Furthermore, a.s.r. engages farmers through events, client panels, and newsletters to share insights and successful strategies. a.s.r. aims to set a knowledge-sharing hub for tenants by 2027 (decarbonisation lever: price incentives and engagement leads to farmers developing and implementing transition plans).
- Advance climate change adaptation in existing and new farmland assets: Real Estate strives to build a portfolio that is progressively adapted to long-term climate-related hazards by both understanding and anticipating the long-term effects of climate change. Real Estate conducted a comprehensive climate risk assessment for all plots in its portfolio. This assessment helped to gain insight into the climate effects relevant to various landscape types and identify opportunities to enhance climate resilience. Based on the assessment, Real Estate identified vulnerabilities to climate-related impacts, including thirteen climate risks divided into three main categories: water, drought and salinisation. And Real Estate identified adaptation solutions to mitigate the identified climate risks and aims to assess and integrate these climate adaptation solutions into its acquisition, investment and disposition strategies. In addition, Real Estate aims for at least 2% of the farmland portfolio's hectares to be dedicated to climate-positive crops, which include leguminous and biobased building varieties, in 2025. The cultivation of these crops is considered an adaptation solution and offers a sustainable alternative to traditional agricultural practices.

*Renewable energy*

- Support the energy transition: Real Estate does (impact) investments in renewable energy deployments such as wind and solar farms.

The scope of first four key actions is the a.s.r. urban real estate property under management of a.s.r. Real Estate. The scope of the second two key actions relates to Real Estate's farmland property and rural estate portfolio. The last key action relates to Real Estate's renewable energy property. The time horizon to complete these actions is, unless described otherwise in the above, 2045.

Real Estate's key climate mitigation actions have already delivered concrete results. The investments in wind and solar farms currently include four wind farms and one solar farm. Together they generate an amount of power comparable to the annual consumption of 231,000 households. The real estate funds' emissions however remained the same (0% emission reduction) in 2024 compared to the base year 2023. In the coming years, the funds will continue to execute asset-level reduction strategies and further refine the Paris Proof roadmap with annual consumption data, lessons learned and evolving insights on an annual basis, which are expected to lead to alignment with the Paris Agreement targets in 2045 at the latest.

*Key actions of Mortgages* 1.1 1.2 2.1 2.2 2.4

Mortgages has adopted a set of key actions towards customers and advisors to stimulate them to make the transition to a net-zero home. The key actions presented by outcome and in case of a climate mitigation action the decarbonisation lever are:

- Reduce GHG emissions and manage risks by offering specific products for making homes more sustainable, such as the Verduurzamingshypotheek which provides the opportunity to borrow up to 65,000 euros which can only be used to finance sustainable home improvements at a reduced tariff compared to the standard mortgage product (decarbonisation lever: financial (impact) incentive leads to making homes more sustainable and reducing emissions).
- Reduce GHG emissions and manage risks by making it more accessible for customers to borrow up to € 10,000 additionally for making their houses more sustainable through an opt-in on the mortgage offer (decarbonisation lever: accessibility of additional (impact) finance incentivises making homes more sustainable and reducing emissions).
- Support the energy transition by setting up the sustainable living platform: on this platform, a.s.r. mortgages helps consumers by sharing other people's experiences and practical advice about sustainable living, such as insulating homes, saving on energy use and how to make a house more climate-resistant.
- Support the energy transition by setting up a partner network for helping customers to realise sustainable home improvements.
- Advance climate change adaptative thinking by increasing knowledge and awareness on climate adaptiveness of residential homes through engagement in partnerships.

The scope of these key actions is emissions of private individuals who take out a mortgage for their homes. Time horizons for the actions to complete is 2050 when a Paris Agreement aligned mortgages portfolio is expected to be achieved.

Mortgages has already delivered concrete results in relation to its key climate mitigation actions: in 2024, Mortgages reduced its GHG emissions by 5% compared to the base year 2023 (please note that this outcome is based on the old CBS lookup tables from PCAF as the new CBS lookup tables were not yet available at the moment of calculating the figures). In the coming years, Mortgages will continue to stimulate and help homeowners to make their homes more sustainable. The organisation has made a reduction pathway but is still dependant on the actions homeowners, advisors, funders, the government and other parties in the mortgage chain to achieve its goals. Mortgages will continue to stimulate and encourage them.

*Key actions of P&C* 1.1 1.2 1.3 2.1 2.2 2.3 2.4

P&C has initiated various actions to manage its climate-related impacts, risks and opportunities. Key actions of P&C by outcome and in case of a climate mitigation action the decarbonisation lever type are:

- Reduce carbon emissions and manage risks: in the underwriting process, P&C excludes producers of thermal coal and unconventional oil and gas, requires other producers in the fossil fuel sector to commit to the Paris Agreement and to have transition plans, and performs ESG risk assessments on other parties with substantial volume in the fossil fuel industry or in sensitive sectors (decarbonisation lever: underwriting criteria incentivise companies to develop and implement energy transition plans).

- Support the energy transition by making renewable energy initiatives insurable through the sustainability desk.
- Support climate adaptation and energy transition by sustainable product development which incentivises prevention measures and renewable energy alternatives.
- Support the energy transition by setting up the sustainable living platform: P&C helps consumers by sharing other people's experiences and practical advice about sustainable living, such as insulating homes and saving on energy use and how to make a house more climate-adapted, on this platform.
- Support the energy transition by setting up the sustainable mobility webpage: P&C provides advice on eco-friendly transport with lower GHG emissions on this webpage.
- Reduce carbon emissions by sending out information in customer communications: in welcome messages to new customers, a.s.r. provides information on the importance of emissions reduction (decarbonisation lever: engagement creates knowledge and awareness amongst customers about the possibilities to reduce emissions).
- Support energy efficiency by setting up the sustainable business webpage: P&C helps entrepreneurs by sharing other entrepreneurs' experiences and practical advice about sustainable entrepreneurship, such as how to save energy at the workplace on this webpage.
- Reduce GHG emissions by setting up a collaboration with Klimaatroute: P&C works with this organisation, which carries out energy scans on business customers at reduced rates and prepares a report on possible actions the customer can take to reduce GHG emissions within the company. If the business customers so wish, Klimaatroute can also help obtain quotes, subsidies and permits (decarbonisation lever: the information and support by Klimaatroute leads to more knowledge and removes barriers amongst business customers in relation to reducing emissions).
- Reduce GHG emissions by referring customers with damaged items which can be repaired by repairers that meet the stringent requirements of sustainable *GroenGedaan!* and *Erkend Duurzaam* certifications (decarbonisation lever: extending lifetime instead of replacing (decarbonisation lever: accessibility of additional finance incentivises making homes more sustainable and reducing emissions) items reduces emissions).

The scope of the actions regarding underwriting criteria and the sustainability desk are commercial customers wishing to purchase object related insurance. The scope of P&C's key actions related to the platform and webpages is the general public, the welcome letter action applies to P&C customers in general, where the collaboration with Klimaatroute focuses on commercial P&C customers specifically. The scope of the actions regarding referring to repairers is claims adjustment of damaged items insured on car and property insurance.

The execution of sustainable underwriting criteria and the sustainability desk will probably need to continue until 2050, new content is placed on the platforms and in the welcome messages regularly throughout the year, with time horizons of 2050 as well. The collaboration with Klimaatroute is set up until 2030. Product development and referral to certified repairers is ongoing.

With regards to its climate mitigation actions, P&C has reduced its insurance associated emissions in scope of its emission reduction target by 3% in 2024 compared to the base year 2022. With regards to emission reductions in the real economy: P&C expects that its product development, engagement and claims adjustment actions have supported the energy transition, energy efficiency and carbon reduction of consumers and entrepreneurs. However, it is unclear by how much emissions in the real economy have been reduced specifically through these actions. In the coming years, P&C will continue these actions and expects that these will keep encouraging consumers and entrepreneurs to reduce their GHG emissions.

*Key actions of Health* 2.2

Joint actions that follow from the Green Deal *Duurzame Zorg* (GDDZ) 3.0 to mitigate negative impacts on climate change - presented by outcome and in case of a climate mitigation action the decarbonisation lever, are:

- Reduce GHG emissions by stimulating healthcare providers via healthcare purchasing policy to reduce their GHG emissions in a uniform manner (decarbonisation lever: emission reduction incentives in purchasing policy lead to less emissions).
- Reduce GHG emissions by asking healthcare providers with more than 100 employees for a mobility plan to reduce GHG emissions and requesting health insurers to include GHG emissions when contracting patient transport (decarbonisation lever: requests to make plans for no/low carbon transportation leads to less emissions).
- Reduce GHG emissions by designing a framework for action for future-proof healthcare real estate (decarbonisation lever: designing actions for future proof healthcare buildings leads to less emissions).
- Reduce GHG emissions by stimulating and supporting the preparation and implementation of GHG emission reduction roadmaps by larger healthcare providers (decarbonisation lever: engagement and support incentivises healthcare providers to develop and implement GHG emission reduction roadmaps lead to less emissions).
- Support the energy transition by providing sustainability training for healthcare purchasers, with the aim of having purchasers discuss sustainability with healthcare providers.

In scope are contracted healthcare providers. Time horizon for the completion of the GDDZ 3.0 is 2026 when a revision will take place. There are no data available yet on the achieved and expected GHG emissions related to the climate mitigation actions.

*Key actions of Funeral* 2.2

Funeral has set various actions to manage its impact. The key actions presented by outcome and in case of a climate mitigation action, the decarbonisation lever, are:

- Reduce GHG emissions by sustainable product development and by contributing positively to making its network of funeral undertakers more sustainable (decarbonisation lever: product development and engagement incentivises reducing emissions).
- Support energy transition by engaging with its customers to make sustainable choices.
- Reduce GHG emissions by developing an industry-wide calculation methodology and definition with sector colleagues to provide insight into GHG emissions of funeral insurance (decarbonisation lever: knowledge of GHG emissions drives emission reduction).

Scope of these actions is Funeral's network and customers with a.s.r. funeral insurance policies. Time horizons for completion of Funeral's key actions is 2050 at the latest.

Due to the lack of methodology and definition to measure GHG emissions of funeral insurance, there are no data available yet on the achieved GHG emission reductions related to the climate mitigation actions.

The development of a methodology and a definition is expected to start in 2025 so there is no insight yet, on the expected GHG emission reductions either.

### Resources in relation to climate change policies

In some cases, the implementation of an action plan may depend on the availability and allocation of resources, which require significant operational expenditures (OpEx) and/or capital expenditures (CapEx). These are stated in the table below and are primarily related to the implementation of the various key actions of Facilities, Mortgages and Asset Management.

#### E1-1 Financial resources allocated to action plans

| | Unit of measure | 2024 |
|---|---|---|
| Current operational expenditure allocated to action plan | in € million | 5 |
| Future operational expenditure allocated to action plan | in € million | 18 |
| **Total operational expenditure** | **in € million** | **23** |
| | | |
| Current capital expenditure allocated to action plan | in € million | 2 |
| Future capital expenditure allocated to action plan | in € million | 0 |
| **Total capital expenditure** | **in € million** | **2** |

*Operational expenditures*
The implementation of the above key actions has led to significant additional operational expenditures for various entities and product lines this year and in the coming years, as is set out in the above table.

For Facilities, this mainly concerns supplier costs related to reducing energy usage, closing some office locations (The Hague in 2025 and Leeuwarden around 2027), promoting eco-friendly transportation options for employees and hybrid working. For Mortgages, this concerns several ESG projects aimed at customers and advisors to encourage them to transition to a net-zero home, including energy-efficient mortgages. The above table also includes the operational expenses related to the implementation of the action plans at Asset Management to manage and mitigate the material impacts, risks, and opportunities related to climate change.

For Real Estate, operational expenditures are made by the Real Estate funds, not by a.s.r. as an investor or by Real Estate as a fund manager. Therefore, these are not included in the above table. The funds focus on reducing energy consumption through asset-level execution plans and increasing on-site renewable energy. As a fund manager, Real Estate encourages, advises, and supports the funds in achieving the Paris Agreement goals.

Operational expenses for the other entities and product lines do not exceed the materiality threshold per action plan of € 1 million yet and are therefore not considered significant expenditures.

The aforementioned operational expenditures are classified in the financial statements as insurance service operating expenses and are part of the insurance service result.

*Capital expenditures*
The expenses related to the implementation of the various action plans are normally not capitalised on the balance sheet but are directly written off as an expense in the results. An exception to this is the investment of Facilities to make the lighting in the a.s.r. headquarters more sustainable. These are reflected in the table above as current capital expenditures allocated to action plan.

Not all entities and product lines were able to determine their exact operational costs and capital expenses in relation to their action plans yet. Also, action planning is a continuous process, so additional CapEx and OpEx may be necessary to carry out further action plans.

See section 6.5.3.1 for CSRD reporting policies.

## 6.2.1.4 Targets and metrics

### Targets

**Targets related to climate change mitigation and adaptation** 2.2

Facilities, Asset Management, Real Estate, Mortgages and P&C have set targets related to climate change mitigation and adaptation to track the effectiveness of their actions to address their climate-related impacts, risks and opportunities and to meet their policy objectives. Health supports the joint target resulting from the GDDZ 3.0.

Procurement, IT, distribution and services entities and Funeral have not yet determined targets, as they are still in the process of developing policies. Targets will be set once policies are finalised. These entities and product lines are currently not tracking the effectiveness of any policies or actions in relation to material sustainability-related impacts, risks and opportunities, as there are no policies or actions yet, except for the actions of Corins to reduce carbon emissions of which effectiveness is also not tracked yet.

**Impact investment target - investments (Asset Management, Real Estate and Mortgages)** 2.1 2.4

A key focus of the Policy on Responsible Investments of Asset Management is supporting the energy transition by creating a positive impact through investments. One of the strategic themes of the ESG Policy of Real Estate is to reduce GHG emissions through impact investments in renewable energy. The Mortgages Transition Plan sets out a framework to reduce negative impact on climate change by financial (impact) incentives. Setting an impact investment target for investments helps to track the effectiveness and progress of the impact investing actions taken to achieve these policy objectives.

Although the impact investment target mainly relates to impact investing actions taken to support the energy transition, impact investments can also be made with the intention to generate social and biodiversity impact.

The target level to be achieved is 10% of the assets under management, in 2027. In scope are a.s.r. own account investments and internally managed affiliated assets. Out of scope are externally managed affiliated assets and internally and externally managed investments on behalf of third-party clients.

The period to which the target applies is three years (until 2027). Regarding the methodologies used and significant assumptions made, impact investing is defined as an investment approach that seeks to generate positive, measurable social and environmental impact alongside financial returns, in line with the Global Impact Investing Network (GIIN). The impact investing selection criteria are detailed in the various policies. The impact investment target is not based on conclusive scientific evidence. No stakeholders were involved in the target setting.

No changes have been made yet to the current target and corresponding metrics. The current impact investment target for a.s.r., including Aegon NL, was defined after having set the previous impact investment target to a nominal amount of € 4.5 billion for a.s.r. standalone in 2024. In 2024, impact investments amounted to 8.7% of the portfolio in scope, which is in line with what has been initially planned. In regard to how the progress is monitored and reviewed and to the metrics used, the product lines calculate the total euro amount related to impact investments as a percentage of the total euro amount related to assets under management in scope in the reporting year at year-end.

| Additional disclosure on impact investment target - Asset Management, Real Estate and Mortgages | |
|---|---|
| Relationship to policy objectives | A key focus of the Policy on Responsible Investments of Asset Management is supporting the energy transition by creating a positive impact through investments. One of the strategic themes of the ESG Policy of Real Estate is to reduce GHG emissions through impact investments in renewable energy. The Mortgages Transition Plan sets out a framework to reduce negative impact on climate change by financial (impact) incentives. Setting an impact investment target for investments helps to track the effectiveness and progress of the impact investments to achieve these policy objectives. |
| IRO's addressed by the target | 2.1 2.4 |
| Scope of the target | In scope are a.s.r. own account investments and internally managed affiliated assets.<br>Out of scope are externally managed affiliated assets and internally and externally managed investments on behalf of third-party clients. |
| Methodologies and significant assumptions | Impact investing is defined as an investment approach that seeks to generate positive, measurable social and environmental impact alongside financial returns, in line with the Global Impact Investing Network (GIIN). |
| Scientific basis | The impact investment target is not based on conclusive scientific evidence. |
| Stakeholder involvement | No stakeholders were involved in the target setting. |
| Changes in targets and metrics | No changes have been made yet to the current target and corresponding metrics. The current impact investment target for a.s.r., including Aegon NL, was defined after having set the previous impact investment target to a nominal amount of € 4.5 billion for a.s.r. standalone in 2024. The scope of the current target is covers a.s.r. own account investments and internally managed affiliated assets. In addition, different corresponding metrics are used in that, compared to the Non-Financial Target (NFT) figures as communicated in the 2023 Annual Report, the current target is measured in percentage instead of euro. |
| Performance against targets | In 2024, impact investments amounted to 8.7% of the portfolio in scope which is in line with what has been initially planned. In regard to how the progress is monitored and reviewed and to the metrics used, the product lines calculate the total euro amount related to impact investments as a percentage of the total euro amount related to assets under management in scope in the reporting year at year-end. |

### Emission reduction targets

Emission reduction targets of the product lines and entities that have set these to support their policies and to address their climate-related impacts, risks and opportunities, have been consolidated to group level emission reduction targets in the categories own operations, financed emissions and insurance-associated emissions. Due to differences in scope between E1-4 targets and E1-6 metrics, the 2024 emissions as disclosed for the E1-4 targets below differ from the emissions as disclosed in E1-6. See below and section 6.5.3.2 for CSRD reporting policies for further information.

## E1-4 Emission reduction targets related to climate change mitigation and adaptation

| | Unit of measure | Base year | Baseline value | 2024 | 2024 reduction in %[1] | Target 2030 reduction in %[1] |
|---|---|---|---|---|---|---|
| **Own operations (scope 1 + 2)[2]** | **in $tCO_2e$** | **2023** | **2,246** | **1,424** | **37%** | **42%** |
| | | | | | | |
| **Financed emissions (scope 3)** | **in $tCO_2e$ / € 1 million** | **2023** | **41** | **39** | **5%** | **25%** |
| Equity | in $tCO_2e$ / € 1 million | 2023 | 38 | 33 | 15% | |
| Government bonds | in $tCO_2e$ / € 1 million | 2023 | 196 | 187 | 5% | |
| Corporate bonds | in $tCO_2e$ / € 1 million | 2023 | 40 | 36 | 10% | |
| Mortgages | in $tCO_2e$ / € 1 million | 2023 | 10 | 10 | 5% | |
| Real Estate | in $tCO_2e$ / € 1 million | 2023 | 123 | 123 | 0% | |
| | | | | | | |
| **Insurance-associated emissions (scope 3)** | | | | | | |
| Personal lines (Personal car) and Commercial lines | in $tCO_2e$ | 2022 | 138,739 | 135,113 | 3% | 26% |

### Emission reduction target - own operations (Facilities) 2.2

The general objective of the Environmental Policy Statement of Facilities is for a.s.r. to maintain its own environmental performance at a socially responsible level. Setting an emission reduction target for own operations GHG emissions helps to track the effectiveness and progress of the climate mitigation actions taken to achieve this policy objective.

The target level to be achieved is a 42% reduction compared to the own operations GHG emissions in the base year. In scope are scope 1 and 2 GHG emissions of a.s.r.'s own buildings in Utrecht, Rotterdam, Enschede, Heerlen, Den Haag and Leeuwarden. Out of scope are the entities Corins, D&S Holding, Knab, Robidus and TKP and scope 3 emissions related to own operations such as GHG emissions of employee commuting.

The base year is 2023 and the baseline value is 2,246 $tCO_2e$. The base year was chosen in line with SBTi's best practice to choose the most recent reporting year for which data are available as a base year. The baseline value in 2023 is considered representative because it covers a.s.r.'s most relevant own operations GHG emissions and minimised external factors such as COVID-19. The period to which the target applies is 2030.

Regarding methodologies used and significant assumptions made, the SBTi methodology has been followed to set the emission reduction target for a.s.r.'s own operations GHG emissions. As the SBTi methodology has been followed to set the target, the emission reduction target is considered to be based on scientific evidence, considered to be science-based and compatible with limiting global warming to 1.5°C but this has not been validated by SBTi yet. Representatives of the different locations and the distribution and services entities have been involved when setting the targets.

No changes have been made yet to the current emission reduction target and corresponding metrics. The current emission reduction target was set after the previous emission reduction target for own operation GHG emissions was reached in 2023. The scope of the current target is different from the previous target in that the current target covers scope 1 and 2 GHG emissions of a.s.r.'s own buildings in Utrecht, Rotterdam, Enschede, Heerlen, Den Haag and Leeuwarden where the previous target covered scope 1, 2 and 3 GHG emissions of a.s.r.'s own building in Utrecht. Metrics remained the same.

In 2024, a reduction of 37% compared to the base year 2023 was achieved, which is ahead of the projected reduction path. This considerable progress in the first year of this target is a result of mostly one-off interventions such as the electrification of the vehicle fleet, the procurement of green energy contracts and additional Guarantees of Origin having an immediate effect and resulting in a relatively high decrease of scope 2 emissions using a market-based approach, in 2024. Facilities monitors and reviews the progress by comparing the own operations GHG emissions in the reporting year (measured in $tCO_2$) to those in the base year, expressed as a percentage difference, at year-end.

1 % reduction compared to base year.
2 Market-based approach included in scope 2.

The emission reduction target for own operations GHG emissions is disclosed as a percentage of the own operations GHG emissions of the base year. This target relates to scope 1 and 2 own operations GHG emissions whereby it has not been determined which share of the target is related to scope 1 and which to scope 2 own operations GHG emissions. Section 6.5.3.2 describes which GHGs are covered by the emission reduction target.

**Emission reduction target - financed emissions (Asset management, Real Estate, Mortgages)**

2.2

A key focus of the Policy on Responsible Investments of Asset Management is on mitigating climate-related risks and supporting the transition to a low-carbon economy. One of the strategic themes of the ESG Policy of Real Estate is to reduce energy intensity and GHG emissions. The Mortgages Transition Plan sets out a framework to reduce negative impact on climate change and mitigate climate-related physical and transition risks in the portfolio. Setting an emission reduction target for financed GHG emissions helps to track the effectiveness and progress of the climate mitigation actions taken to achieve these policy objectives.

| Additional disclosure on emission reduction target - Own operations (Facilities) | |
|---|---|
| Relationship to policy objectives | The general objective of the Environmental Policy Statement of Facilities is for a.s.r. to maintain its own environmental performance at a socially responsible level. Setting an emission reduction target for own operations helps to tracks the effectiveness and progress of the actions taken to achieve this policy objective. |
| IRO's addressed by the target | 2.2 |
| Scope of the target | In scope: scope 1 and 2 emissions of a.s.r. own buildings in Utrecht, Rotterdam, Enschede, Heerlen, Den Haag, Leeuwarden.<br><br>Out of scope: Corins, D&S Holding, Knab, Robidus and TKP and scope 3 own operation emissions. |
| Methodologies and significant assumptions | The SBTi methodology has been followed to set the emission reduction target for the own operations.<br><br>*See section 6.5.2.3.* |
| Scientific basis | As SBTi methodology has been followed to set the target, the emission reduction target is considered to be based on scientific evidence. |
| Stakeholder involvement | Representatives of the different locations and the distribution and services entities have been involved when setting the targets. |
| Changes in targets and metrics | No changes have been made yet to the current emission reduction target. The current emission reduction target was set after the previous emission reduction target for own operation GHG emissions was reached in 2023. The scope of the current target is different from the previous target in that the current target covers scope 1 and 2 GHG emissions of a.s.r.'s own buildings in Utrecht, Rotterdam, Enschede, Heerlen, Den Haag and Leeuwarden where the previous target covered scope 1, 2 and 3 GHG emissions of a.s.r.'s own building in Utrecht. Metrics remained the same. |
| Performance against targets | In 2024, a reduction of 37% compared to the base year 2023 was achieved which is ahead of the initial planning. In regard to how the progress is monitored and reviewed and to metrics used, Facilities compares the emissions in the reporting year (measured in $tCO_2$) to those of the base year, expressed as a percentage difference, at year-end. |

| Additional disclosure on emission reduction target - Financed emissions (Asset management, Real Estate and Mortgages) | |
|---|---|
| Relationship to policy objectives | A key focus of the Policy on Responsible Investments of Asset Management is on mitigating climate-related risks and supporting the transition to a low-carbon economy. One of the strategic themes of the ESG Policy of Real Estate is to reduce energy intensity and GHG emissions. The Mortgages Transition Plan sets out a framework to reduce negative impacts on climate change and mitigate climate-related physical and transition risks in the portfolio. Setting an emission reduction target for financed emissions helps to track the effectiveness and progress of the actions taken to achieve these policy objectives. |
| IRO's addressed by the target | 2.2 |
| Scope of the target | The scope of the emission reduction target for financed GHG emissions is scope 3 Category 15 (financed) GHG emissions of Asset Management, Real Estate and Mortgages.<br><br>For Asset Management, this covers scope 1 and 2 emissions of investees (companies and sovereign states) and concerns internally managed a.s.r. own account investments in equities, corporate bonds, and government bonds. Out of scope for Asset Management are: externally managed a.s.r. own account investments in equities, corporate bonds and government bonds; internally- and externally-managed a.s.r. own account investments in other asset classes; and assets managed on behalf of a.s.r. policyholders and third-party clients. In addition, Knab is not in scope for Asset Management.<br><br>For Real Estate this covers scope 1 and scope 2 emissions of Real Estate assets and concerns assets 100% owned by a.s.r., rural estates and the funds managed by Real Estate. For real estate no outscoping is applied.<br><br>For Mortgages this covers scope 1 and 2 emission of property for which mortgages are serviced by a.s.r. and concerns a.s.r. Hypotheken label and Aegon Hypotheken label including mortgages managed on behalf of BAWAG after Knab was sold to BAWAG. Out of scope Mortgages: Mortgages of own account of a.s.r. but not under management of a.s.r., such as investments in Robuust and Dynamics Credit. Bridging mortgages and savings accounts invested at other parties. These mortgages are subordinated to other mortgage claims made on the property by other companies. |
| Methodologies and significant assumptions | It was not possible to use one single methodology to set a target for Asset Management, as the target relates to both emissions from companies and sovereign states. Real Estate and Mortgages made use of the Carbon Risk Real Estate Monitor (CRREM), which provides pathways in line with the Paris Agreement, to define their targets.<br>See section 6.5.2.3. |
| Scientific basis | The current emission reduction target for financed emissions is not yet entirely based on conclusive scientific evidence. a.s.r. is committed to submit a near term science-based target for financed emissions to SBTi for validation. |
| Stakeholder involvement | Stakeholders may be involved in the process of science-based target submission. |
| Changes in targets and metrics | No changes have been made to the current emission reduction target and corresponding metrics yet. The current emission reduction target for financed emissions for a.s.r., including Aegon NL, was set after reaching the previous emission reduction target for financed emissions for a.s.r. stand alone in 2023. Compared to the Non-Financial Target (NFT) figures as communicated in the 2023 Annual Report, several changes have been made to the metrics. First, the source of the current Asset Management carbon footprint calculation of equity and corporate bonds has changed from Moody's ESG to MSCI. Second, the data source for government bonds has changed from Eurostat to the PCAF database. In addition, Several methodological changes have been made to consider the most recent PCAF methodologies. Finally, the composition of the portfolio has changed due to the Aegon NL integration" |
| Performance against targets | In 2024, a reduction of 5% compared to the base year 2023 was achieved, which is in line with the initial planning. In regard to how progress is monitored and reviewed and to metrics used, the product lines compare the financed emissions (measured in $tCO_2e$ / € 1 million) in the reporting year to those of the base year, expressed as a percentage difference, at year-end. |

The target level to be achieved is a 25% reduction compared to financed GHG emissions in the base year. The scope of the emission reduction target for financed GHG emissions is scope 3 Category 15 (financed) GHG emissions of Asset Management, Real Estate and Mortgages. For Asset Management, this covers scope 1 and 2 emissions of investees (companies and sovereign states) and concerns internally managed a.s.r. own account investments in equities, corporate bonds, and government bonds. For Real Estate, the scope includes scope 1, 2 and 3 (energy use of tenant) emissions of real estate assets and concerns assets 100% owned by a.s.r., rural estates and the funds managed by Real Estate. For Mortgages, this covers scope 1 and 2 emissions of property for which mortgages are serviced by a.s.r. and concerns a.s.r. Hypotheken label and Aegon Hypotheken label including Knab mortgages managed on behalf of BAWAG after Knab was sold to BAWAG.

The base year is 2023 and the baseline value is 41 $tCO_2e$ per € 1 million invested. The base year was set in line with Science-Based Targets initiative's best practice to choose the most recent reporting year for which data are available as a base year. In addition, during 2023 the acquisition of Aegon NL was completed and therefore it covers all relevant activities of the new combined organisation. The baseline value in 2023 is considered representative because it covers the most relevant financed emissions and minimises external factors such as COVID-19. The financed emission reduction target is set to cover the period from 2023 to 2030.

Regarding methodologies used and significant assumptions made, it was not possible to use one single methodology to set a target for Asset Management, as the target relates to both GHG emissions from companies as well as sovereign states. To define its emission reduction target, Asset Management made use of information following from results achieved in the past, benchmark requirements and national and international climate objectives and plans. Real Estate and Mortgages made use of the Carbon Risk Real Estate Monitor (CRREM), which provides pathways in line with the Paris Agreement, to define their targets. The current emission reduction target for financed emissions is therefore not yet entirely based on conclusive scientific evidence, is not entirely science-based nor compatible with limiting global warming to 1.5°C. a.s.r. has committed to submit a near-term science-based target for financed emissions to SBTi for validation. Stakeholders may be involved in this process.

No changes have been made yet to the current target and corresponding metrics. The current emission reduction target for financed emissions for a.s.r., including Aegon NL, was set after reaching the previous emission reduction target for financed emissions for a.s.r. standalone in 2023. Compared to the Non-Financial Target (NFT) figures as communicated in the 2023 Annual Report, several changes have been made to the metrics. First, the source of the current Asset Management carbon footprint calculation of equity and corporate bonds has changed from Moody's ESG to MSCI. Second, the data source for government bonds has changed from Eurostat to the PCAF database. In addition, several methodological changes have been made to consider the most recent PCAF methodologies. Finally, the composition of the portfolio has changed due to the Aegon NL integration.

In 2024, a reduction of 5% compared to the base year 2023 was achieved, which is in line with the initial planning. In regard to how the progress is monitored and reviewed and to metrics used; the product lines compare the financed emissions in the reporting year (measured in $tCO_2$ / € 1 mln) to those in the base year, expressed as a percentage difference, at year-end.

The current emission reduction target for financed emissions is disclosed as a percentage of the base year GHG emissions. This target relates to scope 3 Category 15 (financed) GHG emissions.

**Emission reduction target - insurance-associated emissions (P&C)** 2.2

An objective of a.s.r.'s Policy on Sustainable Insurance is to reduce negative impact on climate change, manage climate-related physical and transition risks and seize climate-related opportunities. Setting an emission reduction target for insurance associated emissions helps to track the effectiveness and progress of the climate mitigation actions taken to achieve these policy objectives.

The target level to be achieved is a 26% reduction in $tCO_2e$ compared to the base year. The scope of the emission reduction target is scope 3 category 15 (insurance-associated) emissions of P&C. In scope are the commercial lines (except Construction All Risk insurance) and personal motor lines (specifically the personal car insurance portfolio). Out of scope is any other P&C insurance as no sound methodologies have yet been developed for other insurance lines of business.

The base year is 2022 and the baseline value is 138,739 $tCO_2e$. This is a recalculated baseline value following changes to the methodologies used and the growth of a.s.r.'s portfolio as a result of the acquisition of the Aegon NL P&C insurance portfolio. Considering the baseline recalculation standard as outlined in the SBTi Corporate Net Zero criteria, the baseline has been recalculated following changes to the methodologies used and the growth of a.s.r.'s portfolio as a result of the acquisition of the Aegon NL P&C insurance portfolio.

The base year was chosen in line with the NZIA target setting guidance, which recommends not to use a base year earlier than 2019. 2019 was not considered a representative year, due to a switch to a new administrative system which did not allow retrieval of sufficient data for 2019. 2020 and 2021 were not considered representative years either when COVID-19 had a considerable influence on transportation by private passenger cars in the Netherlands leading to unusually low GHG emissions. The baseline value in 2022 is considered representative because it encompasses the most relevant insurance-associated emissions for which calculation methodologies are available and minimises the influence of external factors such as COVID-19. The period to which the target applies is 2030.

Regarding the methodologies used and assumptions made, P&C used the overarching emission reduction approach of the NZIA Target-Setting guidance to set its emission reduction target. The Target-Setting guidance works with IPCC pathway IPCC's AR6 WGIII C1 5th and 95th percentile interval and a 1.5°C aligned reference target of 26% for base year 2022. The target is therefore considered to be based on scientific evidence, considered to be science-based and compatible with limiting global warming to 1.5°C but this has not been externally validated yet. No stakeholders have been involved when the target was set.

No changes have been made yet to the emission reduction target. However, the metrics used for calculating the insurance-associated emissions of the personal car insurance portfolio, have changed. P&C now uses average kilometres driven per year, derived from the CBS database, instead of estimated annual mileage supplied by the insured. And for the delegated authority personal car insurance portfolio, insurance-associated emissions are now calculated based on data supplied by the delegated authorities. Additionally, the metrics used for calculating the insurance-associated emissions of the commercial lines have changed as well: the data source for total sector emissions per year and total sector revenue per year has been changed from PCAF to CBS.

In 2024, a reduction of 3% compared to the base year 2022 was achieved. This seemingly limited emission reduction is primarily due to the absolute nature of the emission reduction target and the data quality level used for calculating commercial line emissions. The autonomous growth of the commercial portfolio and inflation-related premium adjustments significantly influence the outcome, making it challenging to determine whether the emission reduction progress is in line with what has been initially planned. To address this, P&C plans to improve data quality and expects to set a relative emission reduction target in due course. In regard to how progress is monitored and reviewed and to metrics used, P&C compares the insurance-associated emissions of the reporting year (measured in $tCO_2e$) to those of the base year, expressed as a percentage difference, at year-end.

The emission reduction target for insurance-associated GHG emissions of P&C is disclosed as a percentage of the base year insurance-associated GHG emissions. This target relates to scope 3 GHG insurance-associated emissions of P&C.

**Emission reduction target - insurance-associated emissions (Healthcare sector)** 2.2

The procurement policy of Health has incorporated the joint ambitions of the GDDZ 3.0, which aims to limit the negative impact of the healthcare sector on climate change. Supporting the joint emission reduction target for the Healthcare sector helps to track the effectiveness and progress of the climate mitigation actions taken to achieve this policy objective.

| Additional disclosure on emission reduction target - Insurance-associated emissions (P&C) | |
|---|---|
| *Relation to policy objectives* | The objective of a.s.r.'s Policy on Sustainable Insurance is a.o. to reduce negative impact on climate change, manage climate-related physical and transition risks and seize climate-related opportunities. Setting an emissions reduction target for insurance associated emissions helps to track the effectiveness and progress of the actions taken to achieve these policy objectives. |
| IRO's addressed by the target | 2.2 |
| *Scope of the target* | The scope of the emission reduction target is scope 3 category 15 (insurance-associated) emissions of P&C. In scope are the commercial lines (except Construction All Risk insurance) and personal motor lines (specifically the personal car insurance portfolio). Out of scope is any other P&C insurance. |
| *Methodologies and significant assumptions* | P&C used the overarching emission reduction approach of the NZIA Target-Setting guidance to set its emission reduction target for insurance associated emissions.<br><br>*See section 6.5.2.3.* |
| *Scientific basis* | The emission reduction target for insurance associated emissions of P&C is based on the Target-Setting guidance which works with IPCC pathway IPCC's AR6 WGIII C1 5th and 95th percentile interval and a 1.5°C aligned reference target of 26% for the base year 2022 and is therefore considered to be based on scientific evidence. |
| *Stakeholder involvement* | No stakeholders have been involved in the target setting. |
| *Changes in targets and metrics* | No changes have been made yet to the current emission reduction target. However, the metrics for calculating the insurance-associated emissions of both the personal car insurance portfolio and the commercial lines have been changed. For more information see above. |
| *Performance against targets* | In 2024 a reduction of 3% compared to the base year 2022 was achieved. It is challenging to determine whether this emission reduction progress is in line with the initial planning. In regard to how progress is monitored and reviewed and to metrics used, P&C compares the insurance-associated emissions of the reporting year (measured in $tCO_2e$) to those of the base year, expressed as a percentage difference, at year-end. |

The target level to be achieved by the healthcare sector in accordance with the GDDZ 3.0 is -55% $tCO_2e$ compared to the base year. In scope are the scope 1 and 2 emissions by healthcare providers. Thus, this emission reduction is not the target of Health, but of the healthcare sector, supported by Health via its procurement policy. Out of scope of the procurement policy of Health is care related to the Long-Term Care Act (*Wet Langdurige Zorg* - Wlz) as a.s.r. only has an administrative role for long-term care and does not procure long-term care.

Hospitals have been allowed to set their own base year, resulting in no single mutual base year being defined across the sector. A baseline value has been calculated based on these different base years, but it does not fully align with the scope of the target and is therefore also not usable. The period to which the target applies is 2030.

As to methodologies used and significant assumptions made: the joint emission reduction target in the GDDZ 3.0 is in line with the Dutch Climate Action Plan. The Dutch Climate Action Plan is aligned with the EU green deal which aims at a 55% emission reduction in 2030 to reach the Paris Agreement to limit global warming to 1.5°C. The joint target is therefore considered to be based on scientific evidence, considered to be science-based and compatible with limiting global warming to 1.5°C but this has not been externally

| Additional disclosure on emission reduction target - Insurance-associated emissions (Healthcare sector) | |
|---|---|
| *Relationship to policy objectives* | The procurement policy of Health has incorporated the joint ambitions of the GDDZ 3.0, which aims to limit the negative impact of the healthcare sector on the climate. Setting an emissions reduction target for the Healthcare sector helps to track the effectiveness and progress of the actions taken to achieve this policy objective. |
| IRO's addressed by the target | 2.2 |
| *Scope of the target* | In scope: scope 1 and 2 emissions by healthcare providers. This emission reduction is not the target of Health, but of the healthcare sector, supported by Health via its procurement policy.<br>Out of scope of the procurement policy of Health is care related to the Long-Term Care Act (*Wet Langdurige Zorg* - Wlz) as a.s.r. only has an administrative role for long-term care and does not procure long-term care. |
| *Methodologies and significant assumptions* | The joint emission reduction target in the GDDZ 3.0 is line with the Dutch Climate Action Plan.<br><br>*See section 6.5.2.3.* |
| *Scientific basis* | The Dutch Climate Action Plan is aligned with the EU green deal which aims at a 55% emission reduction in 2030 to reach the Paris Agreement to limit global warming to 1.5°C. The joint target is therefore considered to be based on scientific evidence. |
| *Stakeholder involvement* | The GDDZ 3.0 was jointly developed and signed by all stakeholders, the branch organisations in healthcare, and the individual health insurers. |
| *Changes in targets and metrics* | No changes have been made yet to the current joint emission reduction target and metrics. |
| *Performance against targets* | The emission reduction target follows from the Green Deal Sustainable Care and includes scope 1 and 2 of healthcare providers. The metric, which was developed by health insurers last year, includes scope 1 and 2 as well as scope 3 of health care providers. Due to this difference in scope and absence of a single mutual base year and baseline value it is not possible to use the metric to monitor and review the target progress. Therefore the performance against the target cannot be disclosed. |

validated yet. The GDDZ 3.0 was jointly developed and signed by all stakeholders, the branch organisations in healthcare, and the individual health insurers.

No changes have been made yet to the current joint emission reduction target and metrics. The joint emission reduction target follows from the Green Deal Sustainable Care and includes scope 1 and 2 emissions of healthcare providers. The metric, which was developed by health insurers last year, includes scope 1 and 2 as well as scope 3 emissions of healthcare providers. Due to this difference in scope and absence of a single mutual base year and baseline value it is not possible to use the metric to monitor and review the target progress. Therefore, the performance against the target cannot be disclosed.

The joint emission reduction target is disclosed as a percentage of the emissions of the base year and relates to scope 1 and 2 emissions of healthcare providers. As explained in the above, the base year and baseline value cannot be determined yet, therefore a.s.r. can not yet claim whether they are considered representative or not.

**Information that applies to all the entities and product lines that have set emission reduction targets**
a.s.r. strives for consistency in target-setting by setting the emission reduction targets for own operations, financed and insurance associated emissions within the GHG inventory boundaries of the PCAF standards. The GHG emission reduction targets are all gross targets not including GHG removals, carbon credits or avoided emissions.

Targets are based on currently available information, estimates and assumptions, as described in this report. Economic, political or regulatory developments may have an impact on the feasibility of the targets. a.s.r. may adopt new technologies if relevant and feasible.

The estimated contribution of the decarbonisation levers and their overall contribution to achieving the GHG emission reduction targets is described in section 6.2.1.3 and in a.s.r.'s Climate Transition Plan where figures combining targets and decarbonisation levers including their (sometimes quantitative but mostly qualitative) contribution to achieve the targets, are shown.

## Metrics

### Gross Scopes 1, 2, 3 and total GHG emissions

a.s.r. recognises that the first step in achieving its climate objectives is to understand where the organisation currently stands. To gain insight into its current position, a.s.r. considers various metrics that help evaluate its performance and effectiveness in relation to its material climate-related impacts, risks, and opportunities.

A key metric measured by a.s.r. is its carbon footprint, specifically its gross GHG emissions across the different scopes. a.s.r. has developed reporting manuals to be used by product lines that have identified material climate-related impacts, risks, or opportunities when calculating their GHG emissions. A baseline recalculation policy is currently being developed, including a materiality threshold to ensure consistency, comparability, and relevance of the reported GHG emissions data over time.

For information on the methodologies, scope and significant assumptions underlying these metrics, see section 6.5.3.2 CSRD reporting policies.

The measurement of the metrics is not validated by any external body other than the assurance provider.

*Classification of Investment properties*

a.s.r. has decided to continue reporting the GHG emissions of investment properties under its scope 3 GHG emissions by using the GHG operational control approach. a.s.r. considers this method to best represent the relationship between the asset user and the associated GHG emissions and the best approach to come to comparable information. Furthermore, using this classification ensures consistency with a.s.r.'s scope 3 GHG emission reduction target, business model, and financial reporting.

If the ESRS were strictly applied, due to the required application of both the financial control and the operational control approach, GHG emissions of investment properties would need to be disclosed as part of a.s.r.'s scope 1 and 2 emissions, resulting in GHG emissions of 41,028 $tCO_2e$ (location-based approach) or 44,671 $tCO_2e$ (market-based approach) being reclassified from scope 3 category 13, along with additional disclosures being necessary to clarify the inconsistencies. Attributing these GHG emissions to scopes 1 and 2 would imply that a.s.r. has control over these emissions. However, this is not the case for emissions from investment properties. This issue is recognised by the EFRAG, the industry and a.s.r.'s assurance provider. It is currently expected that the required ESRS GHG accounting approach will be re-evaluated by EFRAG in 2025.

*Sale of Knab*

GHG emissions of Knab are included in the reporting for the period from 1 January 2024 to 31 October 2024 only, due to the sale of Knab on 1 November 2024. Knab's share in a.s.r.'s total GHG emissions is 50,895

**E1-6 Gross scopes 1, 2, 3, and total GHG emissions (Main table)**

| | Unit of measure | 2024 |
|---|---|---|
| **Scope 1 GHG emissions** | | |
| Gross Scope 1 GHG emissions | in $tCO_2e$ | 1,888 |
| Percentage of Scope 1 GHG emissions from regulated emission trading scheme | in % | 0 |
| | | |
| **Scope 2 GHG emissions** | | |
| Gross location-based Scope 2 GHG emissions | in $tCO_2e$ | 4,749 |
| Gross market-based Scope 2 GHG emissions | in $tCO_2e$ | 4 |
| | | |
| **Scope 3 GHG emissions** | | |
| Cat 1: Purchased goods & services | in $tCO_2e$ | 73,891 |
| Cat 5: Waste generated in operations | in $tCO_2e$ | 827 |
| Cat 6: Business travel | in $tCO_2e$ | 542 |
| Cat 7: Employee commuting | in $tCO_2e$ | 3,688 |
| Cat 13: Downstream leased assets - financed emissions | in $tCO_2e$ | 41,028 |
| Cat 15: Investments - financed emissions | in $tCO_2e$ | 6,584,996 |
| Cat 15: Investments - insurance-associated emissions | in $tCO_2e$ | 332,570 |
| **Gross indirect (Scope 3) GHG emissions - total** | **in $tCO_2e$** | **7,037,543** |
| | | |
| **Total GHG emissions (location-based)** | **in $tCO_2e$** | **7,044,180** |
| **Total GHG emissions (market-based)** | **in $tCO_2e$** | **7,039,435** |

tCO$_2$e (location-based approach) or 50,884 tCO$_2$e (market-based approach) and mainly relate to financed GHG emissions from Knab's investments.

GHG emissions related to mortgage loans serviced by a.s.r., and which concern mortgages managed on behalf of Knab (BAWAG) and which are included in the financed GHG emissions of Mortgages, are reported for the complete year of 2024.

a.s.r. measures various carbon footprint metrics to understand its climate impact. The table below provides a breakdown of a.s.r.'s scope 1, 2 and 3 GHG emissions, where scope 3 GHG emissions are further broken down under relevant categories from the Greenhouse Gas (GHG) Protocol.

The following provides an explanation of the figures in the above table:

*Scope 1*
Scope 1 GHG emissions concern direct emissions from owned or controlled sources, such as a.s.r.'s office locations and a.s.r.'s lease car fleet.

a.s.r.'s headquarters in Utrecht has an energy label of A++ and stopped using gas in 2019. The remaining scope 1 emissions mainly consist of gas usage at other office locations and from the remaining fossil fuel lease cars; these cars are being progressively phased out and replaced with electric vehicles at the end of their lease contracts.

*Scope 2*
Scope 2 GHG emissions comprise indirect emissions from the generation of purchased electricity by a.s.r.'s own office locations.

Market-based scope 2 GHG emissions are virtually zero, driven by green energy contracts and purchasing Guarantees of Origin. The location-based method reflects the energy mix within the specific area of consumption and does not consider any purchase of renewable energy.

a.s.r. calculates emissions from electricity consumption by following the location-based and market-based approaches of the Greenhouse Gas (GHG) Protocol. The location-based approach uses emission factors specific to the municipalities where each of a.s.r.'s locations is situated. For the market-based approach, a.s.r. uses contractual instruments related to energy sales and purchases. Through various contractual instruments, such as Guarantee of Origin certificates, 100% of a.s.r.'s scope 2 emissions are covered. 71% of the contractual instruments are bundled energy attributes.

*Scope 3*
Scope 3 GHG emissions concern the indirect emissions that occur in a.s.r.'s value chain, both upstream and downstream. a.s.r. made use of 76% primary data when calculating its scope 3 GHG emissions.

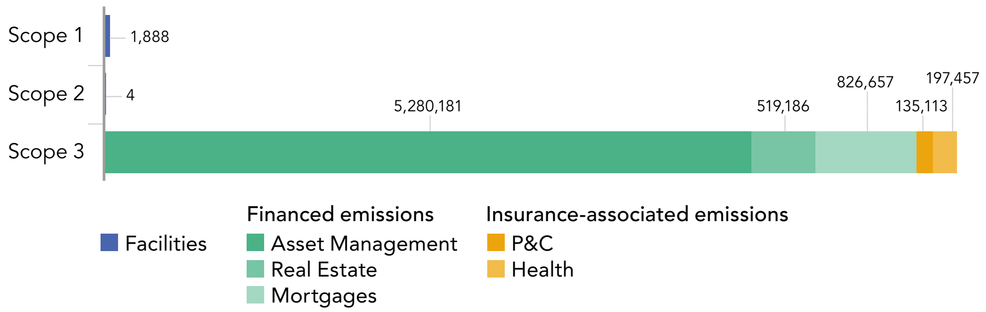
*Category 1: Purchased goods and services* consist of GHG emissions from upstream suppliers and are largely determined by using the spend-based method. This category also includes emissions from reintegration and prevention-related services on behalf of Income and the in-kind benefits on behalf of Funeral.

*Category 13 and 15: Investments – financed emissions* represents the majority of a.s.r.'s scope 3 GHG emissions and relate to investment activities performed by Asset Management, Real Estate and Mortgages. These emissions are detailed in table E1-6 Category 15: Investments – Financed emissions (scope 1 and 2) alongside GHG emissions from downstream leased assets (category 13). In line with PCAF, scope 3 emissions, detailed in the latter table E1-6 category 15 - Financed emissions breakdown (scope 3), are not included in the Main table above due to potential issues concerning double counting.

*Category 15: Investments – insurance associated emissions* consists of scope 3 GHG emissions resulting from the underwriting activities of P&C and Health. These emissions are detailed in table E1-6 category 15 Investments - Insurance-associated emissions (Scope 1, 2 and 3).

The remaining sources of scope 3 GHG emissions are relatively minor and include emissions from waste generated in operations (category 5), business travel (category 6), and employee commuting (category 7).

The following overview provides a breakdown of a.s.r.'s scope 1, 2 and scope 3 Financed and Insurance-associated GHG emissions, highlighting which a.s.r.'s entities and product lines they relate to.




The following tables provide a breakdown of a.s.r.'s scope 3 category 15 GHG emissions and includes information on data coverage (%) and data quality. The coverage (%) indicator shows the proportion of in-scope assets/portfolio's for which the GHG emissions were measured. The data quality score is based on the PCAF data quality scoring approach and gives an indication of the reliability and accuracy of the reported GHG emission data.

## E1-6 Scope 3 category 15 Investments - Financed emissions breakdown (Scope 1 and 2)

| | Unit of measure | 2024 | Total AuM (in € million) | AuM data coverage (in € million) | Coverage (in %) | Emission intensity (in $tCO_2e$ / € million) | Data quality score[1] |
|---|---|---|---|---|---|---|---|
| Government bonds[2] | in $tCO_2e$ | 3,017,269 | 16,421 | 16,032 | 98% | 189 | 1.5 |
| Corporate bonds | in $tCO_2e$ | 422,523 | 11,099 | 10,473 | 94% | 40 | 2.1 |
| Equity | in $tCO_2e$ | 108,576 | 3,620 | 3,382 | 93% | 32 | 2.0 |
| Other investments[3] | in $tCO_2e$ | | 15,784 | 0 | 0% | | |
| Mortgages | in $tCO_2e$ | 254,515 | 26,438 | 26,438 | 100% | 10 | 3.5 |
| **Own investments - total** | **in $tCO_2e$** | **3,802,883** | **73,361** | **56,324** | **77%** | **68** | **2.6** |
| | | | | | | | |
| Government bonds | in $tCO_2e$ | 1,141,477 | 6,291 | 6,149 | 98% | 186 | 1.1 |
| Corporate bonds | in $tCO_2e$ | 150,554 | 3,506 | 3,206 | 91% | 47 | 2.1 |
| Equity | in $tCO_2e$ | 439,782 | 16,518 | 16,427 | 99% | 27 | 2.1 |
| Other investments[3] | in $tCO_2e$ | | 6,493 | 0 | 0% | | |
| **Investments related to direct participating insurance contracts - total** | **in $tCO_2e$** | **1,731,813** | **32,808** | **25,782** | **79%** | **67** | **1.9** |
| | | | | | | | |
| Mortgages | in $tCO_2e$ | 572,142 | 59,709 | 59,709 | 100% | 10 | 3.3 |
| **Investments on behalf of third parties - total** | **in $tCO_2e$** | **572,142** | **59,709** | **59,709** | **100%** | **10** | **3.3** |
| | | | | | | | |
| Constructed | in $tCO_2e$ | 39,228 | 7,763 | 6,204 | 80% | 6 | 2.2 |
| Rural | in $tCO_2e$ | 479,959 | 1,965 | 1,965 | 100% | 244 | 4.0 |
| **Investment property - total** | **in $tCO_2e$** | **519,186** | **9,728** | **8,169** | **84%** | **64** | **2.5** |
| | | | | | | | |
| **Total Scope 3 Financed emissions (scope 1 and 2)** | **in $tCO_2e$** | **6,626,024** | **175,606** | **149,983** | **86%** | **44** | **2.7** |

The scope 1 and 2 emissions in the above table represent the direct GHG emissions (scope 1) and the indirect GHG emissions (scope 2) occurring from the generation of purchased electricity by investee companies, countries, investment properties and mortgaged properties. This corresponds to the sum of category 13 and 15 financed emissions in the Main table above.

Emissions across the various asset classes are not entirely comparable as a result of different methodologies and data sources for each asset class.

The emissions intensity (measured in $tCO_2e$ / million euros) is also shown in the table for each asset class. The overall emission intensity figure for a.s.r. (scope 1 and 2 financed emissions) is positively influenced by the large share of financed emissions relating to Mortgages. The $CO_2e$ emissions intensity of Mortgages is relatively low compared to other investments, partly because of a.s.r.'s focus on helping high-emission homes reduce their emissions. Investments in sustainability through mortgages are under pressure in the Dutch market, partly due to changes in government policy such as the reduction of subsidies related to the use of solar panels. The rural portfolio of Real Estate has the highest emission intensity within the asset mix.

Emissions have been calculated for 86% of the total AuM and a.s.r. expects to increase the data coverage ratio in the coming years in accordance with the standards and guidelines that will be established.

The table below shows the reconciliation of the AuM used in the emissions calculations to the Financial statements.

1 PCAF category, ranging from one to five, with one being the highest quality and five being the lowest.
2 Emission intensity normalised for the sale of Knab.
3 For Other investments no value is disclosed as no emissions have been calculated or estimated.

## Reconciliation of AuM with financial reporting information

| | Unit of measure | Total AuM Sustainability statements | Scope differences | Classification differences | Other differences | Total AuM Financial statements | Note |
|---|---|---|---|---|---|---|---|
| Own investments | in € million | 73,361 | -457 | 6,364 | 1,325 | 80,593 | 7.5.5 |
| Investments related to direct participating insurance contracts | in € million | 32,808 | - | - | 217 | 33,025 | 7.5.6 |
| Investments on behalf of third parties | in € million | 59,709 | -59,709 | - | - | - | |
| Investment property | in € million | 9,728 | - | -6,364 | - | 3,364 | 7.5.3 |
| **Total** | **in € million** | **175,606** | **-60,166** | **-** | **1,542** | **116,982** | |

The scope difference for own investments is the balance of two items: Knab assets, which are included in the emission calculations but are no longer on the balance sheet due to the sale, and some mortgage portfolios that are out of scope for emission calculation but are on-balance investments. Investments on behalf of third parties refer to mortgages managed by a.s.r. that are within the scope for emissions calculations but are not on a.s.r.'s balance sheet.

The classification differences mainly involve the categorisation of real estate-related investment funds. In the sustainability statements, these funds are classified as Investment property, while in the financial statements, they are classified as Own investments.

Other differences include, among other things, differing valuation principles.

The table below provides an overview of a.s.r.'s scope 3 greenhouse gas emissions, comprising all indirect emissions in the value chain in which a.s.r. invests, excluding those covered under scope 1 and scope 2.

## E1-6 Scope 3 category 15 Investments - Financed emissions breakdown (Scope 3)

| | Unit of measure | 2024 | Total AuM (in € million) | AuM data coverage (in € million) | Coverage (in %) | Emission intensity (in $tCO_2e$ / € million) | Data quality score[1] |
|---|---|---|---|---|---|---|---|
| Government bonds | in $tCO_2e$ | 2,163,578 | 16,421 | 15,971 | 97% | 135 | 4.0 |
| Corporate bonds | in $tCO_2e$ | 3,118,442 | 11,099 | 10,355 | 93% | 301 | 3.5 |
| Equity | in $tCO_2e$ | 1,561,103 | 3,620 | 3,382 | 93% | 462 | 3.5 |
| Other investments[2] | in $tCO_2e$ | | 15,784 | 0 | 0% | | |
| **Own investments - total** | **in $tCO_2e$** | **6,843,123** | **46,924** | **29,708** | **63%** | **230** | **3.8** |
| | | | | | | | |
| Government bonds | in $tCO_2e$ | 846,372 | 6,291 | 6,170 | 98% | 137 | 3.9 |
| Corporate bonds | in $tCO_2e$ | 1,607,624 | 3,506 | 3,197 | 91% | 503 | 3.5 |
| Equity | in $tCO_2e$ | 6,188,778 | 16,518 | 16,428 | 99% | 377 | 3.6 |
| Other investments[2] | in $tCO_2e$ | | 6,493 | 0 | 0% | | |
| **Investments related to direct participating insurance contracts - total** | **in $tCO_2e$** | **8,642,774** | **32,808** | **25,795** | **79%** | **335** | **3.7** |
| | | | | | | | |
| **Total Scope 3 Financed emissions (scope 3)** | **in $tCO_2e$** | **15,485,897** | **79,732** | **55,503** | **70%** | **279** | **3.8** |

1 PCAF category, ranging from one to five, with one being the highest quality and five being the lowest.
2 For Other investments no value is disclosed as no emissions have been calculated or estimated.

There is a risk of double counting the scope 3 financed emissions, as the same indirect emissions can be reported by multiple entities in the value chain. For this reason, these financed emissions are not included in the E1-6 Main table.

The accuracy and completeness of reported figures depend on the availability and quality of data from a.s.r.'s ESG data suppliers. a.s.r. uses data from sources such as MSCI and PCAF for calculations.

The table below presents government bond emissions data, both including and excluding land use, land use change, and forestry (LULUCF) and provides a comprehensive view of the emissions associated with government bonds.

### E1-6 Government bond emissions including and excluding land use, land use change and forestry (LULUCF)

| | | 2024 | |
|---|---|---|---|
| | Unit of measure | Excluding LULUCF | Including LULUCF |
| Own investments | in $tCO_2e$ | 3,017,269 | 2,954,008 |
| Investments related to direct participating insurance contracts | in $tCO_2e$ | 1,141,477 | 1,123,477 |

LULUCF data is associated with a number of uncertainties. Therefore, a.s.r. has opted to report government bond emissions excluding the LULUCF related emissions in the corresponding GHG table E1-6 Scope 3 category 15 Investments - Financed Emissions breakdown (Scope 1 and 2).

The emissions in the table below are direct GHG and indirect GHG emissions of insured clients in the basic and supplementary insurance portfolio of Health and of the commercial lines (excluding CAR) and the personal motor lines (specifically the personal car insurance portfolio) of P&C.

### E1-6 Scope 3 category 15 Investments - Insurance-associated emissions breakdown (Scope 1, 2 and 3)

| | Unit of measure | 2024 | Total premiums (in € million) | Premiums data coverage (in € million) | Coverage (in %) | Data quality score[1] |
|---|---|---|---|---|---|---|
| **P&C** | | | | | | |
| Personal motor lines - personal car | in $tCO_2e$ | 96,074 | 541 | 508 | 94% | 2.0 |
| Commercial lines (excluding CAR)[2] | in $tCO_2e$ | 39,039 | 583 | 557 | 96% | 5.0 |
| **Health** | | | | | | |
| Basic and supplementary | in $tCO_2e$ | 197,457 | 1,489 | 1,489 | 100% | 5.0 |
| **Total Scope 3 Insurance-associated emissions** | **in $tCO_2e$** | **332,570** | **2,613** | **2,554** | **98%** | **4.4** |

For further information on the developments within the P&C portfolio, see table E1-4 'Emission reduction targets related to climate change mitigation and adaptation'.

In Health, the emissions are mainly related to the healthcare usage of a.s.r.'s health insurance policyholders and the products purchased by healthcare providers. The premium volume is more than 90% related to the a.s.r. health basic portfolio and the emission factors are in accordance with the agreed calculation methodology in the Dutch insurance industry.

1 PCAF category, ranging from one to five, with one being the highest quality and five being the lowest.
2 Construction all-risk.

The insurance-associated emissions of Disability, Pensions and Individual life are not recognised as material. These product lines do not insure material risks associated with physical assets or activities that directly generate emissions other than those arising from their investment portfolio. There is also no suitable measurement methodology available from PCAF or another source at this time which is also relevant for Funeral.

The tables below present a.s.r.'s GHG emission intensity.

### E1-6 GHG Intensity based on net revenue

| | Unit of measure | 2024 |
|---|---|---|
| Total GHG emissions (location-based) per net revenue | in $tCO_2e$ / € 1 million | 607 |
| Total GHG emissions (market-based) per net revenue | in $tCO_2e$ / € 1 million | 607 |
| | | |
| Total GHG emissions (location-based) | in $tCO_2e$ | 7,044,180 |
| Total GHG emissions (market-based) | in $tCO_2e$ | 7,039,435 |
| | | |
| Net revenue used to calculate GHG intensity | in € million | 11,606 |

The GHG intensity per net revenue is a measure that indicates how efficiently a.s.r. generates revenue in relation to GHG emissions. The lower the GHG intensity per net revenue, the more efficiently revenue is generated with respect to GHG emissions.

### E1-6 Connectivity of GHG intensity based on revenue with financial reporting information

| | Unit of measure | 2024 |
|---|---|---|
| Net revenue used to calculate GHG intensity | in € million | 11,606 |
| Net revenue (other) | in € million | 4,907 |
| **Total net revenue (in financial statements)** | **in € million** | **16,513** |

Total net revenue is based on the consolidated financial statements (see section 7.2.2) and consists of the sum of the insurance contract revenue, direct investment income, fee income and other income related to the revenue from wind farms and solar parks.

The net revenue used to calculate GHG intensity excludes revenue from product lines and portfolios for which emission data is not available. This primarily relates to assets classes such as derivatives, cash and cash equivalents and collateral within the asset mix of Asset Management. For Funeral, only the in-kind funeral insurances are in scope, and the other products are out of scope. For P&C, only the Personal car insurance portfolio and Commercial lines (except Construction All Risk insurance) are in scope and the other portfolios are out of scope. The out of scope net revenue for the GHG intensity metrics is shown in the table above under the line item Net revenue (other).

#### GHG removals and storage projects

a.s.r. has not developed any projects that result in GHG removals or storage in its own operations, nor contributed to any in its upstream and downstream value chain.

Although a.s.r. has joined the Net Zero Asset Managers Initiative as well as the Forum for Insurance Transition to net zero and has the ambition to support the transition to a net-zero economy, it has not yet disclosed (long-term) net-zero targets for its own operations or portfolios. Currently, a.s.r. has set interim emission reduction targets for the short and medium term only and a.s.r.'s current focus is on achieving these near-term emission reductions. In the longer term, when net-zero targets have been set, there will likely be some residual emissions that will need to be neutralised. It is therefore possible that some use of carbon removals may be necessary over the longer term. a.s.r. is currently monitoring market developments and options will be investigated to neutralise residual financed emissions, if any, with carbon removals in the future.

#### Carbon credits

a.s.r. has financed climate change mitigation projects outside its value chain through the purchase of carbon credits.

### E1-7 Total amount of carbon credits outside value chain that are verified against recognised quality standards and cancelled or planned to be cancelled in the future

| | Unit of measure | 2024 |
|---|---|---|
| **Total amount of carbon credits cancelled in reporting year** | **in $tCO_2e$** | **3,300** |
| Reduction project | in % | 0% |
| Removal project | in % | 100% |
| Plan Vivo Carbon Standard | in % | 100% |
| | | |
| Share of projects within EU | in % | 0% |
| Share of carbon credits that qualify as corresponding adjustments | in % | 0% |
| | | |
| **Total amount of carbon credits planned to be cancelled in the future** | **in $tCO_2e$** | **2,000** |
| Existing contractual agreements | in $tCO_2e$ | 0 |
| Non-existing contractual agreements | in $tCO_2e$ | 2,000 |

a.s.r. has cancelled carbon credits to offset market-based scope 1, 2 and 3 emissions from the office location Utrecht, leading to carbon neutrality for the office location Utrecht. This climate neutrality claim is accompanied by the emission reduction target as stated in section 6.2.1.4 and does not impede or diminish a.s.r.'s efforts to achieve its GHG emission reduction targets. For 2025, a.s.r. will cancel carbon credits to offset market-based scope 1 and 2 emissions for all offices managed by Facilities.

The carbon credits are provided by Trees for All. Trees for All only sells carbon credits from projects certified by Plan Vivo against the Plan Vivo Carbon Standard. The Plan Vivo Carbon Standard makes sure these projects meet strict environmental guidelines. Plan Vivo is also recognised by *Milieu Centraal*, a Dutch organisation supported by the government.

See section 6.5.3.3 CSRD reporting policies for the calculation assumptions, methodologies and frameworks applied.

#### Internal carbon pricing

a.s.r. does not make use of internal carbon pricing schemes.

## 6.2.2 Pollution

Pollution of water is not deemed material for a.s.r., but is material for a.s.r.'s subsidiaries a.s.r. health basic and a.s.r. health supplementary. For more information see section 6.1.2 and section 6.1.4.5.

Pollution of water is a major challenge in the health sector and consequently in the health insurance sector. Reducing water pollution is important to assure a continuing abundance of water that is safe to use for current and future generations. Health acknowledges the importance of this and wants to play a role in it. This section describes how Health has identified, measured and managed its negative impact on water pollution.

The following table presents an overview of the material impacts identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

**Pollution of water**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Negative impact | Health insurance offerings (facilitating access to healthcare services and medicines) indirectly lead to the pollution of water. Specifically in relation to the disposal and excretion of medication through urination and defecation which results in trace contaminants entering water systems. | 1. Health | 1. Procurement Policy of Health | 1. Stimulate healthcare providers to prevent impact.<br>2. Raise awareness among insured.<br>3. Make sustainability part of the preference policy for medication. | None |

### 6.2.2.1 Managing impacts, risks and opportunities

**Description of processes to identify and assess material pollution-related impacts, risks and opportunities**

a.s.r.'s product lines and entities identified and assessed their impacts on pollution based on a set of predefined assessment criteria. See section 6.1.4.3 for more information about this process. This resulted in the identification of short-, medium- and long-term actual and potential impacts for Health. Health has not screened its site locations and business activities. No consultations have taken place with affected communities.

*Health*

When patients use medicines, drug residues end up in the surface water via the sewer. Locations where patients use medicines include healthcare institutions and patients' own homes, which together lead to a material impact on water pollution. As a health insurer, Health reimburses the medicines that patients use which cause the pollution of water.

### 6.2.2.2 Policies and actions

**Policies**

*Health*

Agreements from the joint policy in the healthcare sector which follows the GDDZ 3.0 have been translated in to the Procurement Policy of Health. Consequently, policy objectives of the Procurement Policy of Health are:

- Mitigating negative impacts by reducing medicine waste and excess medicine use; and
- Substituting and minimising the use of substances of concern by including sustainability criteria in the purchasing of preferred medicines and (medicinal) products.

Key content of the Procurement Policy of Health is the expectation towards health care providers to commit to the GDDZ 3.0 and therefore to the policy objectives. Besides this, Health has a sustainability module in its Policy for pharmacy care which, among other things, encourages pharmacies to make agreements on demedicalisation and to reduce medicine waste.

In scope are healthcare providers, in particular pharmacists, hospitals and mental healthcare providers. The management team of Health is accountable for the implementation of the Policy.

Third-party standards that Health commits to respect through the implementation of the Procurement Policy of Health are the GDDZ 3.0 and the 'chain approach to pharmaceutical residues from water'.

Consideration was given to the interests of key stakeholders when setting the Procurement Policy of Health in alignment with the GDDZ 3.0 through reducing administrative burdens for healthcare providers. The current Procurement Policy has been published on 1 April 2024 and has been discussed during meetings with healthcare providers.

The policy focuses on both preventing impact (demedicalisation and preventing waste) as well as counteracting it (continued co-operation in 'chain approach to pharmaceutical residues from water'). Measures in the 'chain approach to pharmaceutical residues from water' are aimed at replacing and limiting substances of concern in medicines as much as possible. Avoiding incidents and emergency situations is not specifically addressed in the policy.

The pollutants and substances covered by this policy are medicine residues as mentioned in the '*RIVM-briefrapport 2020-0088*', for example residues of pain killers and antibiotics as well as blood pressure regulators, antidepressants, and anti-epileptic substances.

### Key actions

*Health*

Joint key actions of health insurers, presented by expected outcomes, are:

- Mitigate negative impact through healthcare procurement (policy) stimulating healthcare providers to prevent impact;
- Mitigate negative impact and minimise the use of substances of concern by raising awareness among the insured;
- Minimise the use of substances of concern by making sustainability part of the preference policy; criterion for purchasing medicines.

Actions relate to procurement policies and contracts of health insurers with healthcare providers, specifically pharmacists, and to (information about) sustainable choices that insured have regarding medication use.

Time horizons of the joint actions of health insurers are: 2025 for healthcare product (policy) stimulating healthcare providers to prevent impact and 2026 for the other two actions. Actions one and three regard upstream value chain engagements and action two regards downstream value chain engagements.

## 6.2.2.3 Targets and metrics

*Health*

Health has not set any measurable outcome-oriented targets as these still need to be set up, and it does not yet track the effectiveness of its policies and actions in relation to its material sustainability-related impacts as this cannot be determined yet. No metrics are currently available on water pollution in the value chain.

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## 6.2.3 Biodiversity and ecosystems

a.s.r. recognises the critical importance of biodiversity and ecosystems to the overall well-being of humankind and a.s.r.'s long-term success. a.s.r. aims to avoid and reduce loss of biodiversity and ecosystems and where feasible, to restore and regenerate biodiversity and ecosystem services by 2030. a.s.r. does this by identifying where its activities have a high impact or dependency on biodiversity and ecosystems and by setting up policies addressing these, by taking concrete actions and by formulating targets.

a.s.r. is an adopter of the Taskforce for Nature related Financial Disclosures (TNFD) framework. See the reference table in section 8.3.3. to understand which of the disclosures below also meet the disclosure requirements of the TNFD. Additionally, a.s.r. has signed the Finance for Biodiversity pledge. See the reference table in section 8.3.4. to understand which of the disclosures below also meet the disclosure requirements of the Finance for Biodiversity Pledge.

The following table presents an overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

**3 - Direct impact drivers of biodiversity loss**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 3.1 By promoting sustainable farming practices, a.s.r. positively contributes to biodiversity and more sustainable land use, driven by an investment strategy focused on environmental stewardship, leading to enhanced biodiversity and sustainable farming practices. | 1. Real Estate | 1. The Real Estate Biodiversity Framework, ESG Policy of Real Estate. | 1. Contribute to restoration, broaden knowledge, offer products. | None |
| Negative impact | 3.2 a.s.r.'s investments and insurance activities may have an impact on biodiversity loss, driven by among others land-use change, pollution, resource over-exploitation and climate change. | 1. Asset Management<br>2. Real Estate<br>3. P&C | 1. The Policy on Responsible Investments<br>2. The Real Estate Biodiversity Framework, ESG Policy of Real Estate<br>3. The Policy on Sustainable Insurance | 1. Carry out active ownership, use biodiversity criteria, collaborate and carry out impact investment.<br>2. Promote material use.<br>3. Apply underwriting criteria, make renewable energy initiatives insurable, engage, participate. | 1. Identification target, engagement target, emissions reduction target.<br>2. Fund target, emissions reduction target.<br>3. Emissions reduction target. |
| Financial opportunity | 3.3 Enhancing biodiversity in ecosystems can increase the value of a.s.r.'s rural, farmland and real estate property, benefiting the appeal and sustainability of the properties. | 1. Real Estate | 1. The Real Estate Biodiversity Framework, ESG Policy of Real Estate | 1. Identify high-potential assets to enhance the potential ecological value in the portfolio. | None |

**4 - Impacts and dependencies on ecosystem services**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Negative impact | 4.1 Investments in assets and insurance of activities in certain sectors that have a high impact on ecosystem services may lead to degradation of nearby natural areas. | 1. Asset Management<br>2. P&C | 1. The Policy on Responsible Investment<br>2. The Policy on Sustainable Insurance | 1. Carry out active ownership, use biodiversity criteria, collaborate, carry out impact investment.<br>2. Apply underwriting criteria, make renewable energy initiatives insurable, engage, participate. | 1. Identification target, engagement target, emissions reduction target.<br>2. Emissions reduction target. |
| Financial risk | 4.2 Declining biodiversity and ecosystem services can decrease the value of rural real estate and reduce ecosystem productivity. | 1. Real Estate | 1. The Real Estate Biodiversity Framework, ESG Policy of Real Estate | 1. Take risks into consideration in Real Estate management. | None |
| Financial risk | 4.3 a.s.r.'s diverse customer base (which includes businesses that are heavily reliant on ecosystem services) faces increased physical risks due to diminishing availability of ecosystem services, driven by environmental stress and climate change impacting essential resources, leading to higher insurance claims and operational challenges for affected businesses. | 1. Real Estate<br>2. P&C | 1. The Real Estate Biodiversity Framework, ESG Policy of Real Estate<br>2. The Policy on Sustainable Insurance | 1. Take risks into consideration in Real Estate management.<br>2. Apply underwriting criteria, make renewable energy initiatives insurable, engage, participate. | None |

## 6.2.3.1 Managing impacts, risks, dependencies and opportunities

**Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities**

a.s.r. has identified and assessed several biodiversity and ecosystem-related impacts, risks, dependencies and opportunities. During the assessment, the LEAP approach was applied. This approach encompasses four steps (Locate, Evaluate, Assess and Prepare).

**Impacts**

a.s.r.'s product lines and entities have assessed actual and potential nature-related impacts in expert sessions and by using various tools. This resulted in the identification of actual and potential biodiversity and ecosystem-related impacts in the value chains of Asset Management, Real Estate and P&C.

See section 6.1.4.3 for more information about the process to assess material impacts and about the consolidation process.

*Asset Management*

Asset Management has used a biodiversity impact score, which is accumulated by scores on the five main drivers of biodiversity loss and a score based on location-specific information such as the vicinity of a biodiversity-sensitive area to a production site or asset, to identify and assess actual and potential material biodiversity and ecosystem-related impacts of assets in their investment portfolio.

*Real Estate*

Real Estate has used the Encore database to identify the extent of actual and potential biodiversity and ecosystem-related impacts of urban and rural property in its value chain and on which ecosystem service they have an impact. If an urban or rural property is classified as having a high to very high impact on an ecosystem service, is located within one km of a Nature 2000 (N2000) area providing that ecosystem service, this is assessed a material impact. In addition, Real Estate used the Encore database to identify actual and potential biodiversity and ecosystem-related impacts related to activities in its value chain. If an activity is related to a sector that has an impact on an ecosystem service, this is assessed a material impact.

*P&C*

P&C has used the Encore database to identify the extent of actual and potential biodiversity and ecosystem-related impacts of key actors (e.g. repairers and customers) in its value chain by sector and production process and on which ecosystem service they have an impact. If a key actor is classified as having a high to very high impact on an ecosystem service, is located within one km of a N2000 area providing that ecosystem service, this is assessed a material impact.

**Dependencies**

a.s.r.'s product lines and entities have assessed nature-related dependencies in expert sessions and by using various tools. This resulted in the identification of biodiversity and ecosystem-related dependencies in the value chains of Asset Management, Real Estate and P&C.

See section 6.1.4.3 for more information about the process to assess material impacts and about the consolidation process.

*Asset Management*
Based on research sources (Encore and UNEP-WCMC), a classification of dependency level of sub-sector in the investment portfolio has led to the identification of sub-sectors that are 'highly dependent' on biodiversity. Assets in these sectors are deemed to have a material dependency on biodiversity.

*Real Estate*
Real Estate has used the Encore database to identify the extent of the actual and potential dependencies of properties and activities in its value chain and on which ecosystem service they have this dependency. If a property with a high to very high dependency on an ecosystem service is located within one km of a N2000 area providing that ecosystem service or when an activity is deemed to have a material dependency by sector, they are assessed as having a material dependency.

*P&C*
P&C used the Encore database to identify the extent of actual and potential dependencies on nature that key value chain actors (e.g. commercial customers) by sector and production process have on which ecosystem service. Key actors with a high to very high dependency on an ecosystem service who are located within one km of a N2000 area providing that ecosystem service, are assessed as having a material dependency.

**Transition and physical risks and opportunities**
Although a.s.r. does not know whether the above mentioned ecosystem services are disrupted or likely to be, the product lines have identified transition and physical risks and opportunities resulting from the identified material impacts and dependencies in their value chains during expert sessions. Systemic risks were not considered yet. a.s.r. has not conducted any consultations with affected communities on sustainability assessments of shared biological resources and ecosystems.

**Specific disclosures**
While a.s.r. has biodiversity-sensitive areas in its value chain, it does not have material own sites located in or near biodiversity-sensitive areas. Therefore, it has no activities related to such sites negatively affecting these areas by leading to the deterioration of natural habitats and the habitats of species and to the disturbance of the species for which a protected area has been designated. a.s.r. has not concluded yet that it is necessary to implement biodiversity mitigation measures such as those identified in European directives and national provisions or international standards.

## 6.2.3.2 Consideration of biodiversity and ecosystems in strategy and business model

**Consideration of biodiversity and ecosystems in strategy and business model**
With regard to the resilience of its strategy and business model in relation to biodiversity and ecosystems the following applies.

*Asset Management*
Asset Management has assessed its investment portfolio by evaluating the types of (potential) financial risks following from the identified high to very high dependencies and impacts in its value chain. This has also given a qualitative insight in the physical and transition risks in its value chain. A quantitative assessment of the extent of related financial risks and as such, a full assessment of the resilience of the business model and strategy has not yet been done.

The scope of this qualitative resilience analysis regards the downstream value chain of the Asset Management strategy and business model, more specifically its corporate bonds and listed equity portfolio.

Asset Management has determined the type of (potential) financial risks in its investment portfolio and as such, the resilience of its business model and strategy, on the assumption that investees run certain types of transition and/or physical risks following their (potential) impact and/or dependencies on nature.

The qualitative resilience analysis of Asset Management resulted in the identification of financial risks such as investment risks (e.g. lower returns on and even stranded assets due to declining biodiversity and ecosystem conditions) as well as transition risks (e.g. increased litigation costs for companies causing biodiversity loss) and reputational risks (when companies receive negative attention or loss of customers due to them causing damage to nature).

Asset Management aims to make its strategy and business model more resilient to these financial risks by a combination of top-down and bottom-up approaches such as excluding high risk activities, engaging with companies in high risk sectors, investing in impact solutions and by using biodiversity criteria when screening and selecting companies to invest in. Risks are also mitigated by spreading investments across geographical areas and asset classes.

*Real Estate*
Real Estate has assessed the resilience of its strategy and business model by evaluating the type of (potential) financial risks following from the identified high to very high impacts/dependencies in its value chain. This has also given a qualitative insight into the physical and transition risks in its value chain. A quantitative assessment of the impact to the extent of financial risks and as such, the resilience of the business model and strategy has not yet been done.

The scope of this resilience analysis regards the strategy and business model of Real Estate, in particular for its real estate property, farmland, renewable energy and rural estates in its portfolio.

Real Estate has not made any key assumptions in their resilience analysis.

The resilience analysis of a.s.r. real estate has resulted in the identification of financial risks such as operational risks (e.g. an increase in material costs due to the decrease of availability of natural resources) and investment risks (e.g. lower farmland and real estate property values due to declining biodiversity and ecosystem conditions).

As a result of the resilience analysis, to mitigate its financial risks and to make its business model and strategy more resilient, Real Estate takes nature related risks into consideration when acquiring, renovating and managing real estate property. The funds under management of Real Estate also invest in ecological features (bird, bat and insect boxes) and vegetated surface area (green roofs, facades and plot area) on, in and around its real estate property. Within the farmland portfolio, a.s.r. Real Estate invests in landscape elements, contributing to local biodiversity and ecosystems. In the coming years, Real Estate will further examine where within the property portfolio there is the greatest potential for these initiatives.

*P&C*
P&C has performed an assessment of the type of (potential) financial risks in its insurance portfolio following from the identified transition and physical risks in its value chain. This has led to a first insight into the resilience of its current business model and strategy. A quantitative assessment of the extent of the (potential) financial risks in its insurance portfolio in different biodiversity and ecosystem loss scenarios and as such, a full assessment of the resilience of the business and strategy for its insurance portfolio has not yet been completed.

The scope of this first resilience analysis regards the strategy and business model of P&C, in particular for its commercial customers portfolio.

P&C has determined the types of (potential) financial risks in their portfolio and such, the resilience of its business model and strategy for its insurance portfolio, on the assumption that insured companies run certain types of transition and/or physical risks following their (potential) impact and/or dependencies on nature, based on the sector they are active in. P&C has not taken into account the individual situation and risk mitigation actions of these insured companies as this is currently unknown.

The resilience analysis of P&C has resulted in the identification of financial risks such as underwriting risks (e.g. an increase in claims in relation to physical risks such as damage due to flooding when the flood retention ecosystem service has declined), business risks (e.g. companies going out of business temporarily or even permanently in relation to transition risks such as regulation on limiting water use to protect fresh water supply ecosystem services) and reputational risks (e.g. companies not wanting to be insured with a.s.r. when a.s.r. insures companies that have a very high negative impact on nature).

As a result of its resilience analysis, P&C's strategy and business model have been made (more) resilient to nature-related financial risks by various measures such as short-term contracts only, spreading customers across different sectors, reinsuring the biggest risks and adjusting the underwriting policy when necessary.

*Information that applies to all the product lines which have assessed the resilience of their strategy and business model*
Time horizons used for the resilience analyses are medium- to long-term horizons. a.s.r. has involved several internal stakeholders in its resilience analyses.

### 6.2.3.3 Policies and actions

#### Policies

##### Policies related to biodiversity and ecosystems

In order to manage impacts, risks, dependencies and opportunities that are related to biodiversity and ecosystems, the following policy documents are relevant:

- The Policy on Responsible Investments;
- The Real Estate Biodiversity Framework;
- The Policy on Sustainable Insurance.

*The Policy on Responsible Investments* 3.2 4.1
The Policy on Responsible Investments is centred around three key policy goals that underline its commitment to contributing to a better world: reducing harm, driving change and creating positive impact. These goals, along with its focus themes, guide Asset Management's implementation of the Policy on Responsible Investments. Biodiversity and natural resources is one of the four focus themes: Asset Management aims to contribute to the protection and restoration of the planet's biodiversity and promote the sustainable use of its natural resources. Asset Management makes use of a variety of tools to help us reduce harm and drive change. There is no reliance on biodiversity offsets as a tool. The tools that are leveraged include exclusions, ESG integration, active ownership (engagement and voting) and impact investing.

As part of the active ownership strategy, for review and monitoring processes Asset Management maintains contact with companies it has bilateral or collaborative engagements with. In such engagements time-bound engagement objectives are set at the beginning of the engagement process. When during these engagements insufficient progress is achieved, a number of tools as defined in the Policy on Responsible Investments can be used. These tools collectively form the engagement escalation framework. The engagement service provider Hermes EOS engages companies on behalf of Asset Management, making a substantial contribution to Asset Management's engagement activities. In these third-party engagements, Hermes EOS is responsible for the engagement strategy and monitoring progress.

The Policy on Responsible Investments applies to all investments managed by Asset Management.

In the materiality assessment Asset Management identified that it contributes to direct impact drivers and that it has impacts and dependencies on ecosystem services in its investment portfolio. Therefore, biodiversity and natural resources have become one of the four focus themes of the Policy on Responsible Investments. The Policy aims to contribute to the protection and restoration of the planet's biodiversity and to promote sustainable use of its natural resources a.o. by providing a framework for the exclusion of companies with severe and repeated controversies related to the environment and for active ownership.

The biodiversity and ecosystem-related policy of Asset Management, which is part of its Policy on Responsible Investments, addresses the potential material impacts on biodiversity loss and the loss of ecosystem services by setting out a framework for analysing the listed portfolio companies, identifying drivers of biodiversity loss in its portfolio and by defining the relevant actions to address these impacts. These policy actions are based on the drivers for biodiversity loss and the sectors with the highest impact.

The policy also addresses material dependencies and physical and transition risks by setting out a framework for diversification across geographic areas and asset classes and by defining a set of biodiversity criteria for screening and selecting investee companies and by providing an active ownership framework.

The policy supports the traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along the value chain and addresses deforestation as:

- a.s.r. excludes companies producing or distributing palm oil where <95% is certified to the most stringent RSPO standards. Traceability is an important element of certification.

- a.s.r. excludes companies managing forests with <60% FSC certification coverage (or an equivalent certification). Traceability is an important element of certification.

Furthermore, the policy addresses production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity. In addition to the exclusions related to palm oil and forest management mentioned earlier, a.s.r. screens all companies in its investable universe biannually on multiple other criteria. These screening criteria include adherence to international guidelines such as the UN Global Compact, EU regulations and UNESCO biosphere reserves, CITES convention and UN CBD.

With regard to whether and how the policy addresses social consequences of biodiversity and ecosystem-related impacts, a.s.r. screens all companies in its investable universe biannually on multiple criteria. These screening criteria include the UN Global Compact, Equator Principles and UNGPs. a.s.r. excludes companies with severe Global Compact violations on the environment.

Asset Management has not adopted a policy covering operational sites owned, leased or managed in or near a protected area or a biodiversity-sensitive area outside protected areas as Asset Management does not have such sites.

As to whether Asset Management has adopted sustainable land or agriculture practices or policies, Asset Management screens all companies in its investable universe biannually on multiple criteria. These screening criteria include adherence to international certification schemes, minimizing the use of external inputs such as fertilizers and soil management measures.

Asset Management included sustainable oceans or seas practices and policies in the screening of all companies in its investable universe. It screens these companies bi-annually on multiple criteria, including adherence to Marine Stewardship Council and its Chain of Custody standards and aquaculture Stewardship Council certification. As described above, the policy also addresses deforestation.

*The Real Estate Biodiversity Framework* 3.1 3.2 3.3 4.2 4.3
Climate change poses a significant threat to nature and is one of the major drivers of biodiversity loss. To address the interconnected challenges of biodiversity loss and climate change, Real Estate has a policy which strives to reduce the GHG emissions of the assets under management in line with the Paris Agreement targets. In addition, Real Estate's policy is tailored to the different activities and sectors in which it operates.

*Real estate property*
The Real Estate Biodiversity Framework, developed in collaboration with an external ecologist, includes quantitative and qualitative guidelines to increase natural variation on and around real estate property. This framework is integrated into day-to-day operations, ensuring that biodiversity is considered in relevant aspects of asset and property management.

*Farmland*
The conversion of natural areas into agricultural land, along with the use of pesticides, fertilisers and the employment of intensive farming practices, can lead to a decline in biodiversity and soil quality. To counter these impacts, the Biodiversity Framework sets out a framework for farmers who lease farmland managed by a.s.r. real estate to actively encourage them to implement sustainable farming practices, such as the use of crop rotation and nitrogen-fixing plants. To make room for sustainability efforts, the Framework also aims to contribute financially and reward farmers for the transition they are making.

*Renewable energy*
Although Real Estate is not involved in the actual planning, development and construction of solar and wind farms, an environmental impact assessment is required by the Dutch government to understand the potential impacts on local nature and define measures to manage those impacts. An example of such measures is a bat protection system that is installed at wind parks, which automatically switches off wind turbines when the risk of bat collision is high. Compliance with laws and regulations (including biodiversity regulations) is part of Real Estate's due diligence process when acquiring renewable energy assets. The Biodiversity Framework does not yet apply to renewable energy, but this will be revised in 2025.

*Rural estates*
In addition to its real estate, farmland and renewable energy portfolios, Real Estate manages 16 rural estates, of which nine have the status of estate (*Landgoed*). The Biodiversity Framework sets out a framework for ‘connecting green’ which is a basis for developing sustainable landscape visions in collaboration with all stakeholders of the estates.

All assets directly managed by Real Estate are in scope of the policy.

In the materiality assessment Real Estate identified that it contributes to direct impact drivers and that it has impacts and dependencies on ecosystem services in its portfolio. The Real Estate Biodiversity Framework therefore aims to minimise its negative impact on biodiversity and contribute where possible to conserving and enhancing biodiversity.

Both the real estate and agricultural sector are identified as sectors that have an actual or potential material biodiversity and ecosystem-related impact through impact drivers. The Real Estate Biodiversity Framework therefore aims to minimise its negative impact on biodiversity in those sectors and contribute where possible to conserve and enhance the biodiversity on and around its properties. The Biodiversity Framework also addresses material dependencies, transition and physical risks and opportunities by setting out a framework for using nature-based solutions, such as rainwater runoff and heat regulation, to mitigate the impact of extreme weather events by vegetation.

Real Estate’s policy supports the traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along the value chain by actively promoting the use of sustainable and preferably bio-based materials in construction and renovation projects. This thereby reduces the negative impact, or preferably enhances biodiversity, in areas where these raw materials are sourced. Only certified wood is used within construction and renovation projects to limit the impact on deforestation.

Real Estate's policy addresses production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity by working on healthy ecosystems to limit the consequences of climate change, such as flooding and heat stress, and mitigate climate risks at the level of individual buildings and urban areas. In rural areas, Real Estate emphasises healthy soil and landscape elements, making the countryside more robust and valuable.

Social consequences are not the focus of the Real Estate Biodiversity Framework, as environmental aspects are deemed most material. Real Estate has not adopted a policy covering operational sites owned, leased or managed in or near a protected area or a biodiversity-sensitive area outside protected areas as Real Estate does not have any such sites.

The conversion of natural areas into agricultural land, along with the use of pesticides, fertilisers, and the employment of intensive farming practices, can lead to a decline in biodiversity and soil quality. To counter these impacts, the Biodiversity Framework sets out a framework for farmers who lease agricultural land managed by a.s.r. real estate to actively encourage them to implement sustainable farming practices such as the use of crop rotation and nitrogen-fixing plants. To make room for sustainability efforts, the Framework sets out rules to contribute financially and reward farmers for the transition they are making. In addition, the Framework sets out rules to invest in landscape elements such as forests, pond habitats, hedgerows and flower meadows. These elements play a crucial role in promoting biodiversity due to key benefits such as resilient ecosystems, preservation of native species, attracting pollinating insects, healthy soil and clean water. Real Estate promotes and preserves landscape elements. As there are no activities in oceans and forestation, there is no policy related to these subjects.

*The Policy on Sustainable Insurance* 3.2 4.1 4.3

The objective of a.s.r.'s Policy on Sustainable Insurance is a.o. to reduce negative impact and manage risks. Key contents of the policy are rules on sustainable underwriting, insuring the transition and frameworks for sustainable product development and sustainable claims adjustment.

The scope of the Policy on Sustainable Insurance is Non-life and Life insurance products and services. The most relevant parts for P&C are highlighted below.

In the materiality assessment P&C identified that it contributes to direct impact drivers and that it has impacts and dependencies on ecosystem services, in its value chain. The Policy on Sustainable Insurance addresses this contribution to direct impact drivers a.o. by setting out a framework for sustainable claims adjustment with a focus on repair instead of replacing damaged items by certified sustainable repair network companies. Certification entails a.o. limitations on the use of toxic car paint, a known impact driver of biodiversity loss. In addition, the policy stimulates the insurability of new sustainable business operations and production processes through the sustainability desk, thus aiming to help high impact/dependency customers who run material transition/physical risks to transit to such new business operations and production processes and reduce their impact/dependency on ecosystem services.

The Policy on Sustainable Insurance addresses material biodiversity and ecosystem related impacts leading to financial risks through a set of exclusion rules. These exclusions aim to avoid insuring companies with a significant impact on climate change and thus on biodiversity and ecosystem loss, such as producers of thermal coal and unconventional gas and oil. Producers of conventional energy products are required to commit to the Paris Agreement target and to have a transition plan. For other companies with a substantial volume operating in the chain for the fossil fuel industry or in a sensitive sector, an ESG risk assessment needs to be carried out. The Policy on Sustainable Insurance also addresses material dependencies and transition and physical risks, by providing a framework to stimulate product development to insure emerging nature-related risks customers are faced with.

The policy supports the traceability of products, components and raw materials with significant actual or potential impacts on biodiversity and ecosystems along the value chain by setting out a framework for working with certified sustainable repair network companies only. Certification includes limitations on the use of raw materials.

The Policy on Sustainable Insurance does not address production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity nor does it address social consequences, as the focus is on other topics that are currently deemed more important.

P&C has not adopted a nature protection policy covering operational sites owned, leased or managed in or near a protected area or biodiversity-sensitive area outside protected areas as it has no such material sites. P&C also does not have a sustainable land or agriculture policy, sustainable oceans or seas policy or a no-deforestation policy.

*Information that applies to all the product lines which have policies in place*

The management teams of the involved product lines are accountable for the implementation of the policies, including the monitoring of the effectiveness of the policy.

Through implementing the Policy on Responsible Investments and the Real Estate Biodiversity Framework, a.s.r. commits to respecting the Finance for Biodiversity pledge. Also, the TNFD framework is respected through the implementation of a.s.r.'s nature-related policies. Reference tables which disclose how the CSRD disclosures reference to the disclosures as required by the Finance for Biodiversity pledge as well as the TNFD framework are to be found in section 8.3.3 and section 8.3.4 .

## Actions

### Actions and resources related to biodiversity and ecosystems

The product lines have taken several key actions that contribute to the achievement of biodiversity and ecosystems-related policy objectives and targets.

### Key actions of Asset Management 3.2 4.1

Reducing harm, driving change and creating positive impact is the main focus of Asset Management's Policy on Responsible Investments. Through the key action of engaging and voting, a.s.r. aims to improve investees' policy and implementation of mitigating negative biodiversity impact. Where possible a.s.r. collaborates within sector initiatives to drive change. Asset Management invests in solutions and new technologies for improving biodiversity in line with its impact investing framework to create positive change.

The scope of Asset Management's key actions engaging and voting is all applicable investments under management. Separate engagement activities have their own timelines. But the focus on active ownership is ongoing. Asset Management discloses progress on its active ownership in prior periods on its website through voting dashboards and engagement reports.

### Key actions of Real Estate 3.1 3.2 3.3 4.2 4.3

Real Estate takes various actions to contribute to the achievement of the objectives of the Real Estate Biodiversity Framework.

*Real estate property*

In addition to the integration of the Biodiversity Framework into day-to-day operations, a.s.r. real estate identified 'Land artificialisation' as a quantitative metric to gain additional insight into the share of non-vegetated surface area compared to the total surface area of the plots of all assets. A baseline analysis has been conducted in 2024 for the real estate funds under management of a.s.r. real estate. The insights obtained from this analysis are used to formulate a strategic action plan and to identify prospective assets to enhance the potential ecological value in the portfolio. The company has set an annual target to develop ecological plans for promising assets. Recommended ecological features (bird, bat and insect boxes) and vegetated surface area (green roofs, facades and plot area) will be installed where feasible, taking into consideration project-specific budget and technical constraints.

To counter the impact of natural resources exploitation, the company actively promotes the use of sustainable and preferably bio-based materials in construction and renovation projects, thereby reducing the negative impact or preferably enhancing biodiversity in areas where these raw materials are sourced. Only certified wood is used within construction and renovation projects to limit the impact on deforestation.

*Farmland*

Through its investments in landscape elements, the company will continue to contribute to local biodiversity restoration. It does so by partnering with tenants through the realisation of forests, pond habitats, hedgerows and flower meadows. By promoting and preserving landscape elements, the company can increase biodiversity, enhance agricultural productivity, and produce healthy food in a manner that respects and protects the environment.

Alongside the realisation of these landscape element projects, the company will continue to partner with different stakeholders to broaden knowledge regarding biodiversity restoration. These partnerships range from cooperation with strategic partners to gain insight into the quantification of efforts for reporting purposes (such as the Task Force on Nature-related Financial Disclosures (TNFD), to a longitudinal collaboration with the HAS Green Academy to examine the actual effects of wooden landscape elements on soil and water systems and local biodiversity.

Green lease products will be made available to all clients, with both new and existing contracts, and provide a discount (5-10% on the annual rent) if a farmer commits to a set of sustainable farming criteria. One of these criteria is the implementation of biodiversity measures in line with the Nature and Landscape management framework of the Dutch government or when there is cultivation of 'leguminous or biobased crops' in the cropping plan.

*Renewable energy*

There are no formal actions for renewable energy yet.

*Rural estates*

To protect nature on these properties, the company undertakes biodiversity and ecosystem restoration projects in the country estates it manages, demonstrating a clear commitment to preserving and enhancing natural habitats. Estates also offer visitors the opportunity to both enjoy recreation in a natural environment and to engage with the farmers working on the estate. It is important that the connection between people and nature is maintained and strengthened. This connection is reflected in the company's plans for the estates through the mission 'connecting green.' This mission serves as a basis for developing sustainable landscape visions in collaboration with all stakeholders of the estates. As these estates themselves are often part of N2000 areas, farmers on these grounds have an intricate relationship with local biodiversity and must comply with strict laws and regulations.

The ambition is to create an integrated climate plan for forest and nature management for all relevant estates. *Landgoed 'De Utrecht'* plays a leading role and has, together with *'De Bosgroep'*, developed a climate (action) plan. The implementation of this plan will be further conducted during the upcoming period. At *Landgoed 'Junne'*, a design plan for N2000 was implemented in 2022 and further nature restoration measures will be undertaken during the upcoming period. Additionally, similar to the agricultural landscape element projects, rural estates managed by a.s.r. real estate (financially and technically) support clients to participate in landscape elements projects. a.s.r. real estate continuously strives for an appropriate entrepreneurial climate as a foundation for the estate model, where the functions of economy, ecology and heritage are substantially combined.

The green leases that are provided within the agricultural portfolio are also employed within the rural estates managed by a.s.r. real estate. Doing so allows farmers that are active on these rural estates to enjoy the financial means and the security to invest in sustainable farming practices.

The scope of the key actions described above are all the assets under management of Real Estate, assigned to the main sectors (real estate property, farmland, renewable energy, rural estates) in which a.s.r. real estate invests in (on behalf of institutional investors).

The key actions will be completed within the time horizon of the business plan of the funds under management of a.s.r. real estate, which is three years. The time horizon for assets directly managed on behalf of a.s.r. (separate account) is also three years.

### Key actions of P&C 3.2 4.1 4.3

P&C takes various actions to contribute to the achievement of the objectives of the Policy on Sustainable Insurance.

a.s.r. collaborates with industry peers and civil society in sector initiatives to drive change. For example, P&C actively participates in the PSI working group for nature. The working group is a multistakeholder platform that aims to advance risk management and insurance strategies, approaches, practices, products, services and solutions that address nature-related dependencies, impacts, risks and opportunities in order to value, conserve, restore and wisely use biodiversity and ecosystem services. It also aims to actively contribute to achieving the mission of the Kunming-Montreal Global Biodiversity Framework to halt and reverse nature loss by 2030, and its vision of a world living in harmony with nature by 2050. In 2024, the working group has published the 'Insuring a resilient nature-positive future - global guidance for insurers on setting priority actions for nature' to align with the Global Biodiversity Framework.

P&C also engages with stakeholders to stimulate them to prevent (further) nature loss and mitigate risks due to the degradation ecosystem services through:

*Sustainable living platform:*
On this platform, a.s.r. helps visitors by sharing other people's experiences and practical tips about sustainable living, such as installing a green roof.

*'Kennis Natuurlijk!'*
Together with ASN bank, a.s.r. is involved in *Kennis Natuurlijk!* – a project created in collaboration with the Naturalis Biodiversity Center. In *Kennis Natuurlijk!* young researchers, together with experts from Naturalis, address the question of how to make the living environment nature-inclusive. The outcomes of the various research assignments can be found on the *Kennis Natuurlijk!* platform. They are also shared via a.s.r.'s sustainable living platform and through the organisation's social media channels, in order to reach a wide audience.

Both the sustainable living platform and the *Kennis Natuurlijk!* programme aim to engage with the general public, which includes a.s.r. customers. New content is placed on the sustainable living platform regularly throughout the year. The *Kennis Natuurlijk!* programme is dependent on the number of research requests that are assigned in a year. Research assignments usually take three months to complete.

**Information that applies to all product lines which have adopted key actions**
The product lines have not used biodiversity offsets in their action plans and they have not incorporated local and indigenous knowledge and nature-based solutions into biodiversity and ecosystems-related actions.

## 6.2.3.4 Targets and metrics

### Targets

#### Targets related to biodiversity and ecosystems

The product lines have adopted several targets to support the biodiversity and ecosystem policies and address the material related impacts, dependencies, risks and opportunities.

**E4-4 Targets related to biodiversity and ecosystems**

| As of 31 December | Unit of measure | Base year | Baseline value | 2024 | Target year | Target value |
|---|---|---|---|---|---|---|
| **Asset Management** | | | | | | |
| Engagement with portfolio companies in high-impact sectors | in % | 2024 | 0% | 0% | 2026 | 100% |
| Identification of companies with highest plastic footprint | in % | 2024 | 0% | 0% | 2026 | 100% |
| | | | | | | |
| **Real Estate** | | | | | | |
| Fund target to set quantitative portfolio targets | in % | 2024 | 0% | 0% | 2027 | 100% |

*Asset Management* 3.2 4.1

Through its Policy on Responsible Investments a.s.r. aims to reduce harm, drive change and create positive impact in order to halt further nature loss and if possible, improve the state of nature. Asset Management has set targets on engagement with portfolio companies in high-impact sectors on biodiversity action plans, identification of portfolio companies with the highest plastic footprint, and reduction of carbon footprint within the investment portfolio. See section 6.2.1.4 for a full description of the GHG emission reduction target in the investment portfolio.

The level of target to be achieved is engagement with all relevant high-impact companies on having a biodiversity action plan and identification of all companies with the highest plastic footprint. Asset Management's targets on engagement with portfolio companies in high-impact sectors is measured in percentage of engaged portfolio companies and identification of portfolio companies with the highest plastic footprint is measured in percentage of identified portfolio companies. The Asset Management targets on high-impact sectors and plastic footprint are measured in relative values.

The targets for engaging with high-impact companies and the identification of companies with the highest plastic footprint apply to the equity and credit portfolios.

The baseline values for the engagement of high-impact companies and the identification of companies with the highest plastic footprint targets are both 0%. For the engagement with portfolio companies in high-impact sectors and the identification of portfolio companies with the highest footprint, Asset Management has identified 2024 as the base year. Asset Management is planning to reach the high-impact sector engagement target and the target on identification of portfolio companies with highest plastic footprint by 2026.

At this point, there is no scientific agreement on target setting frameworks for nature. a.s.r. has taken into account scientific evidence on the status and issues related to biodiversity loss in analysing impacts and setting the targets. Asset Management has involved both internal and external stakeholders in its target setting, to determine materiality of the targets and the alignment with standards such as the Finance for Biodiversity Pledge.

No changes in target, metrics, measurement methodologies or assumptions have been made. Considering that the base line values for the engagement with high-impact companies and the identification of companies with the highest plastic footprint have been measured and targets have been set in 2024 and implementation will start in 2025, no performance can be disclosed yet.

To define the target on engaging with high impact companies, Asset Management has used data from MSCI ESG. With regards to the target for identification of companies with the highest plastic footprint, a plastic footprint calculation methodology is in development.

Ecological thresholds (biodiversity sensitive areas) and allocation of impacts (proximity of more than three assets within 1.5 kilometres of such biodiversity sensitive area) were applied to the target on engaging with high-impact companies. Biodiversity sensitive areas were identified as healthy forests (based on the Forest Landscape Integrity Index), intact biodiversity areas (based on Mean Species Abundance value), prime areas for conservation (based on the Global Safety Net) and deforestation fronts (based on WWF Terra-i). No entity-specific thresholds were determined and there has been no specific allocation of the responsibility for respecting the identified ecological thresholds.

The biodiversity specific targets (engagement with high-impact companies and the identification of companies with the highest footprint) set by Asset Management are informed by the Kunming-Montreal Global Biodiversity Framework and support the EU Biodiversity Strategy for 2030.

Asset Management has assessed the nature-related impact, dependencies and risks and opportunities for its investment portfolios. The assessment had led to an approach towards biodiversity including investment exclusions, active ownership of focus themes and impact investments. The biodiversity specific targets underline these actions by either focusing on those investments that are at risk of having a high negative biodiversity impact or to increase insight in this impact.

The targets for Asset Management have a global geographical scope, in line with its investments. Asset Management does not make use of biodiversity offsets. The target on high-impact companies and plastic footprint can be allocated to the 'avoidance' layer of the mitigation hierarchy.

**Additional disclosure on E4-4 targets related to engagement and identification (Asset Management)**

| | |
|---|---|
| *Relationship to policy objectives* | Policy on Responsible Investments is centred around three key policy goals that underline its commitment to contributing to a better world: reducing harm, driving change and creating positive impact. |
| IRO's addressed by the target | 3.2 4.1 |
| *Scope of the target* | Listed equity and credit portfolios |
| *Methodologies and significant assumptions* | To define the target on engaging with high impact companies, Asset Management has used data from MSCI ESG.<br><br>With regard to the target for identification of companies with the highest plastic footprint, a plastic footprint calculation methodology is in development.<br><br>See section 6.5.2.3. |
| *Scientific basis* | At this point, there is no scientific agreement on target setting frameworks for nature. a.s.r. has taken into account scientific evidence on the status and issues related to biodiversity loss in analysing impacts and setting the targets. |
| *Stakeholder involvement* | Asset Management has involved both internal and external stakeholders in its target setting, to determine materiality of the targets and the alignment with standards such as the Finance for Biodiversity Pledge. |
| *Changes in targets and metrics* | No changes in target, metrics, measurement methodologies, assumptions etc. have been made yet. |
| *Performance against targets* | Considering that the base line values for the identification of companies with the highest plastic footprint have not been measured and targets have been set in 2024, no performance can be disclosed yet. |

*Real Estate* 3.1 3.2 3.3 4.2 4.3

As the Biodiversity Framework aims to halt and reverse further biodiversity loss by 2030 and sets several frameworks in order to achieve this, Real Estate has set a target for its funds to set ambitious biodiversity-related portfolio targets, such as ecological plans for promising assets, green leases, landscape elements projects and the promotion of climate-positive crops. The general carbon reduction target for the investment portfolio supports the aim to halt further nature biodiversity loss as well. See section 6.2.1.4 for a full description of the carbon footprint reduction target in the real estate portfolio.

The level of target to be achieved for the fund target to set quantitative portfolio targets is that all funds in scope set quantitative portfolio targets. Real Estate’s target for the funds to set quantitative portfolio targets is measured in percentage of funds that have set quantitative targets. Real Estate's fund target is measured in relative values.

The fund target to set quantitative portfolio targets applies to all funds of Real Estate that are managed on behalf of institutional investors (including a.s.r.) and the direct investments of a.s.r. that are managed by Real Estate.

The baseline value for the fund target to set quantitative portfolio targets is 0% and the base year is 2024. The fund target of a.s.r. real estate is planned to be achieved by 2027.

Real Estate’s fund target to set quantitative portfolio targets is not based on conclusive scientific evidence. Real Estate has involved stakeholders in setting its targets by partnering with various stakeholders to broaden its knowledge.

Measurement methodologies and assumptions used to define the quantitative portfolio targets per fund will need to be determined by the funds themselves. No changes in target, metrics, measurement methodologies, assumptions etc have been made yet. Considering that the base line values of the fund target to set quantitative portfolio targets have been measured and the target has been set in 2024 and implementation will start in 2025, no performance can be disclosed yet.

Real Estate has not taken ecological thresholds into account when setting its fund target. The fund target to set quantitative portfolio targets aligns with the Kunming-Montreal Global Biodiversity Framework as it aims to halt and reverse biodiversity loss by 2030.

Through Real Estate's fund target to set quantitative portfolio targets, its funds under management are stimulated and supported to set ambitious portfolio targets that aim to reduce the fund's impact and dependencies on ecosystem services, mitigate financial risks where feasible and to seize nature-related opportunities.

The geographical scope of the fund target to set quantitative portfolio targets is all funds located in the Netherlands. Biodiversity offsets were not used in setting the fund targets to set quantitative portfolio targets. The fund target to set quantitative portfolio targets can be allocated to the 'restoration' layer of the mitigation hierarchy.

**Additional disclosure on E4-4 fund target to set quantitative portfolio targets (Real Estate)**

| | |
|---|---|
| *Relationship to policy objectives* | The Biodiversity Framework aims to halt and reverse further nature biodiversity loss by 2030 |
| IRO's addressed by the target | 3.1 3.2 3.3 4.2 4.3 |
| *Scope of the target* | The fund target to set quantitative portfolio targets applies to all funds of Real Estate that are managed on behalf of institutional investors (including a.s.r.) and the direct investments of a.s.r. that are managed by Real Estate. |
| *Methodologies and significant assumptions* | Measurement methodologies and assumptions will be defined in the near future by the funds. |
| *Scientific basis* | Real Estate's fund target to set quantitative portfolio targets is not based on conclusive scientific evidence |
| *Stakeholder involvement* | Real Estate has involved stakeholders in setting its targets by partnering with various stakeholders to broaden knowledge of biodiversity restoration. |
| *Changes in targets and metrics* | No changes in target, metrics, measurement methodologies, assumptions, etc. Have been made yet |
| *Performance against targets* | Considering that the baseline values of the fund target to set quantitative portfolio targets have been measured and the target has been set in 2024, no performance can be disclosed yet. |

*P&C* 3.2 4.1 4.3

As climate change and biodiversity are so strongly connected, P&C has focused its efforts on its climate-related targets as reaching these targets will also have a positive effect on biodiversity as well. See section 6.2.1.4 for a full description of the carbon footprint reduction target in the P&C portfolio.

Additionally, P&C aims to further develop its insights in biodiversity effects in connection to its underwriting activities and will therefore keep refining the LEAP assessment on a yearly basis. In 2025, P&C will evaluate whether it will revise its sustainability targets and where relevant formulate specific biodiversity targets.

P&C has not yet set specific biodiversity targets but it does track the effectiveness of some of its actions. The effectiveness of the Sustainable Living Platform is tracked by a central team on a continuous basis by making use of engagement measurement methods. Effectiveness of the *Kennis Natuurlijk!* programme is tracked by indicators such as number of downloads of, the reactions to and media attention for the outputs of the various projects.

The defined level of ambition of the Sustainable Living Platform and the *Kennis Natuurlijk!* programme is that general public takes action to abate nature loss. The progress of the achieved engagements through the sustainable living platform is measured from 2022 onwards. The downloads of, reactions to and media attention for the outputs of the various projects Kennis Natuurlijk! is monitored on a quarterly basis, and has started in 2022.

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## 6.2.4 Resource use and circular economy

As the demand for resources in the rapidly evolving world is increasing, the efficient use of resources and adoption of circular economy principles is becoming more critical than ever. a.s.r. recognises the importance of sustainable resource management and supports the transition from a linear economy characterised by waste to one where the organisation aims to extend the lifecycle of products and limit resource outflows including waste. This commitment positively interacts with a.s.r.'s ambition to reduce the carbon footprint, halt and reverse nature loss and support sustainable entrepreneurship.

The following table presents a comprehensive overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

### 5 - Resource inflows

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 5.1 a.s.r.'s real estate investments that steer towards using secondary materials reduce the inflow of new goods, driven by encouragement of biobased and circular materials, leading to a positive impact on sustainability goals. | 1. Real Estate | 1. ESG Policy of Real Estate | 1. Introduce circular building principles in ESG strategy and policy. | None |
| Negative impact | 5.2 P&C insurance products mandate repair services which is a resource-intensive activity. The healthcare sector's large footprint in raw materials usage, covered under a.s.r.'s health insurance policies, contributes to significant material inflows driven by production and use of single-use medical products. | 1. P&C<br>2. Health | 1. Policy of Sustainable Insurance<br>2. Procurement policy of Health | 1. Refer customers to have damage repaired by certified companies.<br>2. Encourage healthcare providers to reduce the use of raw materials when purchasing aids. | None |
| Financial opportunity | 5.3 Shifting market demand towards circular, recycled, and pre-owned products presents an opportunity for a.s.r. to offer new insurance products and services, driven by increasing consumer interest in sustainability, leading to an expanded customer base and increased revenue. | 1. P&C | 1. Policy of Sustainable Insurance | 1. Promote the use of recycled parts among car repair shops. | None |

### 6 - Resource outflows

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 6.1 a.s.r.'s dedication to material reuse in urban and infrastructure development supports the circular economy leading to a positive impact on resource lifecycle extension. | 1. Real Estate | 1. ESG Policy of Real Estate | 1. Promote the reuse of materials. | None |

## 7 - Waste

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 7.1 a.s.r.'s specialised insurance proposition for recycling companies addresses the challenge of insuring enterprises that may be considered high-risk due to the nature of their operations. By insuring them P&C facilitates these companies' ability to operate and manage waste effectively which has a positive impact on waste reduction and recycling efforts. | 1. P&C | 1. Policy of Sustainable Insurance | 1. Make recycling activities insurable through Corins. | None |
| Negative impact | 7.2 a.s.r.'s offices and distribution and services entities generate waste in their own operations. Furthermore a.s.r.'s various business activities generate significant material, medical, electronic, and operational waste, through for instance the value chain of Health (i.e. medical supply and P&C (i.e. repair services). | 1. Facilities<br>2. Corins, Robidus, TKP, D&S Holding<br>3. IT<br>4. P&C<br>5. Health | 1. None<br>2. None<br>3. None<br>4. Policy of Sustainable Insurance<br>5. Procurement policy of Health | 1. Facilitate waste separation and perform a waste scan of the residual waste.<br>2. None<br>3. None<br>4. None<br>5. Research criteria for sustainable procurement among health insurers to prevent waste. | None |
| Financial opportunity | 7.3 Offering tailored insurance coverage to recycling businesses presents a revenue opportunity for a.s.r., driven by meeting specific market needs for high-risk industries, leading to increased revenue. | 1. P&C | 1. Policy of Sustainable Insurance | 1. Make recycling activities insurable through Corins. | None |

## 6.2.4.1 Managing impacts, risks, and opportunities

**Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities**
The material resource use and circular economy-related impacts of assets and activities were identified as part of the double materiality assessment; for more information on this process, see section 6.1.4.3. During the early stage of the double materiality assessment, a wide range of stakeholders were consulted. In addition to the double materiality assessment, no other methodologies, assumptions and tools were used in the screening process. Since material resource use is located in the value chain of a.s.r., with limited visibility on details of the materials used, no list and prioritisation of material resources was created.

## 6.2.4.2 Policies and actions

### Policies

**Policies related to resource use and circular economy**
In order to manage impacts, risks and opportunities in relation to resource use and circular economy, the following policy documents are relevant:

- The ESG policy (Real Estate);
- The Policy on Sustainable Insurance;
- The Procurement Policy (Health).

*Real Estate* 5.1 6.1
Since the use of primary raw materials in building has a potential negative impact, Real Estate's ESG policy sets out a framework to promote circular building principles. Circular building principles, such as reuse of materials and reduction of waste, are challenged during the design of new buildings projects acquired by Real Estate and incorporated in the programme of requirements.

Real Estate's ESG policy's scope is the upstream value chain.

Real Estate is partnering with external institutions such as the Dutch Green Building Council (DGBC) to create a standard application format for sustainable construction projects and renovations. This format includes circular building principles, such as material sourcing, detachability and reuse potential, handling residual material, and handling construction and demolition waste.

This standard format will support the sector-wide implementation of more circular business models. As such, it addresses transitioning away from use of virgin resources, including relative increases in use of secondary (recycled) resources. Additionally, it addresses sustainable sourcing and the use of renewable resources.

Interests of key stakeholders such as project developers, construction companies and future tenants are given consideration indirectly through the development of market standards with the DGBC and directly during the design and engineering phase of construction and renovation projects.

This policy was made available to stakeholders who are potentially affected or who need to help implement it through the Program of Requirements that is in place for acquisitions of new buildings.

*P&C* 5.2 7.2

a.s.r.'s Policy on Sustainable Insurance addresses circular economy through underwriting and the execution of products and services.

In the underwriting process, a.s.r. may encounter new initiatives that significantly contribute to the transition to a more circular economy. These initiatives often involve companies that use practices such as recycling of materials and reducing waste. The P&C Sustainability Desk serves as a resource for advisors to inquire about the insurability of these initiatives. The Desk is dedicated to thoroughly evaluating these initiatives and, where possible, making them insurable. By leveraging the Sustainability Desk, a.s.r. can offer tailored solutions that address evolving customer needs.

Before any new or updated insurance solution is launched, it undergoes a thorough evaluation through the PARP. This ensures that all insurance solutions meet specific criteria, including that it does not negatively impact circular economy principles.

a.s.r. encourages customers to have damage repaired by certified companies selected by a.s.r. These selected repair companies are part of P&C's sustainable repair network, chosen for their cooperation and adherence to sustainability standards. Damage can be repaired in various ways by different types of companies, such as construction companies, car repair shops or cleaning services. a.s.r.'s sustainable repair network includes a diverse range of these companies. Affiliated repairers are certified by *Erkend Duurzaam* and *Groen Gedaan*, recognised ESG quality marks in the repair sector. These certifications are mandatory for collaboration with a.s.r. The certification outlines minimum requirements for repairers to meet. These include assessing the environmental impact of their activities and developing effective policies for the use and disposal of chemicals, hazardous substances, waste water and gas emissions. Repairs by the selected companies are conducted in a socially responsible and environmentally conscious manner. Certification includes the use of second-hand materials and waste reduction practices. Periodic audits ensure compliance with these sustainability standards.

The scope of the Policy on Sustainable Insurance is Non-life and Life insurance products and services. The most relevant parts for P&C's upstream and downstream value chain are highlighted below.

P&C commits to respect the requirements of the sustainable repair network '*Groen Gedaan*' through the implementation of the policy.

As the policy is expected to do no significant harm to affected communities, no consultations were conducted during the development of the Policy on Sustainable Insurance. The policy was not made available to potentially affected stakeholders and stakeholders who need to help implementing it, as there were none.

The Policy on Sustainable Insurance addresses the transition away from the use of virgin resources; through the sourcing and contracting of parties, a.s.r. prioritises repair over replacement whenever possible. Suppliers and repair companies are encouraged and motivated to repair damages where feasible. During the contracting process, a.s.r. specifically seeks out companies with relevant knowledge and experience in sustainable damage repair, such as fixing dents in stone countertops or water damage on wooden floors. This strategy helps a.s.r. reduce reliance on virgin resources by increasing the use of second-hand or recycled materials in repairs.

The policy also addresses sustainable sourcing and use of renewable resources as it promotes the most environmentally friendly manner of repair. Repairers can achieve this by adhering to the standards outlined in the Code of Conduct, thereby contributing positively to the sustainability of society. Sustainable sourcing of materials and reducing carbon emissions are integral parts of this approach.

*Health* 5.2

The joint policy in the healthcare sector follows from the Green Deal Sustainable Healthcare (GDDZ) 3.0. The agreements resulting from this have been translated into Health's procurement policy. The healthcare sector jointly aims at:

- Reducing the use of primary raw materials;
- Providing circular care where possible;
- Reducing unsorted residual waste;
- Reducing the purchase of incontinence materials.

In addition to the joint policies, a.s.r. has a sustainability module in its pharmacy policy. a.s.r. was the first health insurer to include this sustainability module in its contracts, allowing pharmacies to earn money by delivering sustainably (delivery without using fossil fuels), working paperless using digital applications (*Kijksluiter*) and being a member of a platform on which they can share unused stock with pharmacies that do have patients for it (Pharmaswap). Health also focuses on stimulating sustainable innovation.

The GDDZ 3.0 is an agreement that covers the entire healthcare sector (including contracted healthcare providers in the Netherlands and innovative new businesses) and is shared across various sectors. The agreement is public and can be found online. The purchasing policy for 2025 was published on 1 April 2024. Discussions are being held with individual providers to implement the policy. Both healthcare providers and suppliers play an important role in the implementation of the policy.

The policy addresses transitioning away from the use of virgin resources by aiming to reduce the amount of unsorted residual waste and decrease the use of diapers and incontinence materials. The policy currently does not address sustainable sourcing or the use of renewable resources.

*Facilities and distribution and services entities* 7.2

For Facilities and the distribution and services entities, no policies have been adopted yet, since more time is needed to carefully develop suitable policies.

## Actions

### Actions and resources related to resource use and circular economy

To promote sustainable resource use and circular economy, several actions are undertaken by the product lines.

*Facilities* 7.2

The most important action is to facilitate good waste separation at the office locations of a.s.r. This is expected to reduce the amount of residual waste and increase the share of reuse and recycling. In addition, a scan of the residual waste will be done at the head office in early 2025.

The actions mainly focus on waste at a.s.r.'s head office, because this has the largest share. Where possible, a.s.r. will also implement similar measures at other office locations to further promote residual waste reduction. The waste originating from IT is included in scope of the actions.

A waste scan of the residual waste will be done at the beginning of 2025, after which a more detailed action plan will follow.

*Real Estate* 5.1 6.1

In the coming years, a.s.r. real estate will introduce circular building principles in its ESG strategy and policy, which is expected to lead to less virgin material use and to promote the reuse of materials. Additionally, the programme of requirements will be revised to ensure the targets are accomplished in acquisitions and large renovations.

The scope of these actions is new construction and renovation projects.

Real Estate has the ambition to reduce the impact of using primary materials, by implementing circular building principles in the ESG strategy and policy by 2025 at the latest.

*P&C* 5.2 5.3 7.1 7.3

a.s.r. aims to make a significant contribution to the sustainability of society by addressing societal challenges related to its core activities. One major societal challenge is the shift away from the single-use economy, where many items are replaced with new ones when damaged.

To help address this issue, a.s.r. aims to contribute to the transition to a circular economy by executing a circular repair pilot with a sustainable repair company for mobile electronics. a.s.r.'s repair partner is affiliated with *Stichting Duurzaam* and holds the *Groen Gedaan!* Certification. They are highly inventive in alternative repair methods and specialise in repairing mobile electronics after water damage.

Additionally, to promote the use of recycled parts among car repair shops, a.s.r. has initiated a pilot project on circular claims handling with a group of car repairers. The aim is to explore opportunities and increase the use of second-hand or recycled parts in car repairs, such as installing a second-hand bumper.

The scope of the actions is focused on collaborating with contracted sustainable repair companies.

P&C strives to continuously explore new opportunities to enhance the positive impact of sustainable repair practices. This ongoing process remains a constant focus of attention.

Furthermore, in the co-insurance market, P&C makes recycling activities insurable through Corins by offering customised solutions for industrial risks of manufacturing companies that contribute to the circular economy.

*Health* 5.2 7.2

As a health insurer, a.s.r. has no control over or insight into the purchasing practices of individual healthcare institutions. However, Health can stimulate institutions to work on circularity through its procurement policy. Joint actions of health insurers in the Netherlands:

- Research is being conducted into the possibility for health insurers or care offices to jointly set criteria for sustainability in purchasing. This includes incorporating sustainability criteria in the contracting of aid suppliers, with the aim of reducing packaging, preventing waste and encouraging reuse.
- The healthcare procurement policy is aimed at reducing waste and promoting reuse among healthcare providers, such as with aids, food and medicines. This also contributes to lobbying for possible adjustments in obstructive regulations (article 5.2b, f and j).
- The healthcare purchasing policy strives for uniformity, whereby healthcare providers are encouraged to steer towards reducing the use of raw materials when purchasing aids. This is done per sector and in consultation with the industry, focusing on the most important aids.
- In the healthcare procurement policy 2024, health insurers have included the expectation that healthcare providers commit to the GDDZ 3.0 and anchor sustainability in their business strategy.

In addition to these joint actions, a.s.r. supports three innovations:

- CareCycle: reissuing of unused absorbent incontinence materials that would otherwise be thrown away.
- Medsafe: combating waste by reissuing of medicines and thus reducing medical waste.
- Pharmaswap: sharing marketplace where pharmacists can share supply and demand of medicines that are approaching their expiration date, thus combating waste (both waste and use of raw materials).

The scope of the actions is Dutch contracted healthcare providers. The procurement policy has been revised in 2024.

*Distribution and services entities* 7.2

In 2024, no actions have been adopted in relation to waste by the distribution and services entities, as they are developing a policy first. a.s.r. expects the related actions to be set after policy approval.

## 6.2.4.3 Targets and metrics

### Targets

**Targets related to resource use and circular economy**
In the past year, a.s.r. has mapped activities related to circular economy throughout the organisation. However, it has not yet set specific targets for resource use and circular economy practices.

This has to do with several factors. Firstly, as a service-based rather than product-based company, a.s.r.'s resource use is in its value chain and setting meaningful and impactful targets in this area requires a tailored approach that a.s.r. is still developing.

Also, establishing accurate and actionable targets necessitates comprehensive data on a.s.r.'s current resource use and waste generation. Over the past year, the organisation has focused on enhancing data collection and analysis to ensure that future targets are based on reliable information. Moving forward, a.s.r. will continue its efforts towards the setting of targets and will update stakeholders on its progress in this area.

Currently, a.s.r. does not track the effectiveness of its policies and actions in relation to the material sustainability-related impact, risk and opportunity with regards to resource use and circular economy.

### Metrics

**Resource inflows**
Material impact on the topic resource inflows was identified for the product lines Real Estate, P&C and Health in their value chains. The material resource inflows are outlined here.

- Real Estate's most material resource inflows are construction materials, such as wood, concrete, steel and glass, for new construction and renovation projects.
- P&C's car repair companies use packaging materials (e.g. cardboard) and materials for repair (e.g. metals). Property repair and maintenance relies on materials for interiors (e.g. glass, flooring, construction materials, paints and electronics). Both also rely on the use of property and equipment.
- Health's resource inflows are mainly metals and minerals, which are used for pharmaceuticals and other chemical products, medical and electronic products, food and catering, among other things.

No data is available yet for these resource inflows.

**Resource outflows and waste**
The table below contains the specification of the total amount of waste generated in a.s.r.'s own operations.

**E5-5 Resource outflows (Waste)**

| | Unit of measure | Hazardous | Non-hazardous | Total |
|---|---|---|---|---|
| **Total amount of waste generated** | **in tonnes** | **7.2** | **981.3** | **988.5** |
| | | - | - | - |
| Preparation for reuse | in tonnes | - | 3.3 | 3.3 |
| Recycling | in tonnes | 0.2 | 765.0 | 765.2 |
| Other recovery operations | in tonnes | - | - | - |
| **Total amount diverted from disposal** | **in tonnes** | **0.2** | **768.3** | **768.5** |
| | | - | - | - |
| Incineration | in tonnes | - | 198.1 | 198.1 |
| Landfill | in tonnes | - | 0.3 | 0.3 |
| Other disposal operations | in tonnes | 7.0 | 14.5 | 21.5 |
| **Total amount directed to disposal** | **in tonnes** | **7.0** | **213.0** | **220.0** |
| | | - | - | - |
| Total amount of non-recycled waste | in tonnes | - | - | 220.1 |
| Total percentage of non-recycled waste | in % | - | - | 22% |

a.s.r. is digitalising its paper archive, which leads to relatively high paper waste in comparison to other waste types. Moreover, the office location in Rotterdam has been closed at the end of 2024. The closure of this building caused a one-off spike in waste generated. Both these events led to an increase of more than 400,000 kilogrammes of waste. This is all allocated to "Recycling". For disclosure on the methodology, assumptions and limitations of the above mentioned numbers, see section 6.5.3.4 CSRD reporting policies.

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## 6.2.5 Taxonomy regulation

### General information

The EU Taxonomy Regulation establishes an EU classification system – or taxonomy – that provides investors, including financial sector entities and corporates, with uniform criteria specifying which economic activities qualify as environmentally sustainable. This should provide non-financial and financial actors with clarity on which of their activities are considered sustainable in order to scale up sustainable investments and thereby contribute to the overall objectives of the EU's 2018 Sustainable Finance Action Plan (EU SFAP) and 2020 renewed Sustainable Finance Strategy.

a.s.r. wants to play a leading role in the financial sector when it comes to sustainable business. This means that a.s.r. strives to make a positive contribution to making society more sustainable. a.s.r. systematically takes into account the ESG impacts of its activities, in accordance with its strategy on sustainable business. It does so by setting ambitious targets, developing effective instruments and reporting clearly on the progress and results of its efforts. The EU Taxonomy Regulation provides companies, such as a.s.r., a common EU-wide language for reporting on its efforts. a.s.r. will consider, and where possible include, the taxonomy criteria in its target-setting.

The EU Taxonomy Regulation currently distinguishes six environmental objectives. These objectives are:

- Climate change mitigation;
- Climate change adaptation;
- The sustainable use and protection of water and marine resources;
- The transition to a circular economy;
- Pollution prevention and control;
- The protection and restoration of biodiversity and ecosystems.

For each of these objectives, technical screening criteria have been developed at EU level. Criteria for the first two (climate-related) objectives were established during 2021, and subsequently complemented to include certain additional (gas and nuclear energy-related) activities. The criteria for the remaining four environmental objectives were adopted on 27th June, 2023. The taxonomy framework might be supplemented in future with a social taxonomy.

The reporting requirements in accordance with the EU Taxonomy Regulation enter into effect in a phased manner. As per the 2021 financial year, undertakings have begun to report on which of their economic activities are eligible for the EU Taxonomy Regulation. Eligibility does not mean that the activities are, in fact, environmentally sustainable, but rather that they have the potential to be considered or become sustainable, so-called 'taxonomy aligned'. In order for economic activities to be taxonomy aligned, they must make a substantial contribution to at least one environmental objectives, while doing no significant harm to any of the other environmental objectives and at the same time respecting minimum safeguards. For further information on minimum safeguards, see further down this section.

For 2024, a.s.r. is required to report on the alignment of their activities with the initial two climate-related objectives in line with previous year, and to report on the eligibility of their activities for all six environmental objectives.

For 2024, a.s.r. has assessed whether its economic activities are taxonomy aligned in relation to the applicable two environmental objectives: climate change mitigation and climate change adaptation. Also, a.s.r. has assessed which economic activities can be considered as taxonomy eligible for all six environmental objectives.

### Changes in presentation

*Commission notice*

On 8 November 2024, the European Commission (EC) published a Commission notice with clarification of certain elements of the taxonomy disclosure requirements. This guidance serves as recommendations for the legal interpretation and implementation of the taxonomy legislation. This Commission notice states, amongst others, that groups with various activities need to calculate their group alignment percentage based on a weighted average of the relevant activities within the group. The EU Taxonomy Regulation identifies the following types of entities: insurance and reinsurance undertakings, credit institutions, asset managers, investment firms and non-financial undertakings.

For 2023, a.s.r. has reported its taxonomy alignment KPIs in accordance with the insurance templates[1], all a.s.r. activities were included in the insurance templates. For 2024, a.s.r. updated the EU Taxonomy disclosure for the Commission notice and allocated its activities to insurance activities, asset management activities and non-financial activities.

The comparative figures were updated accordingly. This resulted in a 2% increase in the alignment percentage of the investment activities of the insurance KPI, turnover-based as well as capital expenditure-based. There was no impact on the alignment for the non-life insurance underwriting activities.

*Sale of Knab*

Knab, a credit institution, was sold at 1 November 2024 and therefore a.s.r. did not have any banking activities at year-end. As a result, Knab is not included in the group KPI, nor did a.s.r. prepare the KPI for banking activities.

### EU Taxonomy Regulation KPIs

The group KPI for a.s.r. is determined as the sum of the KPI's of the underlying activities based on the weighted average of revenue of each activity.

1 Annex IX and X of the commission delegated regulation (EU) 2021/2178.

## Aligned economic activities of a.s.r. - current year

| | Revenue | Proportion of total group revenue (A) | KPI turnover based (B) | KPI CapEx based (C) | KPI turnover based weighted (A*B) | KPI CapEx based weighted (A*C) |
|---|---|---|---|---|---|---|
| **A. financial activities** | **15,996** | **97%** | | | | |
| Insurance undertakings | 15,775 | 96% | 5.8% | 6.2% | 5.6% | 5.9% |
| Asset management | 221 | 1% | - | - | - | - |
| | | | Turnover KPI (B) | CapEx KPI (C) | Turnover KPI weighted (A*B) | CapEx KPI weighted (A*C) |
| **B. Non-financial activities** | **518** | **3%** | **-** | **-** | **-** | **-** |
| | | | | | | |
| **Total revenue of a.s.r.** | **16,513** | **100%** | | | | |
| | | | | | Average KPI turnover based | Average KPI CapEx based |
| **Average KPI of a.s.r.** | | | | | **5.6%** | **5.9%** |

## Aligned economic activities of a.s.r. - prior year

| | Revenue | Proportion of total group revenue (A) | KPI turnover based (B) | KPI CapEx based (C) | KPI turnover based weighted (A*B) | KPI CapEx based weighted (A*C) |
|---|---|---|---|---|---|---|
| **A. financial activities** | **12,421** | **98%** | | | | |
| Insurance undertakings | 12,222 | 97% | 4.1% | 4.3% | 4.0% | 4.2% |
| Asset management | 200 | 2% | - | - | - | - |
| | | | Turnover KPI (B) | CapEx KPI (C) | Turnover KPI weighted (A*B) | CapEx KPI weighted (A*C) |
| **B. Non-financial activities** | **202** | **2%** | **-** | **-** | **-** | **-** |
| | | | | | | |
| **Total revenue of a.s.r.** | **12,624** | **100%** | | | | |
| | | | | | Average KPI turnover based | Average KPI CapEx based |
| **Average KPI of a.s.r.** | | | | | **4.0%** | **4.2%** |

Included within revenue are the line items insurance contract revenue, direct investment income, fee income and other income related to the revenue from wind farms and solar parks.

The KPIs for asset managers and non-financial undertakings only contribute to a total of 4% (2023: 3%[1]) to the taxonomy alignment percentage of The group. As a result, a.s.r. decided to report 0% for these undertakings and not to disclose the related templates.

### KPI of insurance undertakings

The insurance KPI consists of the KPI for non-life underwriting activities and for investment activities. The insurance KPI is determined based on the weighted average revenue of both KPI for each of the turnover based KPI and the CapEx KPI as shown in the following table.

1 Knab is excluded from total revenue, for a better comparison with current year, as Knab was sold during 2024.

### Aligned economic activities from insurance undertakings - current year

| | Revenue | Proportion of total group revenue (A) | KPI turnover based (B) | KPI CapEx based (C) | KPI turnover based weighted (A*B) | KPI CapEx based weighted (A*C) |
|---|---|---|---|---|---|---|
| **Insurance, excluding life insurance underwriting activities**[1] | **10,549** | **100%** | | | | |
| Non-life insurance underwriting activities in scope of Taxonomy | 4,375 | 41% | 0.0% | 0.0% | 0.0% | 0.0% |
| Investment activities | 6,173 | 59% | 9.9% | 10.5% | 5.8% | 6.1% |
| **Aligned activities from insurance undertakings** | | | | | **5.8%** | **6.2%** |

### Aligned economic activities from insurance undertakings - prior year

| | Revenue | Proportion of total group revenue (A) | KPI turnover based (B) | KPI CapEx based (C) | KPI turnover based weighted (A*B) | KPI CapEx based weighted (A*C) |
|---|---|---|---|---|---|---|
| **Insurance, excluding life insurance underwriting activities**[1] | **8,574** | **100%** | | | | |
| Non-life insurance underwriting activities in scope of Taxonomy | 4,448 | 52% | 0.0% | 0.0% | 0.0% | 0.0% |
| Investment activities | 4,126 | 48% | 8.5% | 9.0% | 4.1% | 4.3% |
| **Aligned activities from insurance undertakings** | | | | | **4.1%** | **4.3%** |

### KPI of insurance undertakings related to non-life underwriting activities

The KPI related to underwriting activities is limited to the non-life insurance business. The following table shows the reconciliation of total insurance contract revenue as reported in the consolidated income statement to total non-life insurance contract revenue in scope of the EU Taxonomy Regulation.

### Reconciliation total insurance contract revenue to total non-life insurance contract revenue in scope of the Taxonomy

| | 2024 | | |
|---|---|---|---|
| *in € millions* | Total insurance contract revenue | Not in scope of taxonomy | Total non-life insurance contract revenue in scope of taxonomy |
| P&C | 2,078 | - | 2,078 |
| Disability | 2,047 | 1,239 | 808 |
| Health | 1,489 | - | 1,489 |
| Life | 3,987 | 3,987 | - |
| **Total** | **9,601** | **5,226** | **4,375** |

For the purpose of computing Taxonomy alignment, a.s.r. should only use those insurance premiums, or corresponding shares of insurance premiums in case of multi-risk insurance contracts, that pertain to the coverage of climate-related perils. For several products, which also cover climate-related perils, a.s.r. is unable to obtain the data on written premiums related to these climate-related perils. a.s.r. reported those premiums as non-eligible. If a.s.r. had reported on coverage level, eligibility would have been 25% and alignment 1%.

1 The life insurance underwriting activities are excluded from this table as these are not in scope of the KPI for insurance and reinsurance undertakings. The revenue relating to life insurance underwriting activities is, however, part of the total revenue for insurance undertakings and is therefore included within the table above 'Aligned economic activities of a.s.r.'.

### The underwriting KPI for non-life insurance and reinsurance undertakings

| | Substantial contribution to climate change adaptation | | | DNSH (Do No Significant Harm) | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Economic activities (1) | Insurance contract revenue 2024 (2) | Proportion of insurance contract revenue, 2024 (3) | Proportion of insurance contract revenue, 2023 (3) | Climate change mitigation (5) | Water and marine resources (6) | Circular economy (7) | Pollution (8) | Biodiversity and ecosystems (9) | Minimum safeguards (10) |
| | € millions | % | % | Y/N | Y/N | Y/N | Y/N | Y/N | Y/N |
| A.1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable) | 2 | 0% | 0% | Y | Y | Y | Y | Y | Y |
| A1.1.1 Of which reinsured | - | 0% | 0% | Y | Y | Y | Y | Y | Y |
| A1.2 Of which stemming from reinsurance activities | - | 0% | 0% | Y | Y | Y | Y | Y | Y |
| A1.2.1 Of which reinsured (retrocession) | - | 0% | 0% | Y | Y | Y | Y | Y | Y |
| A.2 Non-life insurance and reinsurance underwriting Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) | 15 | 0% | 0% | | | | | | |
| B Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities | 4,358 | 100% | 100% | | | | | | |
| **Total (A.1 + A.2 + B)** | **4,375** | **100%** | **100%** | | | | | | |

The alignment of non-life insurance underwriting activities is determined as follows:

- The insurance contract revenue in scope of the EU Taxonomy Regulation is based on the following lines of business as defined under Solvency II: medical expense insurance, income protection insurance, workers' compensation insurance, motor vehicle liability insurance, other motor insurance, transport insurance, fire and other damage to property insurance and assistance. As such, the Life insurance business and the Health insurance business under Disability are not in the scope of the EU Taxonomy Regulation.
- The underwriting activities are only covered by the environmental objective climate change adaptation.
- The related underwriting activities cover at least one of the climate-related calamities as described in the Climate Delegated Act. Within Non-life, these mainly concern heat waves and wildfires, wind-related calamities such as storms, water-related calamities such as flooding and heavy precipitation and hail.
- The climate-related calamity is explicitly mentioned in the policy terms and conditions. Health and Disability do not have these explicit terms and conditions and are therefore non-eligible.
- The eligible insurance contract revenue of underwriting activities is measured as the amount that covers climate related perils.
- When this eligible underwriting activity fulfils the technical screening criteria set out in the EU Taxonomy Regulation, does not significantly harm any of the other environmental objectives and fulfils the minimum safeguards, it is considered aligned with the EU Taxonomy Regulation.

**KPI of insurance undertakings related to investment activities**
Investments directed at funding or associated with economic activities as described in the delegated acts are considered taxonomy eligible. Eligible investments are aligned when they substantially contribute to one or more of the EU Taxonomy environmental objectives, cause no significant harm to the other environmental objectives, while at the same time respecting minimum safeguards.

The table below shows the reconciliation of total assets held by the insurance undertakings as reported in the financial statements to the total assets covered by the KPI of insurance undertakings.

## Reconciliation total assets to total assets covered by the KPI

| | 31 December 2024 | | | | |
|---|---|---|---|---|---|
| *in € millions* | Total assets | Total assets held by insurance undertakings | Assets not qualifying as investments | Investments not covered by the KPI of insurance undertakings | Total assets covered by the KPI of insurance undertakings |
| Investments[1] | 113,618 | 110,673 | 3,178 | 23,983 | 83,512 |
| Derivatives | 11,767 | 11,520 | - | - | 11,520 |
| Own property, investment property and plant | 3,978 | 3,947 | - | - | 3,947 |
| Other[2] | 9,232 | 7,068 | 6,705 | - | 362 |
| **Total** | **138,595** | **133,208** | **9,883** | **23,983** | **99,341** |

The investments covered by the EU Taxonomy Regulation include investments held in respect of life insurance contracts on behalf of policyholders for an amount of € 23,794 million (2023: € 21,719 million).

Below are the taxonomy alignment disclosures of a.s.r.'s investment activities for the first two environmental objectives: climate change mitigation and climate change adaptation. Eligibility is based on all six environmental objectives.

## The proportion of the insurance or reinsurance undertaking's investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments current year

| The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below: | | The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below: | |
|---|---|---|---|
| Turnover-based in % | 10% | Turnover-based in € millions | 9,872 |
| Capital expenditures-based in % | 10% | Capital expenditures-based in € millions | 10,421 |
| The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities. | | The monetary value of assets covered by the KPI. Excluding investments in sovereign entities. | |
| Coverage ratio in % | 81% | Coverage in € millions | 99,341 |

## The proportion of the insurance or reinsurance undertaking's investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments prior year

| The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below: | | The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below: | |
|---|---|---|---|
| Turnover-based in % | 9% | Turnover-based in € millions | 7,911 |
| Capital expenditures-based in % | 9% | Capital expenditures-based in € millions | 8,384 |
| The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities. | | The monetary value of assets covered by the KPI. Excluding investments in sovereign entities. | |
| Coverage ratio in % | 80% | Coverage in € millions | 92,966 |

For the additional complementary disclosures, including nuclear energy and fossil gas related activities, see appendix 8.4.

The main drivers of the aligned assets are real estate, real estate equity funds, mortgages and mortgage equity funds. The slight increase in alignment percentage of 1% is due to an increase in alignment within all

1 Investments includes investments related to direct participating insurance contracts.
2 Other represents intangible assets, deferred tax assets, reinsurance contracts, cash and cash equivalents, equipment, associates and joint ventures, receivables and other assets.

categories. Changes were made to the assets acquired through the acquisition of Aegon NL to align them to the Policy on Responsible Investments.

*Investment activities - Investments*
The main activities covered by taxonomy aligned investments relate to:

- Acquisition and ownership of buildings;
- Electricity generation using solar photovoltaic technology, concentrated solar power (CSP) technology, wind power, ocean energy technologies, hydropower, geothermal energy, renewable non-fossil gaseous and liquid fuels or bio-energy. Co-generation of heat/cool and power from solar energy, geothermal energy, renewable non-fossil gaseous and liquid fuels or bio-energy;
- Transmission and distribution of electricity;
- Manufacture of low carbon technologies for transport.

*Investment activities - Own property, investment property and plant*
The aligned activities within own property, investment property and plant relate to the acquisition and ownership of buildings and electricity generation using solar photovoltaic technology and from wind power.

## Measurement and key estimates and assumptions

Investment activities are accounted for using the same valuation principles that are used in the IFRS consolidated financial statements. The alignment is based on the assets held at 31 December 2024 and the coverage of the insurance policies per 31 December 2024.

a.s.r. has made efforts to gather the required data for taxonomy eligibility and alignment. Due to uncertainties in legislation and limitations in the availability of data at the time the Annual Report was being prepared a.s.r. has to some extent used interpretations, estimates and assumptions to arrive at the required disclosures. The disclosures made therefore represent a snapshot at the time they were prepared and are only an indication of the eligibility or alignment of the economic activities undertaken by a.s.r. The assumptions and interpretations used are further disclosed below.

Currently, the taxonomy alignment percentage only covers the first two (climate-related) environmental objectives. Due to the phased entry into force of CSRD requirements, gradually more companies will report on the taxonomy alignment of their economic activities. As a result, data availability on taxonomy alignment will increase and should allow a.s.r. to enhance the quality of its taxonomy disclosure over time.

### Investment activities

For assets not generating revenue, such as own property, the CapEx based KPI is determined. The Turnover based KPI is set at an equal level to the CapEx based KPI.

The coverage ratio was calculated by dividing investments held by insurance undertaking excluding exposure to central governments, central banks and supranational issuers by investments held by insurance undertakings.

*Investment activities - Investments*
To assess the eligibility and alignment of the investments, a.s.r. makes use of taxonomy data from data vendors. Data vendors are dependent on the taxonomy information provided by the investee companies. a.s.r. only uses reported data from investees in scope of CSRD.

The classification of investees into financial and non-financial undertakings was done with data from data-vendors. If no data was available the classification was determined using NACE codes. Most codes starting with K and M74.9 were considered financial undertakings. If no data was available, for certain investment funds and illiquid investments, the investment was categorised under other counterparties and assets, and no eligibility and alignment data was disclosed in the numerator.

The eligibility and alignment of real estate funds is assessed using the economic activities of the underlying assets in that fund. The information used to establish the eligibility and alignment of the real estate portfolio is provided by the fund manager based upon knowledge of the underlying assets and their operation.

Own source information, based on, amongst other, EPC labels (*energieprestatiecertificaat*) and climate risk monitor, was largely used to establish the eligibility and alignment of the mortgage loans (e.g. mortgage agreements). The information for mortgage funds managed by third parties was provided by the fund managers.

As part of its Taxonomy reporting obligations, a.s.r. is required to disclose its exposure to the six nuclear and gas activities. a.s.r. was able to gather this information based on reported data from the most significant exposures within the energy sector on a.s.r.'s balance sheet (95% coverage). The remaining exposure in the energy sector, and exposures from other sectors, such as financial undertakings, were assumed to be nil.

*Investment activities - Own property, investment property and plant*
Own source information was used to establish the eligibility and alignment of the real estate portfolio, such as knowledge of the underlying assets and operation.

### Underwriting activities

a.s.r. offers its underwriting activities both directly and through the intermediary channel via independent advisors and mandated brokers. Own source information was used to determine eligibility and alignment for the insurance contract revenue of P&C for insurance policies sold through direct distribution channels and through advisors. For policies sold by mandated brokers as well as co-insurance underwriting activities, no detailed information was available, and the same portfolio composition was therefore assumed as for the portfolio held by advisors.

### Do no significant harm

Activities that meet the technical screening criteria of (at least) one of the objectives mentioned in the EU Taxonomy Regulation must also meet the 'do no significant harm' (DNSH) criterion (i.e. do no significant harm to any of the other environmental objectives).

a.s.r. has used NACE codes registered in its insurance administration systems as the basis for identifying relevant activities in the portfolio. The activities that can be linked to DNSH after this review are excluded from the activities that are covered by the technical screening criteria.

Real Estate and Mortgages has made use of the Climate Risk Monitor to identify whether the activity does no significant harm to the environmental objective climate change adaptation. This is an in-house-developed tool, in which the FCAB drawn up by the DGBC was implemented. For more information, see section 6.2.1.1.

### Minimum safeguards

Minimum safeguards are due diligence and remedy procedures implemented by a company in order to ensure alignment with minimum standards with respect to human and social rights, as set out in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. These minimum safeguards are criteria for responsible business conduct within own operations and within the value chain and focus on the following topics:

- Human rights including workers’ rights;
- Anti-bribery and corruption;
- Taxation;
- Fair competition.

The scope of the due diligence and remedy procedures with respect to adherence to human rights, and with respect to anti-bribery and corruption, includes a.s.r.'s value chain. The scope relating to taxation and fair competition is limited to a.s.r.’s own operations. For a.s.r.'s underwriting activities, a.s.r. mainly relies on its own due diligence and remedy procedures. For assets under management, such as investments in equity and debt instruments, a.s.r. mainly relies on the reported data by those third parties on Taxonomy alignment, which implies meeting the minimum safeguards. For the assets managed by a.s.r., a.s.r. obtains adequate documentary evidence, such as EU Taxonomy disclosures by the non-financial undertakings, ascertaining that undertakings to which they are exposed to meet the minimum safeguards.

In order to meet expectations and to comply with the minimum safeguards, a.s.r. has further enhanced its due diligence and remedy procedures and will continue to do so.

## Description of compliance with the EU Taxonomy Regulation

a.s.r. complies with the current scope of the EU Taxonomy Regulation for the 2024 financial year.

a.s.r.'s product design strategy takes climate-related risks into account, which become even more predominant in the medium and long term. Climate risks are monitored regularly, including their impact on a.s.r.’s pricing policy, acceptance policy, product development, claims handling and means of communication.

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# 6.3 Social

## 6.3.1 Own workforce

For a.s.r., it is key that the own workforce remains sustainably employable, which is why considerable attention is given to personal and professional development, physical and mental health, and work-life balance. a.s.r. has great confidence in its employees and encourages everyone to take control of their own careers, development, and the way they do their work.

To attract and retain the necessary skills, a.s.r. is dedicated to offering an attractive, at market level and flexible employment package. The organisation places significant emphasis on employee development, engagement and vitality. The aim is also to improve diversity, equal treatment and inclusion.

The following table presents a comprehensive overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements. As indicated in the table below, certain staff functions hold an overarching and an oversight responsibility, extending their influence across multiple product lines. HR is such a department. The organisational scope of HR encompasses the following product lines and staff functions: P&C, Disability, Health, Pensions, Individual life and Funeral, Asset Management, Real Estate, Mortgages, Vitality, Procurement, Compliance, IT, Services and the managed services of Knab (until 31 October 2024) and TKP.

**8 - Working conditions - own workforce**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 8.1 a.s.r. leverages its scale to foster a positive and equitable work environment, driven by a strategy to cultivate fair treatment and comprehensive well-being, leading to a resilient, satisfied, and productive workforce. | 1. HR<br>2. D&S Holding<br>3. Corins<br>4. Robidus | All product lines (HR, D&S Holding, Corins, Robidus)<br>1. Code of Conduct<br>2. Collective Labour Agreement<br>3. Human rights policy<br>4. Remuneration Policy<br>5. Diversity, Equity and Inclusion Policy<br>6. Whistleblower Policy<br>7. Unwanted Behaviour Complaint Procedure<br>8. General Complaints Procedure Regulations<br>9. The Other Plan 2024-2026<br>10. Health and Safety policy plan | 1. Provide training that contribute to more diversity, equity and inclusion. a.s.r. has established a Talent Committee to promote the advancement of female talent.<br>2-4. None | 1. Employee engagement target of at least 85 percentile by 2026. Turnover rate is not lower than 10% and not higher than 16% by 2026.<br>2-4. None |
| Negative impact | 8.2 The business combination with Aegon may lead to job uncertainties, driven by organisational restructuring, leading to potential redundancies and shifts in job roles, impacting employee morale and employment stability. | 1. HR | 1. Code of Conduct<br>2. Collective Labour Agreement<br>3. Human rights policy<br>4. Remuneration Policy<br>5. Diversity, Equity and Inclusion Policy<br>6. Whistleblower Policy<br>7. Unwanted Behaviour Complaint Procedure<br>8. General Complaints Procedure Regulations<br>9. The Other Plan 2024-2026 | None | 1. Employee engagement target of at least 85 percentile by 2026. Turnover rate is not lower than 10% and not higher than 16% by 2026. |

## 9 - Other work-related rights - own workforce

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Negative impact | 9.1 As a prominent employer, a.s.r. is entrusted with considerable amounts of employee data. a.s.r. has a potential negative risk on the privacy of employees if the employee data is not handled in a secured and confidential manner. | 1. HR<br>2. D&S Holding<br>3. Corins<br>4. Robidus | All product lines (HR, D&S Holding, Corins, Robidus)<br>1. Privacy policy<br>2. Data Retention Policy<br>3. General Data Protection Regulation | None | None |

## 10 - Equal treatment and opportunities for all

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 10.1 Inclusive practices promote equal treatment and opportunities, driven by initiatives like enabling individuals with disabilities to work at a.s.r. and the participation desk, leading to a diverse and supportive work environment. | 1. HR<br>2. D&S Holding<br>3. Corins<br>4. Robidus | All product lines (HR, D&S Holding, Corins, Robidus)<br>1. Code of Conduct<br>2. Collective Labour Agreement<br>3. Human rights policy<br>4. Remuneration Policy<br>5. Diversity, Equity and Inclusion Policy<br>6. Whistleblower Policy<br>7. Unwanted Behaviour Complaint Procedure<br>8. General Complaints Procedure Regulations<br>9. The Other Plan 2024-2026 | 1. Provide training that contributes to more diversity, equality and inclusion. a.s.r. has established a Talent Committee to promote the advancement of female talent.<br>2-4. None | 1. At least 40% of top management will be women and at least 40% will be men by 2026, Participation desk target with at least 70 persons by 2026, Vacancies will be internally filled with a target of 40% by 2024, Employee engagement target of at least 85 percentile by 2026.<br>2-4. None |
| Negative impact | 10.2 Organisational practices may lead to unequal pay and limited access to opportunities, driven by unconscious bias and in transparency, leading to negative effects on workplace equality and employee well-being. | 1. HR<br>2. D&S Holding<br>3. Corins<br>4. Robidus | All product lines (HR, D&S Holding, Corins, Robidus)<br>1. Code of Conduct<br>2. Collective Labour Agreement<br>3. Human rights policy<br>4. Remuneration Policy<br>5. Diversity, Equity and Inclusion Policy<br>6. Whistleblower Policy<br>7. Unwanted Behaviour Complaint Procedure<br>8. General Complaints Procedure Regulations<br>9. The Other Plan 2024-2026 | 1. Provide training that contribute to more diversity, equity and inclusion. a.s.r. has established a Talent Committee to promote the advancement of female talent.<br>2-4. None | 1. At least 40% of top management will be women and at least 40% will be men by 2026, Participation desk target with at least 70 persons by 2026, Vacancies will be internally filled with a target of 40% by 2024, Employee engagement target of at least 85 percentile by 2026.<br>2-4. None |
| Financial opportunity | 10.3 a.s.r.'s commitment to fair working conditions attracts talented employees, driven by fair pay, training programs, and inclusive policies, leading to enhanced productivity, employee retention, and innovation. | 1. HR<br>2. D&S Holding<br>3. Corins<br>4. Robidus | All product lines (HR, D&S Holding, Corins, Robidus)<br>1. Code of Conduct<br>2. Collective Labour Agreement<br>3. Human rights policy<br>4. Remuneration Policy<br>5. Diversity, Equity and Inclusion Policy<br>6. Whistleblower Policy<br>7. Unwanted Behaviour Complaint Procedure<br>8. General Complaints Procedure Regulations<br>9. The Other Plan 2024-2026 | None | 1. At least 40% of top management will be women and at least 40% will be men by 2026, Participation desk target with at least 70 persons by 2026, Vacancies will be internally filled with a target of 40% by 2024, Employee engagement target of at least 85 percentile by 2026.<br>2-4. None |

## 6.3.1.1 Managing impacts, risks, and opportunities

### Interests and views of stakeholders

a.s.r.'s approach to determining its material impacts, risks and opportunities is described in sections 6.1.4.1, 6.1.4.2 and 6.1.4.3.

a.s.r. places a strong emphasis on the sustainable employability and well-being of its workforce. This is an integral part of its strategy to promote a healthy and productive work environment. Examples include offering flexible working hours, vitality programmes, and a wide range of development opportunities through the a.s.r. academy. These initiatives help a.s.r. remain an attractive employer, which is essential for attracting and retaining talent. This allows the strategy and business model to be better adapted to the needs of the workforce and the labour market.

However, the business combination with Aegon also brings risks, such as uncertainty and potential redundancies, which can affect morale and stability within the workforce. This is addressed through an active policy on sustainable employability and career development support. At the same time, a.s.r.'s commitment to fair working conditions and equal opportunities attracts talent and fosters innovation and productivity. This is woven into a.s.r.'s strategy to create an inclusive and supportive work environment.

a.s.r. ensures that all persons in its workforce who may be materially affected by a.s.r. are included in its considerations and decision-making processes. This includes:

- Employees:
  - Permanent employees: Individuals with an ongoing employment contract.
  - Temporary employees: Individuals with a fixed-term employment contract.
  - Both part-time and full-time staff.
- Non-employees:
  - Self-employed individuals: Contractors who supply labour directly to a.s.r.
  - Agency workers: Individuals provided by third-party companies primarily engaged in employment activities.

Although a.s.r. has not reported widespread or systemic negative impacts, individual incidents are addressed through internal procedures and support. Positive impacts are promoted through initiatives such as the Participation Desk, which supports people with a distance to the labour market. Uncertainty due to mergers and restructuring poses a risk, while increased productivity and innovation through an inclusive and supportive work environment offer opportunities. Within a.s.r. no specific negative impacts from environmental and sustainability transition plans were reported.

a.s.r. has developed an understanding of how people with certain characteristics, working in specific contexts, or performing certain activities may be at greater risk of harm. This understanding is used to develop policies and initiatives to mitigate these risks. Certain material risks and opportunities relate to specific groups of people, such as employees in certain age groups or employees working in specific factories or countries.

## 6.3.1.2 Policies and actions

### Policies

#### Code of Conduct 8.1 8.2 10.1 10.2 10.3

a.s.r.'s Code of Conduct guides actions and decisions, ensuring duties are fulfilled with care and integrity. It applies to all employees, including temporary and external staff, and sets standards for interactions, customer service and environmental responsibility. The code is available on the a.s.r. website.

Upon starting employment, all employees must take an oath or make a solemn affirmation demonstrating their commitment to ethical principles and compliance with the Code of Conduct.

a.s.r. is committed to upholding human rights and adhering to international conventions and guidelines. The human rights policy was updated in 2024 and has been integrated across the business, applying to all roles. a.s.r. explicitly rejects and forbids any form of human trafficking, forced or compulsory labour, and child labour. The human rights policy is in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. The company ensures that its operations and those of its business partners are free from these practices as stated in the Code of Conduct. It includes e.g. a complaints procedure for customers, human rights desk and a whistleblower scheme for reporting potential abuses or irregularities and is in line with the international standards.

*Distribution and services entities* 8.1 8.2 10.1 10.2 10.3

The distribution and services entities place great importance on integrity, responsibility, and a positive work environment. The codes of conduct form the backbone of the business operations and are designed to foster a culture of honesty, respect, and transparency. While each entity has its own unique core values and accents, they share a common foundation that underscores the commitment to ethical business practices and social responsibility.

*Compliance with Laws and Regulations*

The distribution and services entities operate within a framework of national and international laws and regulations, as well as industry codes that promote controlled and ethical business operations. Fundamental human rights, as laid out in the Universal Declaration of Human Rights, are respected and endorsed. This forms the basis of their actions and ensures that obligations are met and contributions are made to a just society.

*Respect and Safety*

A safe and respectful work environment is essential for the well-being of employees. Collaboration takes place on a respectful and equal basis, with no tolerance for unwanted behaviour such as sexual harassment, aggression, discrimination, and abuse of power. Employees are encouraged to contribute to a positive work environment and to report unwanted behaviour. This fosters a culture of openness and trust, where everyone feels valued and respected.

The distribution and services entities are dedicated to creating a work environment that is fair, inclusive and supportive, driving both organisational success and employee satisfaction.

### Collective Labour Agreement 8.1 8.2 10.1 10.2 10.3

a.s.r. has its own collective labour agreement (CLA), The Other CLA (*De Andere CAO*), which reflects '*Het verhaal van a.s.r.*' (the narrative of a.s.r.) and is the backbone of a.s.r.'s HR policy. It contains schemes and agreements on employee development and sustainable employability, on behaviour and leadership, on results, evaluation and remuneration, and on mobility and time, with much attention paid to work-life balance. This collective labour agreement also includes arrangements on vitality, encouraging employees to take responsibility for their own career and well-being. It provides support through training, development programmes, and initiatives that contribute to a healthy work-life balance. The other collective labour agreement applies to employees of a.s.r. who are under a fixed-term or permanent employment contract and have not yet reached the state pension age. This is a related policy regarding the positive and negative impact for a.s.r. on working conditions and equal treatment and opportunities for all.

The CLA:

- is recognisable for everyone and forms the basis for all types of workers at a.s.r.;
- encourages a mature working relationship;
- encourages employees' autonomy;
- increases the labour market value of employees;
- offers freedom of choice as an option, not as an obligation;
- is based on trust, not monitoring;
- contributes to a sustainable and future-proof a.s.r.;
- respects solidarity with and between employees.

The CLA has a duration of nine months, from 1 July 2024 until 31 March 2025, and will be periodically reviewed and approved by the MB.

*Work-life balance*
At a.s.r., employees have significant flexibility in determining their working hours and choosing their workplace, promoting a healthy work-life balance. This approach is part of a mature employment relationship that emphasises autonomy and responsibility. Employees are expected to manage their work schedules sensibly to ensure optimal and efficient performance, prioritising customer interests and mutual consideration.

Employees can set their own working hours within established frameworks. This flexibility allows for more effective and efficient work, better customer service and improved work-life balance. Working hours are expressed as an annual total, with the standard being 1,976 hours for full-time employees. This allows for flexibility in managing workloads throughout the year. Employees have the right to be unreachable outside agreed working hours.

Employees build up to 200 holiday hours annually, which can be taken in consultation with managers and colleagues. Special forms of leave, such as emergency care, parental and sabbatical leave, are also available to support employees' personal needs and responsibilities. Employees can work more hours during busy periods and compensate by working fewer hours during less busy times, ensuring a balanced workload and preventing overburdening.

This flexible and supportive approach to working hours aligns with a.s.r.'s commitment to employee well-being and sustainable employability, contributing to a positive and productive work environment.

In the July 2024 update of the CLA, a study agreement was made with trade unions to explore the possibility of agreeing on a lower standard annual working hours norm (currently 1,976 hours per year, averaging 38 hours per week).

- In the CLA that was reached in 2024, an addition was made regarding special forms of leave, allowing employees to object to an undesirable outcome of a constructive conversation with their supervisor regarding leave in exceptional circumstances.
- In 2024, it was agreed that workload will be periodically addressed during regular quarterly meetings with the trade unions.

*Sustainable mobility*
a.s.r. aims to be a sustainable employer, which includes reducing the GHG emissions from employee commuting. In line with this vision, the Sustainable Mobility programme was established in 2018. This platform, for green transition, meets monthly to identify initiatives that contribute to a.s.r.'s sustainability goals as an employer and to closely monitor their progress.

The Mobility Steering Group, comprising representatives from HR, Corporate Communications, Services, Real Estate, and Procurement, monitors these initiatives and ensures that new developments, both internal and regulatory, are closely followed. This group meets at least twice a year and can convene as needed. They oversee current initiatives and explore future steps.

At the meeting in June 2024, their focus was on implementing new legislation regarding work-related personal mobility. This requirement mandates organisations to be transparent about their mobility patterns. a.s.r. aims not only to comply with these regulations but also to set an example. In addition, the steering group is exploring new sustainable mobility options at various locations. With each decision and adjustment, the Mobility Steering Group contributes to a.s.r.'s ambition to be a sustainable employer.

*Training and skills development*
Aligned with a.s.r.'s principles and the guidelines of the CLA, it is important that a.s.r.'s employees can shape their careers according to their needs. Based on their personal (development) needs, employees can flexibly design their careers, for example, by taking care leave or a sabbatical. a.s.r. also offers opportunities to focus on other activities (volunteer work) or to combine different jobs (hybrid professional). a.s.r. aims to change the perception of demotion and promotion, making it more natural to take a step back or sideways (remotion). a.s.r. also considers the needs employees may have at different stages of their lives (working more or less, senior policy). Personal control and choices are central to this.

In the context of increasing automation and Artificial Intelligence (AI), and the integration of a.s.r. and Aegon, developing employee talents is crucial to ensure they remain future-proof. In today's competitive labour market, a.s.r. prioritises employee retention through comprehensive training and development programs. These initiatives enhance sustainable employability and marketability.

*Job security*
To provide a high level of job security for employees, a.s.r. implements an active role in sustainable employability. Under the name “In Motion” (*In Beweging*), employees are encouraged to enhance their employability in the job market, both within and outside a.s.r. The a.s.r. academy offers inspiration sessions and training that contribute to increasing employee agility, developing future competencies and skills, and provides the opportunity to request non-job-related training that enhances job market opportunities, both within and outside the industry.

Additionally, there is a comprehensive offering in the area of vitality, and every employee can consult with a Talent Advisor for a career trajectory. Assessments can be part of this process to gain insight into which career directions align with the individual employee's motivations and competencies. Furthermore, every employee has access to a Talent Development Plan, which encourages them to reflect on their fit with their current role, helps them map out their ambitions, and create an action plan to achieve them.

### The Other Plan 8.1 8.2 10.1 10.2 10.3

The reorganisation following the business combination with Aegon NL may lead to uncertain job security for employees due to potential redundancies and shifts in job roles or office locations. a.s.r. and Aegon have completed a legal merger, forming a single combined legal entity. This merger necessitates significant organisational restructuring.

The business combination may have implications for current employees. The consequences of the reorganisation following the business combination at a.s.r. significantly affect employee job security. As the company seeks to streamline operations and integrate systems, there may be job redundancies, which negatively impacts job stability. Additionally, employees with temporary contracts face the risk of non-renewal under the new organisational structure. This could negatively impact employee morale and loyalty.

The Other Plan is designed to mitigate the negative impact on employees and support them in finding new opportunities, both within and outside a.s.r.

### Remuneration policy 8.1 8.2 10.1 10.2 10.3

All a.s.r. employees have job-weighted salaries within defined salary scales that they progress through over time. The link between roles and salary scales is consistent throughout the organisation. The principle of the a.s.r. remuneration policy is to reward around the median of the relevant reference group.

For employees, an annual growth of 3% of the maximum of the scale is applied (provided there is upward room in the scale). For EB members, the SB has the mandate to slightly adjust this growth path upwards or downwards (growth of 0% to 6%), taking into account a.s.r.’s performance and the principles of the remuneration policy. The SB accounts for this in the annual remuneration report. In line with the remuneration policy, the remuneration of a.s.r. employees consists solely of a fixed payment. a.s.r. does not have a group-wide variable remuneration scheme. See section 5.3.2.

Periodically, an independent consultant performs a market-based comparison of the remuneration benchmark. In the July 2024 update of the CLA, a.s.r.'s salary structure was adjusted to align with the outcomes of the financial services benchmark, to adhere to a.s.r.'s policy of rewarding around the median of the relevant comparison market, and to integrate the two salary structures of Aegon and a.s.r. This revised structure also provides more salary growth opportunities for employees and better reflects the complexity of job levels. HR is in charge of the remuneration policy and coordinates its formulation and evaluation throughout the a.s.r. group.

### Diversity, Equity and Inclusion policy 8.1 8.2 10.1 10.2 10.3

a.s.r. believes that diversity makes the organisation stronger and better, and a.s.r. is committed to providing equal opportunities for everyone. a.s.r. strives for an inclusive culture where differences are recognised, valued and utilised. It is important that employees are skilled, but also different from each other, and that space is created to express these differences. Different perspectives, backgrounds, knowledge and experience contribute to achieving a.s.r.'s goals and are positively utilised in innovative, sustainable solutions for its customers.

a.s.r. aims to exclude no one and treat everyone equally. Everyone who wants to use their talents to achieve a.s.r. goals is given the opportunity to do so. a.s.r. achieves this by being aware of visible and invisible differences between people. This includes gender (expression), sexual orientation or preference, age, religious beliefs, culture, ethnicity, skin colour, and physical and mental abilities. a.s.r. also pays attention to differences in work styles, beliefs and perspectives. This is laid down in a.s.r.’s Diversity, Equity and Inclusion Policy, which is owned by HR and was revised in 2024. The policy contains the following subjects:

- Promoting diversity: Through recruitment and career progression, a.s.r. aims to create a diverse workforce that reflects society. See section 6.3.1.3 for the diversity target that has been set for the higher management on diversity. This target is one of the strategic non-financial targets as communicated during the Capital Markets Day (CMD) in June 2024. For more information, see section 2.5.2.
- Annual success measurement: a.s.r. conducts an annual culture scan by Denison. By 2026, a.s.r. aims to be among the top 15% of companies participating in the survey. In the Diversity & Inclusion module, a.s.r. aims to be in the top 25% by 2026. a.s.r. measures progress within the organisation based on four pillars:
  - Perceptions of inclusion and respect;
  - A work environment that is safe and free from discrimination;
  - Fair and equal access to opportunities;
  - Leadership that values diversity.
- Participation: By 2026, a.s.r. aims to have at least 70 people at a distance from the labour market working at a.s.r. (25.5 hours per week, approximately 45 FTE).
- Equal pay: a.s.r. ensures equal pay for equal work. To guarantee this, a.s.r. conducts an annual Gender Pay Gap analysis. Additionally, an independent external party analyses the situation every three years.

*Gender equality and equal pay*
Gender equality and equal pay are important topics within a.s.r.’s Diversity, Equity and Inclusion Policy. To monitor whether the policy is effective in practice, a.s.r. conducts an annual Gender Pay Gap analysis. The latest report, published in March 2025 and adjusting for variables such as type of work, age, and work experience, shows that men and women at a.s.r. are paid equally for equal work, resulting in an adjusted pay gap of 0%. This has remained unchanged with the integration of Aegon NL employees into the a.s.r. job structure. This performance is significantly better than the business sector in the Netherlands, where the adjusted pay gap was 6.9% in 2022, according to the most recent research by Statistics Netherlands

(*Centraal Bureau voor de Statistiek* - CBS) in December 2023. See for the definition of 'adjustments' the website of the CBS. See table S1-16 in section 6.3.1.3 for the unadjusted pay gap of a.s.r.

*Gender diversity*

At a.s.r., there is a strong commitment to ensuring gender diversity and equal pay. Through inclusive employer branding and an objective recruitment and selection process, the focus is on attracting talent. Around International Women's Day 2024, a.s.r. participated in a national billboard campaign highlighting female role models. The aim was to inspire and motivate women by sharing their personal stories.

Gender diversity is promoted through talent development. At a.s.r., everyone has the space and equal opportunities to develop themselves. Through training offerings and a focus on personal development, a.s.r. strives to create equal opportunities for all. With the Sustainable Employability budget, all employees are given the chance to develop broadly and enhance their labour market prospects.

Partnerships with organisations that emphasise the importance of women in leadership are also in place. For example, a.s.r. participates in the Talent to the Top mentoring programme, and COO/CTO Ingrid de Swart is an ambassador for the Dutch Top Woman of the Year election.

In the past year, slightly more women (51%) than men (49%) started in new positions at a.s.r. The proportion of women showing potential for advancement to management positions is also growing, identified as (upcoming) top talent.

*Culture programme*

The culture programme at a.s.r. was initiated to strengthen and unify the culture across all product lines. The primary goal is to build a cohesive and strong organisational culture that aligns with the core values and strategic objectives of a.s.r. This initiative is driven by the need to ensure that all employees understand and embody the values, which are helpfulness, forward-thinking and achieving results. The core values are essential for executing the strategy and achieving a.s.r.'s goals. The culture programme has set several actions to strengthen The story of a.s.r.

- Conduct round table discussions to analyse the product line's culture and identify sustainable improvements. The results are used as a basis for further actions.
- Create a connectors network. They identify and engage connectors to promote desired behaviour and sustainable practices. The connectors fulfil an important part of conveying core values and strengthening the culture.
- a.s.r. has also identified key behaviours that require reinforcement, including collaboration, giving and receiving feedback, empowerment and transparency, all to strengthen the story of a.s.r.

*Persons with disabilities*

a.s.r. focuses on employees' potential rather than their limitations. a.s.r. works together with employees to remove barriers and ensure optimal employability. To support individuals with a vulnerable position in the labour market, a.s.r. has established the Participation Desk. This initiative offers people who meet the criteria set by the Participation Act, the opportunity to develop skills and gain work experience through temporary assignments within the organisation. They receive intensive guidance, a tailored training programme and resilience training. The goal is to transition these temporary assignments into permanent positions within a.s.r. after two years. Through the Participation Desk and the regular recruitment policy, a.s.r. strives to fully utilise the talents of this group.

In 2023, a.s.r. maintained Stage 1 of TNO's Corporate Social Responsibility Performance ladder (*Prestatieladder Socialer Ondernemen*). This means that, on average, a.s.r. employs more people who are at a distance from the labour market than other organisations of the same size, and that a.s.r. encourages suppliers and contractors to engage in social entrepreneurship. a.s.r. achieved Stage 1 in January 2020.

### The Code of Conduct on Undesirable Behaviour 8.1 8.2 10.1 10.2 10.3

At a.s.r., great importance is placed on an inclusive and safe working environment where discrimination has no place. The Code of Conduct on Undesirable Behaviour defines discrimination as making unlawful distinctions based on religion, personal beliefs, political opinion, race, gender, nationality, sexual orientation, civil status, disability or chronic illness, age, working hours, or type of contract.

If an employee encounters undesirable behaviour, including discrimination, a.s.r. encourages them to discuss this with their manager, the manager's manager, or the HR Advisor. If this is not possible, employees can contact an external confidential advisor. These confidential advisors are independent and bound by professional secrecy. If internal steps do not lead to a resolution, employees can submit a formal complaint to the Undesirable Behaviour Complaints Committee. This committee will investigate the complaint and provide a written opinion on the validity of the complaint and possible measures.

Additionally, a.s.r. uses other tools to identify discrimination:

- Vitality scan: Every 1.5 years, employees receive an invitation from the occupational health service to participate in the Preventive Medical Examination (*Preventief Medisch Onderzoek* - PMO), known at a.s.r. as the vitality scan. One module of this questionnaire addresses undesirable behaviour.
- eMood®: Employees receive a weekly pulse check consisting of three statements about job satisfaction, vitality, and productivity. eMood® includes recurring statements related to a safe working environment, open culture, and the courage to speak up. This provides a.s.r. with a good understanding of employees' experiences and allows us to detect trend changes over time.
- Denison Culture Scan: This annual survey provides insights into the organisation's cultural dynamics and their impact on performance. a.s.r.'s scores are compared to a benchmark of over 1,200 companies worldwide. One module of this scan focuses on Diversity and Inclusion.
- Risk Inventory and Evaluation (RI&E). To ensure the safety and health of employees, it is essential for employers to identify and address risks related to safety and physical and psychosocial working conditions, including undesirable behaviour. Therefore, a Risk Inventory and Evaluation (RI&E) is conducted periodically (once every three years). The RI&E documents the risks associated with the work and whether adequate precautions have been taken to prevent harm to employees' health.
- Confidential Advisors' Report: a.s.r. employees can contact two confidential advisors (one male and one female) from the occupational health service. These advisors are independent and provide an unbiased perspective on the situation. Employees can approach the confidential advisor without informing their supervisor. Together, they assess the problem, discuss the employee's actions so far, and determine possible next steps. Annually, a.s.r. receives a summary of the findings and the number of reports to the confidential advisors, broken down by type of undesirable behaviour, including discrimination.

### Health and Safety Policy Plan 8.1

Reporting incidents is crucial for both a.s.r. and its employees. Reporting helps a.s.r. identify irregularities or errors, allowing action to be taken. It is also important because a.s.r. must report certain incidents to regulators. Managers proactively create a safe environment for reporting incidents; a.s.r. has a dedicated reporting point for this purpose.

Employees can raise their concerns through the following internal channels:

- The manager.
- HR advisor or vitality specialist.
- External confidant.
- Complaints committee for undesirable behaviour.
- Human rights reporting point.
- Integrity reporting point.
- Whistleblower policy.
- Works Council.

At a.s.r. there are two complaint procedures, namely the general complaint procedure and the unwanted behaviour complaint procedure. The procedures are documented in a policy that involves employee participation. The policies are accessible to all employees via the intranet (Sam). See section 6.4.1.3. for more information about the awareness.

*Workplace accident prevention, registration and reporting*

At a.s.r., various functions and roles are involved in the health and safety policy, including management, employees, HR, prevention officers, business support, employee participation, and the health and safety service. These functions have specific tasks and responsibilities to ensure safety and health in the workplace.

*Preventive Measures*

1. Risk Inventory and Evaluation (RI&E):
   - Periodic execution of the RI&E to identify and address risks in the areas of safety and health;
   - Developing a Plan of Action based on the RI&E, with specific measures to mitigate identified risks.
2. Preventive Medical Examination (PMO):
   - Periodic vitality scans to detect health risks early and provide recommendations for improving the health and vitality of employees.
3. Company Emergency Response (BHV):
   - Training and equipping BHV officers to provide first aid, fight fires, and conduct evacuations;
   - Annual testing of the company emergency response to ensure effectiveness.
4. Emergency Response Plan:
   - Availability of an emergency response plan for all a.s.r. locations to act adequately in emergency situations and limit damage.

*Accident Registration and Reporting*

- All workplace accidents are recorded in the accident register;
- Incidents requiring first aid are documented in an incident report;
- Serious workplace accidents (resulting in death, permanent injury, or hospitalisation) are reported immediately to the Labour Inspectorate.

*Responsibilities and Tasks*

- Managers: Responsible for implementing the health and safety policy within their department and overseeing safe and healthy working practices;
- Employees: Responsible for their own working conditions and the use of prescribed protective equipment;
- HR (vitality and absenteeism specialists): Preparing the RI&E and PMO, monitoring the implementation of the Plan of Action, and providing proactive advice on absenteeism prevention;
- Prevention Officers: Advising and collaborating with the Works Council, and monitoring the correct use of the workplace and protective equipment.

### Other workforce-related themes 8.1 8.2 10.1 10.2 10.3

*Employee engagement*

Employee engagement is measured through the annually performed culture scan. Employees are asked to fill in a questionnaire on the basis of four drivers of engagement: vision, core values, empowerment and knowledge development. The results are compared with a global benchmark of more than 1,200 large organisations that use the scan. The target for 2026 is to achieve an engagement of at least 85. This target is one of the strategic non-financial targets as communicated during the Capital Markets day in June 2024.

*Recruitment and career progression*

To provide equal opportunities for everyone, a.s.r. works as objectively as possible in its recruitment, selection, internal career progression and promotion processes.

- Inclusive job descriptions: a.s.r.'s job descriptions adhere to rules preventing age and gender discrimination. a.s.r. is also trained in writing inclusive recruitment texts;
- Objective assessments: a.s.r. uses assessments that make selection objective and suitable for a diverse range of candidates;
- Internal job postings: All vacancies are posted internally for two weeks before being published externally if no suitable internal candidate is found. External employees working for a.s.r. can also apply for a.s.r.'s internal vacancies;
- Support from the Participation Desk: To help employees from the Participation Desk transition to permanent positions, HR actively highlights suitable vacancies and informs managers about suitable candidates;
- Diverse interview panels: a.s.r. ensures a diverse composition of interview panels in the recruitment process;
- Objective interview training: Managers are offered a workshop on conducting objective interviews;
- Talent committee: A talent committee provides insight into (upcoming) top talents and succession positions. This committee monitors the development of talents and ensures they are known to senior management.

*Vitality and health check*
a.s.r. believes that it is important that workload and capacity are balanced. Prolonged imbalance can lead to complaints or even absenteeism. a.s.r. periodically offers employees the opportunity to gain insight into the stressors and energy sources that affect their work through the Vitality Scan. With these individual insights, employees can work on their health or discuss it with their manager. Through the a.s.r. academy, employees have access to a wide range of workshops and training on vitality. Additionally, employees can have an annual health check through a.s.r. Vitality to gain insight into their health.

- In the fall of 2024, a comprehensive vitality scan has been conducted for all employees of a.s.r. This scan is conducted every three years, and an interim light version monitors ongoing progress. The results of these scans lead to targeted actions to improve employee vitality.
- Based on the outcomes of the light scan in 2023, 'resilience' among employees was identified as a key area of focus, particularly in light of developments following the acquisition of Aegon. To address this, the a.s.r. academy offers workshops on resilience for employees, and a.s.r. provides training for managers on how to support resilience. Additionally, in 2024, physical health checks will be offered on-site, linked to the outcomes of previous vitality scans.
- Furthermore, weekly pulse-checks via eMood® monitor topics such as vitality and social safety, and managers are regularly reminded of training opportunities in the a.s.r. academy.
- A predictive absenteeism module, developed and set to go live in the fall of 2024, is partially based on data collected from the weekly eMood® surveys. The results of this module will be included in the management dashboard, providing real-time insights into absenteeism trends and forecasts for the next three months.
- The manager of the HR Vitality team joined the HR Management Team (MT) in 2024, ensuring that the topic of vitality is well-represented in the MT's discussions and decisions.

*Absenteeism*
In 2024, managers gained access to an interactive absenteeism dashboard developed by HR. This dashboard provides insights into historical and current absenteeism, associated costs, and uses AI to make predictions about future absenteeism. The dashboard aims to raise awareness about absenteeism and equip managers with tools to prevent manageable absenteeism. See section 3.2.3. for more information about absenteeism and see section 6.3.1.3 for the absenteeism targets that have been set.

*Vital from home*
Most employees at a.s.r. perform sedentary work. It is important that they move sufficiently during (screen) work and avoid sitting for long periods to prevent negative physical and mental effects. a.s.r. promotes a healthy movement and rest pattern through vitality software Work&Move, a.s.r. Vitality, an on-site gym, sit-stand desks and a QR Fit route around the building. Taking smart breaks is essential to staying vital throughout the workday.

As employees increasingly work from home, it is important that they also have a healthy and safe work environment at home, tailored to their personal needs. This means that the home workplace should comply with occupational health and safety regulations. a.s.r. also expects that employees continue to work on their vitality during hybrid working, taking sufficient breaks and moving regularly. Ensuring a good work-life balance is also crucial. a.s.r. shares this responsibility with its employees.

a.s.r. supports employees in various ways, including through a workplace check, an additional individual workplace assessment and a vitality check. a.s.r. also provides the necessary equipment for a home workplace on loan.

*Employee participation*
a.s.r. places great value on the involvement of its employees in the strategic goals of the organisation.

a.s.r. organises, when needed, dialogue and information sessions to inform employees about important developments and changes within the organisation. These sessions provide a platform for employees to ask questions and give feedback. Additionally, workshops and training sessions are held to enhance the knowledge and skills of employees, enabling them to better contribute to the strategic goals of the organisation.

The Central Works Council (*Centrale Ondernemingsraad* - COR) plays a crucial role in involving employees in decision-making. The COR provides, as stated in the Works Councils Act (*Wet op ondernemingsraden*), advice and consent on important decisions that affect employees, such as changes in employment conditions, reorganisations and strategic changes. Regular meetings between the COR and management ensure that the voice of the employees is heard and considered in decision-making. The COR holds consultation meetings with the Chief Executive Officer (CEO) and Chief Human Resources Officer (CHRO) every two months, and the Employee Council meets with the MB and the SB every two months. The members of the COR are exempt from work for 50% of their time. The Executive Board of the COR is operationally responsible for the COR. The Executive Board regularly reports to the COR on its operational activities.

The COR has established a subcommittee for each business line to make the work of the COR easier and more manageable, and to better organise employee representation. The members of the subcommittees always work at the respective business line and are elected by colleagues at that business line or appointed by the COR. This ensures that there is knowledge of the respective business unit. The members of the subcommittee are exempt for 10% of their time.

a.s.r. engages with the following trade unions: De Unie, CNV and FNV Finance. There are quarterly meetings with the trade unions. Additionally, a.s.r. schedules extra meetings as needed to timely agree on new CLA and social plan. See section 3.2.4 for the outcome of the latest trade union agreement and the actions.

The quarterly report on sustainable business includes information about activities related to the sustainability pillar of Sustainable Living and Climate. It provides an update on the progress of non-financial objectives such as emission reduction and other initiatives contributing to the transition to a more sustainable world. This report is shared not only with the MB but also more broadly within the organisation, including with the COR sustainability committee. The Sustainability team meets with this committee every quarter to update them on sustainable business practices within a.s.r. Through the a.s.r. academy, various training sessions are offered on sustainability in a broad sense, including vitality and inclusion. In 2024, an employee platform called Sustainable Doers was launched on the intranet, where employees can exchange sustainable ideas and set up initiatives.

a.s.r. believes that weekly employee feedback is key to continuous improvement in organisational culture, connection, and customer service. To stay attuned to how everyone is doing, a.s.r. uses the eMood® pulse-check. This short, weekly survey consists of three questions that change each week, focusing on job satisfaction, productivity, and vitality. The value of eMood® extends beyond the results; the ensuing conversations are equally important. a.s.r. tracks key performance indicators (KPIs) related to job satisfaction and vitality, allowing for timely interventions. This combination of employee feedback and data helps identify trends and guide efforts to improve workplace enjoyment and performance. Each week, the HR department provides follow-up suggestions based on the eMood® theme, focusing on personal growth and team development, such as assertiveness training, feedback workshops, and stress reduction. Based on employee feedback, HR policies are evaluated and developed. to implement improvements.

For more information about Employee participation, see section 5.6.

*Distribution and services entities*

The distribution and services entities with more than 50 employees have their own Works Council. The Works Council represents the interests of the staff within the entity.

### Data Retention Policy 9.1

As a prominent employer, a.s.r. is entrusted with considerable amounts of employee data. This data includes personal information, employment records, and other sensitive details necessary for the effective management of the workforce. a.s.r. recognises the potential negative risks to the privacy of employees if this data is not handled in a secure and confidential manner. Therefore, stringent data protection measures are implemented to safeguard employee information.

The approach to data protection is guided in the Data Retention Policy, which emphasises the importance of:

- Confidentiality: ensuring that employee data is accessible only to authorised personnel and is protected against unauthorised access and disclosure.
- Integrity: maintaining the accuracy and completeness of employee data, preventing unauthorised alterations, and ensuring that data remains reliable and trustworthy.
- Availability: ensuring that employee data is available when needed for legitimate business purposes, while also protecting it from loss or destruction.

To achieve these objectives, a.s.r. has implemented the following measures:

- All employee data is encrypted both in transit and at rest to prevent unauthorised access.
- Strict access controls are in place to ensure that only authorised personnel can access employee data. This includes role-based access and regular audits of access permissions.
- Only the minimum amount of employee data necessary for operations is collected and retained, in compliance with legal and regulatory requirements.
- Employees who work with personal data are regularly trained on data protection policies and procedures.
- A robust incident response plan is established to quickly address any data breaches or security incidents, minimizing potential harm to employees.

By adhering to these principles and measures, a.s.r. aims to protect the privacy of its employees and maintain their trust in the commitment to data security.

*General Data Protection Regulation*

a.s.r. and its distribution and services entities are committed to safeguarding the privacy of its customers, third parties and employees. Proper handling and securing of personal data contribute to a.s.r.'s good reputation. The processing of personal data at a.s.r. and the distribution and services entities falls under the General Data Protection Regulation (GDPR). This European regulation imposes strict requirements on the processing of personal data, including the necessity of a lawful basis for processing, the protection of data through appropriate technical and organisational measures, and the rights of data subjects, such as the right to access, correction and deletion of data. See section 5.5.2 or a.s.r.'s privacy statement for more information. Compliance is policy owner and the privacy policy supports the IRO of other work-related rights.

*Distribution and services entities*

The distribution and services entities operate within a framework of national and international laws and regulations, as well as industry codes that promote controlled and ethical business operations. This includes compliance with the General Data Protection Regulation (GDPR) and other relevant laws, as stated in various Data Retention policies and Privacy Policies.

*Data Security*

Robust measures are taken to ensure the security of both physical and digital data. This includes the use of secure systems, regular audits, and controlled access to ensure that only authorised personnel have access to sensitive information.

### Complaints mechanisms 8.1 8.2 10.1 10.2 10.3

*General Complaint Procedure*

If an employee feels been treated unfairly by a decision of a.s.r., they can use the General Complaint Procedure. If the employee encounters unwanted behaviour, they can file a complaint. The process is described in the Unwanted Behaviour Complaint Procedure. This policy is reviewed when environmental factors warrant it. The General Complaint procedure outlines the procedure for employees to file complaints if they believe they have been treated unfairly by a decision made by a.s.r. The General Complaints Committee (the Committee) ensures that the applicable procedures from the Collective Bargaining Agreement and other guidelines are followed correctly. The Committee reviews the reasonableness of the decision but does not re-evaluate the case substantively. Complaints that are related to termination of employment, legal proceedings, or those covered by other specific procedures are excluded. All information shared during the procedure is confidential.

The procedure and timelines that are followed after a concern is raised are stated in the policy. If there is a delay in the process, all parties involved are informed in a timely manner.

The reporting channels are as following:

- Internal: employees can report misconduct to their supervisor, HR, Compliance, or make use of the whistleblower policy. If senior management is involved, reports can be made directly to HR or Compliance.
- External: anonymous reports can be made to external bodies like the House for Whistleblowers, law enforcement or regulatory under which authorities Dutch Central Bank (*De Nederlandsche Bank* - DNB), the Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten* - AFM), Authority for Personal Data (*Autoriteit Persoonsgegevens* - AP), Authority for Consumers and Markets (*Autoriteit Consument & Markt* - ACM).

Reports are handled confidentially, and whistleblowers are protected from retaliation. If retaliation is suspected, it can be reported to a supervisor, HR or Compliance. Reports are documented, and an investigation team is formed. The team conducts a thorough investigation and communicates findings within three months. Appropriate measures are taken if the report is substantiated.

Incidents, such as data breaches or system hacks, are reported to the risk manager. The risk manager documents and assesses incidents, coordinating responses with relevant departments. Confidentiality is maintained, and regulatory reporting is done if necessary. Regular reviews and training ensure policies remain effective and aligned with legal requirements. Feedback from reports helps improve processes and create a safe environment for raising concerns.

*Unwanted Behaviour Complaint Procedure*
If contact with their manager, the manager's superior, the HR Business Partner, the vitality specialist or the confidential advisor does not lead to a solution, the employee can file a complaint with the Unwanted Behaviour Complaints Committee. The Committee includes a lawyer from Bezemer and Schubad, a representative from the Investigations department, a compliance advisor and an HR representative acting as the Committee's secretary. This policy is evaluated every three years, and earlier when required. The policy describes:

- A complaint can be filed after the Employee's attempt to resolve the issue with the (higher) manager, HR business partner, the vitality specialist or confidential advisor of the employee have failed.
- The Committee investigates the incidents mentioned in the complaint and any directly related incidents that come to light during the investigation. The Committee does not independently uncover other irregularities or investigate whether other individuals are guilty of misconduct.
- The employee may be assisted during the procedure, for example, by the confidential advisor. Any costs are the responsibility of the employee.
- Filing a complaint should not negatively affect the employee's position within a.s.r., nor that of anyone assisting the employee.
- All information shared during the procedure is confidential. The Committee informs all parties of this at the start and, if necessary, during the complaint process. The privacy of those involved is protected as much as possible.

The complaints procedure is concluded with an aftercare conversation with the complainant (and possibly the accused) and the involved supervisor. The committee evaluates each procedure and evolves the procedures when possible.

*Whistleblower Policy*
a.s.r. believes it is important for employees to report (suspected) misconduct within a.s.r. in a careful, confidential and safe manner. Therefore, a.s.r. has established a procedure: If an employee cannot or does not want to report (suspected) misconduct to their manager or via other channels (see section 6.4.1.3 'reporting incidents'), the Whistleblower Policy can be used. Every report, whether anonymous or not, is investigated. a.s.r. will not take or allow any action against anyone who reports suspicions of abuse or irregularities. A suspicion of abuse or irregularities may be reported both internally and externally.

Reports under this scheme are seen as a contribution to improving the functioning of a.s.r. and a.s.r. therefore encourages employees to make reports, so that possible abuse or irregularities can be resolved. a.s.r. will therefore not disadvantage a person reporting who has reasonable grounds to believe that the reported information is correct at the time of reporting a suspicion of an abuse (internal or external) or irregularity during and after the handling of the report. If the person reporting nevertheless has the impression that adverse effects are involved, they can always discuss this with the Compliance Manager. The person reporting a suspected abuse is protected from legal proceedings under the Dutch Whistleblower Protection Act.

*Accountability for policies*
HR is accountable for the implementation of the various workforce-related policies, including the monitoring of the effectiveness of the policies. Compliance is accountable for the implementation of the various compliance-related policies, including the monitoring of the effectiveness of the policies.

*Distribution and services entities*
*Avoiding Conflicts of Interest*
Situations that may involve a conflict of interest between business and personal matters are avoided, as stated in the various codes of conduct. Transparency regarding potential conflicts of interest is crucial, and employees are encouraged to report these to the appropriate department. This promotes honesty and integrity in business relationships and ensures that actions are always taken in the best interest of the distribution and services entities.

*Anti-Fraud Policy*
The distribution and services entities have an active policy to prevent, detect, investigate, and address fraud and unethical behaviour. A zero tolerance policy is enforced regarding fraud, meaning that strict action is taken against any form of unethical conduct. This policy protects the entities and their stakeholders from financial and reputational damage.

*Non-compliance and incidents*
The distribution and services entities are committed to integrity and transparency. They have established whistleblower policies and incident policies to ensure concerns are reported and addressed appropriately. They can also use the channels of a.s.r.

By implementing these processes, the distribution and services entities ensure negative impacts are addressed promptly, and employees have safe channels to raise concerns. The above-mentioned policies are in line with a.s.r.'s policies.

## Actions 8.1 8.2 10.1 10.2 10.3

For material IRO's with no actions set for reporting year 2024, these will be addressed and prioritised upon in the coming years as no measurable resources were available for the reporting year 2024.

Gender diversity in senior and middle management is a priority at a.s.r. To address this, the organisation has implemented the following interventions in 2024 and will continue with these in the coming years:

- Targeted training programmes: In addition to training for managers, HR professionals involved in recruitment and career advancements will also receive additional training. The goal is to equip them further with the knowledge and skills to promote the recruitment and advancement of women. The training covers inclusive communication and recognising and addressing unconscious biases. It is crucial that the diversity, equity and inclusion objective is widely supported. HR and team Sustainability oversee and report on this, but the realisation of the target lies with the entire organisation.
- Talent Committee: To promote the advancement of female talent, actions are taken at various career stages. The Talent Committee plays a crucial role in the progression to senior management. The committee provides insights into (future) top talents and succession positions at senior and higher management levels, monitors the development of these talents and ensures that they are known to senior management. The committee promotes fair opportunities and analyses female talent to encourage a more balanced leadership. Furthermore, it oversees the recruitment and selection of senior management, contributing to the achievement of target figures.
- To prevent unethical behaviour, a.s.r. implements control measures such as integrity screening for new hires and contracting parties. These measures aim to prevent physical, financial or reputational damage. a.s.r. has an internal reporting route for integrity incidents and incidents related to human rights. There is also a reporting point for reporting undesirable behaviour.

## 6.3.1.3 Targets and metrics

### Targets

As part of the sustainability strategy, a.s.r. has established seven targets. For the other material sustainability matters, no specific targets have been formulated yet. This will be addressed in the coming years. a.s.r. remains committed to transparency and continuous improvement in line with the guidelines of CSRD. The monitoring of the effectiveness of the measures takes place through the current management reports and will be further optimised going forward.

**S1-5 Diversity quota**

| As of 31 December | Unit of measure | Base year | Baseline value | 2024 | Target 2026 |
|---|---|---|---|---|---|
| Diversity quota | in % | 2024 | 32% | 32% | 40% |

**Additional disclosure on target S1-5 Diversity quota**

| | |
|---|---|
| *Relationship to policy objectives* | Diversity, Equity & Inclusion (D, E&I) policy |
| IRO's addressed by the target | 10.1 10.2 10.3 |
| *Scope of the target* | Senior, higher and team management of a.s.r. Not in scope are redundant employees, incapacitated employees, employees employed through the Participation desk, self-employed workers and other external staff. Also not in scope are Knab, Corins, D&S Holding and Robidus. |
| *Methodologies and significant assumptions* | The total number of employees (senior, higher and team management) and the gender of the employees.<br><br>*See section 6.5.2.3.* |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | a.s.r. is currently working towards realising a minimum of 40% women and 40% men in all senior, higher and team management positions at the end of 2026. In 2024 a.s.r. reached 32% women in top management in comparison to 29% over 2023. Various actions have been implemented and will continue to be implemented to help us towards reaching our target for 2026. |

This target is one of the strategic non-financial targets as communicated during the CMD in June 2024. Through recruitment and career progression, a.s.r. aims to create a diverse workforce that reflects society. By 2026, the ambition is as follows:

- At least 40% of top management, including senior, higher, and team management, will be women and at least 40% will be men;
- At least 40% of a.s.r.'s MB will be women and at least 40% will be men;
- At least 40% of a.s.r.'s SB will be women and at least 40% will be men.

**S1-5 Denison Culture scan**

| | Unit of measure | Base year | Baseline value | 2024 | Target 2026 |
|---|---|---|---|---|---|
| Denison Culture Scan | in percentile | 2024 | 73 | 73 | 85 |

### Additional disclosure on target S1-5 Denison Culture scan

| | |
|---|---|
| *Relationship to policy objectives* | D, E&I policy |
| IRO's addressed by the target | 8.1 8.2 10.1 10.2 10.3 |
| *Scope of the target* | The Denison Culture Scan is distributed to all employees of a.s.r., including external staff and interns. Not in scope are Knab, Corins, D&S Holding and Robidus. |
| *Methodologies and significant assumptions* | On the basis of four drivers of engagement: vision, core values, empowerment and knowledge development, the engagement score is measured. The results are compared with a global benchmark of more than 1,200 large organisations that use the Denison scan.<br><br>See *section 6.5.2.3.* |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | Because of the business combination with Aegon NL, the engagement score has decreased in 2024. This decrease was expected. Therefore, the target was reset in 2024 to 75 (2023: 85). In line with the proceeding integration with Aegon NL, a.s.r. will gradually increase the target to 80 in 2025 and 85 in 2026. |

Employee engagement is measured through the annually performed culture scan (Denison). The target for 2026 is to achieve a satisfaction of at least 85. This target is one of the strategic non-financial targets as communicated during the CMD in June 2024.

### S1-5 Participation desk

| As of 31 December | Unit of measure | Base year | Baseline value | 2024 | Target 2026 |
|---|---|---|---|---|---|
| Participation desk | in numbers | 2024 | 71 | 71 | 70 |

### Additional disclosure on target S1-5 Participation desk

| | |
|---|---|
| *Relationship to policy objectives* | D, E&I policy |
| IRO's addressed by the target | 10.1 10.2 10.3 |
| *Scope of the target* | a.s.r. employees. Not in scope are redundant employees, incapacitated employees, self-employed workers and other external staff. Also not in scope are Knab, Corins, D&S Holding and Robidus. |
| *Methodologies and significant assumptions* | Total number of employees employed through the Participation desk.<br>See section 6.5.2.3. |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | By 2026, a.s.r. aims to employ at least 70 people at a distance from the labour market. This target serves as a minimum threshold. In 2024, a.s.r. successfully met this target. For more information on the Participation Desk, see section 6.3.1.2. |

To support individuals with a vulnerable position in the labour market, a.s.r. has established the Participation Desk.

## S1-5 Internally filled vacancies

| | Unit of measure | Base year | Baseline value | 2024 | Target 2024 |
|---|---|---|---|---|---|
| Internally filled vacancies | in % | 2024 | 51% | 51% | 40% |

## Additional disclosure on target S1-5 Internally filled vacancies

| | |
|---|---|
| *Relationship to policy objectives* | D, E&I policy |
| IRO's addressed by the target | 10.1 10.2 10.3 |
| *Scope of the target* | a.s.r. employees. Not in scope are redundant employees, incapacitated employees, employees employed through the Participation desk, self-employed workers and other external staff. Also not in scope are Knab, Corins, D&S Holding and Robidus. |
| *Methodologies and significant assumptions* | The number of vacancies filled by internal a.s.r. employees divided by the total number of filled vacancies in the reporting year.<br><br>*See section 6.5.2.3.* |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | a.s.r. aims to fill at least 40% of all vacancies internally to retain knowledge and culture within the company. This target serves as a minimum threshold. |

## S1-5 Employee turnover

| | Unit of measure | Base year | Baseline value | 2024 | Target 2026 |
|---|---|---|---|---|---|
| Employee turnover | in % | 2024 | 12% | 12% | 10 - 16 |

## Additional disclosure on target S1-5 Employee turnover

| | |
|---|---|
| *Relationship to policy objectives* | The Other CLA (*De Andere CAO*) |
| IRO's addressed by the target | 8.1 8.2 |
| *Scope of the target* | a.s.r. employees including redundant employees and employees employed through the Participation desk. Not in scope are incapacitated employees, self-employed workers and other external staff. Not in scope are Corins, D&S Holding and Robidus. Knab was included in the employee turnover figures until 31 October 2024. |
| *Methodologies and significant assumptions* | The total numbers of employees who left a.s.r. in the reporting year as a percentage of the total a.s.r. workforce.<br><br>*See section 6.5.2.3.* |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | Employee turnover was higher than usual due to the integration with Aegon NL. As a result of the relocation from Den Haag to Utrecht, part of the workforce chose to opt for Aegon's social plan. Participation in the early retirement scheme (RVU) in 2024 continued to increase. 673 new employees were hired. |

To achieve synergy benefits from the business combination of Aegon NL and a.s.r. the desired turnover rate is not lower than 10% and not higher than 16% to ensure business continuity. At a.s.r., employee development and internal mobility are prioritised to ensure ample growth opportunities. Internally filled vacancies help retain talent, reduce hiring costs, and maintain cultural fit. Employees can access vacancies for a.s.r. on the internal jobboard. This approach boosts morale, retains institutional knowledge, supports succession planning, and strengthens organisational resilience.

## S1-5 Absenteeism

| | Unit of measure | Base year | Baseline value | 2024 | Target 2024 |
|---|---|---|---|---|---|
| Absenteeism rate | in % | 2024 | 5% | 4.5% | 4% |
| Nil absenteeism | in % | 2024 | 56% | 56.2% | 60% |

## Additional disclosure on target S1-5 Absenteeism

| | |
|---|---|
| *Relationship to policy objectives* | Health and safety policy |
| IRO's addressed by the target | 8.1 |
| *Scope of the target* | a.s.r. employees including redundant employees and employees employed through the Participation desk. Not in scope are self-employed workers and other external staff. Also not in scope are Corins, D&S Holding and Robidus. Knab was included in the absenteeism figures until October 31st 2024. |
| *Methodologies and significant assumptions* | Derived from a.s.r. HR system. The Absenteeism rate is the percentage of working hours that employees called in sick compared to the total amount of workable hours according to contract in the reporting period. Maternity leave and pregnancy-related sickness are excluded. Nil absenteeism is the proportion (in %) of employees who have not reported sick during the reporting period.<br><br>*See section 6.5.2.3.* |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | In 2024 the absenteeism rate has increased to 4.5% (2023: 4.1%). For the former Aegon NL employees, the absence rate was higher than for the rest of a.s.r. The rising trend is a logical consequence of a company in transition. |

## Metrics

### Characteristics of the undertaking's employees

## S1-6 Characteristics of the undertaking's employees (Headcount)

| As of 31 December | Unit of measure | 2024 | | | | |
|---|---|---|---|---|---|---|
| | | Female | Male | Other | Not reported | Total |
| **Total number of employees** | **in numbers** | **3,714** | **4,284** | **0** | **0** | **7,998** |
| Permanent employees | in numbers | 3,281 | 3,900 | 0 | 0 | 7,181 |
| Temporary employees | in numbers | 433 | 384 | 0 | 0 | 817 |
| Non-guaranteed hours employees | in numbers | 0 | 0 | 0 | 0 | 0 |
| | | | | | | |
| Full-time employees | in numbers | 1,174 | 3,120 | 0 | 0 | 4,294 |
| Part-time employees | in numbers | 2,540 | 1,164 | 0 | 0 | 3,704 |

See section 6.5.4.1 for CSRD reporting policies.

## S1-6 Characteristics of the undertaking's employees (Turnover)

| | Unit of measure | 2024 |
|---|---|---|
| Employee turnover | in numbers | 1076 |
| Employee turnover | in % | 12% |

See section 6.5.4.1 for CSRD reporting policies.

### Collective bargaining coverage and social dialogue

## S1-8 Collective bargaining coverage and social dialogue (Percentages)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Collective bargaining agreements | in % | 79% |
| Social dialogue | in % | 100% |

## S1-8 Collective bargaining coverage and social dialogue (Countries)

| As of 31 December | Collective Bargaining Coverage | | Social dialogue |
|---|---|---|---|
| Coverage rate | Employees - EEA | Employees - Non-EEA | Workplace representation (EEA only) |
| 0-19% | | | |
| 20-39% | | | |
| 40-59% | | | |
| 60-79% | Netherlands | | |
| 80-100% | | | Netherlands |

See section 6.5.4.2 for CSRD reporting policies.

79% of a.s.r.'s workforce is covered by CLAs. The workforce of D&S Holding and Robidus is not covered by the CLA but is covered by social dialogue. Corins' workforce is not covered by the CLA or social dialogue of a.s.r.

### Diversity metrics

## S1-9 Diversity metrics (Gender)

| As of 31 December | 2024 | |
|---|---|---|
| | in headcount | in % |
| **Supervisory Board** | | |
| Male | 4 | 57% |
| Female | 3 | 43% |
| Other | 0 | 0% |
| Not reported | 0 | 0% |
| **Total** | **7** | **100%** |
| | | |
| **Management Board** | | |
| Male | 3 | 50% |
| Female | 3 | 50% |
| Other | 0 | 0% |
| Not reported | 0 | 0% |
| **Total** | **6** | **100%** |
| | | |
| **Management** | | |
| Male | 298 | 69% |
| Female | 137 | 31% |
| Other | 0 | 0% |
| Not reported | 0 | 0% |
| **Total** | **435** | **100%** |

## S1-9 Diversity metrics (Age group)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Under 30 years old | in headcount | 875 |
| 30-50 years old | in headcount | 4,313 |
| Over 50 years old | in headcount | 2,810 |
| **Total employees** | **in headcount** | **7,998** |

See section 6.5.4.3 for CSRD reporting policies.

### Adequate wages

At a.s.r., all employees earn an adequate wage. This is ensured through a.s.r.'s remuneration policy, which aligns with the median level of the reference group.

See section 6.5.4.4 for CSRD reporting policies.

**Social protection**
a.s.r. is committed to ensuring the well-being and social protection of its workforce. a.s.r.'s policies are designed to providing comprehensive support, fostering a healthy work-life balance and promoting sustainable employability. a.s.r. is committed to social insurance, which is mandatory and covers all employees.

## S1-12 Persons with disabilities (Percentage)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Male | in % | 1.5% |
| Female | in % | 2.7% |
| Other | in % | 0.0% |
| Not reported | in % | 0.0% |
| **Total** | **in %** | **2.0%** |

See section 6.5.4.6 for CSRD reporting policies.

## S1-13 Participation in annual performance and career development reviews (Coverage)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Male | in % | 90% |
| Female | in % | 89% |
| Other | in % | 0% |
| Not reported | in % | 0% |
| **Total** | **in %** | **90%** |

See section 6.5.4.7 for CSRD reporting policies.

## S1-13 Training and skills development metrics (Average hours)

| | Unit of measure | 2024 |
|---|---|---|
| Male | in numbers | 5.0 |
| Female | in numbers | 5.9 |
| Other | in numbers | 0.0 |
| Not reported | in numbers | 0.0 |
| **Total** | **in numbers** | **5.4** |

See section 6.5.4.7 for CSRD reporting policies.

## S1-14 Health and safety metrics (Coverage)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Own workforce covered by health and safety management systems | in % | 100% |

See section 6.5.4.8 for CSRD reporting policies.

## S1-14 Health and safety metrics (Number of accidents)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Recordable work-related accidents | in numbers | 0 |
| Recordable work-related accidents | rate[1] | 0 |

See section 6.5.4.8 for CSRD reporting policies.

## S1-14 Health and safety metrics (Number of fatalities)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Fatalities in own workforce as a result of work-related injuries and work-related ill health | in numbers | 0 |
| Fatalities of other workers working on undertaking's sites as result of work-related injuries and work-related ill health | in numbers | 0 |

See section 6.5.4.8 for CSRD reporting policies.

## S1-15 Work-life balance metrics (Percentage)

| | Unit of measure | 2024 |
|---|---|---|
| Employees entitled to take family-related leave | in % | 100.0% |
| | | |
| **Entitled employees that took family-related leave** | | |
| Male | in % | 4.2% |
| Female | in % | 7.5% |
| Other | in % | 0.0% |
| Not reported | in % | 0.0% |
| **Total** | **in %** | **5.8%** |

See section 6.5.4.9 for CSRD reporting policies.

1 Rate: number of cases per one million hours worked.

a.s.r. understands the importance of a healthy work-life balance. Therefore, all employees are entitled to take family-related leave. The higher percentage of female employees who took family-related leave reflects the general division of family-related leave in the Netherlands.

### Remuneration metrics

#### S1-16 Remuneration metrics (pay gap and total remuneration)

| As of 31 December | Unit of measure | 2024 |
|---|---|---|
| Gender pay gap[1] | in % | 19.0% |
| Annual total remuneration ratio | ratio | 18.2 |

The gender pay gap shows the difference in total compensation between genders. The pay gap disclosed under S1-16 is absolute and is not adjusted for compensation-related factors, such as seniority and performance. The unadjusted gender pay gap in scope of HR, excluding Corins, D&S Holding and Robidus, amounts to 18.0%.

See section 6.3.1.2 for more information on gender equality, equal pay and the adjusted gender pay gap and section 6.5.4.10 for CSRD reporting policies on the unadjusted gender pay gap.

For more information on how the remuneration ratio was derived, see section 6.5.4.10.

### Incidents, complaints and severe human rights impacts

#### S1-17 Incidents, complaints and severe human rights impacts (Incidents)

| | Unit of measure | 2024 |
|---|---|---|
| Incidents of discrimination including harassment | in numbers | 0 |
| Complaints filed through channels to raise concerns | in numbers | 5 |
| Total amount of fines, penalties and compensation for damages as a result of incidents and complaints | in numbers | 0 |

Four complaints have been registered against a.s.r. The estimation model attributed one complaint to D&S Holding. The four complaints filed against a.s.r. through the designated channels are handled as described in section 6.3.1.2.

See section 6.5.4.11 for CSRD reporting policies.

1 Unadjusted.

#### S1-17 Incidents, complaints and severe human rights impacts (Human rights impacts)

| | Unit of measure | 2024 |
|---|---|---|
| Incidents of severe human rights | in numbers | 0 |
| Incidents of severe human rights that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises | in numbers | 0 |
| Amount of material fines, penalties and compensation for severe human rights issues and incidents connected to own workforce | in numbers | 0 |

See section 6.5.4.11 for CSRD reporting policies.

## 6.3.2 Workers in the value chain

This section outlines a.s.r.'s commitment to addressing the material impacts, risks, and opportunities associated with workers in its value chain, focusing on key areas such as Asset Management and Real Estate. Moreover, the material impacts for a.s.r. health basic and a.s.r. health supplementary are not material for a.s.r. group and are disclosed separately in subsection 6.3.2.4. For more information, see section 6.1.4.5.

For Asset Management and Real Estate, the primary concerns are forced labour and child labour. These issues are prevalent in high-risk countries where labour laws may be less stringent, leading to significant negative impacts on workers' rights and well-being. a.s.r. is dedicated to implementing robust policies and actions to mitigate these risks, ensuring that a.s.r.'s investments do not contribute to such practices.

a.s.r.'s approach to managing these impacts involves regular human rights risk assessments, stakeholder engagements, and the implementation of comprehensive policies aligned with international standards such as the UN Guiding Principles on Business and Human Rights. By fostering positive changes and addressing systemic issues, a.s.r. strives to create a more equitable and sustainable value chain for all value chain workers involved.

The following table presents a comprehensive overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

**11 - Other work-related rights - workers in the value chain**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Negative impact | 11.1 Investments in high-risk countries may be linked to forced labour and/or child labour practices, driven by less stringent labour laws, leading to serious negative impacts on workers' well-being and employment rights. | 1. Asset Management<br>2. Real Estate | 1. Policy on Responsible Investments, Human rights policy.<br>2. Human rights policy | 1. Asset Management conducts human rights risk assessments frequently, Asset Management screens bi-annually its investment portfolio.<br>2. Real Estate conducts human rights risk assessments every three years. | None |

### 6.3.2.1 Managing impacts, risks, and opportunities

#### Interests and views of stakeholders

a.s.r.'s approach to determining its material impacts, risks and opportunities is described in section 6.1.4.

Asset Management and Real Estate is committed to include all value chain workers likely to be materially impacted by its operations, products, services, and business relationships in its disclosures. This includes workers on-site who are not part of the own workforce, those in the upstream and downstream value chains, and particularly vulnerable groups. The material impacts for Asset Management and Real Estate are forced labour and child labour.

a.s.r. identifies significant risks of forced labour and child labour in (value chains) of portfolio companies, particularly in specific geographic areas and sectors. a.s.r. distinguishes between systemic issues and individual incidents.

Positive impacts include initiatives like updated purchasing practices and capacity-building for value chain workers, aimed at job creation and skill enhancement.

Regular human rights risk assessments helps a.s.r. to manage material risks and opportunities related to value chain workers. Engagement with companies in high-risk sectors aims to drive positive changes, particularly in consumer goods, finance, and IT.

a.s.r. understands that workers with specific characteristics or in certain contexts may be at greater risk of harm. This understanding informs a.s.r.'s risk management and engagement strategies.

### 6.3.2.2 Policies and actions

#### Policies

a.s.r. endorses and respects the basic principles of human rights, recognising that they are universal, interdependent and indivisible. a.s.r. adheres to international standards such as the International Bill of Human Rights and the UN Guiding Principles on Business and Human Rights (UNGPs), which apply to all companies, including investors. Human rights are very important for a.s.r. and can be found in the Sustainability Strategy and the Policy on Responsible Investments which oversees all assets under the management of Asset Management. Concerns about negative impacts on human rights caused by activities of a.s.r. or its business partners can be directed to Human Rights Reporting Point. As outlined in the Human Rights Policy, a.s.r. will take responsibility and provide adequate compensation in the event of human rights violations resulting from its activities or within its value chain.

**Policy on Responsible Investments** 11.1

The Policy on Responsible Investments outlines the vision of Asset Management regarding responsible investing. Asset Management aims to create positive impact through investments that contribute to a better world. This includes minimising negative effects and maximising positive effects on environmental, social, and governance (ESG) issues. Asset Management recognises that human rights violations by companies are often a result of systemic issues that cannot be resolved immediately. Asset Management is committed to adhering to the six human rights due diligence steps in line with the OECD Guidelines for Multinational Enterprises and the UNGPs. Similar expectations are held for companies in the investment portfolio as for business partners.

The governance structure of the Policy on Responsible Investments is detailed, including the roles of the MB, the ESG Committee, and other relevant bodies. The MB is ultimately responsible for the development and implementation of the policy, while the ESG Committee oversees compliance and progress on ESG objectives. The Policy on Responsible Investments emphasises the importance of transparency and periodic reporting on the progress and results of the sustainability policy. Asset Management regularly publishes reports and updates to inform stakeholders about the impact of its investments.

Asset Management frequently conducts an analysis of human rights risks within its investment portfolio. Asset Management bases its methodology on guidance from the UN Principles for Responsible Investment and uses information from ESG data providers and additional sources such as the OECD Watch National Contact Points database and the Business & Human Rights Resource Centre allegations and litigations database. From these data sources, information on company performance and controversies related to human rights is extracted. The analysis includes only companies that are part of the Asset Management investment portfolio. To validate the results of the analysis, Asset Management frequently meets with specialists and stakeholders.

### Human Rights Policy 11.1

a.s.r. respects and protects human rights in its various roles:

- Investor: a.s.r. screens investments for human rights compliance and excludes companies that violate these rights.
- Provider of Insurance and Financial Products: a.s.r. safeguards customer privacy, promotes equal treatment, and avoids discrimination in its products and services.
- Purchaser: a.s.r. expects suppliers to respect and endorse human rights, and requires them to sign the Code of Conduct.
- Employer: a.s.r. strives for an inclusive culture and a safe working environment, and regularly trains employees on the Code of Conduct.

The Human Rights Policy of a.s.r. emphasises the commitment to respecting and protecting human rights. This policy is integrated into a.s.r.'s strategy and core activities, aiming to make a positive contribution to the sustainability of society and to minimise negative impacts. The governance structure of a.s.r. includes various roles and responsibilities, such as the MB, which approves and annually evaluates the human rights policy. Additionally, there are specific teams and committees that oversee compliance and progress of the policy. The policy emphasises the importance of transparency and accountability. a.s.r. regularly reports on the impact of its activities on human rights and the results of its policy in Annual Reports, engagement reports, and other publications.

Real Estate is active in the real estate market as an investor on behalf of institutional investors and as an investment manager. Real Estate is invested – directly and indirectly – in real estate and infrastructure assets whilst managing these assets and portfolios on behalf of its institutional client base. For its clients, Real Estate acquires, sells, redevelops and manages property portfolios on a discretionary basis. Real Estate invests on a separate account basis for external clients, including other a.s.r. entities. In doing so, it acknowledges the risk of being associated with negative impacts on human rights, including value chain workers. As part of a.s.r., Real Estate is committed to the a.s.r. human rights policy. The human rights policy is an integral part of Real Estate's ESG vision, which emphasises the well-being and social equality of people in its value chain.

### Engaging with value chain workers 11.1

*Asset Management*

In Asset Management's most recent human rights risk analysis, three sectors with significant risks were identified:

- Consumer discretionary and staples
- Finance
- IT.

Within these three sectors, Asset Management identified the issues that are most occurring in the portfolio by analysing controversy reports, supplemented with other qualitative data sources. In the analysis, Asset Management took into consideration the potential likelihood and severity (based on scope, scale and irremediability).

Asset Management does not directly engage with value chain workers. Asset Management engages with representatives of workers, such as trade unions and NGOs, and with investee companies themselves. Asset Management's decisions on which investee companies to engage with are prompted by the human rights risk analysis and controversies that are reported as a result of the biannual screening.

*Real Estate*

Real Estate primarily invests (directly) in the Dutch real estate market and has limited exposure (and therefore limited influence) to real estate investments in high-risk countries. As such, Real Estate does not engage with value chain workers about impacts.

### Raising concerns

*General*

a.s.r. is committed to maintaining an open and ethical culture where concerns about potential misconduct or irregularities can be reported safely and confidentially. The whistleblower policy is designed to facilitate the reporting of such concerns, ensuring they are addressed appropriately to uphold the integrity and reputation of the organisation. Importantly, this policy is not only available to current and former employees but also extends to third parties, allowing them to report any suspected wrongdoing. For more information about the whistleblower policy, see section 6.3.1.2 and 6.4.1.3.

*Asset Management*

Asset Management avoids investing in companies that do not meet a.s.r.'s minimum standards or are involved in activities that cause significant harm to people. In connection to this, Asset Management defined a number of exclusion rules relating to controversial behaviour on which its investments are screened twice per year. Examples of these exclusion rules are companies with severe (and repeated) controversies relating to human and labour rights, these include forced labour and child labour. All exclusion rules and screening criteria can be found in the Policy on Responsible Investments and detailed screening criteria. Asset Management may decide to engage with a company prior to deciding to exclude it from its investable universe.

In the Policy on Responsible Investments, Asset Management explicitly mentions human right risks and describes this as a priority area for its engagement activities. Asset Management believes that constructive and collaborative engagement is the most effective way to drive positive change in the companies, but Asset Management is also prepared to take stronger action if necessary. Of which excluding companies from the investable universe and divesting a.s.r.'s holding is the strongest. For the complete engagement escalation framework, see the section on 'Actions' below.

In general, asset managers with diverse portfolios have limited remediation possibilities. Workers at investee companies, including value chain workers, could in theory raise their concerns via a.s.r.'s Human Rights Reporting Point, but the likelihood of this occurring in practice is very low, and it has not occurred to date. On the other hand, a.s.r. engages with companies on human rights topics such as forced and child labour, and in these engagements, a.s.r. often urges investee companies to put in place channels to raise concerns and processes to remediate negative impact.

*Real Estate*

Real Estate aims to prevent negative impacts on value chain workers by operating a due diligence process in line with the OECD Guidelines for Multinational Enterprises. A due diligence process is, among other things, operated to identify risks relating to human rights including labour rights, with a view to ceasing, preventing or mitigating those risks. Part of this process involves periodically conducting a human rights risk analysis to assess potential impact of human rights risks. Following the most recent analysis, it has been assessed that forced labour and child labour are themes (amongst others) that could potentially have a significant negative impact on the value chain.

For example, in order to mitigate the risk of involvement in forced labour and child labour within operations, various processes and activities have been implemented, including:

- Screening relations in advance, in collaboration with CDD Desk. Relations involved in human rights violations are generally excluded.
- Enforcing the Code of Conduct with certain material suppliers as part of the contract documents. The code mandates that human rights, labour rights, environmental standards, and anti-bribery and corruption standards are followed.
- Establishing purchasing conditions that obligate suppliers to comply with all legal regulations, including those related to employee rights and working conditions.
- Setting additional ESG-related conditions in contracts and maintaining a risk-based approach. When potential risks are considered to be higher, such as when investing in solar parks, more extensive due diligence is conducted.

Value chain workers are able to raise concerns by using the Human Rights Reporting Points described earlier under Policies – General. Where processes to prevent or mitigate are not adequate to remediate the negative impacts, Real Estate considers how to provide for or cooperate in remediation on a case-by-case basis taking into consideration the relation of the Real Estate activities and the negative impact.

**Actions**

According to the human rights policy, a human rights risk assessment must be conducted at least once every three years. This assessment may prompt adjustments to the policy. Policy adjustments may also occur as a result of incidents. Team Sustainability is responsible for the Human Rights Policy and for the periodic human right risk assessment.

**Asset Management** 11.1

Asset Management also considers its ability to effect change and the leverage that Asset Management holds with companies in these sectors. Engagement on forced labour, particularly in the IT sector, was prioritised due to its prevalence in the value chains of electronics manufacturers, often located in high-risk countries such as China and Malaysia. The complexity of these value chains poses challenges to transparency and standard enforcement.

Where Asset Management encounters insufficient progress with its engagements, the organisation can make use of a number of tools that collectively form the engagement escalation framework. In order of increasing strength, these tools include:

- Voting in support of a.s.r.'s engagements;
- Pre-disclosing a.s.r.'s voting intentions;
- (Co-)filing shareholder resolutions;
- Divesting a.s.r.'s holdings.

There is consensus among investors that it is difficult to measure the effectiveness of engagement. Although engagements sometimes lead to positive outcomes, it is difficult to prove the one-to-one relationship between the engagement efforts and the changes at the companies engaged. Therefore, a.s.r. is unable to quantify the effectiveness of actions taken.

With regard to the investment portfolio, during its bi-annual screening process Asset Management frequently screens its investment portfolio for very severe and repeated incidents, including human rights violations such as forced and child labour. Screening outcomes are followed up by mitigation measures as described in Asset Management's Policy on Responsible Investments. To inform this screening process, Asset Management uses data from external data suppliers.

Specific datapoints on severe forced and child labour cases are currently not available at the external data suppliers, and as a consequence, Asset Management cannot currently precisely determine the number of severe incidents of child and forced labour at investee companies. Data quality and availability is however expected to improve in the coming years. Asset Management will continue to engage with data providers on the availability and the quality of human rights related data, including data on forced labour and child labour.

**Real Estate** 11.1

Real Estate is committed to prevent human rights violations and excludes relations that are involved in human rights violations where possible. If human rights violations are detected, Real Estate considers the violation on a case-by-case basis and generally aims to discontinue the relation when possible. However, Real Estate recognises that ending the relationship with the party involved is not always the best solution to mitigate the impact of the violation.

During 2024, no human rights violations have been reported to Real Estate. There is consensus in the market that it is difficult to measure the effectiveness of preventive and/or mitigating measures taken. Therefore, Real Estate is unable to quantify the effectiveness of actions taken.

### 6.3.2.3 Targets and metrics

#### Targets

**Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

As it is difficult to prove the one-to-one relationship between the measures taken by a.s.r., there is currently no target related to forced labour and/or child labour and no metrics will be disclosed. The monitoring of the effectiveness of the measures takes place through the current management reports and will be further optimised going forward.

## 6.3.2.4 Working conditions

Working conditions is not deemed material for a.s.r. but is material for Health. For more information see section 6.1.2 and 6.1.4.5. Healthcare workers often face high work pressure, irregular shifts, and physically and mentally demanding tasks, which can lead to health issues and increased absenteeism. Health is committed to improving these conditions through various initiatives aimed at enhancing job satisfaction and reducing the administrative burden on healthcare providers.

The following table presents a comprehensive overview of the material impact along with the corresponding policies, actions and targets.

**Working conditions - workers in the value chain**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Negative impact | Health insurance offerings (facilitating access to healthcare services) indirectly contribute to high work pressure, irregular shifts, inadequate wages and physically and mentally demanding tasks for healthcare workers, leading to potential health issues and sick leave among healthcare workers. | Health | Not applicable | Not applicable | Not applicable |

### Policies

#### Procurement Policy

In the healthcare sector, joint agreements are in place to mitigate the negative impact on healthcare workers. In the Integrated Care Agreement (*Integraal Zorgakkoord* - IZA), parties have made agreements regarding the use of non-salaried staff. These agreements are aimed at promoting good employment practices and making salaried employment more attractive, also aimed at reducing the workload for salaried staff.

Health insurers strive to reduce administrative burden and labour-saving care through digitalisation and innovation. Additionally, through the Future-Proof Labour Market Care & Welfare (*Toekomstbestendige Arbeidsmarkt Zorg & Welzijn* - TAZ) programme, health insurers aim to increase job satisfaction and reduce staff turnover, enhance (sustainable) employability, reduce absenteeism and make salaried employment more attractive. The implementation of the IZA and the TAZ programme is a shared responsibility of several system parties as well as healthcare providers, insurers and care offices. The third party agreements, TAZ and IZA were put together in consultation with all parties in the field under the direction of the Ministry of Health, Welfare and Sport, taking into account the interests of employees working for Dutch healthcare providers. Both agreements are publicly available via the government's internet pages.

The IZA agreements are incorporated into the procurement policies of Health. As a result, employees of contracted healthcare providers are in scope of these policies. The management team of Health is accountable for the implementation of the policy.

#### Engaging with value chain workers

By offering health insurance, a.s.r. provides its customers with access to healthcare services. However, facilitating the use of these services indirectly impacts the health and safety of healthcare workers. These workers face high work pressure (working time), irregular shifts (work-life balance), inadequate wages, and physically and mentally demanding tasks. This can lead to health issues, causing the workers to eventually take sick leave.

As a result, staff shortages at healthcare providers can reduce access to healthcare services, potentially preventing all insured individuals from receiving the necessary care. This affects access to care see section 6.3.3.2.

Health insurers must balance two interests: keeping healthcare affordable to ensure access to care and striving for good working conditions for employees of care providers. These interests can conflict when improving working conditions leads to higher costs. However, many causes of work pressure or absenteeism do not have a financial origin (i.e. irregular shifts or mentally demanding tasks). These considerations are made at the administrative level and in consultation with the Ministry of Health, Welfare and Sport, the Dutch Healthcare Authority, professional associations, trade associations and trade unions.

### Actions

To reduce administrative pressure, health insurers test all new regulations against the principle of 'sensible and radically simple'. Sensible refers to what contributes to affordability, accessibility and quality of care. Radically simply means choosing the simplest possible solutions for professionals that enhance professional autonomy, craftsmanship and job satisfaction, while decreasing administrative burden.

In the context of labour-saving care, health insurers make substantively appropriate agreements in their contracts with care providers about the supply and use of user-friendly hybrid care.

Health insurers strive to improve the labour market. They lobby for national policy to promote the labour market and actively participate in national programmes and consultation structures, such as within general practitioner care in the Action Plan Work Pressure in the evening, night and weekend shifts (*Avond Nacht en Weekenddiensten* - ANW). Additionally, health insurers set standards via joint purchasing conditions and stimulate the mutual sharing of promising initiatives to bring these initiatives to the attention of healthcare providers.

In addition to this joint effort in the healthcare sector, Health launched its own initiative in 2024: an inspiring gathering for contracted community nursing and home care (*Verpleeg-en Verzorgingshuizen en Thuiszorg* - VVT) providers about sustainable employability. The VVT sector faces major challenges in terms of personnel. The aim of the gathering was to inspire healthcare providers and provide practical tools to improve job satisfaction and combat absenteeism. About 30 healthcare providers attended the meeting. During the gathering, the theme of sustainable employability was illuminated from different angles by various speakers.

## Target

a.s.r. acknowledges that no specific targets have been set regarding working conditions at this time. This matter will be further investigated and evaluated going forward. The aim is to develop appropriate policies and targets in the future to improve and ensure working conditions.

## 6.3.3 Consumers and end-users

a.s.r. wants to have a leading role in the field of sustainable entrepreneurship in the financial sector. a.s.r. aims to positively contribute to making society more sustainable by continuously working to help create solutions that meet the needs of the current generation, without compromising those of future generations. a.s.r. does this through its products and services, but also through its investments. a.s.r. wants to facilitate the transition to an inclusive, sustainable society and limit negative impact as much as possible.

In its daily work, a.s.r. places the customer at the heart of everything. An insurance or banking product is only valuable if it perfectly meets the customer's needs. Therefore, a.s.r. adheres to a number of guidelines:

- a.s.r. offers insurance exclusively through independent advisors.
- a.s.r. uses clear and simple language.
- a.s.r. provides honest information.
- a.s.r. ensures prompt, careful service and good accessibility.
- a.s.r. monitors customer satisfaction.
- a.s.r. always strives for quality.

The following table presents a comprehensive overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions and targets. The purpose of this table is to highlight the linkages and dependencies among these elements.

**12 - Information-related impacts consumers/end-users**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 12.1 Providing clear and accessible information through online portals helps customers make informed decisions, driven by the complexity of services and products, leading to a positive impact on consumer awareness and decision-making. | 1. P&C<br>2. Disability<br>3. Pensions<br>4. D&S Holding<br>5. Mortgages<br>6. Life Individual and Funeral<br>7. TKP<br>8. Robidus<br>9. Real Estate<br>10. Health | 1. Policy on Sustainable Insurance<br>2 - 7. (applicable to all product lines)<br>2. Privacy policy<br>3. Data Retention policy<br>4. Customer due diligence policy<br>5. Communication policy<br>6. Policy for involving and informing clients and the acceptance policy<br>7. Whistleblower policy | 1 - 10. (applicable to all product lines) Employees are trained in accessibility, which is integrated into design, development, and editorial processes. Digital environments are tested, and experts assess accessibility, with user feedback included.<br>9. Conduct tenant satisfaction surveys.<br>10. Health launched Gezond.nl, Thuisfysio, Welshop, and promotes a healthy lifestyle to reduce healthcare burden. | 1 - 10. (applicable to all product lines) Customer and advisor satisfaction target with an NPS-r higher than the market average by the end of 2024.<br>9. The target for tenant satisfaction is a score of at least 7.0 out of 10.0 for retail, residential, office and science park tenants and 7.5 out of 10.0 for farmland tenants. |
| Negative impact | 12.2 The complexity of a.s.r.'s products and services may make it challenging for customers to understand necessary details, driven by intricate offerings and extensive information, leading to uninformed or incorrect decisions. | 1. P&C<br>2. Disability<br>3. Pensions<br>4. D&S Holding<br>5. Mortgages<br>6. Life Individual and Funeral<br>7. TKP<br>8. Robidus<br>9. Health | 1. Policy on Sustainable Insurance<br>2 - 7. (applicable to all product lines)<br>2. Privacy policy<br>3. Data Retention policy<br>4. Customer due diligence policy<br>5. Communication policy<br>6. Policy for involving and informing clients and the acceptance policy<br>7. Whistleblower policy | 1 - 9. (applicable to all product lines) Employees are trained in accessibility, which is integrated into design, development, and editorial processes. Digital environments are tested, and experts assess accessibility, with user feedback included.<br>9. Health launched Gezond.nl, Thuisfysio, Welshop, and promotes a healthy lifestyle to reduce healthcare burden. | 1 - 9. (applicable to all product lines) Customer and advisor satisfaction target with an NPS-r higher than the market average by the end of 2024. |
| Negative impact | 12.3 Inadequate data security management could lead to data breaches, driven by the necessity to store and process sensitive personal data, leading to exposure of customer information. | 1. Compliance | 1. Privacy policy and Data Retention policy | Not applicable | Not applicable |

## 13 - Personal safety of consumers and/or end-users

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 13.1 a.s.r. as an insurance group positively impacts the mental and physical health of consumers and end-users by providing financial security products and supportive services, driven by initiatives enhancing vitality and financial security, leading to improved self-reliance and well-being. | 1. Disability<br>2. Vitality<br>3. D&S Holding<br>4. Robidus | 1.The story of a.s.r. and Product approval and review process policy<br>2.The story of a.s.r. and Product approval and review process policy<br>3. Not applicable<br>4. Not applicable | Not applicable | Not applicable |
| Financial opportunity | 13.2 a.s.r. has the opportunity to reduce absenteeism by implementing initiatives that support vitality, driven by efforts to enhance client vitality, leading to fewer claims, lower costs, and improved competitive positioning. | 1. Disability | 1. Product approval and review process policy | Not applicable | Not applicable |

## 14 - Social inclusion of consumers and/or end-users

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 14.1 Inclusive initiatives in mortgage offerings, insurance products, and investments promote financial and social inclusivity, driven by a commitment to accessibility and affordability, leading to broader access to essential services and positive societal impact. | 1. Mortgages<br>2. Pensions<br>3. Real Estate<br>4. Health<br>5. P&C<br>6. Disability | 1. Responsible mortgage lending management policy | None | None |
| Negative impact | 14.2 Non-acceptance of certain consumers or charging higher premiums due to high-risk classification negatively impacts social inclusiveness, driven by internal acceptance policies, leading to limited access to products. | 1. Disability<br>2. P&C | Not applicable | None | None |
| Financial risk | 14.3 Irresponsible marketing practices could harm a.s.r.'s brand and reputation, driven by potential ethical issues in marketing, leading to financial repercussions and reduced revenue. | 1. Compliance | Not applicable | None | None |

### 6.3.3.1 Managing impacts, risks, and opportunities

**Interests and views of stakeholders**

For a description how the interests, views and rights of a.s.r.'s customers inform the strategy and business model, see section 6.1.4.2.

a.s.r. aims to lead in sustainable entrepreneurship within the financial sector, contributing to a more sustainable society through its products, services, and investments. This includes providing clear and accessible information to help customers make informed decisions, ensuring data security, and promoting health and vitality through initiatives like the a.s.r. Vitality programme. a.s.r. is committed to financial and social inclusivity, making financial products accessible to diverse consumers. This is achieved through rigorous PARP and continuous monitoring of inclusive initiatives. To mitigate risks from irresponsible marketing, a.s.r. implements strict guidelines and training for marketing teams.

As stated in the value chain see section 6.1.4.1, a.s.r. recognises the following consumers and end-users: commercial customers, employees, participants, private customers and relatives.

Engagement with customers and end-users is maintained through various channels, including phone calls, emails, surveys, and social media. Platforms like the *Raad van Doen* and the *Raad van Verzekerden* involve customers in enhancing services and policies. Comprehensive processes are in place to address negative impacts, including multiple channels for reporting concerns and an annual complaints report.

a.s.r. has not identified any widespread or systemic negative impacts in the contexts where it sells or provides its products or services. No individual incidents or specific business relationships have been identified that have caused material negative impacts. a.s.r. has several initiatives that have positive impacts on consumers and end-users. For example, the design of products that improve accessibility for people with disabilities and promoting a healthy lifestyle through the a.s.r. Vitality programme. Inadequate data security management can lead to data breaches, which can compromise the confidentiality of customer information and reduce trust in a.s.r. Through initiatives like the a.s.r. Vitality programme, a.s.r. can improve the health and well-being of customers, leading to lower claims and costs, and an improved competitive position.

By implementing these measures, a.s.r. ensures customers have the information needed to make informed decisions, aligning with its strategy to create a positive societal impact and maintain customer trust. a.s.r. also recognises the needs of vulnerable groups and tailor made products to ensure access to essential financial services.

For the material impacts, risks and opportunities, see section 2 Business and strategy.

## 6.3.3.2 Policies and actions

### Policies

#### Access to (quality) information 12.1 12.2 12.3 13.1 13.2 14.1 14.2

a.s.r. has implemented various policies to manage material sustainability matters. The general objectives of these policies are aimed at promoting financial and social inclusivity, ensuring data privacy and security, and improving the health and vitality of employees and customers. a.s.r. recognises the importance of providing clear and accessible information to help customers make informed decisions. Given the complexity of its products and services, it is essential to ensure that customers fully understand the necessary information to avoid uninformed or incorrect decisions. It is essential that the information that a.s.r. provides is not only complete and accurate but also understandable for our customers. The financial literacy of our customers varies, and a.s.r. must ensure that everyone, regardless of their knowledge level, can understand the information needed to make informed decisions. This commitment is driven by a.s.r.'s dedication to consumer awareness and decision-making, ultimately leading to a positive societal impact.

To address the challenges posed by the complex nature of a.s.r.'s offerings, a.s.r. has implemented or will implement several measures:

- User-friendly online portals: a.s.r. has developed intuitive and accessible, conform the Web Content Accessibility Guidelines (WCAG) online portals that provide comprehensive information about its products and services. These portals are designed to be user-friendly, ensuring that customers can easily navigate and find the information they need. The WCAG standards ensure that all users, including those with disabilities, can access and understand online information. a.s.r. aims to achieve full compliance with Web Content Accessibility Guidelines 2.1 AA standards by mid-2025.
- Clear communication: a.s.r. prioritises clear and straightforward communication in all its customer interactions. This includes simplifying complex terms and conditions, providing detailed FAQs and offering step-by-step guides to help customers understand its offerings better.
- Customers can trust that the products offered to them are demonstrably the result of product development processes (PARP) that have carefully balanced the interests of the customer. Only products that are in the customer's best interest should be developed, offered to a defined group of customers for whom the product is suitable, and whose information and distribution are tailored to the target audience.
- Educational resources: a.s.r. offers a range of educational resources, including webinars, tutorials and informational articles, to enhance consumer understanding of its products and services. These resources are tailored to address common questions and concerns, making it easier for customers to make informed decisions.
- Customer support: a.s.r.'s dedicated customer support team is available to assist customers with any queries they may have. This team is trained to provide clear and concise explanations, ensuring that customers receive the support they need to understand a.s.r.'s products and services fully.
- Feedback mechanisms: a.s.r. actively seeks feedback from customers to continuously improve the clarity and accessibility of its information. This feedback is used to refine its communication strategies and enhance the user experience on the a.s.r. online portals. The net promoter score (NPS) also provides insight into how customers experience a.s.r. See section 2.4.2.

By implementing these measures, a.s.r. aims to mitigate the risks associated with the potential complexities of its products and services. a.s.r. is committed to ensuring that all customers have the information they need to make informed decisions, thereby promoting financial and social inclusivity. Looking ahead, a.s.r. will continue to explore innovative ways to enhance the accessibility and clarity of its information. Future initiatives may include the development of more interactive and personalised online tools, as well as ongoing collaboration with stakeholders to ensure that its communication strategies meet the evolving needs of its customers. a.s.r. makes its policies available to potentially affected stakeholders and those who need to help implement them. This is done through various channels, including the company website, customer portals, and direct communication with stakeholders.

#### Privacy 12.1 12.2 12.3

a.s.r. is responsible for processing personal data for various entities and brands under its umbrella. The Privacy Statement and the privacy policy outlines how a.s.r. handles personal data, ensuring compliance with applicable privacy laws and industry codes of conduct.

a.s.r. places great importance on the security of personal data. To ensure an appropriate level of protection against data breaches and unauthorised processing, a.s.r. has implemented various technical and organisational measures. These measures include securing IT systems, using encryption, and continuously monitoring data traffic to prevent unauthorised access. For example, employees are trained in data protection, and only authorised personnel have access to personal data. For access to sensitive data employees must sign additional confidentiality agreements.

Despite these measures, inadequate data security management can lead to significant negative impacts. One of the biggest risks is a data breach, where sensitive customer information such as financial details, health records and personal identifiers can be exposed. This can severely damage customer trust and a.s.r.'s reputation. Customers expect their personal data to be handled with the utmost care, and any breach can lead to a loss of confidence in a.s.r.'s ability to protect their information. Moreover, data breaches can result in legal and financial consequences. Regulatory bodies may impose penalties for non-compliance with data protection laws, and a.s.r. may face lawsuits from affected individuals.

To mitigate these risks, a.s.r. conducts regular audits and risk assessments to identify and address potential vulnerabilities in data security. a.s.r. also has a robust incident response plan to quickly address and mitigate the effects of any data breaches. Additionally, security measures and protocols are continuously updated to keep up with evolving threats and technological advancements.

a.s.r. is committed to protecting personal data and minimising the risk of data breaches through comprehensive data security management. By implementing stringent security measures and continuously improving its practices, a.s.r. aims to safeguard customer information and maintain trust.

a.s.r. follows a structured Data Protection Impact Assessment (DPIA) process to identify and mitigate privacy risks associated with the processing of personal data. This process includes:

1. Initiation and coordination: The DPIA process is coordinated by a privacy expert who ensures that all necessary stakeholders are involved. This includes representatives from the Legal, Compliance and Business Risk Management teams.
2. Risk assessment: The DPIA involves a detailed risk assessment using a predefined checklist to identify potential privacy risks. This assessment is based on the data collected through the Privacy by Design/ Default process.
3. Mitigation measures: Based on the risk assessment, appropriate mitigation measures are identified and implemented. These measures are documented in the DPIA report, which includes a detailed analysis of the risks and the steps taken to address them.
4. Review and approval: The DPIA report is reviewed by relevant stakeholders and approved by the process owner. This ensures that all identified risks are adequately addressed before the processing activity begins.
5. Documentation and monitoring: All DPIA-related documentation is archived, and the implementation of mitigation measures is monitored to ensure ongoing compliance with privacy requirements.

By adhering to this comprehensive DPIA process, a.s.r. ensures that privacy risks are proactively managed, and personal data is protected in accordance with regulatory requirements and best practices.

a.s.r. has established a comprehensive Data Retention Policy to manage the lifecycle of data, ensuring that data is retained only as long as necessary for legal, regulatory and business purposes. This policy includes:

1. Scope and objectives: The policy applies to all data processed by a.s.r., including customer data, employee data and financial data. The objective is to ensure data integrity, availability and confidentiality throughout its lifecycle.
2. Governance and responsibilities: The policy outlines the roles and responsibilities of various stakeholders, including the Board of Directors, Compliance, Enterprise Risk Management (ERM) and data owners. Each stakeholder is responsible for ensuring compliance with the data retention requirements.
3. Data lifecycle management: The policy details the processes for data generation, processing, storage, archiving and deletion. It includes specific retention periods for different types of data, as outlined in the retention schedule.
4. Monitoring and compliance: Regular audits and reviews are conducted to ensure adherence to the data retention policy. Compliance with the policy is monitored by the Compliance and ERM teams, and any deviations are addressed promptly.
5. Legal and regulatory requirements: The policy ensures compliance with relevant legal and regulatory requirements, including the General Data Protection Regulation (GDPR) and other applicable laws. It specifies the retention periods for various types of data based on legal requirements and business needs.

By implementing this Data Retention Policy, a.s.r. ensures that data is managed effectively throughout its lifecycle, reducing the risk of data breaches and ensuring compliance with legal and regulatory requirements.

See section 5.5.2 for more detailed information about privacy.

### Health and safety 13.1 13.2 14.1 14.2

Health and vitality are increasingly important topics in society, partly due to developments such as rising healthcare costs and an increase in pension age. This is the reason why a.s.r. encourages sustainable employability and focus on preventing work absence due to illness or disability, such as with the exercise reward programme a.s.r. Vitality.

*Financial resilience and inclusion*
a.s.r. believes it is crucial for individuals to be able to take responsible risks and make informed financial decisions. a.s.r. assists people in making conscious financial choices to prevent them from falling into debt or to help them recover from it. As an insurer for all residents and workers in the Netherlands, a.s.r. is attentive to the interests of vulnerable groups. Within the organisation, a.s.r. also strives for an inclusive culture where differences are recognised, valued and utilised.

*Vitality and sustainable employability*
Also at a.s.r. there is an increasing attention to health and vitality, driven by societal developments. As people live longer, healthcare costs rise, and the labour market changes rapidly, leading to challenges in work, well-being and health. a.s.r. focuses on preventing work absence due to illness or disability, aiming to help people work longer and healthier, thereby continuing to contribute to society. A large network of specialist intermediaries, occupational health service providers and in-house service teams with extensive knowledge of the disability insurance markets helps clients to meet their specific needs. Prevention, treatment and reintegration services assist employees and self-employed individuals with sustainable employability. a.s.r.'s science-based behaviour change programme (a.s.r. Vitality) helps to improve customers' health and well-being. By shifting the focus from reactive to preventive service provision, a.s.r. supports customers in managing their physical and mental health more effectively.

Disability and P&C acknowledge the complex challenges associated with maintaining social inclusiveness, particularly when certain consumers face exclusion, coverage or higher premiums due to high-risk classification. The high risk identification is not based on profiling, but on risk-based (technical) motivation.

This classification arises from internal acceptance policies that may restrict access to essential insurance products for high-risk individuals while always taking the human dimension into account. This practice, the classification of the risks, may contribute to social inequality and could limit the financial protection available to vulnerable groups. To manage the risk profile, a.s.r. has implemented a comprehensive risk management framework that includes a thorough screening process for new customers. This process ensures fair and consistent evaluation of all potential customers, although it may still result into a classification of the terms of acceptance of the high-risk individuals. a.s.r. continuously monitors the effectiveness of its acceptance policies and risk management practices. Regular evaluations are conducted to assess the impact of these policies on social inclusiveness and to identify areas for improvement. Looking ahead, a.s.r. is committed to exploring and implementing more inclusive acceptance policies that balance risk management with social responsibility. Future initiatives may include the development of tailored insurance products that cater to high-risk individuals without compromising a.s.r.'s financial stability.

a.s.r. sees an opportunity to promote financial and social inclusivity through its mortgage offerings, insurance products and investment strategies. These initiatives aim to contribute to accessibility and affordability, aiming to provide broader access to essential financial services. Inclusive initiatives at a.s.r. are designed to enhance social inclusiveness by making financial products more accessible to a diverse range of consumers. This approach helps ensure that more individuals can benefit from financial protection and investment opportunities, contributing to overall societal well-being.

As part of the product approval and review process, inclusivity is addressed by having a well-defined group of customers for whom the products and services of a.s.r. are suitable for. This process involves rigorous review, testing and evaluation to confirm that products are both fraud-resistant and in the interest of the defined group of customers. The effectiveness of the product approval and review process is regularly monitored through customer feedback, market analysis and internal audits. a.s.r. uses these insights to refine its products and strategies, ensuring they continue to meet the needs of all consumers. a.s.r. is dedicated to keep developing new products and services that address the evolving needs of society. Future plans include ongoing research and collaboration with stakeholders to enhance financial inclusivity and support positive societal impact.

a.s.r. aims that its services to customers do not discriminate based on factors including gender, age, religion, background or sexual orientation. By applying the Dutch Association of Insurers' Ethical Framework for Data Applications and Data-Driven Decision Making by Insurers, a.s.r. reduces the risk of unjustified bias, exclusion and discrimination in core processes such as acceptance policies, premium determination, fraud policies, and claims or damage handling. When choosing to use data-driven systems, a.s.r. considers diversity and inclusion, particularly for vulnerable groups, such as those at risk of exclusion or disadvantage due to specific needs and/or disabilities. Preventing exclusion and discrimination is also the principle in a.s.r.'s non-data-driven decision-making processes and in a.s.r.'s communication with (potential) customers. a.s.r. continuously evaluates its services and communication, striving for maximum accessibility for target groups, including vulnerable groups such as people with low literacy or visual impairments.

When developing products and services, a.s.r. considers human rights. a.s.r.'s ambition is to develop products and services that contribute to solving societal issues. Therefore, a.s.r. also develops products and services for vulnerable groups to improve their financial resilience. Additionally, a.s.r. aims to prevent or mitigate any negative impact of its products and services as much as possible. The PARP is an internal process for assessing the quality of products and services and their relevance to the intended market. Part of the PARP includes considering (potential) risks related to human rights violations. The PARP development process encourages improvement based on feedback and expectations and needs of stakeholders, societal developments, current circumstances, and changes in laws and regulations. The PARP applies to both products and services a.s.r. actively offers, as well as existing (including non-selling) products and services that are regularly reviewed.

In the acceptance process for new business customers, a.s.r. also assesses signals of human rights violations. In the Customer Due Diligence policy, signals of human rights violations are a potential exclusion criterion. Additionally, an ESG risk assessment is conducted if necessary, as per the Policy on Sustainable Insurance.

### Responsible marketing practices 14.3

a.s.r. acknowledges the significant risk posed by irresponsible marketing practices, which can harm a.s.r.'s brand and reputation. This risk is driven by potential ethical issues in marketing, such as misleading advertisements or lack of transparency, leading to financial repercussions and reduced revenue. Ethical issues in marketing, such as false claims or deceptive promotions, can erode trust among consumers and stakeholders. This loss of trust can result in a decline in customer loyalty and a negative public perception, ultimately impacting a.s.r.'s financial performance. When marketing practices are not aligned with ethical standards, it can lead to the exclusion of certain consumer groups and may potentially lead to fines and legal claims. Misleading information or lack of clarity in marketing materials can have an effect on a.s.r.'s stakeholders reducing their access to essential financial products and services. This exclusion contributes to social inequality and undermines the principles of social inclusiveness that a.s.r. strives to uphold. To mitigate this risk, a.s.r. has implemented guidelines. The guidelines include strict guidelines and training for marketing teams to ensure all promotional activities adhere to ethical standards. Additionally, a.s.r. conducts thorough reviews of marketing materials to ensure accuracy and transparency, thereby protecting consumers from misleading information.

a.s.r.'s communication policy plays a crucial role in supporting these efforts. The communication policy emphasises the importance of clear, transparent and ethical communication, both internally and externally. It aligns with a.s.r.'s mission to be a trustworthy insurer, a financially stable institution, a people-oriented employer and a valuable societal participant.

Corporate Communication at a.s.r. is tasked with enhancing a.s.r.'s reputation as a socially responsible insurer. This involves ensuring that all communication, including marketing, aligns with the a.s.r.'s core values: being helpful, forward-thinking and decisive. The communication policy also highlights the need for transparency and interaction, fostering a dialogue with stakeholders to build trust and credibility.
By adhering to these communication principles, a.s.r. ensures that its marketing practices are not only effective but also ethical and inclusive. This approach helps mitigate the risks associated with irresponsible marketing and supports a.s.r.'s commitment to social responsibility and financial stability.

### Access to products and services 12.1 12.2

At a.s.r., the commitment is to provide customers with insurance products that meet their specific needs and expectations. Determining the target audience for insurance products is essential to ensure that these products align with the needs, characteristics, and objectives of the customers and end-users. This process stems from the Insurance Distribution Directive (*Richtlijn Verzekeringsdistributie*), which mandates detailed target audience definitions for insurance products. By accurately defining the target audience, a.s.r. can develop insurance products that are suitable for specific customer groups, thereby reducing the likelihood of misunderstandings and incorrect decisions. This not only helps to improve customer satisfaction but also ensures compliance with legal requirements and minimises risks.

For its Health activities, a.s.r. has additional policies related to consumers and end-users:

- Duty of care policy (*Zorgplichtbeleid*); Health insurers have the obligation to make care available to insured persons within a reasonable time and distance when/for as long as they need care
- Healthcare procurement policy outlines the procedures for acquiring medical supplies, equipment, and services, ensuring efficiency, cost-effectiveness, and regulatory compliance. It includes supplier selection, contract management, risk mitigation, and sustainability practices to support high-quality healthcare delivery.
- Policy for involving and informing clients outlines the strategies and procedures to actively engage clients in decision-making processes and keep them informed about relevant developments. This policy promotes transparency, trust, and client satisfaction.

In addition to the laws and regulations, covenants and programs are also periodically concluded between the government, health insurers and other parties involved. These agreements (IZA and GALA and WOZO) and programs (TAZ) include additional agreements on quality, affordability and accessibility of care. The elaboration of the national policy and the agreements in laws and regulations, covenants and programs are included in the individual policies of a.s.r. Health and other health insurers.

### Social inclusion of consumers and end-users 14.1 14.2

a.s.r. respects and endorses fundamental human rights as outlined in the Universal Declaration of Human Rights. a.s.r. also support the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, both in letter and spirit. These principles are implemented in several policies (Human Rights policy, Policy on Sustainable Insurance, Privacy policy and PARP).

a.s.r. has defined vulnerable groups that include young people, high-risk individuals, and those with low literacy. a.s.r. offers certain products to improve financial and social inclusivity. These initiatives are driven by a commitment to accessibility and affordability, leading to broader access to essential services and a positive societal impact. a.s.r. will further develop the definition of vulnerable groups and integrates it into the material business lines.

*Mortgage Offerings*

In the responsible mortgage lending management policy (*Verantwoord Hypotheek Verstrekken beheersbeleid*, VHV) there are high-risk groups identified, with active measures in place to address their needs. These groups include customers who:

- have recently experienced payment arrears;
- are identified through early warning signals;
- hold an interest-only mortgage that have been classified as high-risk;
- are identified as high-risk based on analyses (manual and automated).

This approach ensures that high-risk groups are recognised and supported proactively, aligning with that the principles of social inclusion by offering tailored interventions and preventing further financial strain.

Mortgages also offers products specifically for certain groups. An example of an inclusive mortgage offering is the first-time buyer mortgage. This product is designed to support first-time homebuyers by providing access to affordable mortgages, even if they have limited financial resources. This promotes financial inclusivity by enabling more people to purchase their own homes.

*Insurance Products*

- Disability Insurance (AOV) for Entrepreneurs: If an entrepreneur is denied AOV and has started their business within a certain period, there is an agreement within the Dutch Association of Insurers that the first insurer to reject the application is obliged to offer a Safety Net Insurance. This is a disability insurance specifically for hard-to-insure self-employed individuals.

Langer mee AOV: For people in physically demanding professions who cannot always insure themselves until the state pension age, the Langer mee AOV was developed. This product allows them to insure themselves until the state pension age, provided they pass the medical assessment at the start of the insurance.

*Individual life and Funeral* 12.1 12.2

The acceptance policy of product line Individual life and Funeral includes several inclusive measures. In alignment with the guidelines set forth by the *Verbond van Verzekeraars*, the acceptance policy of a.s.r. for Individual life and Funeral includes providing support to individuals who have battled cancer. a.s.r. Life's Clean Slate Policy offers a favourable acceptance policy, helping them regain access to insurance. Furthermore, clients from vulnerable groups, such as clients under guardianship or people in small-scale living arrangements, can insure themselves without answering health questions. This ensures that even people from vulnerable groups have access to funeral insurance.

These initiatives demonstrate how financial institutions like a.s.r. are committed to inclusivity and accessibility, leading to broader access to essential financial services and a positive impact on society.

*Distribution and other services*

Robidus, Corins, and D&S Holding largely follow the same policies as a.s.r. They acknowledge the importance of clear and accessible information, the positive impact on physical and mental health, and the challenges that complexity can pose for customers in making certain decisions. Various policies have been developed to mitigate risks or enhance positive impacts.

**Accountable**

All policies are formulated at a.s.r. group level, while the product lines are responsible for their implementation and operation.

### Engaging with consumers and end-users 12.1 12.2

Strategic, constructive and proactive consultation with consumers and end-users is very important to a.s.r. to properly align strategy, policy and activities with the expectations and interests of its stakeholders. The way a.s.r. communicates depends on the type of stakeholder, the topic and the purpose of the communication. a.s.r.'s means of communication range from personal contact to organising roadshows, customer and employee surveys, and roundtable and dialogue sessions. See the Stakeholder policy and section 8.5.

The following basic principles are used by a.s.r. to create and build engagement with stakeholders:

- Inclusion – enabling people to express their interests and expectations on issues and decision-making that affect them.
- Materiality – decision-makers should identify the impacts and issues that matter and factor these into their decision-making.
- Responsiveness – a.s.r. is transparent about material impacts and issues and how it deals with them.

a.s.r. applies the following principles when organising stakeholder engagement and stakeholder consultation:

- Stakeholder engagement aims to strengthen a.s.r.'s relationship with key stakeholders to create mutual insight and understanding, and opportunities for collaboration;
- Stakeholder consultation contributes to sustainable development and aims to create sustainable long-term value for a.s.r.'s stakeholders by giving them the opportunity to be involved in tightening a.s.r.'s policy, strategy and activities. Through dialogue, a.s.r. continuously reviews whether, in the opinion of its stakeholders, the organisation is still focusing sufficiently on the right policies;
- Stakeholders are asked to provide input and help with:
  - Defining, reviewing and prioritising material issues for sustainability strategy, policy and reporting;
  - Providing insight into the (negative and positive) impact a.s.r. has on its stakeholders;
  - Identifying sustainability risks and how to mitigate these;
  - Answering the question of how a.s.r. can further increase its social added value and positive impact in the short and longer term;
  - Expanding and improving its understanding of current and future themes and trends.
- a.s.r. believes in the power of collaboration and can explore social themes and issues with stakeholders and jointly tackle activities aimed at improvement.

a.s.r. engages with customers daily using various methods, including phone calls, emails, surveys, webinars and social media. This multi-channel approach ensures effective communication and feedback, allowing a.s.r. to continuously improve its services and address customer needs comprehensively.

To improve overall services and customer engagement, the *Raad van Doen* has been established. The *Raad van Doen* is the online customer and advisor panel for all a.s.r. brands. Through this panel, customers and advisors are involved in enhancing a.s.r.'s services. The panel functions as a sounding board for a.s.r.'s direction, as a forum for co-creation and product development, to advocate for customer interests and as a sparring partner. Product lines also use members of the *Raad van Doen* to conduct customer research on expectations regarding sustainability aspects for specific insurance products and services. This can be done through surveys or by organising dialogue sessions with panel members and this engagement is ongoing. The *Raad van Doen* can be used whenever there is a need.

In addition, Health has a system called the *Raad van Verzekerden*, which enables policyholders to actively engage in discussions about a.s.r.'s healthcare policies and products. Comprising up to 15 diverse members, the Council meets with the Health Board in Utrecht at least twice a year. Key topics like healthcare procurement and communication are discussed. The Council can provide both solicited and unsolicited advice and works in focus groups for in-depth analysis. This ensures that policyholders have a voice in a.s.r.'s policy decisions.

a.s.r.'s reputation for sustainability is measured weekly. Continuous net promoter score (NPS) measurements are conducted among customers regarding the overall relationship (NPS-r), at the process level (NPS-p) and at contact moments (NPS-c) to measure and improve customer satisfaction.

**Raising concerns** 12.1 12.2 13.1

a.s.r. has established comprehensive processes to address negative impacts on consumers and end-users, offering multiple channels for reporting concerns. Respecting and protecting human rights is a central principle of a.s.r.'s sustainability ambitions, and specific mechanisms are in place for consumers to report potential negative effects.

For complaints, a.s.r. offers a user-friendly online complaint form, directing complaints straight to a complaint handler. Consumers can also contact customer service, clearly indicating they are making a complaint. Alternatively, complaints can be mailed to the a.s.r. Complaints Service. A complaint handler will contact the consumer within three working days, and a substantive response will follow within ten working days. See section 3.1.3.1. for more information about the customer focus.

An essential part of this approach is the whistleblower policy, which allows consumers to confidentially report suspected misconduct or irregularities. Reports can be submitted in writing, verbally or anonymously, and a.s.r. provides protection against retaliation, ensuring consumers can safely express their concerns. The Compliance department handles all complaints, ensuring appropriate follow-up while safeguarding the confidentiality and protection of the reporter (*Wet bescherming klokkenluiders*). Protection also applies to the person who assists a Person Reporting (e.g. the confidential advisor of a.s.r.), a third party involved, the person to whom a report is made or who properly follows up on the report. Employees who, in good faith, report a violation are protected against retaliation in accordance with the whistleblower scheme.

a.s.r. has also set up a dedicated Human Rights Reporting Point. This channel is specifically designed for consumers who have concerns about potential negative impacts on human rights caused by the activities of a.s.r. or its business partners. Consumers can submit reports via the Human Rights Reporting Point, clearly stating the nature of the concern, such as equal treatment or the right to a safe working environment.
An acknowledgement of receipt is sent within seven days, and if necessary, the report is forwarded to the appropriate channel, with notice to the reporter. To date, no complaints have been received at the Human Rights Reporting Point, and no serious human rights issues or incidents have occurred.

a.s.r. maintains an annual complaints report, detailing both received and resolved complaints, categorised by type. If consumers disagree with the outcome of a complaint, it can be referred to an independent party. a.s.r. fully cooperates in this process to ensure the effectiveness and integrity of the complaint resolution mechanism. Additionally, once a complaint is closed, a.s.r. invites consumers to participate in a satisfaction survey. a.s.r. seeks feedback on the complaint handling process and focus on identifying the root causes of complaints. This helps a.s.r. to monitor and improve the effectiveness of its channels, reflecting on its commitment to transparency and continuous enhancement in addressing consumer concerns.

If a consumer experiences an incident with an a.s.r. business partner, such as an intermediary, they are encouraged to report it to the Competence Center Intermediary (CC IM). The CC IM is a multidisciplinary team that addresses fraudulent or other undesirable behaviour by intermediaries. Intermediaries in this context include brokers, advisors, sub-brokers, and mandated brokers. While a.s.r. does not require the business partner to establish such a channel, a.s.r. provides consumers with a means to report concerns about the business partner.

If a customer disagrees with the handling of their complaint, they have three options:

1. Submit the complaint to Financial Services Complaints Institute (*Klachteninstituut Financiële Dienstverlening* - Kifid). Within three months the customer can submit their complaint to Kifid;
2. If a customer disagrees with the decision they can go to court. The customer needs to contact Kifid first. Kifid cannot handle complaints that have already been addressed by the court;

Customers can file their complaint at the Disciplinary Board for Insurers. Disciplinary law aims to ensure a proper level of professional practice, while Kifid focuses on dispute resolution (complaint law). The disciplinary board supervises the behaviour of insurers.

## Actions

For material IRO's with no actions set for reporting year 2024, these will be addressed and prioritised in the coming years as for reporting year 2024 no sufficient time and resources were available. Below, a.s.r. describes the actions that are in place for material IRO's.

### Access to (quality) information 12.1 12.2

a.s.r.'s products and services can be complex, making it challenging for customers to understand the necessary details due to the complexity of the offerings and extent of the information provided, leading to uninformed or incorrect decisions. In response, a.s.r. improves information clarity by conducting regular advertising campaigns to promote sustainable damage repair, offering a comprehensive sustainable living platform, providing clear financial information to help customers make informed decisions and maintaining user-friendly portals for customer access.

Below are the actions a.s.r. takes to ensure perceivable, operable, understandable and robust digital environments:

- Employee knowledge: a.s.r. employees regularly undergo training to maintain and stay updated with the latest developments in accessibility.
- Accessibility ‘by Design’: Accessibility is integrated from the start into all steps of the design, development, and editorial processes of a.s.r.'s digital environments.
- Testing: a.s.r. regularly tests its digital environments for accessibility using various online testing tools.
- Research: Independent experts regularly assess a.s.r.'s digital environments for accessibility, covering both functional-technical and editorial aspects. a.s.r. sustainably resolves any identified issues.

User feedback: a.s.r. involves users in the development process of its digital environments. a.s.r. uses feedback and reports from users to improve its website.

### Privacy 12.3

Inadequate data security management could lead to data breaches, driven by the necessity to store and process sensitive personal data, leading to the exposure of customer information. See section 5.5.2 for more information about the actions a.s.r. takes to secure the privacy of its customers and end-users.

### Product lines

The following product lines have defined actions.

*Health* 12.1 12.2 14.1

Main task for Health as health insurer is ensuring access to care, both in terms of affordability and availability, for its customers. In the integrated healthcare agreement (IZA), sector-wide agreements have been made about the necessary actions. The themes for which actions have been formulated in the IZA are:

1. Appropriate care.
2. Regional cooperation.
3. Strengthening the organisation of primary care.
4. Cooperation between the social domain, general practitioner care and mental health care.
5. Healthy living and prevention.
6. Labour market and unburdening healthcare professionals.
7. Digitalisation and data exchange.
8. Contracting.

Health contributes to this joint effort within the industry and with its own policies, contracting and waiting list mediation. Besides these permanent processes, Health started a number of actions, like:

- In the start-up phase of a new form of General Practitioner (GP) care: *Gezond.nl*. The GPs of *Gezond.nl* handle the majority of healthcare questions digitally. In this way, a.s.r. contributes to a solution for the pressure on GP practices and for patients who cannot find a GP;
- In addition, a.s.r. has developed the *Thuisfysio* app in collaboration with Physitrack. With a self-check, exercise programme or video consultation, users can easily remedy minor complaints themselves;
- In Mental Health Care, a.s.r. finances a platform for online care, the *Welshop*. This platform brings together supply and demand and focuses on offering online care. This is of particular importance, since the waiting lists for patients with mental health problems are very long;
- Stimulate a healthy lifestyle of a.s.r.'s policyholders to reduce the burden on healthcare.

*Real Estate* 12.1 14.1

For Real Estate, the relationship the organisation has with its tenants is very important, and as such, Real Estate wants tenants to be involved, aware and satisfied. The real estate funds focus on improving tenant satisfaction, health and well-being, and awareness of sustainable living. The real estate funds periodically send out a tenant satisfaction survey to find out how tenants rate the services, properties, and their living and working environments. The results of these surveys are used to improve the performance of Real Estate and its contractors with regard to quality of living. Real Estate continuously works on a participation program involving various forms of tenant participation. Activities range from taking an active role in sustainability projects and tenants’ associations to focusing on ESG in the bimonthly newsletters and events for tenants.

With regard to impact investing, a.s.r. has defined in 2024 several impact themes, such as affordable housing, Dutch Science parks and international non-listed real estate. See section 3.1.2.2.

*Mortgages* 12.1 12.2 14.1

a.s.r. aims to ensure that customers maintain an affordable mortgage throughout its term. In situations where (potential) financial difficulties arise, customers are encouraged to make early contact, either by phone or through their online account, to explore sustainable solutions. The primary objective is to support customers in remaining in their homes.

In addition to responding to customer enquiries, (potentially) vulnerable customers are proactively identified through active account management. These customers are those with an increased risk of affordability challenges or residual debt, identified using early warning models and periodic scenario analyses of the mortgage portfolio.

A personal and empathetic approach is taken when engaging with these (potentially) vulnerable customers. Information is provided to highlight affordability and residual debt risks, along with actionable solutions wherever possible. The ultimate goal is to prevent financial difficulties and ensure responsible home retention, placing the customer's needs at the centre of this approach.

### 6.3.3.3 Targets and metrics

#### Targets

For most material IRO's, a.s.r. has set related targets. In case a target related to a material IRO is not yet set for reporting year 2024, these will be addressed and prioritised upon in the coming years, as for reporting year 2024 no sufficient time and resources were available. The targets are set by the responsible business line and established in policy. The monitoring of the effectiveness of the measures takes place through the current management reports and will be further optimised going forward.

See section 6.1.4.2 and 8.5 how a.s.r. included the customers in the stakeholder dialogue.

**S4-5 Tenant satisfaction score per fund**

| As of 31 December | Unit of measure | Last survey (year) | Response rate | 2024 | Target 2024 |
|---|---|---|---|---|---|
| **ASR DPRF** | score between 0 and 10 | 2023 | 15% | 7.3 | 7.0 |
| **ASR DCRF** | score between 0 and 10 | 2024 | 35% | 6.7 | 7.0 |
| **ASR DMOF** | score between 0 and 10 | 2024 | 78% | 7.0 | 7.0 |
| **ASR DSPF** | score between 0 and 10 | 2024 | 49% | 6.7 | 7.0 |
| **ASR DFLF** | score between 0 and 10 | 2024 | 37% | 7.3 | 7.5 |

**Additional disclosure on target S4-5 Tenant satisfaction per fund**

| | |
|---|---|
| *Relationship to policy objectives* | Engagement with tenants from the real estate funds. |
| IRO's addressed by the target | 12.1 12.2 14.1 |
| *Scope of the target* | In scope are all (leasehold) tenants of a.s.r. Dutch Prime Retail Fund (DPRF), a.s.r. Dutch Core Residential Fund (DCRF), a.s.r. Dutch Mobility Office Fund (DMOF), a.s.r. Dutch Science Park Fund (DSPF) and a.s.r. Dutch Farmland Fund (DFLF). |
| *Methodologies and significant assumptions* | See section 6.5.2.3 and section 6.5.4.13. |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | Two out of the five funds have met their targets. |

The real estate funds' tenants are very important partners, and as such, the funds want them to be involved, aware and satisfied. The real estate funds are conducting satisfaction surveys among their tenants. These surveys are recurring and are conducted periodically. The results of these surveys are used to improve tenant engagement, and to find out how tenants rate the services, properties and their living and working environments. The findings are processed by asset managers and, where applicable, discussed with the internal or external property managers. The target for this metric is a score of at least 7.0 out of 10.0 for retail, residential, office and science park tenants and 7.5 out of 10.0 for farmland tenants. As the surveys are recurring, a.s.r. aims to consistently meet the target.

See section 6.5.4.13 for CSRD reporting policies.

**S4-5 Net Promoter Score Reputation**

| As of 31 December | Unit of measure | 2024 | 2024 benchmark |
|---|---|---|---|
| **NPS-r** | score between -100 and 100 | -12.0 | -1.0 |

| Additional disclosure on target S4-5 Net Promoter Score Reputation | |
|---|---|
| *Relationship to policy objectives* | Not applicable |
| IRO's addressed by the target | 12.1 12.2 |
| *Scope of the target* | All a.s.r. product lines are in scope and are aggregated on a.s.r. group level. |
| *Methodologies and significant assumptions* | See section 6.5.2.3 and section 6.5.4.14. |
| *Stakeholder involvement* | No |
| *Changes in targets and metrics* | N/A |
| *Performance against targets* | The 2024 result is -11 (difference between benchmark score and a.s.r. score). The main attention points from customer feedback for 2025 are to continuously improve online communication, accessibility, and user-friendliness. Additionally, attention for guidance during the migration of Aegon NL processes into a.s.r. processes also continue to be an attention point. |

See section 6.5.4.14 for CSRD reporting policies.

### Access to products and services 12.1 12.2

Customers are at the heart of a.s.r.'s purpose, and its strategy is designed to meet their needs. a.s.r. closely monitors customer satisfaction by continuously measuring feedback through the Net Promoter Score (NPS). And does so through various indicators, like the Net Promoter Score for customer relationship (NPS-r), which is an analysis of the customer relationship; this extends the methodology of the Net Promoter score for contact moments (NPS-c). NPS-c only measures customer satisfaction during contact moments. The NPS-r of a.s.r. is compared to the market average, where market average is equal to a score of zero. The target was to achieve an NPS-r higher than the market average at the end of 2024. For 2024 the adhered market average is -1. The 2024 result is -11 (difference between benchmark score and a.s.r. score). The main attention points from customer feedback for 2025 are to continuously improve online communication, accessibility, and user-friendliness. Additionally, attention for guidance during the migration of Aegon NL processes into a.s.r. processes also continue to be an attention point.

From January 2025, a.s.r. will only measure the NPS-i (interaction), which includes all forms of contact, including digital interactions. The baseline measurement will be conducted in 2025.

### Responsible marketing practices 14.3

The aim of responsible marketing practices is to inform the customer accurately and without bias. To prevent reputational damage from irresponsible marketing practices, a.s.r. has all marketing communications reviewed in advance by the Legal and Compliance departments. This promotes consistency and prevents greenwashing by ensuring sustainability claims are accurate and comply with legal definitions. These measures are essential to avoid legal complications and protect a.s.r.'s reputation, thereby significantly reducing the risk of financial drawbacks and informs the customer right and unbiased.

### General

a.s.r.'s commitment to sustainability is an ongoing process. a.s.r. continues to strive for improved performance and to keep its stakeholders informed about its progress. Although a.s.r. currently has no further specific sustainability targets established, a.s.r. remains committed to continuous improve in its sustainability practices. a.s.r.'s goal for the future is to present concrete targets and achieving a.s.r.'s sustainability objectives.

### Distribution and other services

There are no actions or targets defined for the distribution and other services entities.

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# 6.4 Governance

## 6.4.1 Business conduct

The objective of a.s.r.'s business conduct policies and corporate culture is to ensure that all employees act with due care and integrity, fostering a positive work environment and maintaining the trust of customers, shareholders and society. The a.s.r. Code of Conduct forms a guideline for the actions and decisions of its employees, and it helps employees to perform their duties properly. It also forms the guideline for how colleagues interact with each other, how a.s.r. serves its customers and how a.s.r. takes responsibility for the environment. By embedding these principles in the corporate culture, a.s.r. aims to create a responsible organisation that contributes positively to society.

The following table presents a comprehensive overview of the material impacts, risks and opportunities identified, along with the corresponding policies, actions, targets and metrics. The purpose of this table is to highlight the linkages and dependencies among these elements.

**15 - Corporate Culture**

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 15.1 a.s.r.'s incorporation of its core values into the Policy on Responsible Investments influences its investment decisions responsibly, driven by a commitment to social responsibility and ethical practices, leading to positive impacts on the investment landscape and alignment of financial growth with ethical conduct. | 1. Asset Management | 1. Code of Conduct, Policy on Responsible Investments, The story of a.s.r. | None | None |
| Positive impact | 15.2 a.s.r.'s emphasis on fostering a strong corporate culture is reflected through initiatives like the Code of Conduct, driven by a commitment to due care and integrity, leading to a positive impact on the corporate culture and work environment. | 1. Compliance | 1. Code of Conduct | None | None |
| Negative impact | 15.3 a.s.r. faces a negative impact when it is not able to effectively exercise influence in line with its Policy on Responsible Investments, particularly in investments linked to poor governance practices, driven by a lack of power to enforce positive changes, leading to compromised investment efforts. | 1. Asset Management | 1. Policy on Responsible Investments | None | None |

## 16 - Management of relationships with suppliers

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 16.1 a.s.r. continuously manages supplier relationships to promote fairness and sustainability, driven by a responsible procurement strategy, leading to encouragement of ethical business conduct. The commitment to ethical procurement practices enhances the stability of small and medium enterprises (SMEs). | 1. Procurement<br>2. Real Estate<br>3. Health<br>4. P&C<br>5. Disability<br>6. Individual life and Funeral,<br>7. Robidus<br>8. TKP<br>9. D&S Holding<br>10. Corins | 1 - 10 (applicable to all product lines): Supplier Code of Conduct, Procurement and supplier policy<br>3. Procurement Policy of Health<br>8. Procurement and Outsourcing policy of TKP | None | None |

## 17 - Corruption and bribery

| Materiality | IRO Description | Product line, staff function and/or other | Policies | Actions | Targets |
|---|---|---|---|---|---|
| Positive impact | 17.1 a.s.r. enforces a rigorous anti-corruption and bribery policy, driven by a commitment to ethical business practices, leading to a reduction in the risk of corrupt practices and enhanced stakeholder trust. | 1. Compliance | 1. Code of Conduct, Anti-corruption Policy, Incentives Policy, Outside business activities Policy, Sponsorship and Donation Policy, Group Policy on Conflicts of Interest, Whistleblower policy, Customer Due Diligence policy | None | None |

### 6.4.1.1 Governance

**The role of the administrative, management and supervisory bodies**

See section 5.1 for the role of the administrative, management and supervisory bodies.

### 6.4.1.2 Managing impacts, risks, and opportunities

**Description of the processes to identify and assess material impacts, risks and opportunities**

a.s.r.'s approach to determining its material impacts, risks and opportunities is described in section 6.1.4.

### 6.4.1.3 Policies

**Business conduct policies and corporate culture** 15.2 17.1

The foundation of a.s.r.'s corporate culture is encapsulated in "The Story of a.s.r.," which provides a shared perspective, fosters connection, and serves as a compass for actions. a.s.r. expects everyone at a.s.r. to operate based on three core values:

1. We are helpful. We consider the needs of our clients and advisors at every step, understanding their requirements. We coordinate meticulously and honour our commitments;
2. We think ahead. We prepare thoroughly. We listen attentively, offering appropriate solutions based on our expertise, experience, and dedication;
3. We achieve results. We are precise in both content and process, take responsibility, and complete what we start. Together, we achieve the desired outcomes.

Additionally, a.s.r. expects all employees to demonstrate courage and personal leadership. a.s.r.'s interactions reflect this approach:

1. We share dilemmas and make them open to discussion;
2. Diversity, equity, and inclusion are key to mutual understanding and respect;
3. We give each other space for dialogue and reflection and dare to challenge each other, even when something isn't going well;
4. Our frameworks are defined and clear. We place responsibility as low in the organisation as possible;
5. We say what we do and do what we say.

The a.s.r. Code of Conduct is a cornerstone of the corporate culture, guiding the actions and decisions of employees. It emphasises compliance with laws and sector agreements, respect for each other, fair treatment of customers, and responsible handling of company property and data. The Code of Conduct also addresses the importance of avoiding conflicts of interest and acting ethically and responsibly. It is part of every employee's employment contract and applies to anyone working for a.s.r.

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All employees take an oath or make a solemn affirmation when they start as employees at a.s.r. This involves, for example, declaring that they will act with integrity and due care. See section 5.5.3. for more information about the Code of Conduct.

a.s.r. has taken a number of control measures to prevent, identify and combat unethical behaviour, including combating corruption and bribery. Examples of control measures include integrity screening carried out by the Security Affairs department prior to hiring new employees as well as in-employment screening. This integrity screening also extends to contracting parties. This screening is conducted to minimise the risk of a.s.r. working with individuals or entities that could harm its integrity.

a.s.r. has a policy to prevent, recognise, report, investigate and adequately deal with unethical behaviour (including fraud, conflicts of interest and bribery and corruption). With regard to unethical conduct a.s.r. applies a zero-tolerance policy.

a.s.r. has established robust mechanisms for reporting non-compliance and incidents. The Security Affairs department is responsible for investigating reports of behaviour lacking integrity, operating independently of the management chain. Regular reports on investigations are discussed with the CEO, and serious violations are communicated to the MB, risk committees and regulators.

**Asset Management** 15.1 15.3

Asset Management recognises the materiality of two key impacts in its investment strategy, both falling under the subtopic of corporate culture. Asset Management believes that a strong and aligned corporate culture can drive better long-term decision-making, increase employee satisfaction and ultimately improve financial performance at investee companies. Poor corporate governance practices, such as perverse incentive structures or ill-equipped leadership, can often lead to poor short-term management of environmental and social issues. For these reasons, corporate governance, which includes corporate culture, is part of the Policy on Responsible Investments.

As part of its biannual screening process, Asset Management evaluates corporate governance practices within its investment portfolio. This evaluation includes assessing key corporate culture indicators such as the establishment of sound management structures, employee relations, diversity, equity and inclusion. In addition, when making investment decisions, Asset Management considers how well companies perform on key corporate culture criteria. Examples of these criteria are i) effectively communicating with employees about matters affecting their work and employment conditions and ii) promoting diversity within their organisation.

**Suppliers in the upstream value chain** 16.1

a.s.r. is continuously considering improvements in its relationships with suppliers in the upstream value chain to enhance the selection process with regard to social and environmental criteria. Compliance with environmental, human rights and labour rights standards is reviewed during the monitoring of suppliers. This information is used as input for annual strategic discussions with suppliers. a.s.r. requires suppliers to be diligent in their own business activities and value chains. a.s.r. has a Supplier Code of Conduct for the centralised procurement, which includes expectations regarding compliance with working conditions and human rights principles, and other relevant standards. The Supplier Code of Conduct provides clarity about key principles in the field of sustainable procurement.

The total procurement of a.s.r. is sourced from various channels, including the central procurement stream via the Procurement department, which handles operational expenditures, and the decentralised procurement streams, which are related to specific products and services expenditures. Decentralised procurement streams occur within Real Estate, Health, P&C, Individual life and Funeral, and Disability.

*P&C, Real Estate and Individual life and Funeral*

P&C, Real Estate and Individual life and Funeral have decentralised procurement but adhere to central policies.

*Disability*

Disability manages its supplier relationships and impacts on the value chain through agreements aimed at improving service quality and reducing claims costs. All suppliers are based in the Netherlands and comply with Dutch regulations, focusing on service procurement. Disability periodically discusses operational matters with its partners but has not yet considered social and environmental criteria in supplier selection.

Providers in Disability's value chain help insured employers with employee reintegration. Disability negotiates with providers to secure the best price-quality ratio, benefiting employers by reducing costs. Employers remain responsible for reintegration but can opt to use Disability's services. Both employers and Disability benefit from successful reintegration, as it lowers claims costs and premiums.

Disability's occupational health service providers, provide occupational health services included in some of Disability's absenteeism products. These partners help employers comply with Dutch laws on workplace safety and health, and the Gatekeeper Improvement Act, which aims to expedite the return of sick employees to work. Disability simplifies this process by offering insurances for absenteeism that can automatically including these services.

*Health*

Procurement is partially centralised. For the decentralised procurement, the following agreements apply: a.s.r. procures healthcare services from providers, adhering to its duty of care, which mandates that insurers ensure sufficient, accessible and high-quality care within a reasonable distance. Due to the limited availability of healthcare services, a high contracting rate is pursued. ESG impacts are not strict evaluation criteria. Within the industry association, insurers collectively determine ESG requirements, which are detailed in the sustainability section of the procurement policy. a.s.r. follows this policy.

*Distribution and services entities*

Robidus and Corins have their own procurement policies. The procurement and supplier policy primarily focuses on information security and does not include oversight of suppliers' compliance with human rights and labour standards this will be a focus point for 2025.

*TKP*

TKP currently lacks a dedicated sustainability policy for supplier selection but aims fair working conditions through its Procurement and Outsourcing Policy. While there is no formal system for evaluating sustainability criteria, TKP is increasingly considering social and environmental factors in new supplier relationships. TKP's supplier questionnaire asks about Corporate Social Responsibility (CSR) policies and social return contributions, though these are not yet fully integrated into decision-making.

TKP acknowledges the importance of managing social and environmental risks in the value chain and is exploring ways to enhance risk management processes. TKP's Procurement and Outsourcing Policy aims fair labour conditions through supplier remuneration standards, and TKP aims to broaden this approach.

### Ensuring timely payments 16.1

a.s.r. is aware that late payments can have a significant impact on its suppliers and outsourcing partners, especially for SMEs. In light of this, a.s.r. upholds a strong commitment to ensure timely and efficient payment practices. A standard payment term of 30 days, as stated in the general purchasing terms and conditions, is uniformly adhered to within the procurement processes of a.s.r. The distribution and services entities also adhere to the standard payment term of 30 days except for Corins which maintains a 14 day payment term.

The procurement processes ensure that invoices are paid within 30 days of receipt. If an invoice is received before the products have been delivered in their entirety, a.s.r. will pay the invoice within 30 days of full delivery, as stated in the general purchasing terms and conditions.

This standard payment term is consistently adhered to, without making a distinction between suppliers, whether they are SMEs or established suppliers, and regardless of the invoice amount. All incoming invoices, both centralised and decentralised, are processed and paid timely upon approval.

### Prevention and detection of corruption and bribery 15.2 17.2

a.s.r. has implemented a policy to prevent, detect, report, investigate and adequately handle unethical behaviour, including fraud, conflicts of interest, corruption and bribery. a.s.r. maintains a zero-tolerance policy towards unethical behaviour. This policy is outlined in the Code of Conduct and the Anti-corruption Policy and is in line with UN Guiding Principles on business and human rights.

This Anti-corruption policy complements the rules of conduct of a.s.r. and should be read in conjunction with related a.s.r. policies. Particularly with the Incentives Policy, the Outside business activities Policy, the Sponsorship and Donation Policy and the Group Policy on Conflicts of Interest.

The Anti-corruption Policy applies to all employees who perform work for a.s.r. under a contract of employment, or those who perform work for or on behalf of a.s.r. other than as an employee. (hereinafter: a.s.r. employees).

Receiving or providing incentives may compromise the integrity of a.s.r. and its employees. For this reason, employees are encouraged to exercise restraint when accepting or offering gifts and invitations (incentives). An incentive is not permitted if it might have an impact on conduct. All incentives must always be reported to Compliance. Receiving cash is not allowed. An incentive must comply with the principles set out in the Incentives Policy. These principles include that the incentive must fit within the statutory framework, be in line with public opinion, social views, not be excessive, be explainable, be proper in light of the business conducted and must be in the best interest of the customer. Similarly, when an employee offers a gift or invites a business contact to an event, for instance, this could influence the judgement of the recipient and may therefore harm the reputation of a.s.r. When offering a gift, the employee must report this beforehand.

*Reporting incidents*

All a.s.r. employees must report unethical behaviour, including suspicions and attempts of bribery or other forms of corruption and bribery, to their manager and/or the Compliance Officer. Employees can also report an integrity incident through the Reporting Point. It may happen that an employee cannot reasonably bring a wrongdoing to attention through the regular route. In that case, the employee may make use of the Whistleblower Scheme. Employees who make a report in good faith of what they believe to be a violation of this policy will be protected from retaliation in accordance with the Whistleblower Scheme.

The Investigation department is responsible for investigating reports of unethical behaviour by employees, intermediaries and contract parties. Incidents may involve fraud, theft, corruption and bribery, conflicts of interest, discrimination and inappropriate behaviour. The Security Affairs department operates independently of the management chain. Each quarter, Investigations department reports on the investigations conducted regarding unethical behaviour by employees, intermediaries and contract parties. This report is discussed with the CEO. The MB, a.s.r. risk committees and regulators are informed of any serious violations.

*Awareness*

To ensure that the Code of Conduct and related behavioural rules are well-known and understood, a.s.r. conducts various initiatives annually. These include training sessions, presentations and the voluntary use of the Gamification training tool to enhance knowledge on topics such as the Code of Conduct and, Customer Due Diligence (CDD) and information security. The effectiveness of these programmes is evaluated annually.

The central awareness initiatives are intended for 100% of all employees, without specifically defining high-risk functions. All employees, including the MB of a.s.r., may encounter risks surrounding corruption and bribery and other risks regarding conflicts of interest in the board sense (including outside business activities and incentives). Therefore, all staff of a.s.r. receive a training about this topic.

Employees are encouraged to engage in dialogue about integrity issues to collectively find good solutions. Additionally, training and presentations are conducted within the various product lines and staff functions.

In 2024, a multidisciplinary central awareness programme was established to structurally promote awareness in areas such as the Code of Conduct, privacy, IT security and CDD starting in 2025.

See section 5.5.4 for more information.

## Actions and Targets

At present, a.s.r. does not have specific actions and targets set for business conduct. These will be addressed and prioritised upon for 2025. For reporting year 2024, no sufficient time and resources were available. However, a.s.r. remains committed to continuously improve governance practices and risk management processes. The approach includes monitoring emerging risks and adapting strategies accordingly.

Maintaining a strong governance framework and robust risk management processes is essential for the long-term success of the organisation. a.s.r. will continue to review and enhance policies and practices to ensure they meet the evolving needs of stakeholders and the CSRD requirements in 2025.

### 6.4.1.4 Metrics

#### G1-3 Prevention of corruption and bribery

| | Unit of measure | 2024 |
|---|---|---|
| Functions-at-risk covered by training programmes | in % | 93% |

See section 6.5.5.1 for CSRD reporting policies.

At a.s.r., no distinction is made between roles with higher risks of corruption and bribery, as these risks can affect any employee. Therefore, training on conflicts of interest, including corruption and bribery, is mandatory for all staff. 93% of employees have completed the required training programmes. While training is mandatory, there may be colleagues who don't complete the training due to absence.

#### G1-4 Convictions and fines for violation of anti-corruption and anti-bribery laws

| | Unit of measure | 2024 |
|---|---|---|
| Number of convictions for violation of anti-corruption laws | in numbers | 0 |
| Amount of fines for violation of anti-corruption laws | in euros | 0 |
| | | |
| Number of convictions for violation of anti-bribery laws | in numbers | 0 |
| Amount of fines for violation of anti-bribery laws | in euros | 0 |

See section 6.5.5.2 for CSRD reporting policies.

In the reporting period, there were no recorded incidents of violations related to anti-corruption and anti-bribery laws. Consequently, there were no convictions or fines imposed.

#### G1-6 Payment practices

| | Unit of measure | 2024 |
|---|---|---|
| Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated | in numbers | 9 |
| Percentage of payments aligned with standard payment terms | in % | 99% |
| Number of outstanding legal proceedings for late payments | in numbers | 0 |

See section 6.5.5.3 for CSRD reporting policies.

a.s.r. upholds a strong commitment to ensure timely and efficient payment practices. Its procurement processes uniformly adhere to a standard payment term of 30 days. a.s.r. adheres to this standard consistently, without making a distinction between suppliers, whether they are SMEs or established suppliers, and regardless of invoice amount. All incoming invoices, both centralised and decentralised, are processed and paid timely upon approval.

On average, invoices are paid within nine days from the start of the contractual or statutory payment term. This prompt payment schedule reflects a.s.r.'s dedication to maintaining healthy and reliable relationships with its suppliers and partners. Additionally, 99% of a.s.r.'s payments are aligned with standard payment terms of 30 days and there are no outstanding legal proceedings related to late payment. The remaining 1% of payments paid beyond the payment term are for instance related to incorrect data on the invoices or incorrect addressing to wrong departments.

# 6.5 CSRD reporting policies

## 6.5.1 Introduction

This section provides a description of the sustainability reporting framework and applied reporting policies for The Sustainability Statements, providing a better understanding of The Sustainability Statements and ensuring that these are prepared consistently and in accordance with the applicable standards.

It gives a detailed description of the specific reporting policies, methodologies, assumptions, estimations, limitations, and practices applied by a.s.r. in preparing and presenting the Sustainability Statements. These policies ensure consistency and comparability of the Sustainability Statements across different periods and a.s.r. entities.

The reporting policies comprise General as well as specifics for ESG, which are included in section 6.5.2 (General), section 6.5.3 (Environmental), section 6.5.4 (Social), and section 6.5.5 (Governance). The general reporting policies in section 6.5.2 include an explanation of the method for using the Estimation model (see section 6.5.2.1) and the Carbon manager (see section 6.5.2.2).

### 6.5.1.1 Changes in standards and adoption of CSRD effective in 2024

The CSRD was adopted on 14 December 2022, and entered into force on 5 January 2023. a.s.r. has adopted the following new reporting standards from materiality perspective, including any consequential amendments to other standards, with a date of initial application of 1 January 2024:

- ESRS 1 – General requirements
- ESRS 2 – General disclosures
- ESRS E1 – Climate change
- ESRS E4 – Biodiversity and ecosystems
- ESRS E5 – Resource use and circular economy
- ESRS S1 – Own workforce
- ESRS S2 – Workers in the value chain
- ESRS S4 – Consumers and end-users
- ESRS G1 – Business conduct

As this marks the first reporting year of implementation of the CSRD for a.s.r., no comparative figures have been presented.

## 6.5.2 CSRD general reporting policies

### 6.5.2.1 Estimation model

Certain quantitative metrics and monetary amounts are subject to a high level of measurement uncertainty due to data availability issues. The estimation model has been used for Corins, D&S Holding, Robidus, and TKP. The datapoints that have been estimated per entity are specified below. The estimation model extrapolates the missing data by using related parameters of these entities and basing the calculations on either actual reported figures of a.s.r. or externally sourced predictive measures. Therefore, a.s.r. deems the a.s.r. data used to be representative for the entities mentioned above. a.s.r. has control measures in place on the calculations within the estimation model including plausibility checks on the estimations calculated to mitigate this uncertainty as much as possible.

The amount of estimated datapoints differs per entity as Corins applied the estimation model for its scope 3 category 1 GHG emissions and the training and skills development metrics. Due to the complex organisational structure of D&S Holding, all datapoints from this entity have been determined by the estimation model except for its collective bargaining coverage, social dialogue coverage, and payment alignment. Robidus applied the estimation model for scope 1,2 and 3 GHG emissions, to determine its resource outflow and waste data, training and skills development metrics, health and safety metrics, work life balance, metrics regarding incidents, complaints and severe impacts, and payment alignment metrics. Lastly, TKP applied the estimation model to determine its functions at risk.

a.s.r. has the ambition to improve its data quality for its own operations on the environmental, social and governance metrics by replacing estimations with actuals and reevaluating its methodologies.

### 6.5.2.2 Carbon manager

Carbon Manager is an application that a.s.r. uses to collect information about consumption. It then calculates the related GHG emissions using a database of emission factors from co2emissiefactoren.nl. Carbon Manager also helps a.s.r. to organise and monitor their carbon footprint.

### 6.5.2.3 General disclaimer on non-financial targets

Targets are based on the assumption of normal (financial) markets, environmental and economic conditions (per end of 2024) and no material regulatory changes. Targets could be affected materially by changes in these topics, including changes in the transition to net zero.

## 6.5.3 CSRD environmental reporting policies

### 6.5.3.1 CapEx and Opex in relation to the action plans

a.s.r. uses CapEx and Opex as key performance indicators to monitor investments and funding that support the implementation and maintenance of action plans for climate change mitigation, adaptation, and transition. Investment amounts in euros are divided between actions taken during this reporting period and planned future allocations. To be included, expenditures must be allocated to an existing action plan. In addition, targets on business line level must exceed the €1 million materiality threshold to be included.

### 6.5.3.2 Gross scope 1, 2, 3 and total GHG emissions

The disclosures on the Greenhouse Gases (GHGs) are related to the seven gases as mentioned in ESRS E1: carbon dioxide ($CO_2$), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3). The general unit of measure for the GHGs is in tonnes of carbon dioxide ($CO_2$) equivalent, $tCO_2e$. This universal unit of measurement is used to indicate the global warming potential (GWP) of each greenhouse gas, expressed in terms of the GWP of one unit of carbon dioxide.

**Scopes 1 & 2**

*Methodology and scope*

Facilities, Robidus, D&S Holding, Corins, TKP, IT and Knab (up to 31 October 2024) contributed to the gross scope 1 and 2 GHG emissions. The GHG emissions resulting from IT's own operations, only accumulate to the scope 2 emissions. For a.s.r., scope 1 GHG emissions include the direct emissions of fossil fuel-based lease cars, refrigerant usage and leakage, fossil fuels used for heating and the fuel usage of emergency generators. The scope 2 GHG emissions of a.s.r. consist of purchased electricity used for office buildings and leased electrical vehicles and are divided in market-based and location-based emissions. The market-based emissions take purchased renewable energy into account and assume that regular power is delivered as residual power. The location-based emissions are calculated based on average country-specific emission factors.

*Assumptions and limitations*

Due to limitations in the data availability for lease cars, a.s.r. does not make a distinction between private and business kilometres and the fuel type. The inclusion of both private and business kilometres in the calculation leads to higher calculated scope 1 and 2 emissions as only business kilometres are required. To cover the emissions associated with refrigerants, a standard leakage of 5% is incorporated in the calculation. The emissions associated with small refrigerators are considered negligible and have therefore been placed out of scope. For the calculation of a.s.r.'s scope 1 and 2 emissions of some offices, estimations are made via an extrapolation factor based on $m^2$ surface or amount of employees.

*Market- and location-based*

The emissions factor for the calculation of the location-based emissions is retrieved from co2emissiefactoren.nl. a.s.r.'s market-based emissions factor is calculated by using the location-based emissions factor minus the amount covered by contractual instruments. These contractual instruments consist of bundled instruments such as energy contracts and unbundled instruments like the Guarantee of Origin (*Garanties van Oorsprong* - GvO) certificates. These energy contracts or certificates are issued by independent organisations and validate the origin of the renewable energy.

*Measurement uncertainties*

The percentages of contractual instruments are calculated using a weighted average, with the scope 2 location-based emissions as weighting factor.

**Scope 3**

*Methodology and scope*

The relevant GHGs and unit of measure mentioned at the start of this section also relate to scope 3 emissions. a.s.r.'s scope 3 emissions are reported in line with the GHG Protocol, which splits the scope 3 GHG emissions into 15 categories. a.s.r. will only report on the significant scope 3 categories in $tCO_2e$. The following scope 3 categories listed below, were found not material in a.s.r.'s double materiality assessment:

Category 2 – Capital goods
Category 3 – Fuel- and energy-related activities
Category 4 – Upstream transportation and distribution
Category 8 – Upstream leased assets
Category 9 – Downstream transportation and distribution
Category 10 – Processing of sold products
Category 11 – Use of sold products
Category 12 – End-of-life treatment of sold products
Category 14 – Franchises

The categories of scope 3 GHG emissions discussed hereafter were found to be material for a.s.r.

The percentage of primary data is calculated using a weighted average, with the $tCO_2e$ amount as the weighting factor. The methodology is based on the GHG protocol. A step-by-step manual has been developed and shared with the product lines to guide them in calculating the percentage for their scope 3 GHG data.

*Application of PCAF*

a.s.r. applies the PCAF methodology to determine the emissions from the downstream leased assets (category 13 of the GHG-Protocol) and Investments (category 15 of the GHG-Protocol). The methodologies for carbon accounting are still evolving, e.g. a new update was published in 2024 for consultation.

**Category 1 – Products and services**

This category includes upstream emissions associated with purchased goods and services by a.s.r. in the reporting year.

*Methodology*

For the calculation of scope 3 emissions associated with purchased goods and services, a.s.r. selected the spend-based method in line with the GHG Protocol, which estimates emissions for goods and services by collecting data on the economic value of goods and services purchased and multiplying it by relevant secondary industry average emissions factors per monetary value of goods. The total spend per supplier is classified according to industry codes, the North American Industry Classification System (NAICS), which is the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analysing, and publishing statistical data related to the U.S. business economy. In order to calculate the total $CO_2$ footprint of central procurement, the NAICS model is paired with the US Environmentally-Extended Input-Output (USEEIO), which is a family of models designed to bridge the gap between traditional economic calculations, sustainability, and environmental decision-making. To adjust for inflation and differences in currency, a.s.r. converted from USD to euros using the 2021 exchange rate, as well as adjusting the 2021 consumer price index (CPI) to 2024.

*Efforts to obtain value chain information*
The spend-based method was employed due to the current unavailability of precise value chain information. Efforts to improve value chain information include working more closely with value chain partners to improve data accuracy and reduce reliance on estimates.

*Assumptions and limitations*
The spend-based method is limited to 80% of total spend within central procurement, which includes the most significant suppliers in terms of total spend. Calculations will be performed per supplier for this 80% of total spend using the mentioned spend based model. The remaining 20% of total spend relates to smaller suppliers and is extrapolated based on the analysis of the 80% total spend that was covered.

Supplier expenditures also occur outside the central Procurement department within the a.s.r. product lines. For this spend, central procurement has included the spend of Real Estate (which is outside the central ProActis system) in their analysis. For Disability, Knab and TKP a separate analysis has been performed. With regard to supplier emissions for Disability, no clear guidance is present within PCAF or the GHG protocol on whether to classify these emissions as category 1 or 15. These costs could be considered as insurance-related expenses similar to Health or P&C. However they also relate to upstream suppliers. For 2024 at a best effort basis the emissions are included within category 1. While acknowledging this approach has limitations, it does include emissions for Disability activities in order to inform stakeholders of these emissions.

For other product lines the spend has been determined to be not material, to be included in other categories (for example category 15 – insurance associated emissions) or the supplier emissions are estimated using an estimation model. This model extrapolates the emissions of purchased goods and services per euro spent of central procurement (including Real Estate spend outside of the central ProActis system) to the distribution and services entities Corins, D&S Holding and Robidus.

**Category 5 – Waste generated**
This category covers the emissions associated with the disposal and treatment of waste generated from facilities owned or controlled by a.s.r. This includes general waste generated, waste from renovation activities and waste from disposed hardware.

*Methodology*
In addition to the GHG protocol scope 3 guidance, Facilities, TKP and IT receive reports stating the kilogrammes per waste type. The data for these product lines on waste type and kilogrammes are multiplied by the relevant emissions factors using the Carbon Manager tool. See section 6.5.3.4 for more information on the calculation methodology and assumptions used for waste generated. Corins and Knab assign a proportion of the waste generated by the whole building based on $m^2$. D&S Holding and Robidus calculate their emissions from generated waste with the estimation model.

**Category 6 – Business travel**
Category 6 of scope 3 emissions includes the emissions related to transportation of employees for business-related activities, not including daily commuting.

*Methodology*
In accordance with the GHG Protocol, a.s.r. applies the distance-based method to calculate the scope 3 category 6 GHG emissions. a.s.r. includes business travel by car, aeroplane and public transport, as per the claim and reimbursement processes. Travel with NS-Business Cards, hotel stays and taxi rides are out of scope for a.s.r. but in scope for TKP.

*Efforts to obtain value chain information*
Given current data availability and complexity of data collection, the distance-based method provides a fair estimation of emissions. a.s.r. aims to strive improving data quality and availability in the future.

*Assumptions and limitations*
The calculated emissions are based on travel claims for public transport and transport by car. Even though the emissions per car differ, the average emission per kilometre from CO2emissiefactoren.nl is used to calculate the emission of transport by car.

**Category 7 – Employee commuting**
Category 7 covers the emissions associated by employee commuting. The scope is limited in terms of travel modes to car, public transport and motorcycles for own employees of a.s.r.

*Methodology*
a.s.r. reports on this category in accordance with the distance-based method, as described in the GHG Protocol for scope 3 emissions. a.s.r. used information from the access control system in the office, along with employee declarations of their commuting distances.

*Efforts to obtain value chain information*
Given current data availability and complexity of data collection, the distance-based method provides a fair estimation of emissions. a.s.r. aims to strive improving data quality and availability in the future.

*Assumptions and limitations*
For the calculation of commuting distance, a.s.r. assumes that the distribution of travel modes is in line with insights provided in the National Traveler Survey 2023 (*Landelijk Reizigersonderzoek 2023*). Other assumptions include that for a.s.r. all motor vehicles are calculated as cars and all scooters are included as bicycles. Bicycles with a commuting distance more than 20 km are assumed to have travelled with public transport.

**Category 13 – Downstream leased assets (Financed Emissions)**
This category includes emissions from investment properties that are leased out by a.s.r.

*Methodology*
From Real Estate's side, this includes the emissions from the ASR Dutch Farmland Fund, which are calculated with data provided by the *Nutriënten Management Instituut* (NMI). The NMI uses the initiator

model to calculate the emissions based on a.s.r. its properties. The initiator model is a publicly available model that gives insight into how carbon behaves and interacts in rural areas and is developed by scientists from the Wageningen University and Research (WUR).

Amvest's category 13 emissions result from the energy usage within its direct fund. Information with regard to the tenant spaces are supplied by the energy suppliers, while asset managers provide insight on the energy usage of the common spaces. In terms of data coverage, the direct funds have a coverage of 99.4% on 2023 data. Missing values are estimated based on ZIP code area.

The data quality score is calculated using a weighted average, with the AuM amount as the weighting factor. The methodology is based on the PCAF standard. A step-by-step manual has been developed and shared with the business lines to guide them in calculating the data quality score.

*Efforts to obtain value chain information*
Given the complexity and scale of the downstream leased assets portfolio, obtaining precise data is currently not feasible. Efforts to improve include potentially improving the granularity of reported data as a.s.r.'s technical capabilities and value chain relationships mature.

*Assumptions and limitations*
The calculation for Real Estate is based on a combination of actual measurements and model estimations provided by the NMI. In Q1 2022 a.s.r. Real Estate has requested a second opinion from an independent professor of the WUR on the research and calculation of the NMI over the 2020 $CO_2$ footprint of Rural. No findings were noted. If any, measurement uncertainty is minimal.

**Category 15 - Investments (Financed Emissions)**
For category 15, a.s.r. reports on financed emissions as reported in the financial statements for Asset Management, Mortgages, Real Estate, Knab and Amvest, where investments on behalf of policyholders are mentioned separately. a.s.r. reports on mortgages for which an a.s.r. entity is the originator, which excludes Robuust and Dynamic Credit mortgages. For an overview of the Real Estate portfolio in scope, see section 7.5.4.The financed emissions from Asset Management include the own account investments and investments on behalf of policyholders and consist of government bonds, corporate bonds, and equities. Investments via funds are allocated to these asset classes via look-through. Other assets such as derivatives, cash, hedge accounting and SME loans are not included in the emission calculation as there is no emission data or PCAF methodology available. For Amvest, the indirect funds; RCF and LCF are in scope for category 15.

The data quality score is calculated based on the PCAF standard, using a weighted average with the AuM amount as the weighting factor. A step-by-step manual has been developed and shared with the product lines to guide them in calculating the data quality score.

*Efforts to obtain value chain information*
Given the complexity and scale of the investment portfolio, obtaining precise data from all investments is currently not feasible. a.s.r. leverages various standards and methodologies to make estimates for emissions which are further described below. Efforts to improve include potentially expanding the scope of data collection and improving the granularity of reported data as a.s.r.'s technical capabilities and value chain relationships mature.

*Methodology*
With respect to Real Estate, the GRESB framework is used for external non-listed real estate investments. For the indirect funds of Amvest, the 2023 data is not available in time to be included in the Annual Report 2024 of a.s.r. Therefore, Amvest provides a.s.r. with 2022 data to calculate its emissions for indirect funds. Once the 2023 data becomes available, it is used to compare to the 2022 data and adjust the values in case this is required. Given the 82% data coverage of the RCF fund, missing values will be estimated based on the ZIP code area. For all other financed emissions, the PCAF methodologies are used. For Mortgages and Real Estate, a.s.r. uses internal and external data, for all other investments a.s.r. relies on external ESG data vendors' data.

*Assumptions and limitations*
Real Estate takes into account the PCAF methodology for estimating based on m2 of an asset, in case no direct meter reading was available and no ESG templates were filled in. Asset Management relies on external ESG data vendors, who provide the necessary datapoints. This external data includes emission data reported by companies as well as estimations. Data coverage of GHG emissions for government bonds, corporate bonds and equities is between 90% and 100%. The GHG emissions of externally managed investments can only be included if look through data is available. The methodology of Amvest contains limitations as it is relying on 2022 data and estimations for missing values. With respect to Mortgages, the attribution factor on gas and electricity usage is based on an extrapolated CBS dataset from 2019. As more recent events are not taken into account in this dataset, it is likely to result in higher reported emissions. Moreover, assumptions are made when the external data is unavailable, based on object characteristics.

**Category 15 - Investments (Insurance-associated Emissions)**
a.s.r. has taken into account the "PCAF Global GHG accounting and reporting standard for the financial industry – part c – insurance associated emissions" in order to report on insurance associated emissions for Health and P&C. Emissions associated with healthcare providers are reported under Category 15 Investments, specifically as Insurance-associated emissions. A discrepancy exists between the upstream placement of healthcare providers in the value chain and their downstream reporting under Category 15. Sector discussions concluded that emissions from healthcare providers should not be placed under Category 1 Purchased Goods and Services, due to the lack of direct operational need, nor under Category 15 Investments, due to value chain orientation discrepancies. Given the anticipated review of the PCAF standard in 2025 and Health's affiliation with a larger insurance group, it is deemed appropriate to report healthcare provider emissions under Category 15 Investments, accepting the value chain orientation discrepancy for the first year of reporting. A similar conclusion applies to the reported emissions of repair companies, but a.s.r. chooses to utilise the transitional provision of value chain information and/or the lack of a generally accepted methodology to calculate emissions of repair companies in particular.

Some insurance product lines are not reported. The emission output for Disability and Individual life and Funeral is not recognised as material, Funeral does not yet have a standard methodology, and Pensions has no insurance-related GHG emissions other than those arising from their investment portfolio.

*Methodology*
For the calculations of P&C, a.s.r. differentiates between its commercial and private car insurance lines. For private car insurance, emissions are calculated by multiplying the average kilometres driven in the Netherlands by the average emissions per kilometre and the PCAF industry attribution factor. The total insurance-associated emissions for the private car insurance portfolio are then determined by accumulating these insured emissions. For commercial lines, emissions are calculated by multiplying the average sector emissions in $tCO_2e$ per euro by the premium in the reporting year. The total insurance-associated emissions for commercial lines are determined by accumulating these insured emissions.

For the funeral sector, the PCAF standard does not contain a methodology and other sources are dated. Therefore, a.s.r. committed to a joint industry initiative as a.s.r. wants to contribute within the sector to obtain an industry-wide calculation methodology and definition. At this moment, the lack of reliable data and methodology results in an exclusion of quantitative explanation. The emissions of claims related to in-kind funeral policies are disclosed in scope 3 Category 1 Products and services. Health calculates its insurance associated emissions by multiplying the emission factor per healthcare type with the euros spend on the healthcare type. The emission factors per healthcare type are retrieved from a report by *Stichting Stimular*.

*Efforts to obtain value chain information*
Estimating emissions associated with insurance activities presents challenges due to the diverse nature of insured assets and the limited availability of methodologies for estimating emissions. a.s.r. has utilized sector-average data and industry benchmarks to provide initial estimates, reflecting a reasonable effort given current data limitations. Efforts to improve data accuracy include collaborating with distribution and services entities to develop standardized reporting frameworks to enhance data collection from insured entities. a.s.r. is committed to progressively refining these estimates as more precise data becomes available.

*Assumptions and limitations*
Within Individual life and Funeral's policies, the funeral payment of a capital insurance policy is freely available for the beneficiaries to spend in accordance with their preferences. Consequently, a.s.r. has no influence on the funeral and little or no reliable data on the insurance associated emissions available.

Due to data unavailability, several assumptions have been made within P&C's policies for the insurance associated emissions for commercial and private lines. For the calculation of the private cars, a.s.r. cannot take mutations into account and due to the publication timeline of the CBS, there is a delay of one year. For the calculations, a.s.r. assumes that all insured cars have an average emission factor and drive the Dutch average amount of kilometres per year. Moreover, the ownership costs in relation to the cost of insurance are unknown to a.s.r. For the commercial line, a.s.r. assumes that customers have an emission based on their industry sector. As not all the client's activities are known to a.s.r. the SBI codes are applied. a.s.r. only has access to premiums booked on a product level, sector and client level is unavailable at the moment. Therefore, certain parts will be estimated. Lastly, the method used for Health is considered the most appropriate methodology due to the diversity in the sector and limited availability of data. As a result of the measurement uncertainty, the reported scope 3 emissions related to Health should be considered as a guiding value.

**Reconciliation of AuM with financial statements**
Due to the use of different standards for emissions calculation (ESRS) and financial statements (IFRS), differences arise, necessitating a reconciliation table. These differences include scope and valuation.

For instance, in the sustainability statements, the mortgage portfolio is valued at residual debt, whereas in the financial statements, it is primarily valued at fair value. Additionally, mortgages on behalf of third parties are off-balance in the financial statements but included in the emissions calculation. For investment property, the emissions calculation includes AuM allocated in real estate funds, which are categorised as own investments in the financial statements

**GHG Emissions intensity**
For the calculation of the emissions intensity, a.s.r. defines net revenue as the insurance contract revenue (ICR) + direct investment income, fee income and other income related to renewables. a.s.r. complies to the ESRS by dividing the market-based, location-based and total GHG emissions by the net revenue in scope of the GHG emissions calculations. This includes the emissions intensity for all the a.s.r. product lines and subsidiaries.

The emission intensity with regard to AuM is determined by dividing the total emissions of as asset class by the AuM data coverage value. Due to the sale of Knab, these assets are included for 10 of the 12 months. This leads to a small variance that is visible in the emission intensity presented for government bonds.

There are no direct assumptions for emissions intensity; however, reliance is placed on the related assumptions of the input values as described in the previous sections.

## 6.5.3.3 Climate change mitigation projects financed through carbon credits
Issued carbon credits for emission reductions or removals from climate change mitigation projects outside the value chain, are material for a.s.r. The carbon credits are issued by Trees for All, which only sells carbon credits from projects that are validated by Plan Vivo against the Plan Vivo Carbon Standard. Each one of these credits represents the removal of one $tCO_2e$ by trees.

For 2024, a.s.r. purchased carbon credits to compensate scope 1, 2 and 3 emissions from its locations in Utrecht.

For 2025, a.s.r. will purchase carbon credits to compensate scope 1 and 2 emissions from its locations in Den Haag, Leeuwarden, Enschede, Rotterdam, Heerlen and Utrecht.

## 6.5.3.4 Resource outflows
*Waste streams*
Waste streams generated from a.s.r.'s own operations are divided into several different categories or waste types. These categories are all related to waste generated by a.s.r.'s own workforce and include waste types such as PCD, paper and organic waste.

**Facilities**

*Methodology*

To categorise the resource outflow data, a.s.r. used the European Waste Catalogue. This catalogue enabled a.s.r. to identify different waste streams in its own operations. Moreover, a.s.r. embedded the Waste Framework Directive for defining all waste disposal methods that are used within its own operations. a.s.r. did not take radioactive waste into account, as this is not applicable for its own operations.

*Assumptions*

Waste from a.s.r.'s own operations is generally reported on the basis of the average weight of waste containers. In cases where only invoices are available, the invoices are based on the number of containers that were emptied. Whenever this is applicable, a.s.r. calculates the weight per waste stream with the help of key figures from the waste recipient. Moreover, where necessary, the weight of waste is calculated based on a ratio using the number of employees at the site, as the Heerlen location is a multi-tenant building.

This excludes waste generated and handled by suppliers and organic waste. Due to data unavailability, a.s.r. made several assumptions. For the waste collected in roll containers, a.s.r. had no exact data but utilised container size and average weight per waste type. For locations where Prezero is not the waste processor, a.s.r. applied Prezero's key figures to make estimates based on the total weight of the waste. For the Heerlen location, a.s.r.'s estimations were calculated as the number of employees at Heerlen multiplied by the average weight per person as per data from Prezero.

*Limitations of methodology and measurement uncertainty*

As only residual waste is specifically weighted, the other waste types that accumulate for approximately 80% of all waste generated in a.s.r.'s own operations, is not specifically weighed. Therefore a.s.r. used averages and ratios in order to calculate the total amount of waste generated and the weight of waste per waste disposal method. Therefore, there is some measurement uncertainty in the data presented.

Moreover, by using ratios to calculate data for the Heerlen location, a.s.r. assumed that all employees produce the same amount of waste in its own operations, which also leads to estimation uncertainty.

**IT**

All waste generated by a.s.r. IT can be categorised into datacentre hardware and end-user hardware. The datacentre hardware includes all hardware from within the two datacentres of a.s.r., the owned datacentre in Utrecht and the rented space from Switch in Woerden. The end-user hardware includes all laptops, mobile phones and other hardware used by employees of a.s.r. All hardware within these datacentres, as well as end-user hardware is considered property of a.s.r. and will be disposed, re-used or recycled by a.s.r. The weights of the disposed products (as per the waste manifests) are researched through publicly available sources (e.g. product pages on online shops) in order to calculate the kilogrammes of waste divided into metals, plastics and refractory oxides (metallic minerals).

**Knab, TKP, Corins, D&S Holding and Robidus**

*Methodology*

The a.s.r.'s distribution and services entities D&S Holding and Robidus made use of an estimation model, which was developed by a.s.r. As actual data was not available for these entities for multiple reasons, these distribution and services entities estimated the amount of their generated waste by using reported values from a.s.r.'s own operations. As Corins and Knab are located in shared buildings, a proportion of the building's total waste is assigned based on these entities office surface. TKP uses actuals but estimates the glass and cartridge waste based on the data of a.s.r.

*Limitations to methodology*

The estimation model was developed by a.s.r. to generate data for its distribution and services entities. It does not take into account the different waste streams and waste disposal treatments per location. Therefore, the estimation model only provides an indication of the actual data, based on apportioning values from a.s.r.'s head office.

*Measurement uncertainty*

To calculate all necessary figures for the distribution and services entities regarding the circular economy, an estimation model based on a.s.r.'s key figures was used. As a.s.r.'s key figures only consist of approximately 20% direct measurement, there is a measurement uncertainty in the circular economy data provided for these entities.

### 6.5.3.5 Impact investments

**Impact investments**

a.s.r. aims to contribute to sustainable development through impact investments in Asset Management, Real Estate and Mortgages. The definition for Impact investments is based on the definition given by the Global Impact Investment Network (GIIN), and is as following:

*'Investing with the intention of generating a positive, measurable social and/or environmental impact in addition to a financial return'.*

The valuation method for financial amounts, such as totals that are published, is in line with the method applied for the balance sheet in the financial statements, unless specified otherwise.

**Asset Management**

Impact investing, which a.s.r. defines in line with the Global Impact Investing Network (GIIN) as an investment approach that seeks to generate positive, measurable social and environmental impact alongside financial returns, is a key component the Policy on Responsible Investments. a.s.r. purposefully allocates capital to generate measurable positive changes in the areas of climate, nature, health, and human rights, without compromising financial performance. Asset Management has formulated impact investing targets since 2018, helping its clients contribute to addressing global sustainability challenges. Asset Management focuses on directing capital to areas where it can create the most significant impact, such as sectors where funding is scarce, technologies critical to building a sustainable future, and underserved groups that require additional support.

Asset Management's impact investing approach is built around five principles, which provide the foundation for all investment decisions.

1. Intentionality: All investments must have a credible Theory of Change (ToC) to ensure intentionality, clearly articulating how the investment will create positive social or environmental outcomes.

2. Measurability: Outcomes and impacts must be tracked through clear Key Performance Indicators (KPIs) to ensure transparency and accountability.
3. Do no significant harm: All investments must avoid causing significant harm to environmental or social objectives.
4. Positive contribution: All investments must make a meaningful and positive contribution to one of more of Asset Management's impact goals, as defined for each of its focus themes.
5. Market rate financial returns: While impact is the defining feature of our approach, Asset Management also aims to deliver competitive financial returns to meet its fiduciary responsibility to its clients.

**Real Estate**
a.s.r. real estate is committed creating long-term value from both a financial and social perspective, by responsibly investing in high-quality real estate. As a result, the sectoral real estate Funds are committed to limiting the negative impact upon the environment. Alongside reducing the environmental footprint, a.s.r. real estate is committed to making a positive societal impact.

The Funds, as part of their yearly strategy cycles, critically assess their ability to make an environmental and societal impact. The result of this is that part of the funds' strategies are clearly defined and accredited as impact investing strategies. These strategies and objectives are in accordance with both the European Association for Investors in Non-Listed Real Estate Vehicles (INREV) and Global Impact Investing Network (GIIN) standards for impact investing.

- Affordable housing
  - a.s.r. Dutch Core Residential Fund developed an impact investment strategy that focuses on the addition of affordable dwellings to its portfolio. Affordable housing refers to residential dwellings with rents that are deemed to be affordable for households with a median income. In 2024, the Fund designates rents up to € 1,350 as affordable. The Fund contributes to affordability by keeping a considerable part of the portfolio in the affordable segment. The Fund extends its portfolio with dwellings in the affordable segment and takes affordability into account in its rental policy.
- Dutch science parks
  - a.s.r. Dutch Science Park Fund makes a positive societal impact by stimulating science parks in the Netherlands, by investing in real estate for the broad range of functions that are needed for science park ecosystems to thrive. To achieve these goals, the Fund partners with (semi) public entities, e.g. universities and local governments, as well-functioning science park ecosystems require both public and private real estate investments.
- Sustainable mobility
  - a.s.r. Dutch Mobility Office Fund makes a positive environmental impact through enabling CO2 emission reductions for tenant employee mobility to the Fund's office buildings. The Fund does this through investing exclusively in offices located on public transport hubs, adding office stock on these locations, and through specific measures aimed at stimulating sustainable mobility for each of the Fund's office buildings.
- Renewable energy
  - a.s.r. Dutch Green Energy Fund is an impact investment vehicle investing in renewable energy, such as wind and solar farms and energy storage in the Netherlands. By investing in renewable projects, the Fund reduces carbon emissions, promotes clean energy and the transition towards a low-carbon economy.
- International non-listed real estate
  - a.s.r. real estate investment partners make impact investments through its investments that contribute to the UN SDGs in three ways: affordable housing, green buildings, and health & well-being.
    Each (potential) investment is screened in order to determine of that investment meets the GIIN requirements for impact investments. If all requirements are met, the investment qualifies and is reported as impact investment.

**Mortgages**
a.s.r. defines mortgage loans that make a positive contribution to reducing GHG as impact investments. And more specifically, where governments and civil society organisations are not sufficiently able to solve certain (persistent) environmental issues on their own therefore, a.s.r. strives to provide support within our ability on this subject. The main target is to generate a measurable positive impact on a sustainable future for people and the planet. These investments are visible in (parts of) concrete products and services.

Customers can make use of an Energy Saving Budget (*Energiebespaar Budget*) and/or Energy Savings Facilities (*Energiebesparende Voorzieningen*) to finance sustainable measures. To do this they can make use of a separate product, the sustainability mortgage (*Verduurzamingshypotheek*). The funds allocated for this purpose can only be used for housing improvements aimed at sustainability, which is in line with this definition and are included in a.s.r.'s impact investment figures. Examples of sustainable housing improvements financed through this product include insulation solutions, solar panels and heat pumps. It is noted that only the used amount for sustainable housing improvements is reported.

## 6.5.4 CSRD social reporting policies

### 6.5.4.1 Characteristics of the undertaking's employees

**Employees**
The scope of this disclosure includes all employees within the own workforce of a.s.r. The number of employees refer to headcount. Not included in the definition of employees within the own workforce are redundant employees, incapacitated employees, employees employed through the Participation Desk, self-employed workers and other external staff, unless stated otherwise in the sections below. For year-end figures (head count, gender) Knab is not included. For employee turnover figures, Knab is included until 31 October 2024.

*Methodology*
a.s.r. used direct measurements for all employees within the own workforce, except for D&S Holding for which the estimation model was used. For the calculation of employee turnover (total number of employees who have left a.s.r.) redundant employees and employees employed through the Participation Desk are included.

For the turnover as disclosed in S1-5 and S1-6 the average head count is used in the numerator instead of the year-end head count in order to account for Knab which is included only until 31 October 2024. In addition, the scope of the S1-6 turnover metrics deviates from the scope of S1-5 turnover target as the S1-6 turnover metrics includes also the turnover for Corins, D&S Holding, Robidus and Knab. The employee turnover target only includes a.s.r. and Knab employees.

*Assumptions and limitations*
No assumptions or estimations were used for a.s.r.'s own workforce characteristics besides the estimation model used for D&S Holding, see section 6.5.2.1.

### 6.5.4.2 Collective bargaining coverage and social dialogue

**Collective bargaining agreements**
The scope for this disclosure includes all employees within the own workforce of a.s.r. redundant employees, incapacitated employees, employees hired through the Participation Desk, self-employed workers and other external staff are also covered by collective bargaining agreements, however they are not included in the scope of this disclosure. All collective bargaining information was obtained from the same dataset as the other employee information. Knab is no longer in scope for collective bargaining and social dialogue metrics as these are based on year-end.

### 6.5.4.3 Diversity metrics

**Gender distribution at top management level & age distribution of employees**
Gender distribution was based on the split between male, female, other, and is reported per management type. This metric makes a distinction in SB, MB and management. Within a.s.r., management is defined as senior, higher, and team management. For gender diversity, a.s.r. considers the management board positions within Corins, D&S Holding and Robidus, such as CEO, CFO, COO and other executives with decision-making authority, to be management of a.s.r. The age distribution was grouped by ages of younger than 30 years, between 30 and 50 and older than 51 years, and is not reported per management type. a.s.r. used direct measurements for the age distribution of all employees within the own workforce, except for D&S Holding for which the estimation model was used, see section 6.5.2.1. All gender and age information was obtained from the same dataset as the other employee information. Knab is no longer included in the diversity metrics as these are based on year-end.

### 6.5.4.4 Adequate wages

In order to determine whether all employees are paid an adequate wage, a.s.r. used national benchmarks. Therefore, all employees within a.s.r. and contractors with a.s.r. contracts are paid an adequate wage. All pay and wage information was obtained from the same dataset as the other compensation information and was the result of direct measurement.

### 6.5.4.5 Social protection

At a.s.r. all employees are covered by social protection. This is mandatory for all employees that work and live in the Netherlands and is, therefore, incorporated into local policies. All social protection information was obtained from the same dataset as the other employee information and was the result of direct measurement.

### 6.5.4.6 Persons with disabilities

**Coverage**
For this metric, incapacitated employees (*IB Arbeidsongeschikt*) are not included in the percentage of employees with disabilities because these employees are both incapacitated and will be redundant when the incapacitation ends. Other incapacitated employees do fall within scope.

**Persons with disabilities**
a.s.r. defines persons with disabilities as employees that have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

### 6.5.4.7 Training and skill development

**Participation in annual performance and career development reviews**
Knab is not in scope for performance review metrics as these are based on year-end.

**Average training hours**
a.s.r. keeps track of all employees performing trainings in its own academy. The duration of each training programme, attendance, and year of training is determined and used for the calculation. All training information is obtained from the same dataset as the other employee information. To derive the average training hours, the number of training hours (per gender category) is divided by the total average head count. Knab is included until 31 October 2024.

### 6.5.4.8 Health and safety metrics

**Coverage by Health and Safety management systems**
Knab is not in scope for the coverage metrics as this is based on year-end.

**Accidents at work**
Accidents reported under S1-14 are those that occur on the premises of the a.s.r. offices. These may involve all types of employees who are injured or suffer physical complaints.

a.s.r. defines the number of fatalities as the number of employees who lost their lives due to work-related incidents. All health and safety information was obtained from the same dataset and was the result of direct measurement. For all accidents and fatalities, Knab is included until 31 October 2024.

### 6.5.4.9 Work-life balance

**Family-related leave**
All leave-related information was obtained from the same dataset as the other employee information. For the entitled employees that took family-related leave as disclosed in S1-15 the 2024 average head count is used. Redundant employees, incapacitated employees, employees employed through the Participation Desk, self-employed workers and other external staff are out of scope for S1-15.

Knab is included until 31 October 2024. D&S Holding and Robidus used the estimation model for the metrics family related leave, see section 6.5.2.1.

### 6.5.4.10 Remuneration (pay gap and total remuneration)

**Pay gap**
The pay gap is shown as a percentage, calculated based on end of year FTEs and is derived by applying the formula as provided in the ESRS S1-16 AR 98 (b). The scope of this disclosure includes all employees within the own workforce of a.s.r. Not included in the definition of employees within the own workforce are redundant employees, incapacitated employees, employees hired through the Participation Desk, self-employed workers and other external staff. Knab is not included in the pay gap metric as this is based

on year-end. a.s.r. used direct measurements for all employees within the own workforce, except for D&S Holding for which the estimation model was used, see section 6.5.2.1. The unadjusted pay gap includes the weighted average salaries of Corins and Robidus.

**Total remuneration ratio**

The total remuneration ratio of the highest-paid individual, a.s.r.'s CEO, was calculated as a ratio of the total annual remuneration of the CEO to the median salary of an FTE (excluding compensation of the CEO). The total annual remuneration of the CEO includes all remuneration components (such as fixed remuneration, variable remuneration in cash (bonus), the share-based part of the remuneration, social contributions, pension, expense allowance, etc.), as included in the (consolidated) financial statements. Under ESRS S1, AR 101 the median salary for employees is used and the remuneration ratio is calculated only for a.s.r. employees (excluding self-employed workers and other external staff). This causes a difference with the pay ratio under the Dutch Corporate Governance Code (DCGC) where the average salary is used and external staff is included.

This ratio was based on the same definition of own workforce as used for the pay gap, however the calculation did not take into account employees within the own workforce who were not employed for the whole reporting year and part-time employees. These employees were excluded from the calculation of the ratio because accurate extrapolation to fulltime employees was not considered possible due to certain loan components. As a result, none of the Knab employees are included in the ratio. For the remuneration ratio, the median salary of a.s.r. employees in scope of HR is considered to be representative for the median salary of a.s.r. including Corins, D&S Holding and Robidus.

### 6.5.4.11 Incidents, complaints and severe human rights impacts

**Incidents of discrimination and severe human rights incidents**

a.s.r. directly measures all incidents of discrimination, harassment and severe human rights violations and uses a combined data set from Labour Affairs, Compliance and Safety Affairs. Moreover, a.s.r. has multiple channels to file complaints or grievances, to report incidents of discrimination of any nature and to report severe human rights incidents. All incident information was obtained from the labour, compliance and safety datasets. Incidents, complaints and severe human rights impacts at Knab are included until 31 October 2024.

### 6.5.4.12 Incidents, complaints and severe human rights impacts related to value chain workers

**Incidents**

*Efforts to obtain value chain information*

For the disclosure of severe human rights issues and incidents in the upstream and downstream value chain, a.s.r. acknowledges the difficulty in obtaining quantitative data for the current reporting year. Despite this, a.s.r. conducts regular risk assessments and continuously engages with key stakeholders, such as ESG data providers, to identify potential human rights risks. Moving forward, a.s.r. aims to enhance its data collection processes and collaborate with value chain partners to improve transparency and reporting accuracy in the coming years. Thereby being able to publish quantitatively as opposed to qualitatively on the number of 'severe' incidents of child and forced labour in the value chain.

### 6.5.4.13 Tenant satisfaction score

**Tenant satisfaction score – Real Estate**

In scope are all (leasehold) tenants of a.s.r. Dutch Core Residential Fund (DCRF), a.s.r. Dutch Prime Retail Fund (DPRF), a.s.r. Dutch Mobility Office Fund (DMOF), a.s.r. Dutch Science Park Fund (DSPF) and a.s.r. Dutch Farmland Fund (DFLF).

Excluded may be specific tenants such as those living in properties completed less than a year ago (for which separate research can be done), tenants in mixed-use properties and temporary tenants with a lease term of less than two years.

*Methodology*

Periodically, an online benchmark tenant survey is conducted, resulting in a tenant satisfaction score. This survey usually takes place in the fourth quarter.

*Assumptions and limitations*

The questionnaire is subject to improvements based on evaluation and knowledge-sharing sessions. Reliability depends on the response rate, so the percentage score may not be representative of all tenants.

### 6.5.4.14 Relation Net Promoter Score

**Relation Net Promoter Score**

Relationship Net Promoter Score (NPS-r) is an indicator that assesses the business relationship between a business and its customers. The NPS-r for a.s.r. on a group level (aggregated scores for the product lines) is compared to the sector average and peer average.

*Methodology*

The research is conducted by the research institution Ipsos. The question being asked is: "How likely is it that you will recommend our brand to your friends, family and/or colleagues?" Respondents can give a score between 0 (=very unlikely) and 10 (=very likely).

## 6.5.5 CSRD governance reporting policies

### 6.5.5.1 Prevention and protection of corruption and bribery

**Functions-at-risk**

When calculating the percentage of employees that completed the trainings, all a.s.r. employees were taken into account, including the distribution and services entities and Knab.

*Methodology*

All data gathered to report on participation in trainings according to the anti-corruption policy was from direct measurements. The metric was calculated by dividing the number of employees who successfully completed the trainings by the total number of a.s.r. employees.

## 6.5.5.2 Confirmed incidents of corruption and bribery

**Incidents of corruption and bribery**

At a.s.r., Safety Affairs records all cases of corruption and bribery at its own operations, including Corins, D&S Holding, Robidus, TKP and Knab. Incidents of corruption and bribery are defined as actions that have been found to be substantiated. The total amount of fines from corruption and bribery is the total sum of fines of a.s.r. its own operations. For this requirement, a.s.r.'s own operations, including Corins, D&S Holding, Robidus, TKP and Knab, are in scope.

*Methodology*

All data gathered to report the number of incidents and convictions of corruption and bribery and the total amount of fines were direct measurements.

## 6.5.5.3 Payment practices

**Invoice and payment terms and legal proceedings**

The total procurement of a.s.r. is sourced from various channels, including the central procurement stream via Procurement, which is related to operational expenditures, and decentralised procurement streams which are related to specific products and services expenditures. Decentralised procurement streams occur within Real Estate, Health, P&C, Individual life and Funeral, Disability and the distribution and services entities.

a.s.r. has general purchasing terms and conditions in place for its payment terms. A standard payment term of 30 days is in place. These terms are the same for all centralised and decentralised payments. To calculate the average time for an invoice to be paid, a.s.r. only took completed payments into account. For instance, payments that were still being validated were not included when providing the data.

When calculating the average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated, all invoices paid in 2024 were taken into account of a.s.r.'s Procurement department, Real Estate, Health, P&C, Individual life and Funeral, Disability and the distribution and services entities.

When calculating the percentage of payments aligned with standard payment terms all invoices paid in 2024 were taken into account of a.s.r.'s Procurement department, Real Estate, Health, P&C, Individual life and Funeral, Disability and the distribution and services entities.

The number of current legal proceedings against late payments is provided by a.s.r.'s Procurement department, Real Estate and Health. With regards to the distribution and services entities and Knab the number of current legal proceedings against late payments is monitored and provided by these entities.

*Methodology*

For all data, direct measurements are in place. Therefore, no assumptions were made. When providing the data regarding payment practices, only suppliers from a.s.r.'s upstream value chain are in scope.

# 6.6 Annex Sustainability statements

## 6.6.1 CSRD reference table

**ESRS 2 - General**

| DR | Description | Section | Additional Information |
|---|---|---|---|
| BP-1 | General basis for preparation of the sustainability statement | 6.1.2 | |
| BP-2 | Disclosures in relation to specific circumstances | 6.1.2 | |
| GOV-1 | The role of the administrative, management and supervisory bodies | 5.1.3<br>5.1.4<br>5.1.6 | Incorporation by reference |
| GOV-2 | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | 5.1.6 | Incorporation by reference |
| GOV-3 | Integration of sustainability-related performance in incentive schemes | 5.3 | Incorporation by reference |
| GOV-4 | Statement on sustainability due diligence | 6.1.3.3 | |
| GOV-5 | Risk management and internal controls over sustainability reporting | 6.1.3.4<br>7.8 | Incorporation by reference |
| SBM-1 | Strategy, business model and value chain | 2.6.3<br>2.6.4 | Incorporation by reference |
| SBM-2 | Interests and views of stakeholders | 6.1.4.2<br>8.5 | Incorporation by reference |
| SBM-3 | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5 | |
| IRO-1 | Description of the process to identify and assess material impacts, risks and opportunities | 6.1.4.3 | |
| IRO-2 | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | 6.1.4.5<br>6.1.4.6<br>6.1.4.3 | |

## ESRS E1 - Climate change

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, GOV-3 | Climate change adaptation<br>Climate change mitigation | Integration of sustainability-related performance in incentive schemes | 5.3 | Incorporation by reference |
| E1-1 | Climate change mitigation | Transition plan for climate change mitigation | 6.2.1.2<br>6.5.3.1 | |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities, and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5<br>6.2.1.1 | |
| ESRS 2, IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of the processes to identify and assess material climate related impacts, risks and opportunities | 6.1.4.3<br>6.2.1.1 | |
| E1-2 | Climate change adaptation<br>Climate change mitigation | Policies related to climate change mitigation and adaptation | 6.2.1.3 | |
| E1-3 | Climate change adaptation<br>Climate change mitigation | Actions and resources in relation to climate change policies | 6.2.1.3<br>6.5.3.1 | |
| E1-4 | Climate change adaptation<br>Climate change mitigation | Targets related to climate change mitigation and adaptation | 6.2.1.4<br>6.5.3.2<br>6.2.1.1 | |
| E1-5 | Climate change mitigation | Energy consumption and mix | n/a | |
| E1-6 | Climate change mitigation | Gross Scopes 1, 2, 3 and total GHG emissions | 6.2.1.4<br>6.5.3.2 | |
| E1-7 | Climate change mitigation | GHG removals and GHG mitigation projects financed through carbon credits | 6.2.1.4<br>6.5.3.3 | |
| E1-8 | Climate change mitigation | Internal carbon pricing | n/a | |
| E1-9 | Climate change adaptation<br>Climate change mitigation | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | n/a | |
| SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4 | |
| IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of the process to identify and assess material impacts, risks and opportunities | 6.1.4.3 | |
| IRO-2 | Climate change adaptation<br>Climate change mitigation | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | 6.1.4.5<br>6.1.4.6 | |

## ESRS E2 - Pollution

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of the processes to identify and assess material pollution-related impacts, risks and opportunities | 6.1.4.3<br>6.2.2.1 | |
| E2-1 | Pollution of air, water and soil | Policies related to pollution | 6.2.2.2 | |
| E2-2 | Pollution of air, water and soil | Actions and resources related to pollution | 6.2.2.2 | |
| E2-3 | Pollution of air, water and soil | Targets related to pollution | 6.2.2.3 | |
| E2-4 | Pollution of air, water and soil | Pollution of air, water and soil | n/a | |
| E2-5 | Substances of concern<br>Substances of very high concern | Substances of concern and substances of very high concern | n/a | |
| E2-6 | Pollution of air, water and soil | Anticipated financial effects from pollution-related impacts, risks and opportunities | n/a | |

## ESRS E4 - Biodiversity and ecosystems

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| E4-1 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Transition plan and consideration of biodiversity and ecosystems in strategy and business model | 6.2.3.2 | |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5<br>6.2.3.1 | |
| ESRS 2, IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities | 6.1.4.3<br>6.2.3.1 | |
| E4-2 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Policies related to biodiversity and ecosystem | 6.2.3.3 | |
| E4-3 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Actions and resources related to biodiversity and ecosystems | 6.2.3.3 | |
| E4-4 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Targets related to biodiversity and ecosystems | 6.2.3.4 | |
| E4-5 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Impact metrics related to biodiversity and ecosystems change | n/a | |
| E4-6 | Direct impact drivers of biodiversity loss<br>Impact and dependencies on ecosystems | Anticipated financial effects from biodiversity and ecosystems-related risks and opportunities | n/a | |

## ESRS E5 - Resource use and circular economy

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities | 6.1.4.3<br>6.2.4.1 | |
| E5-1 | Resources inflows, including resource use<br>Resource outflows related to products and services<br>Waste | Policies related to resource use and circular economy | 6.2.4.2 | |
| E5-2 | Resources inflows, including resource use<br>Resource outflows related to products and services<br>Waste | Actions and resources related to resource use and circular economy | 6.2.4.2 | |
| E5-3 | Resources inflows, including resource use<br>Resource outflows related to products and services<br>Waste | Targets related to resource use and circular economy | 6.2.4.3 | |
| E5-4 | Resources inflows, including resource use | Resource inflows | 6.2.4.3 | |
| E5-5 | Resource outflows related to products and services<br>Waste | Resource outflows | 6.2.4.3<br>6.5.3.4 | |
| E5-6 | Resources inflows, including resource use<br>Resource outflows related to products and services<br>Waste | Anticipated financial effects from material resource use and circular economy-related risks and opportunities | n/a | |

## ESRS S1 - Own workforce

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, SBM-2 | Interests and views of stakeholders | Interests and views of stakeholders | 6.1.4.2 | |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5<br>6.3.1.1 | |
| S1-1 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Policies related to own workforce | 6.3.1.2 | |
| S1-2 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Processes for engaging with own workers and workers' representatives | 6.3.1.2 | |
| S1-3 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Processes to remediate negative impacts and channels for own workers to raise concerns | 6.3.1.2 | |
| S1-4 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | 6.3.1.2 | |
| S1-5 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 6.3.1.3 | |
| S1-6 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Characteristics of the undertaking's employees | 6.3.1.3 | |
| S1-7 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Characteristics of non-employee workers in the undertaking's own workforce | n/a | |
| S1-8 | Working conditions | Collective bargaining coverage and social dialogue | 6.3.1.3 | |
| S1-9 | Equal treatment and opportunities for all | Diversity metrics | 6.3.1.3 | |
| S1-10 | Working conditions | Adequate wages | 6.3.1.2 | |
| S1-11 | Working conditions | Social protection | 6.3.1.3 | |
| S1-12 | Equal treatment and opportunities for all | Persons with disabilities | 6.3.1.3 | |
| S1-13 | Equal treatment and opportunities for all | Training and skills development metrics | 6.3.1.3 | |
| S1-14 | Working conditions | Health and safety metrics | 6.3.1.3 | |
| S1-15 | Working conditions | Work-life balance metrics | 6.3.1.3 | |
| S1-16 | Equal treatment and opportunities for all | Compensation metrics (pay gap and total compensation) | 6.3.1.3 | |
| S1-17 | Working conditions<br>Equal treatment and opportunities<br>Other work-related rights | Incidents, complaints and severe human rights impacts | 6.3.1.3 | |

## ESRS S2 - Workers in the value chain

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, SBM-2 | Interests and views of stakeholders | Interests and views of stakeholders | 6.1.4.2 | |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5<br>6.3.2.1 | |
| S2-1 | Working conditions and opportunities<br>Equal treatment and opportunities<br>Other work-related rights | Policies related to value chain workers | 6.3.2.2 | |
| S2-2 | Working conditions and opportunities<br>Equal treatment and opportunities<br>Other work-related rights | Processes for engaging with value chain workers about impacts | 6.3.2.2 | |
| S2-3 | Working conditions and opportunities<br>Equal treatment and opportunities<br>Other work-related rights | Processes to remediate negative impacts and channels for value chain workers to raise concerns | 6.3.2.2 | |
| S2-4 | Working conditions and opportunities<br>Equal treatment and opportunities<br>Other work-related rights | Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions | 6.3.2.2 | |
| S2-5 | Working conditions and opportunities<br>Equal treatment and opportunities<br>Other work-related rights | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 6.3.2.3 | |

## ESRS S4 - Consumers and end-users

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, SBM-2 | Interests and views of stakeholders | Interests and views of stakeholders | 6.1.4.2<br>8.5 | Incorporation by reference |
| ESRS 2, SBM-3 | Material impacts, risks and opportunities | Material impacts, risks and opportunities and their interaction with strategy and business model | 6.1.4.4<br>6.1.4.5<br>6.3.3.1 | |
| S4-1 | Information related impacts<br>Personal safety<br>Social inclusion | Policies related to consumers and end-users | 6.3.3.2 | |
| S4-2 | Information related impacts<br>Personal safety<br>Social inclusion | Processes for engaging with consumers and end-users about impacts | 6.3.3.2 | |
| S4-3 | Information related impacts<br>Personal safety<br>Social inclusion | Processes to remediate negative impacts and channels for affected communities to raise concerns | 6.3.3.2 | |
| S4-4 | Information related impacts<br>Personal safety<br>Social inclusion | Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions | 6.3.3.2 | |
| S4-5 | Information related impacts<br>Personal safety<br>Social inclusion | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | 6.3.3.3 | |

## ESRS G1 - Business conduct

| DR | Sub-topic | Description | Section | Explanatory notes |
|---|---|---|---|---|
| ESRS 2, GOV-1 | The role of AMSB | The role of the administrative, management and supervisory bodies | 5.1.3<br>5.1.4<br>5.1.6 | |
| ESRS 2, IRO-1 | Process to identify and assess material impacts, risks and opportunities | Description of the processes to identify and assess material impacts, risks and opportunities | 6.1.4.3<br>6.4.1.2 | |
| G1-1 | Corporate culture<br>Business conduct<br>Protection of whistle-blowers<br>Political engagement<br>Management of relationships with suppliers including payment practices<br>Corruption and bribery | Business conduct policies and corporate culture | 6.4.1.3 | |
| G1-2 | Management of relationships with suppliers including payment practices | Management of relationships with suppliers | 6.4.1.3 | |
| G1-3 | Corruption and bribery | Prevention and detection of corruption and bribery | 6.4.1.3;<br>6.4.1.4 | |
| G1-4 | Corruption and bribery | Incidents of corruption or bribery | 6.4.1.4 | |
| G1-5 | Political engagement | Political influence and lobbying activities | n/a | |
| G1-6 | Management of relationships with suppliers including payment practices | Payment practices | 6.4.1.4 | |

# Financial statements

# 7.1 Introduction

## 7.1.1 General information

ASR Nederland N.V. (a.s.r. or 'the Group') is one of the largest insurers in the Netherlands. a.s.r. helps its customers share risks and build up capital for the future. a.s.r. does this with services and products that are good for 'Nu, later en altijd', in the fields of insurance, pensions, and mortgages for customers, businesses and employers. a.s.r. is also active as an asset manager for third parties. In 2024, a.s.r. sold insurance products under the following labels: a.s.r., Aegon, and Loyalis.

a.s.r. is listed on Euronext Amsterdam and is included in the AEX index. a.s.r. has a total of 7,373 internal FTE's (2023: 7,994 of which 7,556 excluding Knab).

a.s.r. is a public limited company under Dutch law having its registered office located at Archimedeslaan 10, 3584 BA inUtrecht, the Netherlands. Country of incorporation is the Netherlands. a.s.r. has chosen the Netherlands as 'country of origin' (land van herkomst) for the issued share capital and some corporate bonds which are listed on Euronext Amsterdam and Euronext Dublin (Ticker: ASRNL).

a.s.r. is registered under number 30070695 in the register of the Chamber of Commerce.

The consolidated financial statements are presented in euros (€), being the functional currency of a.s.r. and all its group entities. All amounts quoted in these financial statements are in euros and rounded to the nearest million, unless otherwise indicated. Calculations are made using unrounded figures. As a result rounding differences can occur.

These statements have been prepared on a going concern basis.

The financial statements for 2024 were authorised for issue by the Executive Board (EB) and approved by the Supervisory Board (SB) on 25 March 2025. The financial statements 2024 will be presented to the Annual General Meeting (AGM) of Shareholders for adoption on 21 May 2025.

## 7.1.2 Statement of compliance

The consolidated financial statements of a.s.r. have been prepared in accordance with IFRS – including the International Accounting Standards (IAS) and Interpretations – as adopted by the EU (EU-IFRS), and with the financial reporting requirements included in Title 9, Book 2 of the Dutch Civil Code, where applicable. a.s.r.'s interpretation of EU-IFRS is included in the a.s.r. accounting manual. The accounting policies included in section 7.3 are a summary of the relevant accounting policies of the a.s.r. accounting manual. a.s.r. applies fair value hedge accounting for portfolio hedges of interest rate risk (macro hedging) under the EU 'carve out' of IFRS.

EU-IFRS differs from International Financial Reporting Standards Accounting Standards as issued by the International Accounting Standards Board (IFRS). Under EU-IFRS, a.s.r. applies fair value hedge accounting for portfolio hedges of interest rate risk (macro hedging) under the EU 'carve out' of IFRS. This is the only difference between EU-IFRS as applied by a.s.r. and IFRS.

Pursuant to the options offered by Section 362, Book 2 of the Dutch Civil Code, a.s.r. has prepared its company financial statements in accordance with the same principles as those used for the consolidated financial statements.

# 7.2 Consolidated financial statements

## 7.2.1 Consolidated balance sheet

**Consolidated balance sheet**

| (in € millions and before profit appropriation) | Note | 31 December 2024 | 31 December 2023 (restated) |
|---|---|---|---|
| Intangible assets | 7.5.1 | 592 | 649 |
| Property, plant and equipment | 7.5.2 | 676 | 732 |
| Investment property | 7.5.3 | 3,364 | 3,051 |
| Associates and joint ventures at equity method | 7.5.4 | 457 | 426 |
| Investments | 7.5.5 | 80,593 | 90,006 |
| Investments related to direct participating insurance contracts | 7.5.6 | 33,025 | 30,352 |
| Derivatives | 7.5.7 | 11,767 | 12,907 |
| Deferred tax assets | 7.5.8 | 101 | 636 |
| Reinsurance contract assets | 7.5.13 | 485 | 501 |
| Other assets | 7.5.9 | 3,342 | 3,598 |
| Cash and cash equivalents | 7.5.10 | 4,194 | 7,910 |
| **Total assets** | | **138,595** | **150,768** |

| (in € millions and before profit appropriation) | Note | 31 December 2024 | 31 December 2023 (restated) |
|---|---|---|---|
| Share capital | 7.5.11.1 | 34 | 34 |
| Share premium reserve | 7.5.11.2 | 4,070 | 4,070 |
| Unrealised gains and losses | 7.5.11.3 | 432 | 383 |
| Actuarial gains and losses | 7.5.11.4 | -175 | -288 |
| Retained earnings | | 4,528 | 4,147 |
| Treasury shares | 7.5.11.5 | -109 | -7 |
| **Equity attributable to shareholders** | | **8,779** | **8,339** |
| | | | |
| Other equity instruments | 7.5.11.6 | 1,007 | 1,004 |
| **Equity attributable to holders of equity instruments** | | **9,786** | **9,342** |
| | | | |
| Non-controlling interests | | 47 | 35 |
| **Total equity** | | **9,833** | **9,377** |
| | | | |
| Subordinated liabilities | 7.5.12 | 2,007 | 2,005 |
| Insurance contract liabilities | 7.5.13 | 64,267 | 63,302 |
| Liabilities arising from direct participating insurance contracts | 7.5.14 | 38,366 | 36,082 |
| Employee benefits | 7.5.15 | 5,037 | 5,218 |
| Provisions | 7.5.16 | 413 | 414 |
| Borrowings | 7.5.17 | 3,135 | 5,451 |
| Derivatives | 7.5.7 | 8,666 | 10,132 |
| Savings deposits | 7.5.18 | - | 11,967 |
| Due to banks | 7.5.19 | 5,550 | 5,445 |
| Other liabilities | 7.5.20 | 1,322 | 1,376 |
| **Total liabilities** | | **128,762** | **141,391** |
| | | | |
| **Total equity and liabilities** | | **138,595** | **150,768** |

The numbers following the line items refer to the relevant sections in the notes.

The 31 December 2023 figures have been restated, see section 7.3.2.

## 7.2.2 Consolidated income statement

### Consolidated income statement for the year ended 31 December

| (in € millions) | Note | 2024 | 2023 (restated) |
|---|---|---|---|
| **Continuing operations** | | | |
| | | | |
| Insurance contract revenue | 7.6.1 | 9,601 | 8,095 |
| *Incurred claims and benefits* | | *-7,389* | *-6,400* |
| *Insurance service operating expenses* | 7.6.11 | *-1,350* | *-1,227* |
| Insurance service expenses | 7.6.2 | -8,739 | -7,628 |
| **Insurance service result before reinsurance** | | **862** | **468** |
| Net result from reinsurance contracts | 7.6.3 | -90 | -27 |
| **Insurance service result** | | **772** | **440** |
| | | | |
| Direct investment income | 7.6.4 | 6,351 | 4,137 |
| Net fair value gains (and losses) | 7.6.5 | 4,459 | 4,747 |
| Impairments on financial assets | 7.6.6 | 1 | -22 |
| Net finance result from insurance and reinsurance contracts | 7.6.7 | -5,731 | -5,211 |
| Other finance expenses | 7.6.8 | -4,031 | -2,451 |
| Investment operating expenses | 7.6.11 | -205 | -146 |
| **Investment and finance result** | | **843** | **1,054** |
| | | | |
| Share of result of associates and joint ventures | | 28 | 11 |
| Fee income | 7.6.9 | 518 | 328 |
| Other income | 7.6.10 | 107 | 372 |
| **Total other income** | | **653** | **711** |
| | | | |
| Other expenses | 7.6.11 | -821 | -927 |
| **Total other income and expenses** | | **-168** | **-217** |
| | | | |
| **Result before tax** | | **1,447** | **1,278** |
| | | | |
| Income tax (expense) / gain | 7.6.12 | -383 | -275 |
| **Result after tax** | | **1,065** | **1,003** |
| | | | |
| **Discontinued operations** | | | |
| Result after tax from discontinued operations | 7.4.6 | -121 | 82 |
| | | | |
| **Net result** | | **944** | **1,086** |

| (in € millions) | Note | 2024 | 2023 (restated) |
|---|---|---|---|
| **Attributable to:** | | | |
| Non-controlling interests | | -2 | 0 |
| | | | |
| - Shareholders of the parent | | 882 | 1,038 |
| - Holders of other equity instruments | | 63 | 48 |
| **Result attributable to holders of equity instruments** | | **946** | **1,086** |

The numbers following the line items refer to the relevant sections in the notes. The comparative figures for 2023 have been restated (see section 7.3.2). Where applicable, in accordance with IFRS, comparative figures have been included in the new presentation format to ensure comparability.

### Basic earnings per share

| (in €) | 2024 | 2023 (restated) |
|---|---|---|
| **Basic earnings per share** | | |
| Basic earnings per ordinary share from continuing operations | 4.76 | 5.34 |
| Basic earnings per ordinary share from discontinued operations | -0.57 | 0.46 |
| | | |
| **Basic earnings per share** | **4.19** | **5.80** |

### Diluted earnings per share

| (in €) | 2024 | 2023 (restated) |
|---|---|---|
| **Diluted earnings per share** | | |
| Diluted earnings per ordinary share from continuing operations | 4.39 | 4.85 |
| Diluted earnings per ordinary share from discontinued operations | -0.52 | 0.41 |
| | | |
| **Diluted earnings per share** | **3.87** | **5.26** |

For more information on the earnings per share, see section 7.5.11.7.

## 7.2.3 Consolidated statement of comprehensive income

**Consolidated statement of comprehensive income for the year ended 31 December**

| (in € millions) | Note | 2024 | 2023 (restated) |
|---|---|---|---|
| **Net result** | | **944** | **1,086** |
| | | | |
| **Continuing operations** | | | |
| | | | |
| Remeasurements of post-employment benefit obligation | 7.5.15.1 | 152 | -162 |
| Unrealised change in value of property for own use and plant | | 2 | 5 |
| Equity instruments designated as FVOCI | 7.5.5.2 | | |
| - Unrealised change in value of equity instruments designated as FVOCI | | 74 | 134 |
| - Exchange rate differences | | | |
| - Realised gains/(losses) on equity instruments designated as FVOCI | | 156 | 85 |
| Income tax on items that will not be reclassified to profit or loss | 7.5.8 | -102 | -6 |
| **Total items that will not be reclassified to profit or loss** | | **283** | **54** |
| | | | |
| **Discontinued operations** | | | |
| Other comprehensive income after tax from discontinued operations that may be reclassified to profit and loss | 7.4.6 | -7 | 7 |
| | | | |
| **Total other comprehensive income after tax** | | **276** | **61** |
| | | | |
| **Total comprehensive income** | | **1,220** | **1,147** |
| | | | |
| **Attributable to:** | | | |
| Non-controlling interests | | -2 | - |
| | | | |
| - Shareholders of the parent | | 1,158 | 1,099 |
| - Holders of other equity instruments | | 63 | 48 |
| **Total comprehensive income attributable to holders of equity instruments** | | **1,222** | **1,147** |

The numbers following the line items refer to the relevant sections in the notes.

## 7.2.4 Consolidated statement of changes in equity

**Consolidated statement of changes in equity**

| (in € millions) | Share capital | Share premium reserve | Unrealised gains and losses | Unrealised actuarial gains and losses | Retained earnings | Treasury shares (-) | Equity attributable to shareholders | Other equity instruments | Non controlling interest | Total equity |
|---|---|---|---|---|---|---|---|---|---|---|
| **At 1 January 2023** | **24** | **1,533** | **266** | **-168** | **3,569** | **-79** | **5,146** | **1,004** | **27** | **6,177** |
| Net result | - | - | - | - | 1,086 | - | 1,086 | - | - | 1,086 |
| Total other comprehensive income | - | - | 117 | -120 | 65 | - | 61 | - | - | 61 |
| **Total comprehensive income** | **-** | **-** | **117** | **-120** | **1,151** | **-** | **1,147** | **-** | **-** | **1,147** |
| Dividend paid | - | - | - | - | -482 | - | -482 | - | -2 | -484 |
| Discretionary interest on other equity instruments | - | - | - | - | -48 | - | -48 | - | - | -48 |
| Treasury shares acquired (-)/sold | - | - | - | - | -1 | -4 | -5 | - | - | -5 |
| Increase / (decrease) in capital | 10 | 2,537 | - | - | -40 | 75 | 2,582 | - | 2 | 2,584 |
| Changes in the composition of the group | - | - | - | - | - | - | - | - | 14 | 14 |
| Other movements | - | - | - | - | -2 | - | -2 | - | -7 | -8 |
| **At 31 December 2023** | **34** | **4,070** | **383** | **-288** | **4,147** | **-7** | **8,339** | **1,004** | **35** | **9,377** |

| (in € millions) | Share capital | Share premium reserve | Unrealised gains and losses | Unrealised actuarial gains and losses | Retained earnings | Treasury shares (-) | Equity attributable to shareholders | Other equity instruments | Non controlling interest | Total equity |
|---|---|---|---|---|---|---|---|---|---|---|
| **At 1 January 2024** | **34** | **4,070** | **383** | **-288** | **4,147** | **-7** | **8,339** | **1,004** | **35** | **9,377** |
| Net result | - | - | - | - | 946 | - | 946 | - | -2 | 944 |
| Total other comprehensive income | - | - | 49 | 113 | 114 | - | 276 | - | - | 276 |
| **Total comprehensive income** | **-** | **-** | **49** | **113** | **1,059** | **-** | **1,221** | **-** | **-2** | **1,220** |
| Dividend paid | - | - | - | - | -627 | - | -627 | - | -3 | -629 |
| Discretionary interest on other equity instruments | - | - | - | - | -63 | - | -63 | - | - | -63 |
| Issue of other equity instruments | - | - | - | - | - | - | - | 500 | - | 500 |
| Redemptions of other equity instruments | - | - | - | - | - | - | - | -502 | - | -502 |
| Cost of issue of other equity instruments | - | - | - | - | -5 | - | -5 | - | - | -5 |
| Treasury shares acquired (-)/sold | - | - | - | - | -2 | -102 | -103 | - | - | -103 |
| Increase / (decrease) in capital | - | - | - | - | - | - | - | - | 17 | 17 |
| Other movements | - | - | - | - | 17 | - | 17 | 5 | - | 22 |
| **At 31 December 2024** | **34** | **4,070** | **432** | **-175** | **4,528** | **-109** | **8,779** | **1,007** | **47** | **9,833** |

For more information on the share premium reserve, see section 7.5.11.2.

For more information on the actuarial gains and losses related to the pension obligation, see section 7.5.11.4.

For more information on treasury shares acquired and sold, see section 7.5.11.5.

For more information on the issue and redemption of other equity instruments in 2024, see section 7.5.11.6.

## 7.2.5 Consolidated statement of cash flows

| Consolidated statement of cash flows | | |
|---|---|---|
| (in € millions) | 2024 | 2023 restated |
| **Cash and cash equivalents as at 1 January** | **7,910** | **2,246** |
| | | |
| Result before tax from continuing and discontinued operations[1] | 1,608 | 1,389 |
| Adjustments on non-cash items included in result | 677 | 395 |
| Changes in operating assets and liabilities | -2,882 | 1,895 |
| Income tax received (paid) | -102 | -82 |
| **Cash flows from operating activities** | **-699** | **3,597** |
| | | |
| **Cash flows from investing activities:** | | |
| Investments in associates and joint ventures | -18 | -28 |
| Proceeds from sales of associates and joint ventures | 3 | 8 |
| Purchases of property, plant and equipment | -25 | -29 |
| Purchases of group companies (less acquired cash positions) | 1 | 2,255 |
| Proceeds from sales of property, plant and equipment | 1 | - |
| Sales of group companies (less sold cash positions) | -1,898 | - |
| Purchase of intangible assets | -5 | -5 |
| **Cash flows from investing activities** | **-1,941** | **2,201** |
| | | |
| **Cash flows from financing activities:** | | |
| Proceeds from issues of loans | 310 | 1,165 |
| Repayment of loans | -582 | -741 |
| Repayment of lease liabilities | -17 | -12 |
| Dividend paid | -629 | -484 |
| Discretionary interest to holders of equity instruments | -63 | -48 |
| Non-controlling interests | 15 | -5 |
| Issue of other equity instruments | 495 | - |
| Repayment of other equity instruments | -502 | - |
| (Purchase)/ sale of treasury shares | -103 | -5 |
| **Cash flows from financing activities** | **-1,076** | **-130** |
| | | |
| Effect of movements in exchange rates on cash held | - | -4 |
| | | |
| **Cash and cash equivalents as at 31 December** | **4,194** | **7,910** |

The comparative figures for 2023 have been restated (see section 7.3.2).

For more information on cash and cash equivalents, see section 7.5.10.

For more information on the cash flows from operating activities, including the cash flows from interest received, interest paid and dividend received, see section 7.7.2.

1 Result before tax from continuing and discontinued operations consists of Result before tax from continued operations amounting to € 1,447 mln. (2023: € 1,278 mln.) and Result before tax from discontinued operations amounting to € 161 mln (2023: € 111 mln.). Result after tax from discontinued operations amount to - € 121 mln. (2023: € 82 mln.). For more detailed information on discontinued operations, see note 7.4.6.

# 7.3 Accounting policies

## 7.3.1 Changes in EU endorsed published IFRS Standards and Interpretations effective in 2024

In 2024, no changes in EU endorsed published IFRS Standards and Interpretations are relevant to a.s.r.

## 7.3.2 Changes in presentations

The current presentation differs from last year's presentation as recognised in the 2023 financial statements, primarily following the sale of Knab, further harmonisation between a.s.r. and Aegon NL and the refinements related to the implementation of IFRS 17 and IFRS 9. These immaterial (on a qualitative basis) changes in presentation have no impact on a.s.r.'s past or future financial position, financial performance, or cash flows from operating, investing and financing activities.

The following restatements, given their nature, are explained in more detail:

**Reclassification of Knab to discontinued operations**
On 1 February 2024, a.s.r. reached an agreement to sell Knab to the BAWAG Group AG. Closing of the transaction took place on 1 November 2024. Knab's results have therefore been reclassified from continuing to discontinued operations, in line with the requirements of IFRS 5. This reclassification has resulted in a single amount of € 82 million presented as result after tax from discontinued operations in the 2023 consolidated income statement and € 7 million presented as other comprehensive income after tax from discontinued operations in the 2023 consolidated statement of comprehensive income. For further details, please refer to section 7.4.6.

**Changes to the presentation of the Consolidated statement of cash flows:**
Due to a reassessment of the presentation of the cash flow statement in 2024, the 2023 comparative figures for the cash flows from operating activities were adjusted for the revaluation through profit or loss (€ 357 million) as part of the adjustment for non-cash items included in the result, with a corresponding opposite adjustment in the changes in operating assets and liabilities.

**Cash collateral**
The presentation of cash collateral paid (2023: €2.3 billion) has been changed to align more with industry practice and is included in other assets and not in investments.

**Harmonisation between a.s.r. and Aegon NL**
Following further alignment of methodologies and application of policies with Aegon NL, selected comparative figures have also been restated to ensure consistency and comparability. These restatements are part of the ongoing harmonisation process and reflect the integration of Aegon NL into a.s.r.'s financial reporting framework.

## 7.3.3 Upcoming changes in published IFRS standards and interpretations, not yet effective in 2024

The following new standards, amendments to existing standards and interpretations, relevant to a.s.r. and published prior to 1 January 2025 and effective for accounting periods beginning on or after 1 January 2025, were not early adopted by a.s.r.:

- IFRS 18: Presentation and Disclosure in Financial Statements (2027);

**IFRS 18 Presentation and Disclosure in Financial Statements**
IFRS 18 replaces IAS 1, carrying forward many of the requirements in IAS 1 unchanged and introduces the following key requirements:

- present specified categories and defined subtotals in the income statement;
- provide disclosures on management-defined performance measures (MPMs) in the notes to the financial statements;
- improve aggregation and disaggregation;
- the operating profit subtotal is the starting point for the statement of cash flows when presenting the operating cash flows under the direct method.

a.s.r. is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements. IFRS 18 will be applied retrospectively.

## 7.3.4 Key accounting policies

### A. Estimates and assumptions

The preparation of the financial statements requires a.s.r. to make estimates, assumptions and judgements in applying accounting policies that have an effect on the reported amounts in the financial statements. These relate primarily to the following:

- The estimated useful life, residual value and fair value of property, plant and equipment, investment property, and intangible assets (see accounting policy C, D and P);
- The fair value and impairments of unlisted financial instruments (see accounting policy B and E);
- The recoverable amount of impaired assets (see accounting policy B and E );
- The fair value used to determine the net asset value in acquisitions (see section 7.4.5);
- The fair value used in measuring the assets held for sale and liabilities related to the assets held for sale (see section 7.4.6);
- The measurement of insurance contract liabilities and liabilities arising from direct participating insurance contracts (see section 7.5.13.4);
- Actuarial assumptions used for measuring employee benefit obligations (see section 7.5.15);
- When forming provisions, the required estimate of existing obligations arising from past events (see section 7.5.16).

The estimates and assumptions are based on management's best knowledge of current facts, actions and events. The actual outcomes may ultimately differ from the results reported earlier on the basis of estimates and assumptions. A detailed explanation of the estimates and assumptions are given in the relevant notes to the consolidated financial statements.

As from the date of the Aegon NL business combination, harmonisation of assumptions and methods between Aegon NL and a.s.r. is in progress and is expected to continue in the coming years. a.s.r. takes into account in the expense assumptions the estimated synergy effects from the Aegon NL business combination for the part that can be assessed within the budget period.

### B. Fair value of assets and liabilities

The fair value is the price that a.s.r. would receive to sell an asset or pay to transfer a liability in an orderly transaction between market participants on the transaction date or reporting date in the principal market for the asset or liability, or in the most advantageous market for the asset or liability and assuming the highest and best use for non-financial assets.

Where possible, a.s.r. determines the fair value of assets and liabilities on the basis of quoted prices in an active market. In the absence of an active market for a financial instrument, the fair value is determined using valuation techniques. Although valuation techniques are based on observable market data where possible, results are affected by the assumptions used, such as discount rates and estimates of future cash flows. In the unlikely event that the fair value of a financial instrument cannot be measured, it is carried at cost.

**Fair value hierarchy**

The following three hierarchical levels are used to determine the fair value of financial instruments and non-financial instruments when accounting for assets and liabilities at fair value and disclosing the comparative fair value of assets and liabilities:

*Level 1. Fair value based on quoted prices in an active market*

Level 1 includes assets and liabilities whose value is determined by quoted (unadjusted) prices in the primary active market for identical assets or liabilities.

A financial instrument is quoted in an active market if:

- Quoted prices are readily and regularly available (from an exchange, dealer, broker, sector organisation, third party pricing service, or a regulatory body); and
- These prices represent actual and regularly occurring transactions on an at arm's length basis.

Financial instruments in this category primarily consist of bonds and equities listed in active markets. Cash and cash equivalents (excluding money market instruments), reverse repurchase agreements and cash collateral received are also included as level 1.

*Level 2. Fair value based on observable market data*

Determining fair value on the basis of Level 2 involves the use of valuation techniques that use inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is derived from prices of identical or similar assets and liabilities). These observable inputs are obtained from a broker or third party pricing service and include:

- Quoted prices in active markets for similar (not identical) assets or liabilities;
- Quoted prices for identical or similar assets or liabilities in inactive markets;
- Input variables other than quoted prices observable for the asset or liability. These include interest rates and yield curves observable at commonly quoted intervals, volatility, loss ratio, credit risks and default percentages.

This category primarily includes:

I. Financial instruments: unlisted fixed-interest preference shares and interest rate contracts;
II. Financial instruments: loans (excluding mortgage loans and reverse repurchase agreements);
III. Other financial assets and liabilities.[1]

*I. Financial instruments: unlisted fixed-interest preference shares and interest rate contracts*

This category includes unlisted fixed-interest preference shares and interest rate contracts. The valuation techniques for financial instruments use present value calculations and in the case of derivatives, include forward pricing and swap models. The observable market data contains yield curves based on company ratings and characteristics of the unlisted fixed-interest preference shares.

1 Not measured at fair value on the balance sheet and for which the fair value is disclosed.

*II. Financial instruments: Loans (excluding mortgage loans and reverse repurchase agreements)*
The fair value of the loans is based on the discounted cash flow method. It is obtained by calculating the present value based on expected future cash flows and assuming an interest rate curve used in the market that includes an additional spread based on the risk profile of the counterparty.

*III. Other financial assets and liabilities*
For other financial assets and liabilities where the fair value is disclosed these fair values are based on observable market inputs, primarily being the price paid to acquire the asset or received to assume the liability on initial recognition, assuming that the transactions have taken place on an at arm's length basis. Valuation techniques using present value calculations are applied using current interest rates where the payment terms are longer than one year.

*Level 3. Fair value not based on observable market data*
The fair value of the level 3 assets and liabilities are determined in whole or in part using a valuation technique based on assumptions that are not supported by prices from observable current market transactions in the same instrument and for which any significant inputs are not based on available observable market data. The financial assets and liabilities in this category are assessed individually.

Valuation techniques are used to the extent that observable inputs are not available. The basic principle of fair value measurement is still to determine a fair, at arm's length price. Unobservable inputs therefore reflect management's own assumptions about the assumptions that market participants would use in pricing the asset or liability (including assumptions about risk). These inputs are generally based on the available observable data (adjusted for factors that contribute towards the value of the asset) and own source information.

This category primarily includes:
I. Financial instruments: private equity investments (or private equity partners) and equity funds third parties directly investing in real estate;
II. Financial instruments: mortgage loans and mortgage equity funds;
III. Investment property, real estate equity funds associates, rural property contracts, buildings for own use and plant (e.g. wind farms);
IV. Financial instruments: asset-backed securities.

*I. Financial instruments: private equity investments and real estate equity funds third parties*
The main non-observable market input for private equity investments and equity funds third parties directly investing in real estate is the net asset value of the investment as published by the private equity company (or partner) and real estate equity funds respectively.

*II. Financial instruments: mortgage loans and mortgage equity funds*
The fair value of the mortgage loan portfolio is based on the discounted cash flow method. It is obtained by calculating the present value based on expected future cash flows and assuming an interest rate curve used in the market that includes an additional spread based on the risk profile of the counterparty.

The valuation method used to determine the fair value of the mortgage loan portfolio derives the spread from consumer rates and includes assumptions for originating cost and risks. The method of determining the fair value of the mortgage equity funds is similar to that of mortgage loans.

*III. Investment property, real estate equity funds associates, rural property contracts, buildings for own use and plant*
The following categories of investment properties, buildings for own use and plant are recognised and methods of calculating fair value are distinguished:
- Residential – based on reference transaction and discounted cash flow method;
- Retail – based on reference transaction and income capitalisation method;
- Rural – based on reference transaction and discounted cash flow method;
- Offices – based on reference transaction and discounted cash flow method (including buildings for own use);
- Other investment property – based on reference transaction and discounted cash flow method;
- Property under development – based on both discounted cash flow and income capitalisation method;
- Plant - based on reference transaction and discounted cash flow method.

The following valuation methods are available for the calculation of fair value by the external professional appraisers for investment property, including real estate equity funds associates, rural property contracts, buildings for own use and plant:

*Reference transactions*
Independent professional appraisers use transactions in comparable properties and plant as a reference for determining the fair value of the property and plant. The reference transactions of comparable objects are generally based on observable data consisting of the land register 'Kadaster' and the rural land price monitor as published by the Dutch government 'grondprijsmonitor' in an active property market and in some instances accompanied by own use information.

The external professional appraisers valuate the property or plant using the reference transaction in combination with the following valuation methods to ensure the appropriate valuation of the property:
- Discounted cash flow method;
- Income capitalisation method (property only).

*Discounted cash flow method*
Under the discounted cash flow method, fair value is estimated using assumptions regarding the benefits and liabilities of ownership over the asset's life including an exit or terminal value. This method involves the projection of a series of cash flows on the investment property or plant dependent on the duration of the lease contracts.

A market-derived discount rate is applied to these projected cash flow series in order to establish the present value of the cash flows associated with the asset. The exit yield is normally determined separately, and differs from the discount rate.

The duration of the cash flows and the specific timing of inflows and outflows are determined by events such as rent reviews, lease renewal and related re-letting, redevelopment, or refurbishment. The appropriate duration is typically driven by market behaviour, which depends on the class of investment property. Periodic cash flow is typically estimated as gross rental income less vacancy (apart from the rural category), non-recoverable expenses, collection losses, lease incentives, maintenance costs, agent and commission costs and other operating and management expenses. The series of periodic net operating income, along with an estimate of the terminal value anticipated at the end of the projection period, is then discounted.

For the categories residential, offices and other in applying the discounted cash flow method, the significant inputs are the discount rate and market rental value. These inputs are verified with the following market observable data (that are adjusted to reflect the state and condition, location, development potential etc. of the specific property):

- Market rent per square meter for renewals and their respective re-letting rates;
- Reviewed rent per square meter;
- Investment transactions of comparable objects;
- 10 Year Dutch Government Bond Yield (%) as published by the DNB.

When applying the discounted cash flow method for rural valuations, the significant inputs are the discount rate and market lease values. These inputs are verified with the following market observable data (that are adjusted to reflect the state and condition, location, development potential etc. of the specific property):

- Market value per acre per region in accordance with the ‘rural land price monitor’;
- 10 Year Dutch Government Bond Yield (%) as published by the DNB.

*Income capitalisation method*

Under the income capitalisation method, a property’s fair value is estimated based on the normalised net operating income generated by the property, which is divided by the capitalisation rate (the investor’s rate of return). The difference between gross and net rental income includes the same expense categories as those for the discounted cash flow method with the exception that certain expenses are not measured over time, but included on the basis of a time weighted average, such as the average lease-up costs. Under the income capitalisation method, rents above or below the market rent are capitalised separately.

The significant inputs for retail valuations are the reversionary yield and the market or reviewed rental value. These inputs are generally verified with the following observable data (that are adjusted to reflect the state and condition, location, development potential etc. of the specific property):

- Market rent per square meter for renewals;
- Reviewed rent per square meter (based on the rent reviews performed in accordance with Section 303, Book 7 of the Dutch Civil Code).

The fair value of investment properties and buildings for own use, are appraised annually. Valuations are conducted by independent professional appraisers who hold recognised and relevant professional qualifications and have recent experience in the location and category of the property being valued. Market value property valuations were prepared in accordance with the Royal Institution of Chartered Surveyors (RICS) Valuation Standards, 7th Edition (the ‘Red Book’). a.s.r. provides adequate information to the professional appraisers, in order to conduct a comprehensive valuation. The professional appraisers are changed or rotated at least once every three years.

*IV. Financial instruments: asset-backed securities*

The fair value of the asset-backed securities is based on quotes published by an independent data vendor.

### Transfers between levels

The hierarchical level per individual instrument, or group of instruments, is reassessed at every reporting period. If the instrument, or group of instruments, no longer complies with the criteria of the level in question, it is transferred to the hierarchical level that does meet the criteria. A transfer can for instance be when the market becomes less liquid or when quoted market prices for the instrument are no longer available.

## C. Intangible assets

Intangible assets are carried at cost, less any accumulated amortisation and impairment losses. The residual value and the estimated useful life of intangible assets are assessed on each balance sheet date and adjusted where applicable.

### Goodwill

Acquisitions by a.s.r. are accounted for using the acquisition method. Goodwill represents the excess of the cost of an acquisition over the fair value of a.s.r.’s share of the net identifiable assets and liabilities and contingent liabilities of the acquired company at acquisition date. If there is no excess (purchase gain), the carrying amount is directly recognised through the income statement. At the acquisition date, goodwill is allocated to the cash-generating units (CGUs) that are expected to benefit from the business combination.

Goodwill has an indefinite useful life and is not amortised. a.s.r. performs an impairment test annually, or more frequently if events or circumstances warrant so, to ascertain whether goodwill has been subject to impairment. As part of this, the carrying amount of the cash-generating unit to which the goodwill has been allocated is compared with its recoverable amount. The recoverable amount is the higher of a CGU’s fair value less costs to sell and value in use. The carrying value is determined as the net asset value including goodwill. The methodologies applied to arrive at the best estimate of the recoverable amount involves two steps.

In the first step of the impairment test, the best estimate of the recoverable amount of the CGU to which goodwill is allocated is determined separately based on Price to Earnings or Price to Book ratios (fair value less cost to sell model). The ratio(s) used per CGU depends on the characteristics of the entity in question. The main assumptions in this valuation are the multiples for the aforementioned ratios. These are developed internally but are either derived from or corroborated against market information that is related to observable transactions in the market for comparable businesses.

If the outcome of the first step indicates that the difference between the recoverable amount and the carrying value may not be sufficient to support the amount of goodwill allocated to the CGU, step two is performed. In step two an additional analysis is performed in order to determine a recoverable amount in a manner that better addresses the specific characteristics of the relevant CGU.

The additional analysis is based on internal value-in-use models, wherein managements assumptions in relation to cash flow projections for budget periods up to and including five years are used and, if deemed justified, expanded to a longer period given the nature of the insurance activities. Other assumptions, such as the (pre-tax) discount rate and the steady state growth rate, are determined on the advice of an independent external party and are based on a Capital Asset Pricing Model (CAPM). This methodology is based on a risk-free rate plus a risk premium. Operating assumptions are best estimate assumptions and based on historical data where available. Economic assumptions are based on observable market data and projections of future trends.

If the recoverable amount is lower than its carrying amount, the difference is directly charged to the income statement as an impairment loss.

In the event of impairment, a.s.r. first reduces the carrying amount of the goodwill allocated to the CGU. After that, the carrying amount of the other assets included in the unit is reduced pro rata to the carrying amount of all the assets in the unit.

## D. Investment property

Investment property is property held to earn rent or for capital appreciation or both. Property interests held under operating leases are classified and accounted for as investment property. In some cases, a.s.r. is the owner-occupier of investment properties. If owner-occupied properties cannot be sold separately, they are treated as investment property only if a.s.r. holds an insignificant portion for use in the supply of services or for administrative purposes. Property held for own uses (owner-occupied) is recognised within property, plant and equipment.

Investment property is primarily recognised using the fair value model. After initial recognition, a.s.r. remeasures all of its investment property (see accounting policy B) whereby any gain or loss arising from a change in the fair value of the specific investment property is recognised in the income statement under fair value gains and losses.

Residential property is generally let for an indefinite period. Other investment property is let for defined periods under leases that cannot be terminated early. Some contracts contain renewal options. Rentals are accounted for as investment income in the period to which they relate.

If there is a change in the designation of property, it can lead to:
- Reclassification from property, plant and equipment to investment property: at the end of the period of owner-occupation or at inception of an operating lease with a third party; or
- Reclassification from investment property to property, plant and equipment: at the commencement of owner-occupation or at the start of developments initiated with a view to selling the property to a third party.

The following categories of investment property are recognised by a.s.r. based primarily on the techniques used in determining the fair value of the investment property:
- Retail;
- Residential;
- Rural;
- Offices;
- Other (consisting primarily of parking);
- Investment property under development.

Property under development for future use as investment property is recognised as investment property. The valuation of investment property takes (expected) vacancies into account.

Borrowing costs directly attributable to the acquisition or development of an asset are capitalised and are part of the cost of that asset. Borrowing costs are capitalised when the following conditions are met:
- Expenditures for the asset and borrowing costs are incurred; and
- Activities are undertaken that are necessary to prepare an asset for its intended use.

Borrowing costs are no longer capitalised when the asset is ready for use or sale. If the development of assets is interrupted for a longer period, capitalisation of borrowing costs is suspended. If the construction is completed in stages and each part of an asset can be used separately, the borrowing costs for each part that reaches completion are no longer capitalised.

## E. Financial assets and financial liabilities

### Recognition and initial measurement

a.s.r. recognises deposits and loans and borrowings on the date on which they originate. All other financial instruments are recognised at the transaction date, which is the date on which a.s.r. becomes party to the contractual stipulations of the instrument.

Financial assets or financial liabilities are initially measured at fair value plus, for a financial asset or financial liability not measured at FVTPL, transaction costs that are directly attributable to its acquisition or issue.

### Classification and subsequent measurement

When a.s.r. becomes party to a financial asset contract, the related assets are classified into one of the following categories:
- Amortised cost;
- Financial assets at fair value through other comprehensive income (FVOCI); or
- Financial assets at fair value through profit or loss (FVTPL).

The classification of the financial assets is determined at initial recognition. The classification and measurement of certain financial assets (debt instruments) is based on a.s.r.'s business models in which a financial asset is managed, and its contractual cash flow characteristics. For detailed information on the fair value of the financial assets see accounting policy B.

### Financial assets at amortised cost
A financial asset (debt instrument) can be measured at amortised cost if it meets both of the following conditions and is not designated as FVTPL:

- It is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding. This is known as the SPPI test.

Debt instruments at amortised cost include mortgage loans and private loans held by Aegon Bank N.V. (Knab) and Aegon Hypotheken B.V. (Aegon hypotheken).

Financial assets that are designated as hedged items are measured in accordance with the requirements for hedge accounting.

### Financial assets at FVOCI
Financial assets at FVOCI can be divided into debt instruments and equity instruments.

A debt instrument can be measured at FVOCI if it meets both the following conditions and is not designated as at FVTPL:

- It is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
- Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Debt instruments at FVOCI are measured at fair value. Unrealised fair value gains and losses are recognised in other comprehensive income, and are subsequently reclassified to profit or loss when realised. Interest income is recognised in profit or loss using the effective interest rate. Debt instruments at FVOCI are subject to the impairment requirements.

a.s.r. has only classified the bonds portfolio held by Knab at FVOCI.

Equity instruments can be measured at FVOCI if they are not held for trading. There is no subsequent recycling of fair value gains and losses to profit or loss following the derecognition of the investment if elected to measure the equity investments as FVOCI.

a.s.r. classifies most equity instruments at FVOCI to reduce volatility in the income statement.

### Financial assets at FVTPL
All financial assets not classified as measured at amortised cost or FVOCI, as described above, are measured at FVTPL.

Financial assets at FVTPL include:

- Derivatives that do not qualify for hedge accounting;
- Financial assets that are managed and whose performance is evaluated on a fair value basis, such as:
  - Debt instruments for which a.s.r. has identified the business model Other;
  - Investments related to direct participating contracts;
  - Financial assets held for trading;
- Associates for which a.s.r. elects to measure at FVTPL under IFRS 9.

*Hedge accounting (see also risk management section in section 7.8)*
To qualify for hedge accounting, the hedge relationship is designated and formally documented at inception, detailing the particular risk management objective and strategy for the hedge (which includes the item and risk that is being hedged), the derivative that is being used and how hedge effectiveness is being assessed. A derivative has to be effective in accomplishing the objective of offsetting either changes in fair value or cash flows for the risk being hedged. The effectiveness of the hedging relationship is evaluated on a prospective and retrospective basis using qualitative and quantitative measures of correlation. A hedging relationship is considered effective if the results of the hedging instrument are within a ratio of 80% to 125% of the results of the hedged item. a.s.r. has elected to continue to apply the hedge accounting requirements of IAS 39 for macro fair value hedges (EU ‘carve out’) on adoption of IFRS 9.

As part of its asset liability management, a.s.r. enters into economic hedges to limit its risk exposure at Knab and Aegon hypotheken. These transactions are assessed to determine whether hedge accounting can and should be applied. a.s.r. currently applies hedge accounting for fair value hedges.

*Fair value hedges*
a.s.r. applies fair value hedge accounting to portfolio hedges of interest rate risk (fair value macro hedging) under the EU ‘carve out’ of EU-IFRS. The EU ‘carve out’ macro hedging enables a group of derivatives (or proportions thereof) to be viewed in combination and jointly designated as the hedging instrument and removes some of the limitations in fair value hedge accounting. Under the EU ‘carve out’, ineffectiveness in fair value hedge accounting only arises when the revised projection of the amount of cash flows in scheduled time buckets falls below the designated amount of that bucket. a.s.r. applies fair value hedge accounting for portfolio hedges of interest rate risk (macro hedging) under the EU ‘carve out’ to mortgage loans. Changes in the fair value of the derivatives are recognised in the income statement, together with the fair value adjustment on the mortgage loans (hedged items) insofar as attributable to interest rate risk (the hedged risk). If the hedge relationship no longer meets the criteria for hedge accounting, the cumulative adjustment of the hedged item is, in the case of interest bearing instruments, amortised through the income statement over the remaining term of the original hedge or recognised directly when the hedged item is derecognised.

Knab and Aegon hypotheken hold portfolios of long-term fixed rate mortgages and therefore are exposed to changes in fair value due to movements in market interest rates. Knab and Aegon hypotheken manage this risk exposure by entering into pay fixed/receive floating interest rate swaps.

Only the interest rate risk element is hedged and therefore other risks, such as credit risk, are managed but not hedged by Knab and Aegon hypotheken. This hedging strategy is applied to the portion of exposure that is not naturally offset against matching positions held by Knab and Aegon hypotheken. Changes in fair value of the long-term fixed rate mortgages arising from changes in interest rate are usually the largest component of the overall change in fair value. This strategy is designated as a fair value hedge and its effectiveness is assessed by comparing changes in the fair value of the loans attributable to changes in the benchmark rate of interest with changes in the fair value of the interest rate swaps.

Knab and Aegon hypotheken establish the hedging ratio by matching the notional of the derivatives with the principal of the portfolio being hedged. Possible sources of ineffectiveness are as follows:

- Differences between the expected and actual volume of prepayments, as Knab and Aegon hypotheken hedge to the expected repayment date taking into account expected prepayments based on past experience;
- Difference in the discounting between the hedged item and the hedging instrument, as cash collateralised interest rate swaps are discounted using Overnight Indexed Swaps (OIS) discount curves, which are not applied to the fixed rate mortgages;
- Hedging derivatives with a non-zero fair value at the date of initial designation as a hedging instrument; and
- Counterparty credit risk which impacts the fair value of uncollateralised interest rate swaps but not the hedged items.

Knab and Aegon hypotheken manage the interest rate risk arising from fixed rate mortgages by entering into interest rate swaps on a monthly basis. The exposure from these portfolios frequently changes due to new loans originated, contractual repayments and early prepayments made by customers in each period. As a result, Knab and Aegon hypotheken adopt a dynamic hedging strategy (sometime referred to as a 'macro' or 'portfolio' hedge) to hedge the exposure profile by closing and entering into new swap agreements at each month-end. Knab and Aegon hypotheken use the portfolio fair value hedge of interest rate risk to recognise fair value changes related to changes in interest rate risk in the mortgage portfolio, and therefore reduce the profit or loss volatility that would otherwise arise from changes in fair value of the interest rate swaps alone.

**Accrued interest**

In line with Solvency II reporting a.s.r. accounts for debt instruments at their "dirty" fair value, thus including any related accrued interest.

**Business model assessment**

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. a.s.r.'s business models refer to how a.s.r. manages its financial assets in order to generate cash flows.

a.s.r. identifies the business model Hold to Collect for the mortgage loans and private loans held by Knab and Aegon hypotheken and for its other financial assets, and identifies the business model Hold to Collect & Sell for the bonds portfolio held by Knab. All other debt instruments are mandatorily designated as at FVTPL (business model Other).

**Assessment whether contractual cash flows are solely payments of principal and interest (SPPI)**

For the purpose of this assessment, principal is defined as the fair value of the financial asset on initial recognition. However, the principal may change over time – e.g. if there are repayments of principal.

Interest is defined as consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks (e.g. liquidity risk) and costs (e.g. administrative costs), as well as a profit margin that is consistent with a basic lending arrangement. Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows are SPPI.

a.s.r. assesses the SPPI for the loans and bonds portfolio held by Knab and Aegon hypotheken and for its other financial assets. All other debt instruments are mandatorily designated as at FVTPL (business model Other).

**Subsequent measurement and gains and losses**

*Financial assets at amortised cost*

Financial assets at amortised cost are measured at amortised cost using the effective interest method. Interest income, foreign exchange gains and losses and impairment are recognised in profit or loss. Any gain or loss on derecognition is also recognised in profit or loss.

*Financial assets at FVOCI*

Equity investments at FVOCI are measured at fair value. All fair value gains and losses are recorded in OCI, without recycling to profit or loss. Dividends from such investments continue to be recognised in profit or loss as Investment income when a.s.r.'s right to receive payments is established. Impairment requirements are not applicable to equity investments measured as FVOCI.

*Financial assets at FVTPL*

Financial assets at FVTPL are measured at fair value. Net gains and losses, including any interest or dividend income and foreign exchange gains and losses, are recognised in profit or loss. Impairment requirements are not applicable to financial assets measured at FVTPL.

See accounting policy W3.

### Financial liabilities
### Classification

a.s.r. classifies its liabilities into one of the following categories:

- financial liabilities at FVTPL (derivatives); or
- financial liabilities at amortised cost (all other financial liabilities).

### Subsequent measurement and gains and losses

*Financial liabilities at FVTPL*

Financial liabilities at FVTPL are measured at fair value. Net gains and losses, including any interest expenses and foreign exchange gains and losses, are recognised in profit or loss.

*Financial liabilities at amortised cost*

Financial liabilities at amortised cost are measured at amortised cost using the effective interest method. Interest expenses, foreign exchange gains and losses are recognised in profit or loss. Any gain or loss on derecognition is also recognised in profit or loss.

### Accrued interest

In line with Solvency II reporting a.s.r. accounts for financial liabilities at their "dirty" fair value, thus including any related accrued interest.

### Interest on financial liabilities

Interest expenses are calculated by applying the effective interest rate to the amortised cost of the liability. When calculating the effective interest rate, a.s.r. estimates future cash flows considering all contractual terms of the liability.

### Derivatives including embedded derivatives

Derivatives within the insurance entities are primarily used by a.s.r. for hedging interest rate and exchange rate risks, for hedging future transactions and the exposure to market risks.

These derivatives are classified as held-for-trading. Derivatives are measured at fair value with changes in fair value recognised in profit or loss. Derivatives may be embedded in another contractual arrangement (a host contract).

For contracts where the host contract is a financial asset in the scope of IFRS 9, the hybrid financial instrument as a whole is assessed for classification and the embedded derivative is not separated from the host contract.

A derivative embedded in a host insurance or reinsurance contract is not accounted for separately from the host contract if the embedded derivate itself meets the definition of an insurance or reinsurance contract.

For other contracts, a.s.r. accounts for an embedded derivative separately from the host contract when:

- the hybrid contract is not measured at FVTPL;
- the terms of the embedded derivative would have met the definition of a derivative if they were contained in a separate contract; and
- the economic characteristics and risks of the embedded derivative are not closely related to those of the host contract.

### Impairments in the P&L

a.s.r. recognises loss allowances for ECL on debt instruments measured at amortised cost or FVOCI. a.s.r. uses the low credit risk simplification for investment grade debt instruments and recognises a lifetime ECL for other financial assets using the simplified approach. Lifetime ECL are the ECL that result from all possible default events over the expected life of a financial instrument.

ECLs are a probability-weighted estimate of credit losses. Credit losses are measured as the present value of all cash shortfalls (i.e. the difference between the cash flows due to a.s.r. in accordance with the contract and the cash flows that a.s.r. expects to receive). The maximum period considered when estimating ECLs is the maximum contractual period over which a.s.r. is exposed to credit risk.

*Write-off*

The gross carrying amount of a financial asset is written off (either partially or in full) to the extent that there is no realistic prospect of recovery. This is generally the case when a.s.r. determines that the borrower does not have assets or resources of income that could generate sufficient cash flows to repay the amounts subject to the write-off. However, financial assets that are written off could still be subject to enforcement activities in order to comply with a.s.r.'s procedures for recovery of amounts due. Should amounts be recovered these are then recognised when the payment has been received.

### Derecognition and contract modification
### Financial assets

a.s.r. derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which a.s.r. neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

On derecognition of a financial asset, the difference between the carrying amount at the date of derecognition and the consideration received (including any new asset obtained less any new liability assumed) is recognised in the income statement, unless the financial asset is an equity instrument and is measured at fair value through other comprehensive income. For these instruments any revaluation amount is transferred within equity from unrealised gains and losses to retained earnings.

a.s.r. enters into transactions whereby it transfers assets recognised in its balance sheet, but retains either all or substantially all of the risks and rewards of the transferred assets. In these cases, the transferred assets are not derecognised. Examples of such transactions are repurchase agreements and securities lending. The asset recognised for cash paid on reverse repurchase agreements is presented under investments. The liability recognised for cash collateral received on repurchase agreements is presented under the line item due to banks.

In transactions in which a.s.r. neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, a.s.r. continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

If the terms of a financial asset are modified, then a.s.r. evaluates whether the cash flows of the modified asset are substantially different. If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognised and a new financial asset is recognised at fair value.

If a financial asset measured at amortised cost is modified but not substantially, then the financial asset is not derecognised. If the asset has not been derecognised, then a.s.r. recalculates the gross carrying amount of the financial asset by discounting the modified contractual cash flows at the original effective interest rate and recognises the resulting adjustment to the gross carrying amount as a modification gain or loss in profit or loss. If such a modification is carried out because of financial difficulties of the borrower, then the gain or loss is presented together with impairment losses; in other cases, it is presented as interest revenue.

**Financial liabilities**

a.s.r. generally derecognises a financial liability when its contractual obligations expire or are discharged or cancelled. a.s.r. also derecognises a financial liability when its terms are modified and the cash flows of the modified liability are substantially different (i.e. the net present value of the of the cash flows under the new terms discounted at the original effective interest rate is at least 10% different from the discounted present value of the remaining cash flows of the original debt instrument), in which case a new financial liability based on the modified terms is recognised at fair value.

On derecognition of a financial liability, the difference between the carrying amount extinguished and the consideration paid (including any non-cash assets transferred or liabilities assumed) is recognised in profit or loss.

If a financial liability measured at amortised cost is not substantially modified, then it is not derecognised. For such financial liabilities, a.s.r. recalculates the amortised cost of the financial liability by discounting the modified contractual cash flows at the original effective interest rate and recognises any resulting adjustment to the amortised cost as a modification gain or loss in 'other finance expenses' in profit or loss. Any costs and fees incurred adjust the carrying amount of the liability and are amortised over the remaining term of the modified liability.

## F1. Insurance contracts

**Classification**

Insurance contracts issued by a.s.r. are contracts that transfer significant insurance risks, and in some cases also financial risk, from the policyholder to a.s.r. Contracts measured using the general measurement model (GMM) or premium allocation approach (PAA) are classified on the balance sheet as insurance contract liabilities and contracts measured using the variable fee approach (VFA) are classified as liabilities arising from direct participating insurance contracts.

a.s.r. offers non-life insurance contracts and life insurance contracts as shown in the table below.

**Measurement model applied**

| Segment | Product | Measurement model applied |
|---|---|---|
| Non-life | P&C | PAA |
| | Disability | GMM |
| | Health | PAA |
| Life | Individual life | GMM or VFA |
| | Pension | GMM or VFA |
| | Funeral | GMM |

**Insurance contract liabilities**

*Non-life insurance contracts*

Non-life insurance contracts are contracts that provide cover that is not related to the life or death of insured persons. These insurance contracts are primarily classified into the following categories: Disability, Health, P&C (motor, fire and liability).

*Life insurance contracts*

The segment Life includes: annuities, term insurance policies, savings contracts and funeral insurance contracts. In addition to non-participating life insurance contracts, the insurance portfolio also includes:

- Individual and group participating contracts;
- Individual contracts with discretionary participation features;
- Group contracts with segregated pools with returns based on investment guarantees.

Life insurance contracts with (discretionary) participation features are included within the Life segment. Under these contracts, policyholders are assigned, in addition to their entitlement to a guaranteed element, an entitlement to potentially significant additional benefits whose amount or timing is contractually at the discretion of a.s.r. These additional benefits are based on the performance of a specified pool of investments held by a.s.r. or on the issuer's operational result.

*Liabilities arising from direct participating insurance contracts.*
a.s.r. classifies an insurance contract as a direct participating contract for which at inception the following criteria are met:

- the contractual terms specify that the policyholder participates in a share of a clearly identified pool of underlying items;
- a.s.r. expects to pay the policyholder an amount equal to a substantial share of the fair value returns on the underlying items; and
- a.s.r. expects a substantial proportion of any change in the amounts to be paid to the policy holder to vary with the change in the fair value of the underlying items.

Life insurance contracts with direct participating features are included within the Life segment and mainly concern unit-linked contracts and group pension contracts, with policyholders bearing the investment risk. An investment unit is a share in an investment fund that a.s.r. acquires on behalf of the policyholders using net premiums paid by the policyholders. The cash flow upon maturity of the contract is equal to the value of the investment units of the fund in question.

Contracts that meet the requirements of a direct participating contract are measured using the variable fee approach (VFA).

### Separating components
Currently a.s.r. does not separate any components from its insurance contracts.

### Non-distinct investment components
Non-distinct investment components are identified for products where under all circumstances a payment will be made to the policyholder. These are generally recognised for GMM as the surrender value of the funeral insurance and as the savings account related to the mortgage savings insurance. For VFA policies the non-distinct investment component is the minimum payment that will be made under all circumstances (i.e. the minimum of surrender, lapse and maturity).

### Level of aggregation
Insurance contracts are aggregated into groups for measurement purposes. a.s.r. identifies portfolios of insurance contracts comprising contracts subject to similar risks and managed together. Each portfolio is then divided into cohorts of contracts issued within a maximum of one year and divided into two groups based on the profitability buckets for:

- any contracts that are onerous on initial recognition; and
- any remaining contracts in the portfolio.

The profitability bucket for contracts that have no significant possibility of becoming onerous subsequently is currently not used by a.s.r.

Similar risks managed together are generally based on the homogeneous risk groups similar to those used in Solvency II at inception, more or less granularity is applied where applicable. Contracts within a portfolio that would fall into different groups only because law or regulation specifically constraints a.s.r.'s practical ability to set a different price or level of benefits for policyholders with different characteristics are included in the same group. This applies to contracts issued in Europe that are required by EU regulation to be priced on a gender-neutral basis.

The resulting groups represent the level at which the recognition and measurement accounting policies are applied. The groups are established on initial recognition and their composition is not subsequently reassessed.

Whether a contract is onerous or not is a policy (test) which is set per business. Part of this policy will be pricing and thresholds and forward looking metrics available within a.s.r. The test is performed based on the contracts which are issued in any specific calendar year and are grouped according to the similar risks managed together criteria as described above. The test is generally performed on a set of contracts using reasonable and supportable information, considering that the outcome would be the same had the individual policy assessment been performed.

### Recognition
a.s.r. recognises a group of insurance contracts issued from the earliest of:

- the beginning of the coverage period of the group of contracts. The coverage period is the period during which a.s.r. provides services (insurance services, investment-return services or investment-related services) in respect of all premiums within the boundary of the insurance contract;
- the date when the first payment from a policyholder in the group becomes due. If there is no contractual due date, then it is considered to be the date when the first payment is received from the policyholder; or
- the group of onerous contracts, the date when the group becomes onerous.

Insurance contracts acquired in a (portfolio) transfer or a business combination are recognised on the date of acquisition.

When the contract is recognised, it is added to an existing group of contracts or, if the contract does not qualify for inclusion in an existing group, it forms a new group to which future contracts can be added. Groups of contracts are established on initial recognition and their composition is not revised once all contracts have been added to the group.

### Contract boundaries
The measurement of a group of contracts includes all of the future cash flows within the boundary of each contract in the group. Cash flows are within the boundary of a contract if they arise from substantive rights and obligations that exist during the reporting period under which a.s.r. can compel the policyholder to pay premiums or has a substantive obligation to provide services.

A substantive obligation to provide services ends when:

- a.s.r. has the practical ability to reassess the risks of the particular policyholder and can set a price or level of benefits that fully reflects those reassessed risks; or
- a.s.r. has the practical ability to reassess the risks of the portfolio that contains the contract and can set a price or level of benefits that fully reflects the risks of that portfolio; and the pricing of the premiums for coverage up to the reassessment date does not consider risks that relate to periods after the reassessment date.

For individual contracts with discretionary features the contract boundary is defined so that cash flows are within the contract boundary if they result from a substantive obligation of a.s.r. to deliver cash at a present or future date.

The contract boundary is reassessed at each reporting period and more frequently if and when product characteristics and/or conditions fundamentally change and, therefore, may change over time.

**Measurement**
a.s.r. uses the following measurement models:

- the general measurement model (GMM);
- the variable fee approach (VFA) for contracts with a direct participating feature; and
- the premium allocation approach (PAA) which is a simplified version of the GMM and is used mainly for short-duration contracts.

**Measurement – contracts measured under the GMM**
*Initial measurement*
On initial recognition, a.s.r. measures a group of insurance contracts as the total of:

- the fulfilment cash flows, which comprise estimates of future cash flows, adjusted to reflect the time value of money and the associated financial risk and the risk adjustment for non-financial risk (RA); and
- the CSM.

The measurement of the fulfilment cash flows of a group of insurance contracts does not reflect non-performance risk of a.s.r. It is the net present value of the projected cash flows of benefits and expenses, less the net present value of premiums, adjusted for the risk adjustment. These cash flows are estimated using realistic, “best estimate”, assumptions in relation to mortality, longevity, disability, lapse rate, expense and inflation. The best estimate assumptions include mortality and longevity trend assumptions for life expectancy. Mortality rate tables applied are generally developed based on a blend of company experience and industry wide studies, taking into consideration product characteristics, own risk selection criteria, the insured population, recent mortality trend assumptions for life expectancy in the Netherlands and past experience. Mortality experience is monitored through regular studies, the results of which are fed into the pricing cycle for new products and reflected in the liability calculation when appropriate. The best estimate includes the intrinsic value and the time value of options and guarantees (TVOG: Time Value of Financial Options and Guarantees) and is calculated using stochastic techniques.

Where applicable, the direct or discretionary participating features of the insurance contracts, such as profit sharing, and any guaranteed benefits at maturity are considered in the future cash flows. The cash flows are discounted using an interest curve whose construction is related to the Solvency II curve construction published by EIOPA. The construction differs in that a different CRA is determined and used, there is no VA but there is a Liability Illiquidity Premium (LIP), a different UFR is used (2024: 3.25%, 2023: 3.40%; whereas SII used 2024: 3.30%, 2023: 3.45%) and the convergence to the UFR follows a different methodology.

Insurance pre-recognition cash flows consist of pre-acquisition cash flows and pre-paid premium cash flows for insurance contracts not yet recognised. Insurance pre-acquisition cash flows that a.s.r. pays before the related group of contracts is recognised (i.e. for renewals of insurance contracts or insurance contracts recognised in the following period), are presented as an asset under the insurance contract liabilities. When the group of contracts is recognised, these cash flows are included by way of expected acquisition cash flows in the measurement of the group and the previously recognised asset is transferred and included as part of expected acquisition cash flows initially recognised in the insurance liability. The insurance pre-acquisition cash flow asset is reassessed for a possible impairment trigger at each reporting date.

The risk adjustment for a group of insurance contracts is the compensation required for bearing uncertainty about the amount and timing of the cash flows that arises from non-financial risk.

a.s.r. disaggregates changes in the risk adjustment for non-financial risk between the insurance service result and insurance finance income or expenses. See section 7.5.13.4.

The CSM of a group of insurance contracts represents the unearned profit that a.s.r. will recognise as it provides service under those contracts. On initial recognition of a group of insurance contracts, if the total fulfilment cash flows allocated to the contract, any previously recognised insurance acquisition cash flows, pre-paid premium cash flows and any cash flows arising from the contract at the date of initial recognition is a net inflow, then the group is not onerous. In this case, the CSM is measured as the equal and opposite amount of the net inflow, which results in no income or expenses arising on initial recognition.

For groups of contracts acquired, the consideration received for the contracts is included in the fulfilment cash flows as a proxy for the premiums received at the date of acquisition. For business combinations see accounting policy H.

If the total of the fulfilment cash flows is a net outflow, then the group is onerous. In this case, the net outflow is recognised as a loss in the income statement, or as an adjustment to goodwill or a gain on a bargain purchase if the contracts are acquired in a business combination. A loss component is created as part of the insurance liabilities to depict any losses recognised in the income statement, which determines the amounts that are subsequently presented in the income statement as reversals of losses on onerous groups.

*Subsequent measurement*
The carrying amount of a group of insurance contract liabilities at each reporting date is the sum of the liability for remaining coverage and the liability for incurred claims. The liability for remaining coverage comprises:

- the fulfilment cash flows that relate to services that will be provided under the contracts in future periods including the risk adjustment; and
- any remaining CSM at that date.

The liability for incurred claims comprises the fulfilment cash flows for incurred claims and attributable expenses that have not yet been paid, including claims that have been incurred but not yet reported, and the handling of the payments to policyholders. For the contracts in the Non-life segment this concerns all future payments related to the incurred claim (the LIC option), whereas for contracts in the Life segment this concerns the amounts payable for the period (LRC option).

The fulfilment cash flows of groups of insurance contracts are measured at the reporting date using current estimates of future cash flows, current discount rates and current estimates of the risk adjustment for non-financial risk. Changes in fulfilment cash flows are recognised as follows:

- Changes relating to future services are adjusted against the CSM (or recognised in the insurance service result in profit or loss if the group is onerous);
- Changes relating to current or past services are recognised in the insurance service result in the income statement;
- Effects of the time value of money, financial risk and changes therein on estimated future cash flows and risk adjustment for non-financial risk are recognised as insurance finance income or expenses.

The CSM of each group of contracts is subsequently calculated at each reporting date.

The carrying amount of the CSM at the end of each reporting period is the carrying amount at the start of the reporting period, adjusted for:

- The CSM of any new contracts that are added to the group in the period;
- Interest accreted on the carrying amount of the CSM during the period, measured at the discount rates on nominal cash flows that do not vary based on the returns on any underlying items determined on initial recognition;
- Changes in fulfilment cash flows that relate to future services, except to the extent that:
  - Any increases in the fulfilment cash flows exceed the carrying amount of the CSM, in which case the excess is recognised as a loss in the income statement and creates a loss component; or
  - Any decreases in the fulfilment cash flows are allocated to the loss component, reversing losses previously recognised in profit or loss; and
- The amount recognised as insurance contract revenue due to the services provided in the period.

Changes in fulfilment cash flows that relate to future services comprise:

- Experience adjustments arising from premiums received in the period that relate to future services and related cash flows, measured at the discount rates determined on initial recognition and non-distinct investment components;
- Changes in estimates of the present value of future cash flows in the liability for remaining coverage, measured at the discount rates determined on initial recognition, except for those that relate to the effects of the time value of money, financial risk and changes therein; and
- Changes in the risk adjustment for non-financial risk that relate to future services.

CSM is recognised as insurance contract revenue following the services provided. The amount is determined by identifying coverage units in the group. The number of coverage units in the group is the quantity of insurance contract services provided by the contracts, determined by considering for each contract the quantity of benefits provided and its expected coverage period.

Changes in discretionary cash flows are regarded as relating to future services and accordingly adjust the CSM. a.s.r. allocates the CSM to each period based on the passage of time as the service (insurance services and investment-return services) is deemed to be delivered equally over the coverage period.

To determine whether changes in cash flows are deemed to be changes in discretionary cash flows, a.s.r. exercises judgement in specifying at inception what is regarded as their commitment under the contract. How a.s.r. specifies its commitment under the contract will determine how much of the changes in expected future cash flows will be reflected immediately in profit or loss or will adjust CSM.

**Measurement – contracts measured under the VFA**
The VFA measurement model is used for direct participating contracts. This measurement model is identical to the GMM at initial recognition, however, subsequent measurement differs from the GMM.

Direct participating insurance contracts are contracts under which a.s.r.'s obligation to the policyholder is the net of:

- The obligation to pay the policyholder an amount equal to the fair value of the underlying items; and
- A variable fee in exchange for future services provided by the contracts, being a.s.r.'s share of the fair value of the underlying items less fulfilment cash flows that do not vary based on the returns on underlying items. a.s.r. provides investment-related services under these contracts by promising an investment return based on underlying items, in addition to insurance coverage.

When measuring a group of direct participating contracts, a.s.r. adjusts the fulfilment cash flows for the whole of the changes in the obligation to pay policyholders an amount equal to the fair value of the underlying items. These changes do not relate to future services and are recognised in the income statement. a.s.r. then adjusts any CSM for changes in a.s.r.'s share of the fair value of the underlying items, which relates to future services, as explained below.

*Subsequent measurement*
The carrying amount of the CSM at the end of each reporting period is the carrying amount at the start of the reporting period, adjusted for:

- The CSM of any new contracts that are added to the group in the period;
- a.s.r.'s share of the change in the fair value of the underlying items and changes in fulfilment cash flows that relate to future services, except to the extent that:
  - a.s.r. has chosen to exclude from the CSM changes in the effect of financial risk on its share of the underlying items;
  - a.s.r.'s share of a decrease in the fair value of the underlying items, or an increase in the fulfilment cash flows that relate to future services, exceeds the carrying amount of the CSM, giving rise to a loss in the income statement (included in insurance service expenses) and creating a loss component; or
  - a.s.r.'s share of an increase in the fair value of the underlying items, or a decrease in the fulfilment cash flows that relate to future services, is allocated to the loss component, reversing losses previously recognised in the income statement (included in insurance service expenses); and
- The amount recognised as insurance contract revenue because of the services provided in the period.

Changes in fulfilment cash flows that relate to future services include the changes relating to future services specified above for contracts with direct participation features (measured at current discount rates) , the effect of the time value of money and financial risks and the risk mitigation option where applicable.

CSM is recognised as insurance contract revenue following the services provided. The amount is determined by identifying coverage units in the group. The number of coverage units in the group is the quantity of insurance contract services provided by the contracts, determined by considering for each contract the quantity of benefits provided and its expected coverage period.

a.s.r. allocates the CSM to each period based on the passage of time as the investment-related services provided in relation to the investment component and the insurance services provided in relation to the insurance component are deemed to be delivered equally over the coverage period.

*Risk mitigation*
a.s.r. has chosen to apply the risk mitigation option to certain VFA contracts, thereby not recognising a change in the CSM to reflect some or all of the changes in the effect of the time value of money and financial risk (that would normally adjust the CSM) on:

- The amount of a.s.r.'s share of the underlying items if a.s.r. mitigates the effect of financial risk on that amount using derivatives or reinsurance contracts held; and
- The fulfilment cash flows if a.s.r. mitigates the effect of financial risk on those fulfilment cash flows using derivatives, non-derivative financial instruments measured at FVTPL, or reinsurance contracts held.

If a.s.r. mitigates the effect of financial risk using derivatives or non-derivative financial instruments measured at FVTPL, it shall include insurance finance income or expenses for the period arising from the application of the risk mitigation in profit or loss.

If a.s.r. mitigates the effect of financial risk using reinsurance contracts held, it shall apply the same accounting policy for the presentation of insurance finance income or expenses arising from the application of the risk mitigation as a.s.r. applies to other reinsurance contracts held. a.s.r. does not currently use reinsurance as a hedge instrument dedicated to financial risks.

### Measurement – contracts measured under the PAA
The PAA simplifies the measurement of groups of contracts when:

- the coverage period of each contract in the group of contracts is one year or less; or
- a.s.r. expects that the resulting measurement would not differ materially from the result of applying the GMM.

*Initial measurement*
On initial recognition of each group of contracts, the carrying amount of the liability for remaining coverage is measured at the premiums received on initial recognition. Insurance acquisition cash flows are recognised as expenses when they are incurred making use of the option under IFRS 17. The risk adjustment is an implicit part of the valuation of the related liability.

*Subsequent measurement.*
Subsequently, the carrying amount of the liability for remaining coverage is increased by any premiums received and decreased by the amount recognised as insurance contract revenue for coverage provided. This is recognised over the coverage period based on the passage of time.

If at any time during the coverage period, facts and circumstances indicate that a group of contracts is onerous, then a.s.r. recognises a loss in the income statement and increases the liability for remaining coverage to the extent that the current estimates of the fulfilment cash flows that relate to remaining coverage (including the risk adjustment for non-financial risk) exceed the carrying amount of the liability for remaining coverage.

a.s.r. recognises the liability for incurred claims of a group of insurance contracts at the amount of the fulfilment cash flows relating to incurred claims, including a risk adjustment for non-financial risk. The fulfilment cash flows are discounted at current rates.

### Derecognition and contract modification
a.s.r. derecognises a contract when it is extinguished – i.e. when the specified obligations in the contract expire or are discharged or cancelled.

a.s.r. also derecognises a contract if its terms are modified in a way that would have changed the accounting for the contract significantly had the new terms always existed, in which case a new contract based on the modified terms is recognised. If a contract modification does not result in derecognition, then a.s.r. treats the changes in cash flows caused by the modifications as changes in estimates of fulfilment cash flows.

On the derecognition of a contract from within a group of contracts:

- The fulfilment cash flows allocated to the group are adjusted to eliminate the present value of the future cash flows and risk adjustment for non-financial risk relating to the rights and obligations that have been derecognised from the group; and
- The CSM of the group is adjusted for the change in fulfilment cash flows.

If a contract is derecognised because its terms are substantially modified, then the CSM is also adjusted for the premium that would have been charged had a.s.r. entered into a contract with the new contract's terms at the date of modification, less any additional premium charged for the modification. The new contract recognised is measured assuming that, at the date of modification, the issuer received the premium that it would have charged less any additional premium charged for the modification.

## F2. Reinsurance contracts

### Classification

Contracts held by a.s.r. under which it transfers significant insurance risk related to insurance contracts are classified as reinsurance contracts. a.s.r. does not issue reinsurance contracts.

### Separating components and Level of aggregation

The accounting principles for the separation of components do not differ from those for insurance contracts. For the determination of the level of aggregation for reinsurance contracts the accounting principles are the same with the exception that a reinsurance contract cannot be classified as onerous.

### Recognition

a.s.r. recognises a group of reinsurance contracts held that do not provide proportionate coverage at the earlier of (i) the beginning of the coverage period of the group of reinsurance contracts held; and (ii) the date a.s.r. recognises an onerous group of underlying contracts if a.s.r. entered into the related reinsurance contract held at or before that date.

### Contract boundaries

The measurement of a group of reinsurance contracts held includes all of the future cash flows within the boundary of each contract in the group. Cash flows are within the boundary of a contract if they arise from substantive rights and obligations that exist during the reporting period under which a.s.r. has a right to receive services from the reinsurer and is compelled to pay premiums.

### Measurement – contracts under the PAA

a.s.r. uses the PAA as the default measurement approach for reinsurance contracts with a coverage period of one year or less, but the business line has the option to choose the GMM.

To measure a group of reinsurance contracts a.s.r. applies the same accounting policies for the related insurance contracts, adapted where necessary to reflect the features of reinsurance contracts held that differ from those of the insurance contracts.

### Measurement – contracts under the GMM

a.s.r. applies the same accounting policies for insurance contracts to measure a group of reinsurance contracts, with the following modifications.

The carrying amount of a group of reinsurance contracts at each reporting date is the sum of the remaining coverage component and the incurred claims component. The remaining coverage component comprises:

- The fulfilment cash flows that relate to services that will be received under the contracts in future periods including the risk adjustment; and
- Any remaining CSM at that date.

a.s.r. measures the estimates of the present value of future cash flows using assumptions that are consistent with those used to measure the estimates of the present value of future cash flows for the underlying insurance contracts.

*Loss-recovery component*

a.s.r. determines a loss-recovery component of the asset for remaining coverage of a group of reinsurance contracts held when a.s.r. recognises a recovery of a loss on initial recognition of an onerous group of underlying contracts as well as for subsequent measurement of the recovery of losses. This loss-recovery component is accounted for in a manner consistent with the loss component of the group of underlying insurance contracts issued. As such, as cedant, a.s.r. determines the resulting amount of the loss-recovery at initial recognition to be recognised in profit or loss by multiplying:

- The loss recognised on the group of underlying insurance contracts; and
- The percentage of claims on underlying contracts a.s.r. expects to recover from the group of reinsurance contracts held.

After a.s.r. has established a loss-recovery component, it shall adjust it to reflect changes in the loss component of the underlying contracts. Therefore, the balance of loss-recovery component needs to be tracked along the fulfilment of the reinsurance group and run off to zero at the end of the reinsurance coverage period or earlier when the loss component on the underlying group(s) has been fully reversed. The carrying amount of the loss recovery component shall not exceed the portion of the carrying amount of the loss component of the underlying insurance contracts that a.s.r. expects to recover from the group of reinsurance contracts held.

The risk adjustment for non-financial risk is the amount of the risk transferred by a.s.r. to the reinsurer.

On initial recognition, the CSM of a group of reinsurance contracts represents a net cost or net gain on purchasing reinsurance. It is measured as the equal and opposite amount of the total of the fulfilment cash flows, any derecognised assets for cash flows occurring before the recognition of the group and any cash flows arising at that date, and taking into account any recognised loss recovery component, if applicable. However, if any net cost on purchasing reinsurance coverage relates to insured events that occurred before the purchase of the group, then a.s.r. recognises the cost immediately in the income statement as an expense.

The carrying amount of the CSM at the end of each reporting period is the carrying amount at the start of the reporting period, adjusted for:

- The CSM of any new contracts that are added to the group in the period;
- Interest accreted on the carrying amount of the CSM during the period, measured at the discount rates on nominal cash flows that do not vary based on the returns on any underlying items determined on initial recognition;
- Changes in fulfilment cash flows that relate to future services, unless the change results from a change in fulfilment cash flows allocated to a group of onerous underlying insurance contracts, in which case the change is recognised in the income statement;
- The amount recognised in the income statement because of the services received in the period.

CSM is recognised in profit or loss following the services provided.

*Non-performance risk*
Changes in the fulfilment cash flows related to the risk of non-performance do not adjust the CSM, therefore a.s.r. recognises them in profit or loss. This requires that the fulfilment cash flows must be adjusted to include the effect of any non-performance risk, or credit risk, by the reinsurer.

Reinsurance contracts cannot be onerous.

## G. Employee benefits

### Pension obligations

a.s.r. has, with effect of 2021, defined contribution (DC) plans for all its employees, including employees that are employed by entities that operate in the Distribution and Service segment. For these DC plans, a.s.r. pays contributions to privately administered pension insurance plans with ASR Levensverzekering N.V. (a.s.r. life) on a contractual basis. a.s.r. life recognises these contracts as insurance contracts. They are accounted for in accordance with liabilities arising from insurance contracts (accounting policy F1).

With regards to the DC plans, Aegon employees had a DC plan with Aegon Cappital as of 2020, and as of 1 October 2023 this DC plan became non-contributory, as they entered the a.s.r. DC plan.

a.s.r. has no further payment obligations to the employees once the contributions have been paid. The contributions are recognised as operating expenses in the income statement during the period the services are rendered. Prepaid contributions are recognised as an asset to the extent that a cash refund or a reduction in future payments is available.

In addition, a number of defined benefit (DB) plans for own employees exist, which ended at the end of 2019 (Aegon NL DB) and 2020 (a.s.r. DB), and were left non-contributory. The defined benefit obligation continues to exist. The plans are schemes under which employees are awarded pension benefits upon retirement, usually dependent on one or more factors, such as years of service and compensation. The defined benefit obligation is calculated at each reporting date by independent actuaries.

The liability in respect of DB plans is the present value of the defined benefit obligation at the balance sheet date, less the fair value of the plan assets where the pension plans are insured by third parties.

a.s.r. life and Aegon life administer most of the post-employment benefit plans and hold the investments that are intended to cover the employee benefit obligation. These investments do not qualify as plan assets in the consolidated financial statements under IFRS.

Pension obligations are calculated using the projected unit credit method. Inherent to this method is the application of actuarial assumptions for discount rates, future salary increases and bonuses, mortality rates and consumer price indices. The assumptions are updated and checked at each reporting date, based on available market data. The assumptions and reports were reviewed by Risk Management.

Actuarial assumptions may differ from actual results due to changes in market conditions, economic trends, mortality trends and other assumptions. Any change in these assumptions can have a significant impact on the defined benefit obligation and future pension costs.

Changes in the expected actuarial assumptions and differences with the actual actuarial outcomes are recognised in the actuarial gains and losses included in other comprehensive income (component of total equity).

When employee benefit plans are modified and when no further obligations exist, a gain or loss, resulting from the changes are recognised directly in the income statement. Consistent with the calculation of a gain or loss on a plan amendment, a.s.r. will use updated actuarial assumptions to determine the current service cost and net interest for the remainder of the annual reporting period upon the time of such amendment. The effect of the asset ceiling, if applicable, is disregarded when calculating the gain or loss on any settlement of the plan.

The financing cost related to employee benefits is recognised in interest expense. The current service costs are included in operating expenses.

### Other long-term employee benefits

Plans that offer benefits for long-service (leave), but do not qualify as a post-employment benefit plan, such as jubilee benefits, are measured at present value using the projected unit credit method and changes are recognised directly in the income statement.

### Other post-retirements obligations

a.s.r. offers post-employment benefit plans, such as arrangement for mortgage loans at a discount (fixed amount, reference date December 2017). The entitlement to these benefits is usually conditional on the employee remaining in service up to retirement age and the completion of a minimum service period.
The expected costs of these benefits are accrued over the period of employment using an accounting methodology that is similar to that for DB plans.

### Vacation entitlements

A liability is formed for the vacation days which have not been taken at year-end.

### H. Acquisitions (Business combinations)
Business acquisitions are accounted for according to the acquisition method, with the cost of the acquisitions being allocated to the fair value of the acquired identifiable assets, liabilities and contingent liabilities.

The goodwill is determined as the difference between the cost of the acquisition and a.s.r.'s interest in the fair value of the acquired identifiable assets, liabilities and contingent liabilities at the acquisition date. Additionally for insurance contracts acquired that are onerous at the transaction date, the difference between the fair value and the fulfilment cash flows is also part of the goodwill.

Any change, in the fair value of acquired assets and liabilities at the acquisition date, determined within one year after acquisition, is recognised as an adjustment charged to goodwill in case of a preliminary valuation. Adjustments that occur after a period of one year are recognised in the income statement. Adjustments to the purchase price that are contingent on future events, and to the extent that these are not already included in the purchase price, are included in the purchase price of the acquisition at the time the adjustment is likely and can be measured reliably.

### I. Discontinued operations
Classification as held for sale occurs when the carrying amount will be recovered principally through a sale transaction rather than through continuing use.

Classification as a discontinued operation occurs at the earlier of disposal or when the operation meets the criteria to be classified as held for sale. When a group of assets classified as held for sale represents a major line of business or geographical area the disposal group classifies as discontinued operations.

The comparative consolidated income statement and consolidated statement of comprehensive income are restated to show the discontinued operations separately from the continuing operations. Where applicable in the notes to the financial statements the reclassification to assets held for sale and liabilities relating to assets held for sale are recognised in the changes in the composition of the Group. Should the impairment exceed the carrying value of the non-current assets within the scope of IFRS 5 measurement, any remaining impairment amount will be presented as a separate provision.

## 7.3.5 Other accounting policies

### J. Basis for consolidation - subsidiaries
The consolidated financial statements include the financial statements of a.s.r. and its subsidiaries. Subsidiaries are those entities (which may include deemed separate entities, the so-called silos and investments on behalf of policyholders) over which a.s.r. has control. Control exists when a.s.r. is exposed, or has rights, to variable returns from its involvement with the subsidiary and has the ability to affect those returns through its power over the subsidiary. This is the case if more than half of the voting rights may be exercised or if a.s.r. has control in any other manner. Subsidiaries are fully consolidated from the date on which control is acquired by a.s.r. and are deconsolidated when control ceases to exist.

A subsidiary's assets, liabilities and contingent liabilities are measured at fair value on the acquisition date and are subsequently accounted for in accordance with a.s.r.'s accounting policies, which are consistent with IFRS.

Non-controlling interests are initially stated at their proportionate share in the fair value of the net assets on the acquisition date and are subsequently adjusted for the non-controlling interest in changes in the subsidiary's equity.

a.s.r. concluded that the fund assets and liabilities of the IORP entities are a silo outside of the control of a.s.r., therefore these assets and liabilities are not consolidated by a.s.r. Only the remaining assets and liabilities within the IORP entities (outside of the silo) are consolidated into a.s.r.'s financial statements.

**Intragroup transactions**
Intragroup balances and transactions between consolidated group companies are eliminated. Gains and losses on transactions between a.s.r. and associates and joint ventures are eliminated to the extent of a.s.r.'s interest in these entities.

**Structured entities**
Structured entities that are consolidated include certain mortgage backed securitisation deals, where a.s.r. was involved in the design of the structured entities and also has the ability to use its power to affect the amount of the investee's returns. Other factors that contribute to the conclusion that consolidation of these entities is required includes consideration of whether a.s.r. fully services the investees and can therefore influence the defaults of the mortgage portfolios and the fact that in these cases the majority of risks are maintained by a.s.r. Structured entities that are not consolidated include general account investments in non-affiliated structured entities that are used for investment purposes.

## K. Product classification

Insurance contracts are defined as contracts under which a.s.r. accepts significant insurance risk from policyholders by agreeing to compensate policyholders if a specified uncertain future event adversely affects the policyholder. These contracts are considered insurance contracts throughout the remaining term to maturity, irrespective of when the insured event occurs. In addition, these contracts can also transfer financial risk.

a.s.r. offers non-life insurance contracts and life insurance contracts.

**Non-life insurance contracts**

Non-life insurance contracts are contracts that provide cover that is not related to the life or death of insured persons. These insurance contracts are classified into the following categories: Disability, Health, P&C (motor, fire and liability) and Other.

**Life insurance contracts**

Life insurance contracts (in cash) include savings-linked mortgages, annuities, term insurance policies, savings contracts and funeral insurance contracts. In addition to non-participating life insurance contracts, the insurance portfolio also includes:

- Individual and group participating contracts;
- Individual contracts with discretionary participation features;
- Group contracts with segregated pools with returns based on investment guarantees.

**Direct participating insurance contracts**

Claims from these life insurance contracts are directly linked to the underlying investments. The investment risk and return are borne fully for policyholders. Life insurance contracts for the account and risk of policyholders generally consist of contracts where premiums, after deduction of costs and risk premium, are invested in unit-linked funds. For some individual contracts, a.s.r. guarantees returns on unit-linked investment funds. In addition, group contracts with segregated pools are classified as direct participating insurance contracts.

## L. Segment information

At organisational level, a.s.r.'s operations have been divided into five operating segments (2023: six, including Banking). The main segments are the Non-life and Life segment that include all insurance activities. The non-insurance activities are presented as three separate segments being the Asset Management, Distribution and Services and Holding and Other segment. There is a clear difference between the risk and return profiles of these five segments.

Intersegment transactions or transfers are conducted at arm's length conditions.

## M. Transaction date and settlement date

All purchases and sales of financial instruments, which have to be settled in accordance with standard market conventions, are recognised at the transaction date, which is the date on which a.s.r. becomes party to the contractual stipulations of the instrument. Any purchases and sales other than those requiring delivery within the time frame established by regulations or market conventions are accounted for as forward transactions until the time of settlement. For details on these transactions, see accounting policy E.

## N. Securities lending

a.s.r. participates in securities lending transactions, whereby collateral is received in the form of securities or cash. Cash received as collateral is recognised in the balance sheet and a corresponding liability is recognised as liabilities arising from securities lending in 'Due to banks'. Securities lent remain on the balance sheet. Securities received as collateral are not recognised in the balance sheet.

## O. Statement of cash flows

The statement of cash flows classifies cash flows by operating activities, investing activities and financing activities. Cash flows denominated in foreign currencies are converted at the exchange rates applicable on the transaction date.

Cash flows from operating activities are reported using the indirect method. Cash flows from operating activities include result before tax, adjustments for gains and losses that did not result in income and payments in the same financial year, adjustments for movements in provisions, and accrued and deferred items.

The statement of cash flows recognises interest received and paid, and dividends received within cash flows from operating activities. Cash flows from purchasing and selling investments and investment property are included in cash flows from operating activities on a net basis. Dividends paid are recognised within cash flows from financing activities.

## P. Property, plant and equipment

**Property held for own use and plant**

Property held for own use and plants comprise of land and office buildings and plants like wind farms and are measured at fair value (revaluation model) based on annual valuations, conducted by external, independent valuators with adequate professional expertise and experience in the specific location and categories of properties or plant.

They are subsequently measured at fair value, including any unrealised fair value changes in equity, taking into account any deferred tax liabilities. For the method of determining the fair value reference is made to accounting policy B for investment property and plant.

Increase in the fair value exceeding the cost price is added to the revaluation reserve in shareholders' equity, less deferred taxes. Decreases in the fair value that offset previous increases of the same asset, are charged against the revaluation reserve. The revaluation reserve cannot be negative. All other decreases in fair value are accounted for in the income statement. Increases that reverse a revaluation decrease on the same asset previously recognised in net result are recognised in the income statement.

Buildings and wind farms are depreciated using the straight-line method based on expected useful life, taking into account their fair value amount, the residual value from the time when it is in the location and condition necessary for it to be capable of operating in the manner intended by management. The useful life of buildings is assessed annually for every individual component (component approach).

**Property and plant classified into components and their maximum life**

| Components | Useful life (expressed in years) |
|---|---|
| Land | n.a. |
| Shell | 50 |
| Outer layer | 15-30 |
| Wind turbines | 25 |
| Solar panels | 25 |
| Systems | 15-20 |
| Fittings and fixtures | 15 |

Repair and maintenance costs are charged to the income statement in the period in which they are incurred. Expenses incurred after the acquisition of an asset are capitalised if it is probable that the future economic benefits will flow to a.s.r. and the cost of the asset can be measured reliably.

Upon the sale of a property or plant, the part of the revaluation reserve related to the sold property or plant, within equity, is transferred to 'other reserves' and is not reclassified to the income statement. Therefore annually a transfer is also made from the revaluation reserve related to 'other reserves' in line with the depreciation recognised in the income statement for the revalued portion.

### Equipment

Equipment is recognised at cost, less accumulated depreciation and / or any accumulated impairment losses. Cost corresponds with the cash paid or the fair value of the consideration given to acquire the asset.

Equipment is depreciated over its useful life, which is determined individually (usually between three and five years). Repair and maintenance costs are charged to the income statement in the period in which they are incurred. Expenses incurred after the acquisition of an asset are capitalised if it is probable that the future economic benefits will flow to a.s.r. and the cost of the asset can be measured reliably.

Accounting for borrowing costs attributable to the construction of property, plant and equipment is the same as accounting for borrowing costs attributable to investment property. For details, see accounting policy D.

### Right-of-use assets

Right-of-use assets are recognised for lease contracts for which a.s.r. is the lessee. For more information reference is made to accounting policy V.

## Q. Associates and joint ventures

### Associates

Associates are entities over which a.s.r. has significant influence on operating and financial contracts, without having control. Generally, associates are accounted for using the equity method from the date at which a.s.r. acquires significant influence until the date at which such influence ceases. This means that associates are initially recognised at cost, including any goodwill paid. This value is subsequently adjusted to take account of a.s.r.'s share of the associate's comprehensive income. Comprehensive income is adjusted in accordance with the accounting principles used by a.s.r.

Losses are accounted for until the carrying amount of the investment has reached zero. Further provisions are recognised only to the extent that a.s.r. has incurred legal or constructive obligations concerning these associates.

If objective evidence of impairment exists, associates are tested for impairment and, if necessary, written down.

When the application of the equity method produces information that is not relevant to the investors, a.s.r. may use the exemption of IAS 28 to measure the investments in those associates at fair value through profit or loss in accordance with IFRS 9. a.s.r. applies fair value measurement for investments in real estate equity funds and mortgage equity funds, over which a.s.r. has significant influence.

### Joint ventures

Joint ventures are contractual arrangements whereby a.s.r. and one or more parties undertake an economic activity that is subject to joint control. Joint control exists only when the strategic financial and operating decisions relating to the activity require the unanimous consent of the parties sharing control.

These interests are accounted for using the equity method as applied to associates. The interests are recognised in the financial statements from the date on which a.s.r. first obtains joint control until the date that this joint control ceases.

If objective evidence of impairment exists, joint ventures are tested for impairment and, if necessary an impairment is recognised in the income statement.

### Joint operations

a.s.r. has a limited number of non-material joint operations. These are recognised in relation to a.s.r.'s interest in the joint operation's individual balance sheet and income statement items.

## R. Other assets

Other assets include accrued investment income, property developments, collateral (including margin accounts), reverse repurchase agreements, tax assets and accrued assets.

Property developments consist of property under development commissioned by third parties. Development property is measured at cost including any incremental costs (if a.s.r. expects to recover those costs), directly related costs to the contract (i.e. labour, materials, allocation of directly related costs, payments to subcontractors) and construction period interest, less any invoiced instalments and impairments.

Revenue on property development is primarily accounted for at the moment the property is sold. This is a performance obligation satisfied at a point in time. The point in time is the moment a customer obtains control of the promised asset.

Property developments which are sold can have guarantees (such as rent guarantees or construction guarantees), which may give rise to a separate performance obligation.

## S. Cash and cash equivalents

Cash and cash equivalents include cash in hand, deposits held at call with banks, cash collateral and other short-term highly liquid investments that are not subject to a significant risk of changes in value. Cash and cash equivalents are measured at fair value through profit or loss.

## T. Equity

### Share capital and share premium reserve

The share capital disclosed in the balance sheet consists of issued and fully paid-up ordinary shares. The share premium reserve comprises additional paid-in capital in excess of the par value of the shares.

### Reserve for unrealised gains and losses

This reserve consists of:

- Unrealised gains and losses from assets FVOCI net of tax (see accounting policy E);
- The share of unrealised gains and losses of associates and joint ventures using the equity method held by a.s.r. (see accounting policy Q);
- Unrealised change in value of property for own use (see accounting policy P);

### Actuarial gains and losses

Actuarial gains and losses result from the post-employment benefit pension plans (see accounting policy G).

### Retained earnings

Retained earnings also include other reserves and the unappropriated result.

### Other equity instruments

This item represents the par value of the other equity instruments. Costs directly attributable to the equity issue and the tax impact thereof are recognised in retained earnings.

### Treasury shares

Treasury shares are a.s.r.'s own ordinary shares that have been issued and subsequently reacquired by a.s.r. Treasury shares are deducted from equity, regardless of the objective of the transaction. No gain or loss is recognised in the income statement on the purchase, sale, issue or cancellation of the instruments. If sold, the difference between the carrying amount and the proceeds is reflected in retained earnings. The consideration paid or received is recognised directly in shareholders' equity. All treasury shares are eliminated in the calculation of earnings per share and dividend per ordinary share.

Treasury shares are either required as part of the share buy-back program, or acquired and resold as part of the employee share purchase plan, see section 7.7.6.

### Non-controlling interest

The non-controlling interest relates to the equity in a consolidated subsidiary not attributable, directly or indirectly, to a.s.r. (see accounting policy J).

### Dividends on ordinary share capital

Dividends on ordinary shares are recognised as a liability and recognised in equity when they are approved by a.s.r.'s shareholders. Interim dividends are recognised in equity when they are paid.

Dividends for the year that are approved after the reporting date are treated as an event after the reporting date.

### Discretionary interest on other equity instruments

Discretionary interest on other equity instruments is recognised in equity upon payment. The related income tax on these equity instruments is recognised in the income statement.

## U. Financing

Financing includes savings deposits, borrowings, due to customers, due to banks, subordinated liabilities and other financial liabilities. On initial recognition, debt instruments and other loans are stated at fair value, net of transaction costs incurred. Subsequent valuation is at amortised cost. Any difference between the proceeds and the redemption value is recognised in the income statement over the period of the borrowings using the effective interest method. Lease liabilities are included under borrowings and measured in accordance with accounting policy V.

## V. Leasing

A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for a consideration. For contracts that contain a lease component and one or more additional lease or non-lease components a.s.r. applies the practical expedient not to separate non-lease components from lease components.

At the commencement date of the lease, a.s.r. recognises a right-of-use asset and a lease liability. The right-of-use asset comprises the amount of the lease liability at initial measurement. The lease liability is measured at the present value of the lease payments that are not paid at the commencement date. For vehicles, the lease payments are discounted using the interest rate implicit in the lease. For other leases a.s.r.'s incremental borrowing rate is used.

Subsequently, the right-of-use asset is valued at cost less any cumulated depreciation and any accumulated impairment losses and adjusted for any remeasurement of the lease liability. The lease liability is increased with interest accrued and reduced for lease payments made. When applicable the lease liability is remeasured for changes in future payments resulting from a change in index or lease term.

The right-of-use assets are presented under property, plant and equipment. The lease liabilities are presented under borrowings.

## W1. Insurance contract revenue

Insurance contract revenue excludes any investment components and is measured as follows.

**Insurance contract revenue – contracts measured under the GMM or VFA**
a.s.r. recognises insurance contract revenue as it satisfies its performance obligations – i.e. as it provides coverage or other services required due to groups of insurance contracts.

For contracts measured under the GMM or VFA, the insurance contract revenue relating to services provided for each period represents the total of the changes in the liability for remaining coverage that relate to services for which a.s.r. expects to receive consideration.

Insurance contract revenue consists of the sum of the changes in the liability for remaining coverage due to:

- The insurance service expenses incurred in the period measured at the amounts expected at the beginning of the period, excluding:
  – Amounts allocated to the loss component;
  – Repayments of investment components;
  – Amounts that relate to transaction-based taxes collected on behalf of third parties;
  – Insurance acquisition expenses; and
  – Amounts relating to risk adjustment for non-financial risk.
- The change in the risk adjustment for non-financial risk, excluding:
  – Changes that relate to future service that adjust the CSM; and
  – Amounts allocated to the loss component.
- The amount of CSM for the services provided in the period;
- In addition, a.s.r. allocates a portion of premiums that relate to recovering insurance acquisition cash flows to each period in a systematic way based on the passage of time. a.s.r. recognises the allocated amount as insurance contracts revenue and an equal amount as insurance service expenses.

The amount of the CSM of a group of insurance contracts that is recognised as insurance contract revenue in each reporting period is generally determined by considering the quantity of benefits provided from the services per insurance contract and allocating the CSM per insurance contract remaining at the end of the reporting period (before any allocation) equally to the services provided in the reporting period and expected to be provided in future periods.

Per group of contracts, in accordance with the level of aggregation criteria, the CSM is subsequently released, considering each individual contract, to the current coverage period and to future coverage periods in which the insurance contract service is expected to be provided (considering expected contract terms and survivor, lapse and death assumptions).

**Insurance contract revenue – contracts measured under the PAA**
For contracts measured under the PAA, the insurance contract revenue for each period is the amount of expected premium receipts for providing coverage in the period. a.s.r. allocates the expected premium receipts to each period on the basis of the passage of time.

**Allocation of reinsurance premiums paid**
a.s.r. allocates reinsurers premiums paid as it receives coverage or other services under groups of reinsurance contracts. For contracts measured under the GMM the allocation of reinsurance premiums paid relating to services received for each reporting period represents the total of the changes in the remaining coverage component that relate to services for which a.s.r. expects to pay consideration.

For contracts measured under the PAA, the allocation of reinsurance premiums paid for each period is the amount of expected premium payments for receiving coverage in the period.

## W2. Insurance service expenses

Insurance service expenses arising from insurance contracts are recognised in the income statement generally as they are incurred. They comprise the following items:

- Claims and benefits
  - Incurred claims and benefits;
  - Losses and reversal of losses on onerous contracts;
  - Adjustment of the liabilities for incurred claims and benefits that do not arise from the effects of the time value of money, financial risk and changes therein;
- Insurance service operating expenses
  - Attributable insurance service operating expenses;
  - Acquisition costs when incurred for insurance contracts measured under the PAA; and
  - Amortisation of insurance acquisition cash flows for contracts not measured under the PAA.

*Loss components*
a.s.r. establishes a loss component of the liability for remaining coverage for onerous groups of insurance contracts. The loss component determines the amounts of fulfilment cash flows that are subsequently presented in the income statement as reversals of losses on onerous contracts and are excluded from insurance contract revenue when they occur. When the fulfilment cash flows occur, they are allocated between the loss component and the liability for remaining coverage excluding the loss component on a systematic basis.

The systematic basis is determined by the proportion of the loss component relative to the total estimate of the present value of the future cash outflows plus the risk adjustment for non-financial risk at the beginning of each period (or on initial recognition if a group of contracts is initially recognised in the period).

Decreases in fulfilment cash flows relating to future services or increases in a.s.r.'s share of the fair value of any underlying items are allocated solely to the loss component. If the loss component is reduced to zero, then any excess over the amount allocated to the loss component creates a new CSM for the group of contracts.

## W3. Investment income

Investment income comprises the direct investment income such as interest income on financial assets, dividends received, rental income from investment property and other direct investment income. Fair value gains and losses includes the net gains on financial assets at FVTPL, net gains on derecognition of financial assets and liabilities at amortised cost and debt instruments at FVOCI, net gains on derecognition of associates at equity method and fair value gains on investment property.

**Interest income**
Interest income for all interest-bearing instruments includes coupons earned on fixed income instruments and is recognised on an accrual basis. Transaction costs attributable to the acquisition of debt securities at fair value through profit or loss are immediately recognised in the income statement.

When unpaid interest has accrued before the acquisition of an interest-bearing investment, the subsequent receipt of interest is allocated between pre-acquisition and post-acquisition periods; only the post-acquisition portion is recognised as revenue. The pre-acquisition interest is part of the consideration paid.

*Interest rate swaps*
When the two legs of an interest rate swap are settled gross, interest paid and interest received on these swap are not offset. Gross settlement means that both legs of the swap are settled separately: one party receives interest and the other party pays interest. The net amount depends on the market interest rate. Interest received is accounted for as direct investment income, interest paid is accounted for as other finance expense.

**Impairments**
When a receivable is impaired, a lifetime expected credit loss (ECL) is recognised and interest income is calculated on the net carrying amount (that is the gross carrying amount less credit allowance).

**Dividends**
Dividend income is recognised in the income statement when a right to receive payment is established.

**Rental income**
Rental income from investment property is allocated to the period to which they relate.

## W4. Insurance finance income and expenses
Insurance finance income and expenses comprise changes in the carrying amounts of groups of insurance and reinsurance contracts, measured through GMM and PAA, arising from the effects of the time value of money, financial risk and changes therein. For direct participating insurance contracts (VFA) the change in the fair value of the underlying items is included in the insurance finance income and expenses.

## X. Solvency II
In accordance with the Solvency II regulations (2009/138/EG art. 75 - 86), Solvency II figures are based on fair value.

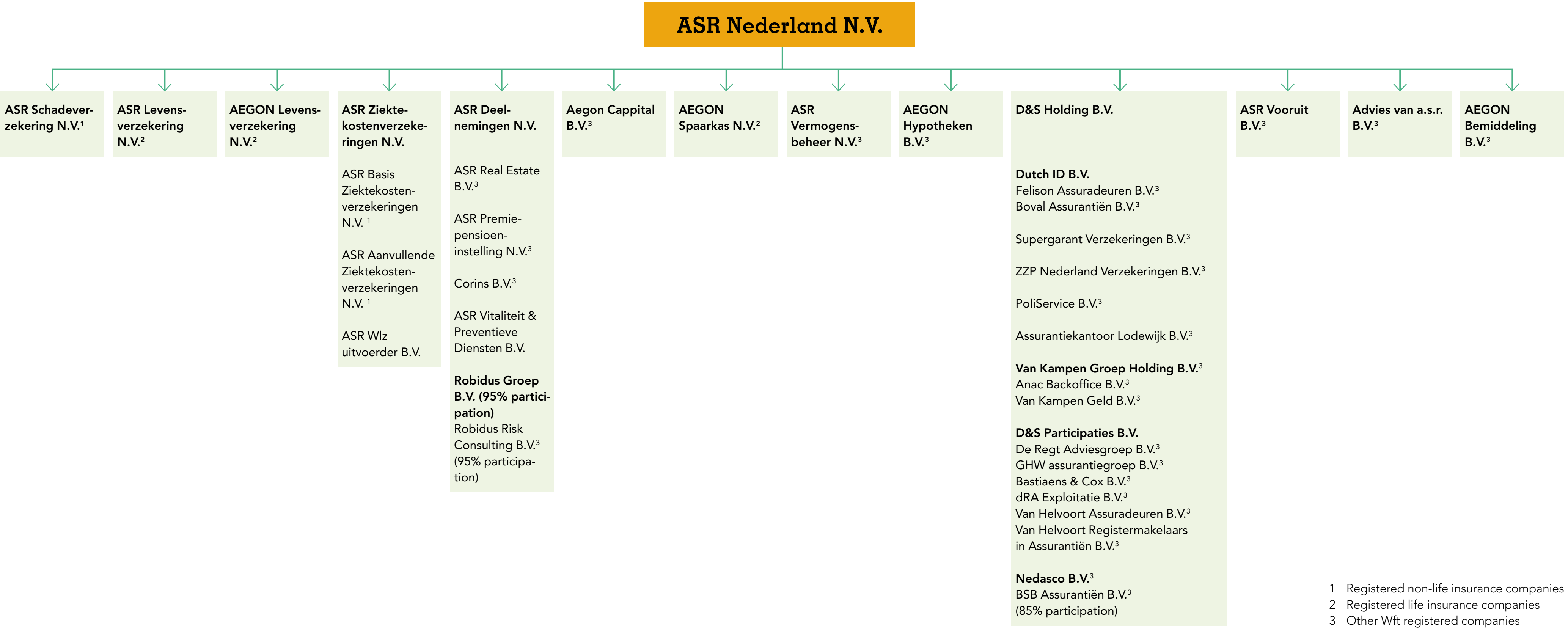
Fair value measurement is based on the same fair value hierarchy described in the IFRS accounting policies (see accounting policy B).

Most important adjustments in the balance sheet, compared to IFRS, are the valuation of the (savings-linked) mortgage loans-portfolio and the liabilities arising from insurance contracts (including the risk margin). Basis of Solvency II Eligible own funds (EOF) is the excess of assets over liabilities, adjusted with some specific EOF-items (subordinated liabilities which classify as EOF under Solvency II and foreseeable dividend). The Solvency Capital Requirement (SCR) of Aegon Levensverzekering N.V. (Aegon life) and of Aegon Spaarkas N.V. (Aegon Spaarkas) is based on the partial internal model, while the SCR of the other a.s.r. entities are based on the standard formula, including the calculation of the Loss Absorbing Capacity of Deferred Tax (LAC DT). The LAC DT methodology is reviewed and properly documented. Usage of the models is agreed upon with DNB.

# 7.4 Group structure and segment information

## 7.4.1 Group structure

The Group comprises a number of operating and holding companies. Except where indicated, a.s.r. is 100% shareholder of these companies.




## Segment information

The operations of a.s.r. have been divided into five operating segments (2023: six, including Bank). The main segments are the Non-life and Life segment in which all insurance activities are presented. The other activities are presented as three separate segments being Asset Management, Distribution and Services and Holding and Other.

Intersegment transactions or transfers are concluded at arm's length conditions.

### Insurance activities

Insurance entities are entities that accept the transfer of insurance risks from policyholders. The Non-life segment consists of non-life insurance entities and their subsidiaries. These non-life insurance entities offer non-life insurance contracts such as disability insurance and P&C insurance and health insurance. The Life segment mainly comprises the life insurance entities and their subsidiaries. This life insurance entities offer financial products such as life insurance contracts and life insurance contracts on behalf of policyholders. The Life segment also includes ASR Premiepensioeninstelling N.V. (a.s.r. IORP) and Aegon Cappital B.V. (Aegon IORP) which offer investment contracts to policyholders that bear no insurance risk and for which the actual return on investments allocated to the contract is passed on to the policyholder. The Life segment also includes ASR Vooruit B.V., the investment firm that performs activities related to private investing for customers. The Non-life and Life segments have different levels of profitability and growth opportunities, as well as a different outlook and risk profile. See section 7.7.9 for a list of principal group companies and associates in the relevant segments.

### Other activities

The other activities consist of:

- The Asset Management segment involves all activities related to asset management including investment property management. These activities include amongst others ASR Vermogensbeheer N.V., ASR Real Estate B.V. and Aegon Hypotheken B.V. (Aegon hypotheken);
- The Distribution and Services segment includes the activities related to distribution of insurance contracts and include amongst others the financial intermediary business of PoliService B.V., Van Kampen Groep Holding B.V. (and Van Kampen Geld B.V. and Anac Backoffice B.V.), Dutch ID B.V. (and

Felison Assuradeuren B.V. and Boval Assurantiën B.V.), Corins B.V., SuperGarant Verzekeringen B.V., D&S Participaties B.V., (and ZZP Nederland Verzekeringen B.V. and Bedrijfsartsengroep B.V.), Nedasco B.V., Robidus Groep B.V., TKP Pensioen B.V., Advies van a.s.r. B.V. and AEGON Bemiddeling B.V.;
- The Holding and Other segment consists primarily of the holding activities of a.s.r. (including the group related activities), other holding and intermediate holding companies, the real estate development business (ASR Vastgoed Projecten B.V.), ASR Vitaliteit & Preventieve Diensten B.V (Vitality) and the minority participations of ASR Deelnemingen N.V.
- The former Banking segment consisted of the Knab activities (Aegon Bank N.V.), which were sold during 2024, see section 7.4.6.

The eliminations applied in the reconciliation of the segment information to the consolidated balance sheet and the consolidated income statement are separately presented in section 7.4.2 and 7.4.3.

The a.s.r. segment reporting shows the financial performance of each segment. The purpose is to allocate all items in the balance sheet and income statement to the segments that hold full management responsibility for them.

Segment information has been prepared in accordance with the accounting principles used for the preparation of a.s.r.'s consolidated financial statements (see section 7.3). Goodwill and other intangibles are presented in the related cash generating unit's segment. Intersegment transactions are conducted at arm's length conditions. In general, costs related to centralised services are allocated to the segments based on the utilisation of these services.

The segments are assessed on their operating result as defined in section 7.10.

## 7.4.2 Segmented balance sheet

**Segmented balance sheet**

| As at 31 December 2024 | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|
| Intangible assets | 32 | 101 | 97 | 362 | - | - | 592 |
| Property, plant and equipment | - | 584 | - | 40 | 257 | -206 | 676 |
| Investment property | 63 | 3,301 | - | - | - | - | 3,364 |
| Associates and joint ventures at equity method | - | 362 | - | 9 | 86 | - | 457 |
| Investments | 10,284 | 68,295 | 2,633 | 19 | 431 | -1,068 | 80,593 |
| Investments related to direct participating contracts | - | 33,025 | - | - | - | - | 33,025 |
| Derivatives | 152 | 11,369 | 247 | - | - | - | 11,767 |
| Deferred tax assets | - | 739 | 8 | - | - | -646 | 101 |
| Reinsurance contract assets | 277 | 208 | - | - | - | - | 485 |
| Other assets | 460 | 2,417 | 427 | 226 | 6,428 | -6,615 | 3,342 |
| Cash and cash equivalents | 387 | 2,589 | 329 | 114 | 774 | - | 4,194 |
| **Total assets** | **11,654** | **122,989** | **3,740** | **770** | **7,977** | **-8,536** | **138,595** |
| | | | | | | | |
| Equity attributable to holders of equity instruments | 3,044 | 7,260 | 432 | 373 | -1,303 | -21 | 9,786 |
| Non-controlling interests | 7 | 43 | - | 2 | -6 | - | 47 |
| **Total equity** | **3,052** | **7,303** | **432** | **376** | **-1,308** | **-21** | **9,833** |
| | | | | | | | |
| Subordinated liabilities | 95 | - | - | - | 2,007 | -95 | 2,007 |
| Insurance contract liabilities | 7,822 | 59,269 | - | - | - | -2,824 | 64,267 |
| Liabilities arising from direct participating insurance contracts | - | 41,331 | - | - | - | -2,966 | 38,366 |
| Employee benefits | - | - | - | - | 5,036 | - | 5,037 |
| Provisions | 1 | 327 | - | 6 | 79 | - | 413 |
| Borrowings | 8 | 680 | 2,278 | 225 | 1,097 | -1,153 | 3,135 |
| Derivatives | 322 | 8,085 | 259 | - | - | - | 8,666 |
| Deferred tax liabilities | 197 | - | - | 4 | 441 | -642 | - |
| Due to banks | 46 | 4,829 | 674 | - | - | - | 5,550 |
| Other liabilities | 111 | 1,165 | 97 | 160 | 624 | -836 | 1,322 |
| **Total liabilities** | **8,603** | **115,686** | **3,308** | **395** | **9,285** | **-8,515** | **128,762** |
| | | | | | | | |
| **Total equity and liabilities** | **11,654** | **122,989** | **3,740** | **770** | **7,977** | **-8,536** | **138,595** |
| | | | | | | | |
| **Additions to** | | | | | | | |
| Intangible assets | - | 1 | - | 16 | - | - | 17 |
| Property, plant and equipment | 1 | - | - | 19 | 6 | - | 26 |
| **Total additions** | **1** | **1** | **-** | **34** | **6** | **-** | **43** |

## Segmented balance sheet

| As at 31 December 2023 | Non-life | Life | Asset Management | Bank | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|---|
| Intangible assets | 36 | 107 | 102 | 28 | 377 | - | - | 649 |
| Property, plant and equipment | - | 632 | - | - | 30 | 282 | -212 | 732 |
| Investment property | 47 | 3,005 | - | - | - | - | - | 3,051 |
| Associates and joint ventures at equity method | - | 342 | - | - | 12 | 71 | - | 426 |
| Investments | 9,785 | 64,873 | 2,506 | 13,147 | 11 | 1,057 | -1,374 | 90,006 |
| Investments related to direct participating contracts | - | 30,352 | - | - | - | - | - | 30,352 |
| Derivatives | 76 | 11,237 | 309 | 1,285 | - | - | - | 12,907 |
| Deferred tax assets | - | 968 | - | - | - | - | -332 | 636 |
| Reinsurance contract assets | 284 | 217 | - | - | - | - | - | 501 |
| Other assets | 360 | 3,036 | 474 | 135 | 269 | 6,228 | -6,904 | 3,598 |
| Cash and cash equivalents | 213 | 4,639 | 254 | 2,538 | 78 | 188 | - | 7,910 |
| **Total assets** | **10,801** | **119,408** | **3,645** | **17,134** | **778** | **7,826** | **-8,822** | **150,768** |
| | | | | | | | | |
| Equity attributable to holders of equity instruments | 2,764 | 6,770 | 489 | 750 | 310 | -1,712 | -29 | 9,342 |
| Non-controlling interests | 5 | 31 | - | - | 7 | -9 | - | 35 |
| **Total equity** | **2,770** | **6,801** | **489** | **750** | **318** | **-1,721** | **-29** | **9,377** |
| | | | | | | | | |
| Subordinated liabilities | 95 | - | - | - | - | 2,005 | -95 | 2,005 |
| Insurance contract liabilities | 7,237 | 58,841 | - | - | - | - | -2,776 | 63,302 |
| Liabilities arising from direct participating insurance contracts | - | 39,025 | - | - | - | - | -2,943 | 36,082 |
| Employee benefits | - | - | - | - | - | 5,218 | - | 5,218 |
| Provisions | 1 | 321 | - | 1 | 7 | 84 | - | 414 |
| Borrowings | 1 | 710 | 1,787 | 3,049 | 192 | 1,172 | -1,460 | 5,451 |
| Derivatives | 318 | 8,840 | 269 | 706 | - | - | - | 10,132 |
| Deferred tax liabilities | 5 | - | 7 | 16 | 53 | 249 | -330 | - |
| Savings deposits | - | - | - | 11,967 | - | - | - | 11,967 |
| Due to banks | 16 | 3,757 | 933 | 539 | - | 200 | - | 5,445 |
| Other liabilities | 358 | 1,114 | 159 | 107 | 209 | 619 | -1,190 | 1,376 |
| **Total liabilities** | **8,031** | **112,607** | **3,155** | **16,384** | **461** | **9,547** | **-8,793** | **141,391** |
| | | | | | | | | |
| **Total equity and liabilities** | **10,801** | **119,408** | **3,645** | **17,134** | **778** | **7,826** | **-8,822** | **150,768** |
| | | | | | | | | |
| **Additions to** | | | | | | | | |
| Intangible assets | 10 | 43 | 64 | 29 | 224 | - | - | 370 |
| Property, plant and equipment | - | 40 | - | - | 24 | 57 | - | 121 |
| **Total additions** | **10** | **84** | **64** | **29** | **248** | **57** | **-** | **490** |

## 7.4.3 Segmented income statement and operating result

**Segmented income statement and operating result**

| 2024 | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|
| **Continuing operations** | | | | | | | |
| | | | | | | | |
| Insurance contract revenue | 5,614 | 4,241 | - | - | - | -254 | 9,601 |
| *Incurred claims and benefits* | *-4,198* | *-3,402* | - | - | - | *211* | *-7,389* |
| *Insurance service operating expenses* | *-1,061* | *-290* | - | - | - | - | *-1,350* |
| Insurance service expenses | -5,258 | -3,692 | - | - | - | 211 | -8,739 |
| **Insurance service result before reinsurance** | **356** | **550** | **-** | **-** | **-** | **-44** | **862** |
| **Net result from reinsurance contracts** | **-32** | **-58** | **-** | **-** | **-** | **-** | **-90** |
| **Insurance service result** | **324** | **491** | **-** | **-** | **-** | **-44** | **772** |
| | | | | | | | |
| Direct investment income | 485 | 5,643 | 219 | 8 | 220 | -224 | 6,351 |
| Net fair value gains (and losses) | 203 | 4,277 | -27 | - | 2 | 6 | 4,459 |
| Impairments on financial assets | 1 | - | - | - | - | - | 1 |
| Net finance result from insurance and reinsurance contracts | -262 | -5,751 | - | - | - | 281 | -5,731 |
| Other finance expenses | -218 | -3,380 | -166 | -8 | -236 | -23 | -4,031 |
| Investment operating expenses | -16 | -168 | -118 | - | -1 | 99 | -205 |
| **Investment and finance result** | **192** | **620** | **-92** | **-** | **-15** | **138** | **843** |
| | | | | | | | |
| Share of result of associates and joint ventures | - | 21 | - | 1 | 6 | - | 28 |
| Fee income | 7 | 73 | 325 | 377 | 3 | -267 | 518 |
| Other income | 15 | 72 | - | 12 | 18 | -10 | 107 |
| **Total other income** | **22** | **166** | **325** | **390** | **27** | **-277** | **653** |
| | | | | | | | |
| Other expenses | -51 | -126 | -161 | -374 | -277 | 168 | -821 |
| **Total other income and expenses** | **-29** | **40** | **164** | **16** | **-250** | **-109** | **-168** |
| | | | | | | | |
| **Result before tax** | **487** | **1,151** | **72** | **16** | **-265** | **-15** | **1,447** |
| | | | | | | | |
| Income tax (expense) / gain | -123 | -305 | -19 | -11 | 72 | 3 | -383 |
| **Result after tax** | **364** | **846** | **54** | **5** | **-193** | **-11** | **1,065** |
| | | | | | | | |
| **Discontinued operations** | | | | | | | |
| Result after tax from discontinued operations | - | - | - | - | -131 | 10 | -121 |
| | | | | | | | |
| **Net result** | **364** | **846** | **54** | **5** | **-324** | **-1** | **944** |

| 2024 | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|
| **Attributable to:** | | | | | | | |
| Non-controlling interests | - | -1 | - | 1 | -1 | - | -2 |
| | | | | | | | |
| - Shareholders of the parent | 364 | 848 | 54 | 4 | -386 | -1 | 882 |
| - Holders of other equity instruments | - | - | - | - | 63 | - | 63 |
| **Result attributable to holders of equity instruments** | **364** | **848** | **54** | **4** | **-323** | **-1** | **946** |

a.s.r. decided to use the 'look through' approach on a group level when calculating the CSM, representing all income and expenses of the Group related to insurance contracts. As a result the services of a.s.r. asset management related to insurance contracts measured under the variable fee approach are reflected in the insurance service result of the segment Life, as well as the segment Asset management, and subsequently reversed in 'other income and other expenses' within the segment Life. a.s.r. considers this to be a true and fair view. It reflects the measure reported to the Executive Board, as chief operating decision maker, for the purpose of making decisions about allocating resources to the segment and assessing its performance.

The results from discontinued operations in relation to Knab, including the loss as a result of the sale, is recognised in segment Holding and Other. See section 7.4.6 for more details.

## Operating result

| 2024 | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|
| **Result before tax from continuing operations** | **487** | **1,151** | **72** | **16** | **-265** | **-15** | **1,447** |
| Minus adjustments related to the insurance service result | -15 | 63 | - | - | - | -44 | 5 |
| Minus adjustments related to the investment and finance result | 48 | -15 | -15 | - | 145 | 9 | 173 |
| Minus adjustments related to the other result | -16 | 26 | -13 | -33 | -128 | 5 | -158 |
| | | | | | | | |
| **Operating result** | **469** | **1,076** | **100** | **50** | **-283** | **15** | **1,428** |

In 2024, adjustments related to the insurance service result (€ 5 million) consist of changes to future services on onerous contracts (€ 42 million, mostly reflecting synergies in expense provisioning). This was partly offset by, among others, the amortisation of pre-recognition interest rate hedged developments prior to the initial CSM recognition (€ -18 million) and the non-economic assumption update for inflation in the liability of incurred claims of Disability (€ -8 million).

Adjustments related to the investment and finance result (€ 173 million) were mainly related to revaluations due to market developments to arrive at normalised investment returns in the operating result.

Adjustments related to the other result (€ -158 million) consist of costs for integration of the Aegon NL business lines, charged to the Holding, project costs for the regulatory pension reform and CSRD, project costs for the implementation of a partial internal model and amortisations of intangible assets defined in earlier acquisitions.

For more information including an explanation of the definition, see section 7.10.

## Impairments

| 2024 | | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|---|
| Property, plant and equipment | Impairment | - | - | - | - | -3 | - | -3 |
| Property, plant and equipment | Reversal | - | - | - | - | - | - | - |
| Other assets | Impairment | - | - | - | - | - | - | - |
| Other assets | Reversal | 1 | - | - | - | - | - | 1 |
| **Total Impairments** | **Impairment** | **-** | **-** | **-** | **-** | **-3** | **-** | **-3** |
| | **Reversal** | **1** | **-** | **-** | **-** | **-** | **-** | **1** |
| | | | | | | | | |
| | **Total** | **1** | **-** | **-** | **-** | **-3** | **-** | **-2** |

## Segmented income statement and operating result

| 2023 | Non-life | Life | Asset Management | Bank | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|---|
| **Continuing operations** | | | | | | | | |
| | | | | | | | | |
| Insurance contract revenue | 5,379 | 2,898 | - | - | - | - | -182 | 8,095 |
| *Incurred claims and benefits* | *-4,267* | *-2,298* | - | - | - | - | *164* | *-6,400* |
| *Insurance service operating expenses* | *-966* | *-264* | - | - | - | - | *2* | *-1,227* |
| Insurance service expenses | -5,232 | -2,562 | - | - | - | - | 166 | -7,628 |
| **Insurance service result before reinsurance** | **147** | **336** | | **-** | **-** | **-** | **-15** | **468** |
| **Net result from reinsurance contracts** | **-12** | **-16** | **-** | **-** | **-** | **-** | **-** | **-27** |
| **Insurance service result** | **135** | **320** | **-** | **-** | **-** | **-** | **-15** | **440** |
| | | | | | | | | |
| Direct investment income | 396 | 3,658 | 89 | - | 5 | 72 | -84 | 4,137 |
| Net fair value gains (and losses) | 186 | 4,568 | -14 | - | - | 21 | -15 | 4,747 |
| Impairments on financial assets | - | 1 | -23 | - | - | -1 | - | -22 |
| Net finance result from insurance and reinsurance contracts | -243 | -5,174 | - | - | - | - | 205 | -5,211 |
| Other finance expenses | -143 | -2,031 | -54 | - | -7 | -87 | -129 | -2,451 |
| Investment operating expenses | -11 | -103 | -98 | - | - | -2 | 68 | -146 |
| **Investment and finance result** | **185** | **919** | **-98** | **-** | **-2** | **4** | **47** | **1,054** |
| | | | | | | | | |
| Share of result of associates and joint ventures | - | 9 | | - | - | 2 | - | 11 |
| Fee income | 5 | 54 | 248 | - | 237 | 3 | -219 | 328 |
| Other income | 12 | 105 | 111 | - | 6 | 149 | -10 | 372 |
| **Total other income** | **17** | **167** | **359** | **-** | **243** | **154** | **-229** | **711** |
| | | | | | | | | |
| Other expenses | -66 | -438 | -134 | - | -233 | -207 | 150 | -927 |
| **Total other income and expenses** | **-49** | **-270** | **224** | **-** | **10** | **-52** | **-80** | **-217** |
| | | | | | | | | |
| **Result before tax** | **271** | **969** | **126** | **-** | **8** | **-48** | **-48** | **1,278** |
| | | | | | | | | |
| Income tax (expense) / gain | -68 | -238 | -33 | - | -6 | 58 | 12 | -275 |
| **Result after tax** | **203** | **731** | **94** | **-** | **2** | **10** | **-36** | **1,003** |
| | | | | | | | | |
| **Discontinued operations** | | | | | | | | |
| Result after tax from discontinued operations | - | - | - | 76 | - | - | 6 | 82 |
| | | | | | | | | |
| **Net result** | **203** | **731** | **94** | **76** | **2** | **10** | **-30** | **1,086** |

| 2023 | Non-life | Life | Asset Management | Bank | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|---|
| **Attributable to:** | | | | | | | | |
| Non-controlling interests | - | - | - | - | - | - | - | - |
| - Shareholders of the parent | 203 | 731 | 94 | 76 | 2 | -38 | -30 | 1,038 |
| - Holders of other equity instruments | - | - | - | - | - | 48 | - | 48 |
| **Result attributable to holders of equity instruments** | **203** | **731** | **94** | **76** | **2** | **10** | **-30** | **1,086** |

## Operating result

| 2023 | Non-life | Life | Asset Management | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|
| **Result before tax from continuing operations** | **271** | **969** | **126** | **8** | **-48** | **-48** | **1,278** |
| Minus adjustments related to the insurance service result | -106 | 47 | - | - | - | -16 | -75 |
| Minus adjustments related to the investment and finance result | 29 | 510 | -30 | - | 123 | -22 | 611 |
| Minus adjustments related to the other result | -30 | -279 | 77 | -24 | 25 | - | -231 |
| **Operating result** | **378** | **691** | **78** | **33** | **-197** | **-11** | **973** |

In 2023, adjustments related to the insurance service result (€ -75 million) mainly consist of the non-economic assumption update for inflation in the liability of incurred claims of Disability (€ -87 million) in the segment Non-life.

Adjustments related to the investment and finance result (€ 611 million) were mainly related to fair value revaluations driven by decreasing interest rates in 2023.

Adjustments related to the other result (€ -231 million) consists on the one hand of provisions made following the agreement with claim organisations on Unit Linked-life insurance transparency (see section 7.7.7.2). In the Life segment a provision is made of in total € 300 million which includes an additional provision of € 50 million to facilitate individual claims of customers in distressing situations. On the other hand, an adjustment was made in the Asset Management segment for the net positive impact from the Aegon transaction and the exchange of investment portfolios. In the Distribution and Services segment an impairment of goodwill and amortisations of other intangible assets were adjusted for. In the Holding and Other segment the positive adjustment for the purchase gain on the Aegon transaction was partially set off by expenses for integration of the Aegon business lines and expenses for innovation projects.

Operating result is an alternative performance measure; for more information see section 7.10.

## Impairments

| 2023 | | Non-life | Life | Asset Management | Banking | Distribution and Services | Holding and Other | Eliminations | Total |
|---|---|---|---|---|---|---|---|---|---|
| Intangible assets | Impairment | - | - | - | - | -13 | - | - | -13 |
| Intangible assets | Reversal | - | - | - | - | - | - | - | - |
| Investments | Impairment | - | - | -1 | 3 | - | -1 | - | 2 |
| Investments | Reversal | - | - | - | - | - | - | - | - |
| Other assets | Impairment | - | - | -22 | - | - | - | - | -22 |
| Other assets | Reversal | - | 1 | - | - | - | - | - | 1 |
| **Total Impairments** | **Impairment** | **-** | **-** | **-23** | **3** | **-13** | **-1** | **-** | **-34** |
| | **Reversal** | **-** | **1** | **-** | **-** | **-** | **-** | **-** | **1** |
| | **Total** | **-** | **1** | **-23** | **3** | **-13** | **-1** | **-** | **-32** |

## 7.4.4 Non-life ratios

The combined ratio including the claims, commission and expense ratios is an alternative performance measure and is not a measure of financial performance under IFRS. Because it is not determined in accordance with IFRS, these ratios as presented by a.s.r. may not be comparable to other similarly titled measures of performance of other companies.

**Non-life combined ratio**

| | 2024 | 2023 |
|---|---|---|
| Claims ratio | 74.56% | 77.0% |
| Commission ratio | 12.7% | 12.3% |
| Expense ratio | 6.5% | 6.1% |
| | | |
| **Combined ratio** | **93.8%** | **95.4%** |

**Non-life combined ratio per business line**

| | 2024 | 2023 |
|---|---|---|
| Property & Casualty (P&C) | 90.7% | 93.6% |
| Disability | 93.0% | 93.5% |
| P&C and Disability | 91.9% | 93.5% |
| Health | 99.1% | 98.9% |

The claims, commission and expense ratios can be calculated based on the following information:

**Claims, commission and expenses**

| | 2024 | 2023 |
|---|---|---|
| Insurance contract revenue | 5,614 | 5,379 |
| Allocation of reinsurance premiums paid | -129 | -122 |
| Adjustment to the insurance contract revenue | 17 | 0 |
| **Net insurance contract revenue** | **5,502** | **5,257** |
| | | |
| Insurance claims and benefits | -4,198 | -4,267 |
| Amounts recoverable from reinsurers | 97 | 110 |
| Adjustment to the insurance claims and benefits | -2 | 106 |
| **Adjusted net insurance claims and benefits** | **-4,102** | **-4,050** |
| | | |
| Insurance service operating expenses | -1,061 | -966 |
| Of which: Incurred commission expenses | -701 | -646 |
| **Insurance service operating expenses excluding incurred commission expenses** | **-360** | **-320** |

The Non-life combined ratio indicates the insurance related profitability of a non-life insurance contract. To measure the Non-life combined ratio, the insurance service expenses are divided by the insurance contract revenue, considering the operating result definition of those items (see section 7.4.3 and section 7.10).

In 2024, the adjustment to the net insurance contract revenue (€ 17 million) relates to the impact on the CSM of hedging for pre-recognition interest rate movements. The adjustments to the insurance claims and benefits (€ -2 million) consist of € 8 million impact of changes of inflation on the Liability for Incurred Claims, € -11 million related to changes to future services on onerous contracts and € 1 million impact on the loss component of hedging for pre-recognition interest rate movements.

In 2023, adjustments to the insurance claims and benefits (€ 106 million) consist of € 87 million impact of changes of inflation on the Liability for Incurred Claims and € 19 million related to changes to future services on onerous contracts.

## 7.4.5 Acquisitions

See accounting policy H.

### Acquisitions 2024

During 2024, a.s.r. acquired eleven insurance brokerage companies, which became subsidiaries in segment Distribution and Services.

**Other acquisitions**

a.s.r. increased its shareholding in an associate, whereby it became a subsidiary in segment Distribution and Services.

### Acquisitions 2023

**Aegon Nederland**

On 4 July 2023, a.s.r. announced the completion of the business combination between a.s.r. and Aegon Ltd. (formerly known as Aegon N.V.) by acquiring the shares of Aegon NL. a.s.r. established the final acquisition balance sheet of Aegon NL in December 2023. Aegon NL was legally merged into a.s.r. as per 1 October 2023. For further information see the 2023 consolidated financial statements.

**Other acquisitions**

a.s.r. acquired an entity in segment Non-life and three entities in segment Distribution and Services.

## 7.4.6 Discontinued operations

See accounting policy I.

On 1 February 2024, a.s.r. reached an agreement to sell Knab to the BAWAG Group AG. Closing of the transaction took place on 1 November 2024.

a.s.r. has presented in a single amount (after tax) the result from discontinued operations in relation to Knab, including the loss as a result of the sale. The result from discontinued operations of €- 121 million is recognised in segment Holding and Other (see section 7.4.3).

The result of discontinued operations can be specified as follows:

**Result of discontinued operations**

| Income statement | January - October 2024 | July - December 2023 |
|---|---|---|
| Total income | 721 | 481 |
| Total expenses | -560 | -370 |
| **Result from operating activities** | **161** | **111** |
| Income tax (expense) / gain | -42 | -29 |
| Result on sale after tax | -240 | - |
| **Result for the period** | **-121** | **82** |
| | | |
| Statement of comprehensive income | | |
| **Items that may be reclassified subsequently to profit or loss** | | |
| Unrealised change in value of debt instruments designated at FVOCI | -11 | 9 |
| Realised gain/(loss) on debt instruments at FVOCI reclassified to profit or loss | -1 | - |
| Income tax on items that may be reclassified | 5 | -2 |
| **Other comprehensive income for the period from discontinued operations** | **-7** | **7** |
| | | |
| **Total comprehensive income / (loss) from discontinued operations** | **-128** | **89** |
| | | |
| **Attributable to shareholders of the parent** | **-128** | **89** |

**Cash flows from discontinued operations**

| | 2024 | 2023 |
|---|---|---|
| Cash and cash equivalents as at 1 January | **2,538** | - |
| | | |
| Knab cash and cash equivalents acquired through the acquisition of Aegon as at 4 July 2023 | | 2,071 |
| | | |
| Cash flows from operating activities | -29 | 467 |
| Cash flows from investing activities | | |
| Cash flows from financing activities | | |
| | | |
| Sale of Knab as at 1 November 2024 | -2,509 | |
| | | |
| **Cash and cash equivalents as at 31 December** | **-** | **2,538** |

### Effect of disposal on the financial position of the Group

| | 1 November 2024 |
|---|---|
| Property, plant and equipment | 4 |
| Investments | 13,067 |
| Derivatives | 521 |
| Deferred tax assets | 11 |
| Other assets | 67 |
| Cash and cash equivalents | 2,509 |
| **Total assets** | **16,180** |
| | |
| Provisions | 1 |
| Borrowings | 2,820 |
| Derivatives | 18 |
| Savings deposits | 11,969 |
| Due to banks | 511 |
| Other liabilities | 30 |
| **Total liabilities** | **15,349** |
| | |
| **Net assets and liabilities** | **831** |
| Consideration received | 611 |
| **Book loss on sale** | **-221** |
| Impairment loss on intangible assets | -19 |
| **Result on sale of discontinued operations** | **-240** |
| | |
| **Cash flows** | |
| Consideration received | 611 |
| Cash and cash equivalents disposed of | -2,509 |
| **Net cash outflows** | **-1,898** |

# 7.5 Notes to the consolidated balance sheet

## 7.5.1 Intangible assets

See accounting policy C.

**Intangible assets**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Goodwill | 233 | 234 |
| Other intangible assets | 359 | 415 |
| | | |
| **Total intangible assets** | **592** | **649** |

**Intangible assets**

| | Goodwill | Other intangible assets | Total 2024 | Total 2023 |
|---|---|---|---|---|
| Cost price | 246 | 477 | 723 | 738 |
| Accumulated amortisation and impairments | -13 | -118 | -131 | -89 |
| **At 31 December** | **233** | **359** | **592** | **649** |
| | | | | |
| At 1 January | 234 | 415 | 649 | 322 |
| Acquisition | - | 5 | 5 | 5 |
| Amortisation and impairments | - | -50 | -50 | -43 |
| Transfer | -3 | 5 | 1 | - |
| Changes in the composition of the group | 3 | -16 | -13 | 364 |
| **At 31 December** | **233** | **359** | **592** | **649** |

Changes in the composition of the group relates to the sale of Knab in 2024, see section 7.4.6. In 2023, changes in the composition of the group related to the intangible assets (mainly customer relationships, trade names and software) acquired through the acquisition of Aegon NL.

### Goodwill

For the purpose of impairment testing, goodwill is allocated to the CGU's of the relevant operating segment.

**Goodwill allocation per segment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Non-life | 16 | 16 |
| Life | 43 | 43 |
| Asset Management | 35 | 35 |
| Distribution and Services | 139 | 140 |
| | | |
| **Total goodwill** | **233** | **234** |

Goodwill has an indefinite useful life and is not amortised. a.s.r. performs an impairment test annually, or more frequently if events or circumstances warrant so, to ascertain whether goodwill has been subject to impairment.

For the CGU's within the Non-life, Life, Asset Management and Distribution and Services segments, the results of these tests, using updated multiples and discount rates, show excess recoverable values over the book values and no goodwill impairment is recognised. A deterioration within reasonable limits on one of the assumptions in isolation would not lead to an impairment. The buffer is also capable of absorbing a combination of negative factors. However, should circumstances on multiple factors deteriorate significantly, it could lead to a negative outcome for the buffer (the difference between the recoverable value and the book value).

In 2023, for one CGU within the Distribution and Services segment an impairment loss on the goodwill was charged to the income statement amounting to € 13 million.

### Other intangible assets

The other intangible assets mainly relate to Aegon NL, Distribution and Services, a.s.r. IORP and Loyalis, and mainly consist of customer relationships, trade names and software. The other intangible assets are amortised straight-line over their useful life, which is determined individually (between 3 and 20 years). The amortisation charges on other intangible assets are recorded in the operating and other expenses (see section 7.6.11).

## 7.5.2 Property, plant and equipment

See accounting policies P and V.

**Property, plant and equipment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Land and buildings for own use | 164 | 168 |
| Plant | 386 | 417 |
| Equipment | 53 | 63 |
| **Property, plant and equipment owned** | **603** | **648** |
| | | |
| Land and buildings | 65 | 77 |
| Vehicles | 8 | 7 |
| **Right-of-use assets** | **72** | **84** |
| | | |
| **Total property, plant and equipment** | **676** | **732** |

**Changes in property, plant and equipment**

| | Land and buildings for own use | Plant | Equipment | Right-of-use Assets | Total 2024 | Total 2023 |
|---|---|---|---|---|---|---|
| At 1 January | 168 | 417 | 63 | 84 | 732 | 679 |
| Additions | - | - | 11 | 14 | 25 | 29 |
| Depreciations | -7 | -20 | -15 | -11 | -53 | -50 |
| Impairments | - | - | -3 | - | -3 | - |
| Revaluations through profit of loss | -4 | -11 | - | - | -15 | -26 |
| Revaluations through equity | 6 | -3 | - | - | 2 | 5 |
| Other | 1 | 2 | -2 | -11 | -10 | 3 |
| Changes in the composition of the group | - | - | - | -4 | -4 | 91 |
| **at 31 December** | **164** | **386** | **53** | **72** | **676** | **732** |
| | | | | | | |
| Gross carrying amount as at 31 December | 290 | 446 | 170 | 114 | 1,020 | 1,061 |
| Accumulated depreciation as at 31 December | -126 | -60 | -114 | -41 | -341 | -329 |
| Accumulated impairments as at 31 December | - | - | -3 | - | -3 | - |
| **Net carrying value as at 31 December** | **164** | **386** | **53** | **72** | **676** | **732** |
| | | | | | | |
| **Revaluation surplus** | | | | | | |
| At 1 January | 48 | 6 | - | - | 54 | 50 |
| Revaluation in the year | 6 | -3 | - | - | 3 | 5 |
| Other | -1 | - | - | - | -1 | -1 |
| Changes in the composition of the group | - | - | - | - | - | -1 |
| **at 31 December** | **53** | **3** | **-** | **-** | **56** | **54** |

In 2023, changes in the composition of the Group related to the property acquired through the acquisition of Aegon NL, see section 7.4.5.

Depreciation of property, plant and equipment is recorded in the operating and other expenses, see section 7.6.11.

The fair value of land and buildings for own use is based on the external valuations and the significant inputs for the fair value of plant are disclosed in section 7.7.1.3.

## 7.5.3 Investment property

See accounting policy D.

**Changes in investment property**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 3,051 | 664 |
| Changes in value of investments, realised/unrealised gains and losses: | | |
| - Fair value gains and losses | 226 | -65 |
| Purchases | 246 | 79 |
| Disposals | -159 | -36 |
| Changes in the composition of the group | - | 2,409 |
| **At 31 December** | **3,364** | **3,051** |

Purchases in 2024 mainly relates to residential (€ 126 million) and offices (€ 117 million). Disposals relates to residential (€ -159 million). In 2023, changes in the composition of the Group related to the investment property acquired through the acquisition of Aegon NL, see section 7.4.5.

Investment property is leased to third parties and is diversified over the rural, residential, offices and retail sectors and over property under development in the Netherlands. The significant inputs are the net initial yield and market rental value. For more information see section 7.7.1.

Rental income is recognised as direct investment income. In 2024, rentals amounted to € 144 million (2023: € 91 million). The rental income has increased due to the acquisition of Aegon NL.

Direct operating expenses arising from investment property amounted to € 52 million (2023: € 29 million). Given the overall low vacancy rate, virtually all direct operating expenses relate to investment properties generating rental income. Direct operating expenses of investment property are classified as operating and other expenses within the investment operating expenses.
Investment property consists mainly of assets expected to be recovered after more than one year after the balance sheet date.

## 7.5.4 Associates and joint ventures

See accounting policy Q.

**Associates and joint ventures**

| | Interest | 31 December 2024 | 31 December 2023 |
|---|---|---|---|
| **At equity method** | | | |
| Associates and joint ventures | ranging between 10 % and 50 % | 457 | 426 |
| **At fair value through profit or loss** | | | |
| Real estate equity funds | ranging between 25 % and 85 % | 4,775 | 4,561 |
| Mortgage equity funds | ranging between 5 % and 20 % | - | 687 |
| Other equity funds | ranging between 1 % and 10 % | 553 | 247 |

The amount of € 457 million (2023: € 426 million) consists of € 292 million (2023 : € 260 million) associates and € 165 million (2023: € 166 million) joint ventures.

The main associates at equity method acquired through the acquisition of Aegon NL are OB Capital Cooperatief U.A. and N.V. Levensverzekering-Maatschappij 'De Hoop'.

The joint ventures at equity method acquired through the acquisition of Aegon NL, see section 7.4.5, are the real estate companies Amvest Vastgoed B.V. and Amvest Development Fund B.V.

The real estate equity funds consist of the ASR Dutch Mobility Office Fund (ASR DMOF), ASR Dutch Prime Retail Fund (ASR DPRF), ASR Dutch Core Residential Fund (ASR DCRF), ASR Dutch Farmland Fund (DFLF), and the real estate equity funds acquired through the acquisition of Aegon NL, namely Amvest Residential Core Fund (Amvest RCF) and Amvest Living & Care Fund (Amvest LCF).

The mortgage equity funds consists of the ASR Mortgage Fund (ASR MF).

The other equity funds consists of five (2023: five) equity funds managed by a.s.r.

The interests in these funds are classified and presented as an investment at FVTPL. For more information, see section 7.5.5 and section 7.7.1.

Investments in associates and joint ventures generally have a duration of more than one year after the balance sheet date.

### Changes in associates and joint ventures at equity method

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 426 | 79 |
| Acquisition | 18 | 28 |
| Disposal | -3 | -8 |
| Share of profit/(loss) | 28 | 11 |
| Dividend | -12 | -3 |
| Changes in the composition of the group | - | 319 |
| | | |
| **At 31 December** | **457** | **426** |

In 2023, changes in the composition of the group relates to the associates and joint ventures acquired through the acquisition of Aegon NL, see section 7.4.5.

During 2024, management of ASR MF and the Separate Account Mortgage Fund (SAM Fund) was transferred to Aegon Asset Management N.V., which is an affiliate of Aegon Ltd. The transfer is part of the business combination agreement in 2023. Given this transfer, the funds no longer qualify as subsidiary (SAM Fund) or associate (ASR MF) and are classified as investments in (external) mortgage equity funds. This transfer has no impact on the value of these funds. Following the transfer, the funds are renamed to AeAM Dutch Mortgage Fund 3 (ASR MF) and AeAM Dutch Mortgage Fund 4 (SAM Fund).

Some participating interests in which a.s.r. has an interest of less than 20% qualify as associates, because a.s.r. has significant influence as a result of contractual agreements. a.s.r. also has interests of 50% or more in associates at fair value through profit or loss. a.s.r. has no control over these entities as the ability to direct the relevant activities is limited by contractual agreements and therefore does not consolidate these entities.

The information disclosed in the following tables is based on the most recent financial information available from the associates and joint ventures. This is primarily based on the investee's financial statements and their accounting policies. If these policies differ from a.s.r.'s accounting policies, carrying amounts in a.s.r.'s consolidated financial statements have been changed to be in line with a.s.r.'s policies.

### Financial information available from the associates and joint ventures

| | 31 December 2024 | | | | | 31 December 2023 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Associates and joint ventures at equity method | Real estate equity funds | Mortgage equity funds | Other equity funds | Total | Associates and joint ventures at equity method | Real estate equity funds | Mortgage equity funds | Other equity funds | Total |
| Total assets | 864 | 11,752 | - | 9,812 | 22,428 | 878 | 10,889 | 8,457 | 7,815 | 28,039 |
| Total liabilities | 260 | 1,590 | - | 12 | 1,862 | 292 | 1,385 | 69 | 10 | 1,756 |
| Total income | 260 | 396 | - | 1,554 | 2,210 | 243 | 379 | 379 | 1,151 | 2,152 |
| Result | 41 | 839 | - | 1,545 | 2,425 | 32 | -327 | 343 | 1,145 | 1,194 |
| Total comprehensive income | 44 | 839 | - | 1,545 | 2,428 | 25 | -327 | 343 | 1,145 | 1,186 |

The decrease of the assets and liabilities of the mortgage equity funds relates to the transfer of the ASR MF to Aegon Asset Management, after which these funds no longer qualified as investments in associate. The increase in assets and liabilities of the real estate equity funds and of the other equity funds mainly relates to the positive performance of these funds during 2024.

The total assets of the real estate equity funds consist primarily of investment property, € 11,287 million (2023: € 10,567 million) and € 9,750 million (2023: € 7,760 million) of the total assets of the other equity funds consist of equities.

The interest in the real estate equity funds are as follows:

### Investments in real estate equity funds

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| ASR DPRF | 588 | 598 |
| ASR DCRF | 1,000 | 957 |
| ASR DMOF | 149 | 123 |
| ASR DFLF | 1,748 | 1,679 |
| Amvest RCF | 1,012 | 928 |
| Amvest LCF | 278 | 276 |
| | | |
| **Total** | **4,775** | **4,561** |

## 7.5.5 Investments

See accounting policy E.

**Investments**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| At FVTPL | 75,119 | 71,919 |
| At FVOCI | 2,841 | 3,312 |
| At amortised cost | 2,633 | 14,775 |
| **Total investments** | **80,593** | **90,006** |

2023 comparing figures are restated as a result of a reclassification of collateral paid to other assets of € 2.3 billion. See section 7.3.2 for further details.

### 7.5.5.1 Investments at FVTPL

**Investments at FVTPL**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **Financial investments - transferred under repurchase agreements** | | |
| Government bonds | - | 213 |
| | | |
| **Financial investments - own risk** | | |
| Real estate equity funds | 5,428 | 5,253 |
| Mortgage equity funds | 2,031 | 997 |
| Debt equity funds | 639 | 772 |
| Government bonds | 15,774 | 15,854 |
| Corporate bonds | 10,621 | 9,948 |
| Asset-backed securities | 3,023 | 3,013 |
| Other investment funds | 2,068 | 2,153 |
| Equities | 553 | 247 |
| Mortgage loans | 25,398 | 24,494 |
| Private loans | 9,584 | 8,976 |
| **Total investments at FVTPL** | **75,119** | **71,919** |

Investments at FVTPL mainly increased mainly the result of positive fair value gains and additional investments. Increase in Mortgage equity funds relates to the transfer of the SAM fund to Aegon Asset Management out of mortgage loans.

For the real estate equity funds and mortgage equity funds for which a.s.r. has significant influence the exemption of IAS 28 was used, thereby measuring the investments at FVTPL and presenting them as a separate category within the investments at FVTPL. For a breakdown of the real estate equity funds and mortgage equity fund, see section 7.5.4.

a.s.r. has bonds amounting to € 3,427 million (2023: € 3,483 million), shares amounting to € 10 million (2023: € 24 million) and cash amounting to nil (2023: € 750 million) (see section 7.5.10) that have been transferred, but do not qualify for derecognition. The majority of these investments are part of a securities lending programme whereby the investments are lent in exchange for a fee with collateral obtained as a security. The collateral furnished as security representing a fair value of € 4,925 million (2023: € 5,067 million) consists of mortgage loans and corporate and government bonds. See accounting policy N about securities lending.

Private loans consists for € 2,199 million (2023: € 2,285 million) of savings-linked mortgage loans.

At year-end 2024 and 2023, debt instruments at FVTPL consisted entirely of investments mandatorily measured as such.

Based on their contractual maturity, an amount of € 58,171 million (2023: € 57,936 million) of fixed income investments is expected to be recovered after more than one year after the balance sheet date. For assets without a contractual maturity date, it is expected that they will be recovered after more than one year after the balance sheet date.

For more detailed information about the fair value valuation of the investments, see section 7.7.1.

### 7.5.5.2 Investments at FVOCI

**Investments at FVOCI**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Government bonds | - | 359 |
| Corporate bonds | - | 521 |
| Equities | 2,696 | 2,348 |
| Preference shares | 134 | 79 |
| Other participating contracts | 11 | 5 |
| **Total investments at FVOCI** | **2,841** | **3,312** |

Investments at FVOCI mainly decreased due to the assets sold through the sale of Knab (see section 7.4.6). After the sale of Knab, a.s.r. no longer has debt securities measured at FVOCI.

a.s.r. sold equity instruments held at FVOCI for an amount of € 1,218 million (2023: € 953 million) in the ordinary course of business. The sales resulted in a gain of € 156 million (2023: gain € 85 million) which is directly recognised in retained earnings.

For assets without a contractual maturity date, it is expected that they will be recovered after more than one year after the balance sheet date.

### 7.5.5.3 Investments at amortised cost

**Investments at amortised cost**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Mortgage loans | 2,624 | 14,590 |
| Private loans | 9 | 185 |
| | | |
| **Total investments at amortised cost** | **2,633** | **14,775** |

Investments at amortised costs decreased due to the assets sold through the sale of Knab (see section 7.4.6).

Certain mortgage loans shown within the category investments at amortised cost are designated in portfolio fair value interest rate hedging relationships, and are fair valued with respect to the hedged interest rate. For 2024, this resulted in a higher carrying value of € 109 million (2023: € 289 million higher). None of the financial assets has been reclassified during the financial year.

Based on their contractual maturity, an amount of € 2,432 million (2023: 13,929 million) of debt instruments is expected to be recovered after more than one year after the balance sheet date. For assets without a contractual maturity date, it is expected that they will be recovered after more than one year after the balance sheet date.

## 7.5.6 Investments related to direct participating insurance contracts

See accounting policy E.

**Investments related to direct participating insurance contracts**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Real estate equity funds | 243 | 278 |
| Mortgage equity funds | 352 | 271 |
| Debt equity funds | 18 | 18 |
| Government bonds | 6,373 | 6,013 |
| Corporate bonds | 3,375 | 2,936 |
| Asset-backed securities | 333 | 351 |
| Other investment funds | 896 | 1,197 |
| Derivatives | 73 | 98 |
| Equities | 16,078 | 14,252 |
| Mortgage loans | 1,421 | 1,357 |
| Private loans | 245 | 208 |
| Other investments | 3,617 | 3,375 |
| | | |
| **Total investments related to direct participating insurance contracts** | **33,025** | **30,352** |

Investments related to direct participating insurance contracts are mandatorily measured at FVTPL.

Within other investments, an amount of € 2,486 million (2023: € 2,394 million) consists of cash and cash equivalents held within investments related to direct participating insurance contracts.

Direct participating insurance contracts are managed on behalf of policyholders on a fair value basis. Although individual instruments may (or may not) have a maturity depending on their nature, this does not impact the liquidity position of a.s.r.

## 7.5.7 Derivatives

See accounting policy E.

**Derivatives**

| | 31 December 2024 | | 31 December 2023 | |
|---|---|---|---|---|
| | Asset | Liability | Asset | Liability |
| Derivatives not designated in a hedge | 11,534 | 8,438 | 11,447 | 9,240 |
| Derivatives designated as fair value hedges | 233 | 228 | 1,461 | 892 |
| **Total** | **11,767** | **8,666** | **12,907** | **10,132** |

Derivatives consist primarily of derivatives used to hedge interest rate movements. Derivatives are classified mandatorily as FVTPL and changes in the fair value of derivatives at FVTPL are recorded in net fair value gains and (losses), see section 7.6.5.

Derivatives held for mortgage loans of Aegon hypotheken are designated under fair value hedge accounting using the EU carve-out on hedge accounting, only net accounting ineffectiveness has an impact on the net result (for more information, see below under hedge accounting).

a.s.r. trades both cleared and non-cleared derivatives on the basis of standardised contracts and exchanges cash variation margin with its counterparties. The derivatives are valued daily and cash collateral is exchanged to reflect the change in mark-to-market (MtM) of the derivatives. Because of this periodic margining process, counterparty risk on derivatives is negligible.

In addition to the above variation margin obligations, there is also an initial margin obligation for central cleared derivatives which further reduces the risk of a.s.r. and its counterparties that they cannot fulfil their obligations.

Notional amounts are not recognised as assets or liabilities in the balance sheet, however notional amounts are used in determining the fair value of the derivatives. Notional amounts do not reflect the potential gain or loss on a derivative transaction.

**Derivatives by type of instrument**

| | 31 December 2024 | | | 31 December 2023 | | |
|---|---|---|---|---|---|---|
| | Asset | Liability | Notional amount | Asset | Liability | Notional amount |
| Foreign exchange contracts | 46 | 189 | 4,172 | 57 | 116 | 4,936 |
| Interest rate contracts | | | | | | |
| - Swaps | 10,644 | 8,334 | 230,555 | 11,655 | 9,766 | 198,897 |
| - Options | 704 | 49 | 8,266 | 709 | 59 | 8,539 |
| - Futures | 52 | 3 | 4,340 | 78 | 91 | 3,278 |
| Inflation linked swaps | 277 | 37 | 2,724 | 358 | 21 | 2,794 |
| Equity index contracts | 44 | 55 | 11,246 | 49 | 79 | 10,463 |
| Credit default swaps | - | - | - | - | - | 45 |
| **Total derivatives** | **11,767** | **8,666** | **261,302** | **12,907** | **10,132** | **228,952** |

The derivatives do not include the derivatives relating to direct participating insurance contracts of € 73 million (2023: € 98 million).

Net derivatives increased primarily as a result of positive revaluations due to changes in the long-term interest swap rates compared to year-end 2023.

In addition to the use of swaps and options a.s.r. manages interest rate risk by using bond forwards, included in interest rate contracts futures.

The notional amounts of both receiver and payer swaps are included in the total notional amounts of foreign exchange contracts.

The fair value of interest rate contracts is calculated by first determining the cash flows of the floating leg based on the Euribor-curve corresponding the interest reset period (3 months, 6 months or 12 months) of the swap. Then the net present value of the floating and fixed leg is determined by discounting the cash flows with the relevant curve (such as €STR, SOFR and SONIA).

The fair value of the interest rate contracts using the above valuation method form the basis for the amount of collateral that is exchanged between a.s.r. and its counterparties in accordance with the underlying contracts. For more information see section 7.8 on risk management.

Of the derivatives € 10,323 million assets (2023: € 11,638 million) and € 7,455 million liabilities (2023: € 8,967 million) is expected to be recovered respectively settled more than one year after the balance sheet date.

**Transition**

Throughout the world, a transition is taking place from interbank offered rates (IBORs) to alternative benchmarks. In the EU, the transition to alternative interest-rate benchmarks is governed by the Benchmark

Regulation (BMR). Pursuant to the BMR, IBOR based contracts need to be amended to reference alternative rates or to be provided with a fallback option.

The transition away from IBORs has mainly affected a.s.r.'s derivative book, which is measured at fair value through profit or loss. Although most references under these derivatives remain BMR compliant, the Cash Collateral Interest Rate, and consequently discount rates, have required amendments towards Alternative Reference Rates (ARRs).

In the past years, all relevant contracts referencing Ibors (except Euribor) have been amended to reflect ARRs.

### Hedge accounting

Macro fair value hedge accounting under the EU carve-out is applied by subsidiaries Knab and Aegon hypotheken (continuing practice post-acquisition).

**Derivatives designated as fair value hedges**

| | 2024 | 2023 |
|---|---|---|
| Fair value changes mortgage loans recognised in profit or loss under EU carve-out | 46 | *329* |
| Offset amount of fair value changes recognised on derivatives used as hedging instrument | -44 | -326 |
| **Total accounting ineffectiveness under EU carve-out recognised in profit or loss** | **2** | **3** |

## 7.5.8 Deferred taxes

**Deferred taxes**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Deferred tax assets | 101 | 636 |
| **Net Deferred tax** | **101** | **636** |

Deferred taxes are formed for differences between the carrying amount of assets and liabilities and their tax base at the enacted tax rate, taking into account tax-exempt components. The current tax rate is 25.8% (2023: 25.8%). The deferred taxes are calculated with the enacted tax rate of 25.8%.

For subsidiaries outside the fiscal unity the unused tax losses for which no deferred tax has been recognised amount to € 28 million (2023: € 28 million). These unused tax losses include expected losses which are already provided for.

Deferred tax assets and liabilities are expected to be recovered more than one year after the balance sheet date.

**Changes in deferred taxes**

| | 1 January 2024 | Changes recognised in profit or loss | Changes recognised in other comprehensive income | Changes in composition of the group | 31 December 2024 |
|---|---|---|---|---|---|
| Intangible assets | -83 | -3 | 2 | -1 | -85 |
| Property, plant and equipment | 4 | 6 | -2 | - | 8 |
| Investment property | -707 | -136 | - | - | -843 |
| Investments | 549 | -297 | -59 | -217 | -24 |
| Financial assets held for trading | -219 | -556 | - | 118 | -657 |
| Liabilities arising from insurance contracts | 1,470 | 623 | - | - | 2,093 |
| Employee benefits | -180 | -33 | -39 | - | -252 |
| Amounts received in advance | -78 | -19 | - | - | -97 |
| Fiscal reserves | -60 | 3 | - | - | -57 |
| Other | -61 | -36 | - | 110 | 13 |
| **Net deferred tax** | **636** | **-448** | **-97** | **10** | **101** |

**Changes in deferred taxes**

| | 1 January 2023 | Changes recognised in profit or loss | Changes recognised in other comprehensive income | Changes in composition of the group | 31 December 2023 |
|---|---|---|---|---|---|
| Intangible assets | -19 | 5 | - | -69 | -83 |
| Property, plant and equipment | -16 | 8 | -1 | 13 | 4 |
| Investment property | -76 | 15 | - | -646 | -707 |
| Investments | 87 | -572 | -49 | 1,083 | 549 |
| Financial assets held for trading | 147 | -244 | - | -122 | -219 |
| Liabilities arising from insurance contracts | 487 | 402 | - | 581 | 1,470 |
| Employee benefits | -86 | -9 | 42 | -127 | -180 |
| Amounts received in advance | - | -11 | - | -67 | -78 |
| Fiscal reserves | -82 | 22 | - | - | -60 |
| Other | -123 | 214 | - | -152 | -61 |
| **Net deferred tax** | **318** | **-169** | **-9** | **495** | **636** |

In 2024, the decrease in the deferred tax asset is mainly caused by the changes to the tax base of the technical provisions and their related assets. Changes in the composition of the group relates to Aegon Bank N.V. (Knab).

## 7.5.9 Other assets

See accounting policy R.

**Other assets**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **Financial assets** | | |
| Due from customers | 72 | 17 |
| Other receivables | 666 | 1,109 |
| Impairments | -25 | -34 |
| Cash collateral paid | 2,341 | 2,333 |
| | **3,053** | **3,425** |
| | | |
| **Non-financial assets** | | |
| Tax receivable | 194 | 68 |
| Prepaid costs | 10 | 30 |
| Property developments | 18 | 27 |
| Other non-financial assets | 67 | 48 |
| | **289** | **172** |
| | | |
| **Total other assets** | **3,342** | **3,598** |

The other receivables decrease mainly due to mutations Aegon of which the sale of Knab and differences investment trade-and settlement date differences.

**Impairments**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | -34 | -4 |
| Increase in impairment through profit and loss | -2 | -22 |
| Reversal of impairment through profit and loss | 1 | 1 |
| Reversal of impairment due to disposal | 9 | 25 |
| Other | - | - |
| Changes in the composition of the group | - | -34 |
| | | |
| **At 31 December** | **-25** | **-34** |

An amount of € 3,331 million (2023: € 3,570 million) of other assets is expected to be recovered less than or equal to one year after the balance sheet date.

## 7.5.10 Cash and cash equivalents

See accounting policy S.

**Cash and cash equivalents**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Cash and bank balances | 2,228 | 4,681 |
| Short-term deposits | 336 | 1,581 |
| Money market investments | 1,629 | 1,648 |
| | | |
| **Total cash and cash equivalents** | **4,194** | **7,910** |

In 2024 a.s.r. has no cash (2023: € 750 million) that has been transferred as part of a securities lending programme, but does not qualify for derecognition. For more information see section 7.5.5.1.

The cash items per year end 2024 are not subject to other restrictions. The cash components include € 2,663 million (2023: € 2,824 million) related to cash collateral received on derivative instruments and is managed separately from other cash equivalents.

Interest expenses on cash collateral is mainly based on €STR (2023: €STR).

As a result of the sale of Knab, there are no deposits with DNB at year-end (2023: € 70 million).

## 7.5.11 Equity

See accounting policy T.

### 7.5.11.1 Share capital

**Share capital**

| | 31 December 2024 | | 31 December 2023 | |
|---|---|---|---|---|
| | Number of Shares (in millions) | Amounts (in € millions) | Number of Shares (in millions) | (Amount (in € millions) |
| Ordinary shares | | | | |
| - Authorised capital; par value of € 0.16 | 325 | 52 | 325 | 52 |
| - Of which unsubscribed | 114 | 18 | 114 | 18 |
| **Subscribed and paid-up capital** | **211** | **34** | **211** | **34** |
| | | | | |
| Preference shares | | | | |
| - Authorised capital; par value of € 0.16 | 325 | 52 | 325 | 52 |
| - Of which unsubscribed | 325 | 52 | 325 | 52 |
| **Subscribed and paid-up capital** | - | - | - | - |

### 7.5.11.2 Share premium reserve

In 2024, there were no changes in share premium reserve.

In 2023, the share premium reserve increased by € 2,537 million due to the issued share capital to finance the business combination of a.s.r. and Aegon NL (€ 2,572 million) and the cancellation of 1.798 thousands treasury shares (€ -35 million), as approved at the AGM in May 2023, see section 7.5.11.5.

### 7.5.11.3 Unrealised gains and losses recorded in equity

**Unrealised gains and losses recorded in equity**

| | 31 December 2024 | | | 31 December 2023 | | |
|---|---|---|---|---|---|---|
| | Investments at FVOCI | Revaluation of property in own use and plants | Total | Investments at FVOCI | Revaluation of property in own use and plants | Total |
| Gross unrealised gains and losses | 476 | 56 | 532 | 414 | 54 | 467 |
| Related tax | -86 | -14 | -100 | -72 | -13 | -85 |
| **Total unrealised gains and losses recorded in equity** | **390** | **42** | **432** | **342** | **41** | **383** |

### 7.5.11.4 Actuarial gains and losses

The balance of actuarial gains and losses related to the pension obligation increased in 2024 by € 113 million after tax and € 152 million before tax. (2023: decreased by € 120 million after tax and € 162 million before tax). The increase is mainly due to an increase in the discount rate (see section 7.5.15).

### 7.5.11.5 Treasury shares

In January 2024, a.s.r. announced a share buyback programme for the amount of 300 thousand shares related to the employee share purchase plan. The repurchase was completed on February 7, 2024. Therefore, during the period from 22 January 2024 through 7 February 2024, a.s.r. repurchased 300 thousand shared under an open market share buyback programme for an amount of € 13 million (average share price € 43.27).

In November 2024, a.s.r. announced a share buyback programme for an amount of € 100 million from the proceeds from the disposal of Knab. Therefore, during the period from 7 November 2024 through 11 December 2024, a.s.r. repurchased 2,213 thousand shares under an open market share buyback programme for an amount of € 100 million (average share price € 45.18). a.s.r. will seek approval from the General Meeting of Shareholders on 21 May 2025 to cancel the repurchased shares.

As part of the employee share purchase plan a.s.r. sold 268 thousand shares (2023: 159 thousand shares) for an amount of € 9 million (2023: € 5 million), leading to a decrease of € 2 million (2023: € 1 million) in retained earnings. For more information on the employee share purchase plan, see section 7.7.6.

In 2024, no shares are cancelled. In the AGM in May 2023 the resolution was adopted to cancel 1,798 thousand shares which were acquired in 2022. The cancellation was effected in August 2023.

The amount of treasury shares held at year-end of € 109 million (2023: € 7 million) represents 2,425 thousand treasury shares (2023: 179 thousand).

### 7.5.11.6 Other equity instruments

**Other equity instruments**

| | 2024 | 2023 | Coupon date | First possible redemption date |
|---|---|---|---|---|
| Hybrid Tier 2 instrument 5% fixed interest | - | 497 | Annually with effect from 30 September 2015 | 30 September 2024 |
| Restricted Tier 1 instrument 4.625% fixed interest | 507 | 507 | Semi-annually with effect from 19 April 2018 | 19 October 2027 |
| Restricted Tier 1 instrument 6.625% fixed interest | 500 | - | Semi-annually with effect from 27 March 2024 | 27 December 2031 |
| **Total other equity instruments** | **1,007** | **1,004** | | |

The Tier 1 and Tier 2 instruments bear discretionary interest and have no maturity date, but can be redeemed at the option of a.s.r. on any coupon due date from the above mentioned possible redemption date.

The Tier 1 and Tier 2 instruments have subordination provisions, rank junior to all other liabilities and senior to only shareholder's equity. The conditions of the securities contain certain provisions for optional and required coupon payment deferral and mandatory coupon payment events.

The coupon payments in respect of the Tier 1 and Tier 2 instruments are deductible for tax purposes.

In March 2024, a.s.r. issued € 500 million perpetual subordinated restricted Tier 1 capital securities priced with a fixed rate coupon of 6.625% per annum. The new issue is first callable on 27 December 2031.

In March 2024, holders of the hybrid Tier 2 instrument 5% fixed interest were offered to tender their notes for cash in accordance with the terms and conditions as set out in the Tender Offer Memorandum. As a result, the carrying value of the hybrid Tier 2 instrument 5% fixed interest decreased by € 382 million. On 30 September 2024, the remaining outstanding notes with a principal amount of € 120 million were redeemed in full at their principal amount.

**Distributed amounts to holders of equity instruments as discretionary interest**

| | 2024 | 2023 |
|---|---|---|
| Hybrid Tier 2 instrument 5% fixed interest | 15 | 25 |
| Restricted Tier 1 instrument 4.625% fixed interest | 23 | 23 |
| Restricted Tier 1 instrument 6.625% fixed interest | 25 | - |
| **Total distributed amounts** | **63** | **48** |

The Tier 1 and Tier 2 instruments are classified as equity as there is no requirement to settle the obligation in cash or another financial asset or to exchange financial assets or financial liabilities under conditions that are potentially unfavourable for a.s.r.

### 7.5.11.7 Earnings per share

**Basic earnings per share at year-end**

| | 2024 | 2023 (restated) |
|---|---|---|
| Net profit from continuing operations | 1,003 | 956 |
| Net profit from discontinued operations | -121 | 82 |
| **Net result attributable to holders of ordinary shares for calculating the earnings per ordinary share** | **882** | **1,038** |
| Weighted average number of ordinary shares in issue | 210,798,737 | 178,838,730 |
| Basic earnings per ordinary share from continuing operations (in euros) | 4.76 | 5.34 |
| Basic earnings per ordinary share from discontinued operations (in euros) | -0.57 | 0.46 |
| **Basic earnings per ordinary share (in euros)** | **4.19** | **5.80** |

**Diluted earnings per share at year-end**

| | 2024 | 2023 (restated) |
|---|---|---|
| Net profit (loss) attributable to holders of ordinary shares | 1,003 | 956 |
| - effect of Restricted Tier 1 capital instrument | 17 | 17 |
| **Adjusted net result from continuing operations** | **1,020** | **973** |
| Net profit from discontinued operations | -121 | 82 |
| **Adjusted net result attributable to holders of ordinary shares for calculating the diluted earnings per ordinary share** | **899** | **1,055** |
| | | |
| Weighted average number of ordinary shares in issue | 210,798,737 | 178,838,730 |
| Weighted average number of ordinary shares resulting from conversion of bonds Restricted Tier 1 | 21,645,022 | 21,645,022 |
| **Weighted average number of shares used to calculate the diluted earnings per ordinary share** | **232,443,759** | **200,483,751** |
| | | |
| Diluted earnings per ordinary share from continuing operations (in euros) | 4.39 | 4.85 |
| Diluted earnings per ordinary share from discontinued operations (in euros) | -0.52 | 0.41 |
| **Diluted earnings per ordinary share (in euros)** | **3.87** | **5.26** |

Net result in the table is after tax and non-controlling interests.

For additional information related to net result, see section 7.2.2.

## 7.5.12 Subordinated liabilities

See accounting policy U.

**Subordinated liabilities**

| | Nominal amount | Carrying value 2024 | Carrying value 2023 |
|---|---|---|---|
| Hybrid Tier 2 instrument 5.125% fixed interest | 500 | 506 | 506 |
| Hybrid Tier 2 instrument 3.375% fixed interest | 500 | 508 | 507 |
| Hybrid Tier 2 instrument 7.000% fixed interest | 1,000 | 993 | 992 |
| | | | |
| **Total subordinated liabilities** | **2,000** | **2,007** | **2,005** |

In 2015, a.s.r. issued € 500 million subordinated liabilities in the form of Tier 2 notes, first callable on 29 September 2025, and maturing on 29 September 2045. The coupon is fixed at 5.125% and paid annually on 29 September with a step up at the first call date.

In 2019 a.s.r. issued € 500 million subordinated liabilities in the form of Tier 2 notes. The bond has a maturity date of 2049 and is first callable 3 months before the first reset date of 2 May 2029. The coupon is fixed at 3.375% and paid annually on 2 May. After the reset date the interest is calculated based on the 5 Year Mid Swap Rate plus a margin of 4.000 % and updated once every five years.

In 2022 a.s.r. issued € 1 billion subordinated liabilities, qualified as Tier 2 notes, to partially finance the business combination with Aegon NL. The Tier 2 notes have a maturity date of 2043 and are first callable on 7 December 2033. The coupon is fixed at 7.000% and paid annually on 7 December.

These notes are subordinated and ranking equally without any preference amongst themselves and (a) junior to the claims of all senior creditors of a.s.r., (b) equally with any parity obligations and (c) in priority to claims in respect of (i) any equity securities and (ii) any junior obligations.

The subordinated liabilities are classified as liabilities given the obligation to settle the loans and pay the coupon. They are considered Tier 2 own funds for regulatory purposes.

## 7.5.13 Insurance contract liabilities and reinsurance contract assets

See accounting policies F.

**Insurance and reinsurance contracts**

| | | Assets | | Liabilities |
|---|---|---|---|---|
| | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| Non-life - GMM | - | - | 5,781 | 5,401 |
| Non-life - PAA | - | - | 1,992 | 1,804 |
| **Non-life insurance contracts** | **-** | **-** | **7,772** | **7,205** |
| | | | | |
| Life - GMM | - | - | 56,443 | 56,063 |
| **Life insurance contracts** | **-** | **-** | **56,443** | **56,063** |
| | | | | |
| Pre-recognition cash flows | - | - | **52** | **34** |
| | | | | |
| **Total insurance contracts** | **-** | **-** | **64,267** | **63,302** |
| | | | | |
| Non-life - GMM | 195 | 209 | - | - |
| Non-life - PAA | 82 | 75 | - | - |
| Life - GMM | 205 | 211 | - | - |
| Life - PAA | 3 | 6 | - | - |
| **Total reinsurance contracts** | **485** | **501** | **-** | **-** |

Pre-recognition cash flows consists of prepaid premiums for insurance contracts not yet recognised.

The tables in the following paragraphs show the movements in insurance contract balances for the different measurement models.

## 7.5.13.1 Insurance contracts - Non-life

**Changes in insurance contracts by remaining coverage and incurred claims current year GMM and PAA**

| | Liabilities for remaining coverage | | Liabilities for incurred claims | | | Total |
|---|---|---|---|---|---|---|
| | | | | Contracts measured under PAA | | |
| | Excluding loss component | Loss component | Contracts measured under GMM | Estimates of the present value of the future cash flows | Risk adjustment for non financial risk | |
| **At 1 January 2024** | **467** | **29** | **4,666** | **1,975** | **68** | **7,205** |
| | | | | | | |
| **Changes in the income statement** | | | | | | |
| Insurance contract revenue from contracts measured under GMM, of which: | -2,047 | - | - | - | - | -2,047 |
| Contracts recognised from transition date and retrospective approach | -1,100 | - | - | - | - | -1,100 |
| Contracts under the modified retrospective approach | -465 | - | - | - | - | -465 |
| Contracts under the fair value approach | -483 | - | - | - | - | -483 |
| | | | | | | |
| Insurance contract revenue from contracts measured under PAA | -3,567 | | - | | | -3,567 |
| | | | | | | |
| **Insurance service expenses** | | | | | | |
| New incurred claims and benefits | - | -28 | 1,569 | 2,655 | 20 | 4,215 |
| Changes related to past services | - | - | 48 | -65 | -22 | -39 |
| Losses and reversals of losses on onerous contracts | - | 22 | - | - | - | 22 |
| **Claims and benefits** | **-** | **-7** | **1,617** | **2,590** | **-2** | **4,198** |
| | | | | | | |
| Other insurance service operating expenses | - | - | 298 | 738 | - | 1,036 |
| Amortisation of insurance acquisition cash flows | 24 | - | - | - | - | 24 |
| **Insurance service operating expenses** | **24** | **-** | **298** | **738** | **-** | **1,061** |
| | | | | | | |
| **Total insurance service expenses** | **24** | **-7** | **1,915** | **3,328** | **-2** | **5,258** |
| | | | | | | |
| **Insurance service result** | **-5,590** | **-7** | **1,915** | **3,328** | **-2** | **-356** |
| | | | | | | |
| Net finance result from insurance contracts | 53 | 1 | 143 | 72 | 3 | 272 |
| **Total changes in the income statement** | **-5,537** | **-6** | **2,058** | **3,400** | **1** | **-84** |
| | | | | | | |
| **Cash flows** | | | | | | |
| Premiums received | 5,579 | - | - | - | - | 5,579 |
| Insurance service expenses paid, including investment components | -527 | - | -1,504 | -2,866 | - | -4,897 |
| Insurance acquisition cash flows | -30 | - | - | - | - | -30 |
| **Total cash flows** | **5,021** | **-** | **-1,504** | **-2,866** | **-** | **651** |
| | | | | | | |
| Other | -78 | - | - | 75 | 3 | - |
| Transfer prepaid insurance service expenses from LRC to LIC | 526 | - | - | -526 | - | - |
| | | | | | | |
| **At 31 December 2024** | **400** | **23** | **5,220** | **2,059** | **71** | **7,772** |

Other relates to the transfer of the Aegon P&C acquired claims portfolio from GMM to PAA, so that the complete P&C portfolio would fall under the PAA model. This could be done due to the very limited CSM that was remaining on this portfolio at the moment of the transfer (€ 1 million early release to the insurance contract revenue).

## Changes in insurance contracts by remaining coverage and incurred claims prior year GMM and PAA

| | Liabilities for remaining coverage | | Liabilities for incurred claims | | | Total |
|---|---|---|---|---|---|---|
| | | | | Contracts measured under PAA | | |
| | Excluding loss component | Loss component | Contracts measured under GMM | Estimates of the present value of the future cash flows | Risk adjustment for non financial risk | |
| **At 1 January 2023** | **-243** | **29** | **4,191** | **1,682** | **55** | **5,713** |
| | | | | | | |
| **Changes in the income statement** | | | | | | |
| Insurance contract revenue from contracts measured under GMM, of which: | -1,686 | - | - | - | - | -1,686 |
| Contracts recognised from transition date and retrospective approach | -839 | - | - | - | - | -839 |
| Contracts under the modified retrospective approach | -306 | - | - | - | - | -306 |
| Contracts under the fair value approach | -541 | - | - | - | - | -541 |
| | | | | | | |
| Insurance contract revenue from contracts measured under PAA | -3,693 | - | - | - | - | -3,693 |
| | | | | | | |
| **Insurance service expenses** | | | | | | |
| New incurred claims and benefits | - | -31 | 1,392 | 2,844 | 21 | 4,226 |
| Changes related to past services | - | - | -9 | 29 | -10 | 10 |
| Losses and reversals of losses on onerous contracts | - | 31 | - | - | - | 31 |
| **Claims and benefits** | **-** | **-** | **1,383** | **2,873** | **11** | **4,267** |
| | | | | | | |
| Other insurance service operating expenses | - | - | 264 | 682 | - | 946 |
| Amortisation of insurance acquisition cash flows | 24 | - | - | - | - | 24 |
| **Insurance service operating expenses** | **24** | **-** | **264** | **682** | **-** | **970** |
| | | | | | | |
| **Total insurance service expenses** | **24** | **-** | **1,648** | **3,555** | **11** | **5,237** |
| | | | | | | |
| **Insurance service result** | **-5,355** | **-** | **1,648** | **3,555** | **11** | **-142** |
| | | | | | | |
| Net finance result from insurance contracts | 22 | - | 173 | 55 | 3 | 253 |
| **Total changes in the income statement** | **-5,332** | **-** | **1,821** | **3,610** | **13** | **111** |
| | | | | | | |
| **Cash flows** | | | | | | |
| Premiums received | 5,101 | - | - | - | - | 5,101 |
| Insurance service expenses paid, including investment components | -487 | - | -1,346 | -2,841 | - | -4,674 |
| Insurance acquisition cash flows | -32 | - | - | - | - | -32 |
| **Total cash flows** | **4,581** | **-** | **-1,346** | **-2,841** | **-** | **395** |
| | | | | | | |
| Changes in the composition of the group | 985 | - | 1 | - | - | 986 |
| Transfer prepaid insurance service expenses from LRC to LIC | 476 | - | - | -476 | - | - |
| | | | | | | |
| **At 31 December 2023** | **467** | **29** | **4,666** | **1,975** | **68** | **7,205** |

**Changes in insurance contracts measured under GMM, by measurement component current year**

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, contracts recognised from transition date and retrospective approach | Of which contracts under fair value approach | |
| **At 1 January 2024** | **4,942** | **223** | **236** | **155** | **81** | **5,401** |
| **Changes in the income statement** | | | | | | |
| ***Changes that relate to future services:*** | | | | | | |
| - Changes in estimates that adjust the CSM | -61 | -32 | 93 | 71 | 22 | - |
| - Changes in estimates that result in losses or the reversal of losses on onerous contracts | -9 | -2 | - | - | - | -11 |
| - Effects of contracts initially recognised in the period | -109 | 31 | 101 | 101 | - | 23 |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -148 | -137 | -11 | -148 |
| - Release of the risk adjustment for non-financial risk | - | -23 | - | - | - | -23 |
| - Experience adjustments | -28 | 18 | - | - | - | -9 |
| ***Changes relate to past service*** | 54 | -6 | - | - | - | 48 |
| **Insurance service result** | **-153** | **-14** | **46** | **35** | **11** | **-121** |
| Net finance result from insurance contracts | 177 | 10 | 11 | 11 | - | 197 |
| **Total changes in the income statement** | **24** | **-4** | **57** | **46** | **11** | **76** |
| **Cash flows** | | | | | | |
| Premiums received | 1,915 | - | - | - | - | 1,915 |
| Insurance service expenses paid | -1,504 | - | - | - | - | -1,504 |
| Insurance acquisition cash flows | -30 | - | - | - | - | -30 |
| **Total cash flows** | **381** | **-** | **-** | **-** | **-** | **381** |
| Other | -75 | -3 | - | - | - | -78 |
| **At 31 December 2024** | **5,271** | **217** | **293** | **201** | **92** | **5,781** |

Other relates to the transfer of the Aegon P&C acquired claims portfolio from GMM to PAA, so that the complete P&C portfolio would fall under the PAA model. This could be done due to the very limited CSM that was remaining on this portfolio at the moment of the transfer (€ 1 million early release to the insurance contract revenue).

## Changes in insurance contracts measured under GMM, by measurement component prior year

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, contracts recognised from transition date and retrospective approach | Of which contracts under fair value approach | |
| **At 1 January 2023** | **3,737** | **158** | **69** | **3** | **66** | **3,963** |
| **Changes in the income statement** | | | | | | |
| ***Changes that relate to future services:*** | | | | | | |
| - Changes in estimates that adjust the CSM | -65 | 24 | 41 | 13 | 28 | - |
| - Changes in estimates that result in losses or the reversal of losses on onerous contracts | 25 | -6 | - | - | - | 19 |
| - Effects of contracts initially recognised in the period | -117 | 21 | 96 | 96 | - | - |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -70 | -57 | -13 | -70 |
| - Release of the risk adjustment for non-financial risk | - | -33 | - | - | - | -33 |
| - Experience adjustments | 63 | 21 | - | - | - | 84 |
| ***Changes relate to past service*** | 3 | -11 | - | - | - | -9 |
| **Insurance service result** | **-90** | **15** | **67** | **52** | **15** | **-9** |
| Net finance result from insurance contracts | 187 | 4 | 5 | 5 | -0 | 196 |
| **Total changes in the income statement** | **96** | **19** | **71** | **56** | **15** | **187** |
| **Cash flows** | | | | | | |
| Premiums received | 1,658 | - | - | - | - | 1,658 |
| Insurance service expenses paid | -1,346 | - | - | - | - | -1,346 |
| Insurance acquisition cash flows | -32 | - | - | - | - | -32 |
| **Total cash flows** | **280** | **-** | **-** | **-** | **-** | **280** |
| Changes in the composition of the group | 829 | 47 | 96 | 96 | - | 972 |
| **At 31 December 2023** | **4,942** | **223** | **236** | **155** | **81** | **5,401** |

## 7.5.13.2 Insurance contracts - Life

**Changes in insurance contracts by remaining coverage and incurred claims current year GMM**

| | Liabilities for remaining coverage | | Liabilities for incurred claims | Total |
|---|---|---|---|---|
| | Excluding loss component | Loss component | | |
| **At 1 January 2024** | **55,585** | **220** | **258** | **56,063** |
| | | | | |
| **Changes in the income statement** | | | | |
| Insurance contract revenue of which: | -2,906 | - | - | -2,906 |
| Contracts recognised from transition date and retrospective approach | -1,972 | - | - | -1,972 |
| Contracts under the fair value approach | -934 | - | - | -934 |
| | | | | |
| **Insurance service expenses** | | | | |
| New incurred claims and benefits | - | -15 | 2,443 | 2,428 |
| Losses and reversals of losses on onerous contracts | - | -9 | - | -9 |
| **Claims and benefits** | **-** | **-25** | **2,443** | **2,419** |
| | | | | |
| Other insurance service operating expenses | - | - | 128 | 128 |
| Amortisation of insurance acquisition cash flows | 2 | - | - | 2 |
| **Insurance service operating expenses** | **2** | **-** | **128** | **130** |
| | | | | |
| **Total insurance service expenses** | **2** | **-25** | **2,571** | **2,549** |
| | | | | |
| Investment components | -720 | - | 720 | - |
| | | | | |
| **Insurance service result** | **-3,624** | **-25** | **3,292** | **-357** |
| | | | | |
| Net finance result from insurance contracts | 2,412 | 2 | - | 2,414 |
| **Total changes in the income statement** | **-1,212** | **-23** | **3,292** | **2,057** |
| | | | | |
| **Cash flows** | | | | |
| Premiums received | 1,670 | - | - | 1,670 |
| Insurance service expenses paid, including investment components | - | - | -3,330 | -3,330 |
| Insurance acquisition cash flows | -17 | - | - | -17 |
| **Total cash flows** | **1,653** | **-** | **-3,330** | **-1,677** |
| | | | | |
| **At 31 December 2024** | **56,025** | **198** | **220** | **56,443** |

**Changes in insurance contracts by remaining coverage and incurred claims prior year GMM**

| | Liabilities for remaining coverage | | Liabilities for incurred claims | Total |
|---|---|---|---|---|
| | Excluding loss component | Loss component | | |
| **At 1 January 2023** | **25,549** | **210** | **141** | **25,900** |
| | | | | |
| **Changes in the income statement** | | | | |
| Insurance contract revenue of which: | -2,113 | - | - | -2,113 |
| Contracts recognised from transition date and retrospective approach | -1,148 | - | - | -1,148 |
| Contracts under the fair value approach | -965 | - | - | -965 |
| | | | | |
| **Insurance service expenses** | | | | |
| New incurred claims and benefits | - | -32 | 1,744 | 1,712 |
| Losses and reversals of losses on onerous contracts | - | 41 | - | 41 |
| **Incurred claims and benefits** | **-** | **9** | **1,744** | **1,753** |
| | | | | |
| Other insurance service operating expenses | - | - | 132 | 132 |
| Amortisation of insurance acquisition cash flows | 2 | - | - | 2 |
| **Insurance service operating expenses** | **2** | **-** | **132** | **134** |
| | | | | |
| **Total insurance service expenses** | **2** | **9** | **1,875** | **1,887** |
| | | | | |
| Investment components | -619 | - | 619 | - |
| | | | | |
| **Insurance service result** | **-2,730** | **9** | **2,495** | **-226** |
| | | | | |
| Net finance result from insurance contracts | 2,415 | 1 | - | 2,416 |
| **Total changes in the income statement** | **-315** | **10** | **2,495** | **2,190** |
| | | | | |
| **Cash flows** | | | | |
| Premiums received | 927 | - | - | 927 |
| Insurance service expenses paid, including investment components | -4 | - | -2,501 | -2,505 |
| Insurance acquisition cash flows | -3 | - | - | -3 |
| **Total cash flows** | **920** | **-** | **-2,501** | **-1,581** |
| | | | | |
| Changes in the composition of the group | 29,552 | - | 1 | 29,553 |
| Other | -122 | - | 122 | - |
| | | | | |
| **At 31 December 2023** | **55,585** | **220** | **258** | **56,063** |

For the Life segment the LRC includes the incurred claims from certain second order events (for example from future premium waiver at disability or incurred survivor benefits) following the option to account for these events as part of the LRC.

### Changes in insurance contracts by measurement component current year

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | |
| **At 1 January 2024** | **50,313** | **2,082** | **3,668** | **3,122** | **545** | **56,063** |
| | | | | | | |
| **Changes in the income statement** | | | | | | |
| | | | | | | |
| ***Changes that relate to future services:*** | | | | | | |
| - Changes in estimates that adjust the CSM | -455 | -65 | 520 | 188 | 332 | - |
| - Changes in estimates that result in losses or the reversal of losses on onerous contracts | 4 | -24 | - | - | - | -20 |
| - Effects of contracts initially recognised in the period | -49 | 28 | 31 | 31 | - | 10 |
| | | | | | | |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -211 | -171 | -40 | -211 |
| - Release of the risk adjustment for non-financial risk | - | -151 | - | - | - | -151 |
| - Experience adjustments | 14 | - | - | - | - | 14 |
| | | | | | | |
| **Insurance service result** | **-486** | **-211** | **340** | **49** | **292** | **-357** |
| | | | | | | |
| Net finance result from insurance contracts | 2,177 | 123 | 114 | 114 | - | 2,414 |
| | | | | | | |
| **Total changes in the income statement** | **1,690** | **-88** | **454** | **162** | **292** | **2,057** |
| | | | | | | |
| **Cash flows** | | | | | | |
| Premiums received | 1,670 | - | - | - | - | 1,670 |
| Insurance service expenses paid | -3,330 | - | - | - | - | -3,330 |
| Insurance acquisition cash flows | -17 | - | - | - | - | -17 |
| **Total cash flows** | **-1,677** | **-** | **-** | **-** | **-** | **-1,677** |
| | | | | | | |
| **At 31 December 2024** | **50,327** | **1,994** | **4,122** | **3,284** | **838** | **56,443** |

## Changes in insurance contracts by measurement component prior year

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | |
| **At 1 January 2023** | **23,339** | **963** | **1,598** | **1,049** | **549** | **25,900** |
| | | | | | | |
| **Changes in the income statement** | | | | | | |
| | | | | | | |
| ***Changes that relate to future services:*** | | | | | | |
| - Changes in estimates that adjust the CSM | -194 | 168 | 25 | -12 | 37 | - |
| - Changes in estimates that result in losses or the reversal of losses on onerous contracts | 38 | -8 | - | - | - | 30 |
| - Effects of contracts initially recognised in the period | -91 | 27 | 76 | 76 | - | 11 |
| | | | | | | |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -145 | -104 | -41 | -145 |
| - Release of the risk adjustment for non-financial risk | - | -103 | - | - | - | -103 |
| - Experience adjustments | -19 | - | - | - | - | -19 |
| | | | | | | |
| **Insurance service result** | **-266** | **84** | **-44** | **-40** | **-3** | **-226** |
| | | | | | | |
| Net finance result from insurance contracts | 2,391 | -45 | 71 | 71 | - | 2,416 |
| | | | | | | |
| **Total changes in the income statement** | **2,125** | **39** | **27** | **30** | **-3** | **2,190** |
| | | | | | | |
| **Cash flows** | | | | | | |
| Premiums received | 927 | - | - | - | - | 927 |
| Insurance service expenses paid | -2,505 | - | - | - | - | -2,505 |
| Insurance acquisition cash flows | -3 | - | - | - | - | -3 |
| **Total cash flows** | **-1,581** | **-** | **-** | **-** | **-** | **-1,581** |
| | | | | | | |
| Changes in the composition of the group | 26,430 | 1,080 | 2,043 | 2,043 | - | 29,553 |
| | | | | | | |
| **At 31 December 2023** | **50,313** | **2,082** | **3,668** | **3,122** | **545** | **56,063** |

### 7.5.13.3 Reinsurance contracts - Non-life and Life

**Changes in reinsurance contracts by remaining coverage and incurred claims current year**

| | Assets for remaining coverage | | Assets for incurred claims | | Total |
|---|---|---|---|---|---|
| **2024** | **Excluding loss recovery component** | **Loss recovery component** | **Estimates of the present value of the future cash flows** | **Risk adjustment for non-financial risk** | |
| **At 1 January** | **298** | **-** | **200** | **3** | **501** |
| | | | | | |
| **Changes in the income statement:** | | | | | |
| Allocation of reinsurance premiums paid | -678 | - | - | - | -678 |
| Amounts recoverable from reinsurers | - | - | 559 | - | 559 |
| Changes in amounts recoverable arising from changes in assets for incurred claims | - | - | 30 | -1 | 29 |
| **Net expenses from reinsurance contracts** | **-678** | **-** | **589** | **-1** | **-90** |
| | | | | | |
| Net finance result from reinsurance contracts | 19 | - | 7 | - | 26 |
| | | | | | |
| **Total changes in the income statement** | **-659** | **-** | **596** | **-1** | **-64** |
| | | | | | |
| **Cash flows:** | | | | | |
| Premiums paid | 655 | - | - | - | 655 |
| Reinsurance recoveries received | - | - | -607 | - | -607 |
| **Total cash flows** | **655** | **-** | **-607** | **-** | **48** |
| | | | | | |
| Other | -16 | - | 16 | - | - |
| | | | | | |
| **At 31 December** | **278** | **-** | **204** | **3** | **485** |

**Changes in reinsurance contracts by remaining coverage and incurred claims prior year**

| | Assets for remaining coverage | | Assets for incurred claims | | Total |
|---|---|---|---|---|---|
| **2023** | **Excluding loss recovery component** | **Loss recovery component** | **Estimates of the present value of the future cash flows** | **Risk adjustment for non-financial risk** | |
| **At 1 January** | **131** | **-** | **248** | **1** | **381** |
| | | | | | |
| **Changes in the income statement:** | | | | | |
| Allocation of reinsurance premiums paid | -392 | - | - | - | -392 |
| Amounts recoverable from reinsurers | - | - | 330 | 1 | 331 |
| Changes in amounts recoverable arising from changes in assets for incurred claims | - | - | 34 | - | 34 |
| **Net expenses from reinsurance contracts** | **-392** | **-** | **364** | **1** | **-27** |
| | | | | | |
| Net finance result from reinsurance contracts | -14 | - | 7 | 1 | -6 |
| | | | | | |
| **Total changes in the income statement** | **-406** | **-** | **371** | **2** | **-33** |
| | | | | | |
| **Cash flows:** | | | | | |
| Premiums paid | 388 | - | - | - | 388 |
| Reinsurance recoveries received | - | - | -419 | - | -419 |
| **Total cash flows** | **388** | **-** | **-419** | **-** | **-31** |
| | | | | | |
| Changes in the composition of the group | 185 | - | - | - | 185 |
| | | | | | |
| **At 31 December** | **298** | **-** | **200** | **3** | **501** |

## Changes in reinsurance contracts by measurement component current year

| 2024 | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | Contractual service margin Total | Of which, contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | Total |
|---|---|---|---|---|---|---|
| **At 1 January** | **-139** | **485** | **75** | **70** | **5** | **420** |
| | | | | | | |
| **Changes in the income statement:** | | | | | | |
| | | | | | | |
| ***Changes that relate to future services*** | | | | | | |
| - Changes in estimates that adjust the CSM | -37 | 3 | 34 | 29 | 5 | - |
| - Effects of contracts initially recognised in the period | - | - | - | - | - | - |
| | | | | | | |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in the income statement for services received | - | - | -19 | -19 | -0 | -19 |
| - Release of the risk adjustment for non-financial risk | - | -41 | - | - | - | -41 |
| - Experience adjustments | 4 | 0 | - | - | - | 4 |
| | | | | | | |
| ***Changes relate to past service*** | **17** | **-0** | **-** | **-** | **-** | **17** |
| | | | | | | |
| **Net expenses from reinsurance contracts** | **-16** | **-39** | **15** | **10** | **5** | **-40** |
| | | | | | | |
| Net finance result from reinsurance contracts | -6 | 25 | 3 | 3 | - | 22 |
| | | | | | | |
| **Total changes in the income statement** | **-22** | **-14** | **18** | **13** | **5** | **-18** |
| | | | | | | |
| **Cash flows:** | | | | | | |
| Premiums paid | 539 | - | - | - | - | 539 |
| Reinsurance recoveries received | -528 | - | - | - | - | -528 |
| **Total cash flows** | **11** | **-** | **-** | **-** | **-** | **11** |
| | | | | | | |
| Other | -13 | - | - | - | - | -14 |
| | | | | | | |
| **At 31 December** | **-163** | **470** | **93** | **83** | **10** | **400** |

## Changes in reinsurance contracts by measurement component prior year

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | Contractual service margin | | | Total |
|---|---|---|---|---|---|---|
| 2023 | | | Total | Of which, contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | |
| **At 1 January** | **309** | **9** | **1** | **-0** | **2** | **319** |
| | | | | | | |
| **Changes in the income statement:** | | | | | | |
| | | | | | | |
| ***Changes that relate to future services*** | | | | | | |
| - Changes in estimates that adjust the CSM | -24 | 55 | -32 | -35 | 3 | -0 |
| - Effects of contracts initially recognised in the period | - | 1 | -1 | -1 | - | - |
| | | | | | | |
| ***Changes that relate to current services:*** | | | | | | |
| - CSM recognised in the income statement for services received | - | - | -2 | -2 | - | -2 |
| - Release of the risk adjustment for non-financial risk | - | -12 | - | - | - | -12 |
| - Experience adjustments | -5 | - | - | - | - | -5 |
| | | | | | | |
| ***Changes relate to past service*** | **-8** | **-1** | **-** | **-** | **-** | **-9** |
| | | | | | | |
| **Net expenses from reinsurance contracts** | **-36** | **43** | **-34** | **-38** | **3** | **-27** |
| | | | | | | |
| Net finance result from reinsurance contracts | -10 | - | 2 | 2 | - | -8 |
| | | | | | | |
| **Total changes in the income statement** | **-46** | **43** | **-32** | **-36** | **3** | **-35** |
| | | | | | | |
| **Cash flows:** | | | | | | |
| Premiums paid | 283 | - | - | - | - | 283 |
| Reinsurance recoveries received | -333 | - | - | - | - | -333 |
| **Total cash flows** | **-50** | **-** | **-** | **-** | **-** | **-50** |
| | | | | | | |
| Changes in the composition of the group | -352 | 433 | 105 | 105 | - | 186 |
| | | | | | | |
| **At 31 December** | **-139** | **485** | **75** | **70** | **5** | **420** |

## 7.5.13.4 Assumptions used

In estimating the fulfilment cash flows included in the contract boundary, a.s.r. considers the range of all possible outcomes in an unbiased way specifying the amount of cash flows, timing and probability reflecting conditions existing at the measurement date, using a probability-weighted average of all possible scenarios. In determining possible scenarios, a.s.r. uses all the reasonable and supportable information available to them without undue cost and effort, which includes information about past events, current conditions and future forecasts.

The following are key assumption and methodologies used in the valuation of the insurance liabilities and are discussed in more detail further in this chapter:

- actuarial assumptions: addressing mortality and longevity, lapse, cancellation and surrender assumptions and for expenses;
- risk adjustment;
- discount rate; and
- coverage units

### 7.5.13.4.1 Changes in estimates

Assumptions are reviewed periodically, based on historical experience, observable market data, including market transactions such as acquisitions and reinsurance transactions, anticipated trends and legislative changes. Similarly, the models and systems used for determining our insurance liabilities are reviewed periodically and, if deemed necessary, updated based on emerging best practices and available technology.

During 2024, a.s.r. continued with the harmonisation of assumptions and methods between Aegon NL and a.s.r., which is expected to continue in the coming years. The main impacts of the harmonisation process and annual update of the non-economic assumptions are the impacts on the mortality, expense, inflation and disability and the update of the coverage units.

*Mortality assumption*

For the mortality assumptions, next to the harmonisation of the mortality table principles, a.s.r. implemented several refinements to the mortality model and updated the model to the latest available data and experience factors. These updates resulted in a reduction of € 105 million on the insurance liabilities fulfilment cashflows, increasing the CSM. As part of the harmonisation of assumptions and methods between Aegon NL and a.s.r., a new mortality table was developed, based on the Aegon mortality table principles, with updated data as from 2024, which resulted in a reduction of € 71 million on the insurance liabilities, increasing the CSM. Previously a.s.r. applied the Dutch Koninklijk Actuarieel Genootschap tables. The mortality assumption updates also had an impact on the loss component, leading to a net future services dotation with a negative P&L impact of € 13 million

*Expense assumption*

The maintenance expense methodologies of a.s.r. and Aegon NL are aligned, and the parameters used for the maintenance expense reserve were updated. These updates consisted of numerous changes with partly offsetting impacts, which in aggregate resulted in a reduction of € 258 million on the insurance liabilities fulfilment cashflows, increasing the CSM. The annual update of the investment expense assumptions resulted in an increase of € 24 million on the insurance liabilities fulfilment cashflows from direct participating insurance contracts, decreasing the CSM of contracts measured under VFA (see section 7.5.14). The assumption update also had an impact on the loss component, leading to a future services release to the P&L of € 114 million.

*Inflation assumption*

As part of the harmonisation process, a.s.r.'s methodology for inflation is also implemented for the Aegon NL life portfolios, which resulted in a decrease of € 51 million on the insurance liabilities fulfilment cashflows, increasing the CSM. The annual update of the inflation assumption results in a partially offsetting increase of € 19 million in fulfilment cashflows, decreasing the CSM. The impact on pre-tax income in 2024 of these updates is limited, as the impact relates almost entirely to future services.

*Disability*

For the Disability business, a.s.r. updated the non-economic assumptions, including updates for assumptions for disability percentage, incidence and recovery rates and mandated brokers, which resulted in a reduction of € 62 million on the insurance liabilities fulfilment cashflows, increasing the CSM. The impact on pre-tax income in 2024 of these updates is € 5 million, which concerns the impact on past services. The remainder of the impact relates to future services.

*Harmonisation on Coverage units*

a.s.r. and Aegon NL reassessed the defined coverage units in a consistent manner for similar products, and reassessment of identified coverage units for dissimilar products. Subsequently, all information was incorporated in the updated a.s.r. CSM-engine model, which resulted in a fractional lower release of the CSM through profit or loss in 2024 (€ 19 million) than would have been in the situation before the alignment and integration.

### 7.5.13.4.2 Actuarial assumptions

Cash flow estimates include both market variables directly observed in the market or derived directly from markets and non-market variables, such as mortality and longevity. The best estimate assumptions regarding mortality and longevity include recent trend assumptions for life expectancy in the Netherlands and a.s.r.'s past experience and are generally developed based on a blend of company experience and industry wide studies, taking into consideration product characteristics, own risk selection criteria, the insured population, recent mortality trend assumptions.

Lapse, cancellation and surrender assumptions are non-economic assumptions and reflect the expected policyholder behaviour. As such the rates usually depend on issue year, policy year, major business lines and sales channels. Such granularity is usually enough to capture how the product terms and conditions as well as regulations can influence the timing and volume of lapse and surrenders. Calendar year based adjustments and dynamic policyholder behaviour are considered when needed in specific circumstances.

Expenses are included in the fulfilment cash flows, when they are directly attributable to insurance contracts and have been allocated to the business lines. These expenses include acquisition expenses, investment expenses related to direct participating contracts as well as overhead costs that a.s.r. considers to be unavoidable when fulfilling the in-force contracts.

#### 7.5.13.4.3 Risk adjustment

The risk adjustment is determined for each portfolio of insurance contracts using a Cost of Capital (CoC) method similar to the risk margin used for reporting under the Solvency II. a.s.r. currently uses the Solvency II model to quantify the risks, adjusted for the following points:

- Excluding general operational risk;
- Excluding market risk (if any);
- Excluding reinsurance counterparty default risk;
- Added a reinsured risk adjustment by calculating the risk adjustment gross and net of reinsurance;
- A CoC rate of 6% is used, diversification effects are applied for disability, taking into account a going concern basis;
- ECAP is used where available (e.g. P&C Cat risk); and
- The IFRS 17 discount rate curve is used.

The risks that are generally incorporated through the risk adjustment are mortality, longevity, disability, lapse, catastrophe and expense risk. A projection of expected future risks is made and all these risks are projected into the future. The total risk for every future year is determined based on correlations between the risks described in Solvency II. The projected total risk for every year is multiplied by a cost of capital charge and discounted at the balance sheet date.

The risk adjustment is calculated at a range of confidence levels, as set out below in the table. The implied confidence levels are determined for both the one year and multiyear view, gross of reinsurance.

**Confidence levels**

| | 31 December 2024 | |
|---|---|---|
| | 1 year view | Ultimate view |
| Range | 95% - 98% | 66% - 76% |

The implied confidence levels at 31 December 2023 were equal to those implied at 31 December 2024.

#### 7.5.13.4.4 Discount

Discount curves to discount the expected future fulfilment cash flows are determined using a liquid risk free curve to which an illiquidity premium is added. The risk-free curve is based on the 6-month EURIBOR swap rate and includes a credit-risk adjustment and a first smoothing point of 20 years. a.s.r. uses an UFR of 3.25 % in 2024 (2023: 3.40%) for the construction of the curve from the first smoothing point (FSP). The impact of the decrease in UFR is € 131 million on the value of the insurance contract liabilities and € 27 million on the liabilities arising from direct participating insurance contracts.

The liability illiquidity premium (LIP) is the adjustment resulting from differences between the liquidity characteristics of the group of insurance contracts and the liquidity of the assets used to establish the yield curve. The LIP is derived from a.s.r.'s current asset portfolio using a top-down approach per entity or liability product.

The discount curves are also applicable to the liabilities arising from direct participating insurance contracts. Further information on these contracts can be found in section 7.5.14.

The range of application ratio's follow the SCR Mass Lapse methodology, and include the harmonisation with Aegon NL.

**Discount curves used in the valuation of the insurance contract liabilities and liabilities arising from direct participating insurance contracts**

| | | Years | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | Range LIP | 1 | 5 | 10 | 20 | 30 | 40 | 50 |
| 31 December 2023 | 50% (min) | 3.80% | 2.76% | 2.83% | 2.84% | 2.82% | 2.91% | 2.99% |
| | 100% (max) | 4.21% | 3.17% | 3.24% | 3.25% | 3.17% | 3.18% | 3.21% |
| 31 December 2024 | 50% (min) | 2.64% | 2.54% | 2.67% | 2.66% | 2.63% | 2.72% | 2.81% |
| | 100% (max) | 3.23% | 3.13% | 3.26% | 3.25% | 3.12% | 3.11% | 3.13% |

#### 7.5.13.4.5 Coverage units

Coverage units are determined based on the expected insurance contract services. The insurance contract services are determined considering the (weighted) quantity of the benefits provided from insurance and investment (return/related) services. If a contract provides coverage for more than one insured event or if it provides additional investment (return/related) services, the coverage unit reflects all material benefits.

a.s.r. has defined coverage units that differ per product type to best reflect a product's characteristics and the nature of the services provided to the policyholder. Insurance services are typically depicted by a metric that is based on the maximum amount that a policyholder would receive if the insured event were to occur, such as the total benefits amount or the death benefit amount. For investment-type services, coverage units are based on the total service that a.s.r. expects to provide the policyholder over the lifetime of the contract, which is best represented by the coverage unit 'total premium'.

## Coverage units

| Product type | Coverage unit driver |
|---|---|
| **Pensions** | |
| Defined Benefit (DB) | Attainable pension |
| Defined Contribution (DC) - open book | Attainable pension |
| Defined Contribution (DC) - closed book | Total premium |
| Pensions - Term insurance | Sum assured including indexation |
| **Individual Life** | |
| Unit Linked | Total premium |
| Term Insurance | Sum assured (including indexation) |
| Saving Mortgage | Sum assured (including indexation) |
| Annuity | Annuity payable |
| Traditional Saving / Endowment | Sum assured (including indexation) |
| **Funeral** | |
| Funeral | Sum assured including indexation |

## 7.5.13.5 Contracts issued and acquired in the period

The following tables summarise the effect on the measurement components of insurance and reinsurance contracts arising from the initial recognition of contracts measured under the GMM that were initially recognised in the year.

### Contracts issued and acquired: Non-life insurance contracts current year

| 2024 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Expected claims and insurance service operating expenses | 598 | 817 | - | 1,415 |
| Insurance acquisition cash flows | 22 | 9 | - | 30 |
| **Estimates of the present value of future cash outflows** | **620** | **826** | **-** | **1,446** |
| | | | | |
| Estimates of the present value of future cash inflows | -744 | -811 | - | -1,555 |
| Risk adjustment for non-financial risk | 23 | 8 | - | 31 |
| CSM | 101 | - | - | 101 |
| **Losses recognised on initial recognition** | **-** | **23** | **-** | **23** |

Onerous Non-life contracts issued consist for about two thirds of Sickness Leave yearly prolongations at a combined ratio slightly above 100% due to an increased claims ratio, whereby cost synergies were not yet taken into account. The remainder consist of a part of the Group Disability production which was priced slightly above 100% for commercial reasons, which is more than offset by profitable other Group Disability products in the same portfolio.

### Contracts issued and acquired: Non-life insurance contracts prior year

| 2023 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Expected claims and insurance service operating expenses | 1,100 | - | 1,333 | 2,433 |
| Insurance acquisition cash flows | 32 | - | - | 32 |
| **Estimates of the present value of future cash outflows** | **1,132** | **-** | **1,333** | **2,465** |
| | | | | |
| Estimates of the present value of future cash inflows | -1,249 | - | -1,475 | -2,724 |
| Risk adjustment for non-financial risk | 21 | - | 46 | 67 |
| CSM | 96 | - | 96 | 192 |
| **Losses recognised on initial recognition** | **-** | **-** | **-** | **-** |

### Contracts issued and acquired: Life insurance contracts current year

| 2024 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Expected claims and insurance service operating expenses | 141 | 474 | - | 615 |
| Insurance acquisition cash flows | 2 | 15 | - | 17 |
| **Estimates of the present value of future cash outflows** | **143** | **489** | **-** | **632** |
| | | | | |
| Estimates of the present value of future cash inflows | -186 | -495 | - | -681 |
| Risk adjustment for non-financial risk | 12 | 16 | - | 28 |
| CSM | 31 | - | - | 31 |
| **Losses recognised on initial recognition** | **-** | **10** | **-** | **10** |

### Contracts issued and acquired: Life insurance contracts prior year

| 2023 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Expected claims and insurance service operating expenses | 215 | 219 | 26,430 | 26,864 |
| Insurance acquisition cash flows | 2 | 4 | - | 6 |
| **Estimates of the present value of future cash outflows** | **217** | **223** | **26,430** | **26,871** |
| | | | | |
| Estimates of the present value of future cash inflows | -315 | -217 | -29,553 | -30,085 |
| Risk adjustment for non-financial risk | 22 | 5 | 1,080 | 1,107 |
| CSM | 76 | - | 2,043 | 2,118 |
| **Losses recognised on initial recognition** | **-** | **11** | **-** | **11** |

### Contracts issued and acquired: reinsurance contracts

| | 2024 | 2023 |
|---|---|---|
| Estimates of present value of cash inflows | - | 193 |
| Estimates of present value of cash outflows | - | -731 |
| Risk adjustment for non-financial risk | - | 434 |
| CSM | - | 104 |

In 2023, reinsurance contracts consist almost completely of contracts acquired of Aegon NL.

## 7.5.13.6 Expected release of the CSM

The following table illustrates when a.s.r. expects to recognise the remaining CSM as revenue for contracts measured under the GMM.

### Expected release of the CSM current year

| 31 December 2024 | < 1 year | 1-2 years | 2-3 years | 3-4 years | 4-5 years | 5-10 years | > 10 years | Total |
|---|---|---|---|---|---|---|---|---|
| **Insurance contracts** | | | | | | | | |
| Non-Life GMM | 44 | 31 | 19 | 19 | 19 | 94 | 68 | 293 |
| Life GMM | 186 | 186 | 176 | 170 | 163 | 736 | 2,504 | 4,122 |
| | | | | | | | | |
| **Reinsurance contracts** | | | | | | | | |
| Non-Life GMM | -9 | -9 | -6 | 1 | 1 | 3 | -1 | -19 |
| Life GMM | -2 | -3 | -2 | -2 | -2 | -13 | -50 | -74 |
| | | | | | | | | |
| **Total expected release of the CSM** | **219** | **206** | **187** | **187** | **181** | **819** | **2,522** | **4,322** |

### Expected release of the CSM prior year

| 31 December 2023 | < 1 year | 1-2 years | 2-3 years | 3-4 years | 4-5 years | 5-10 years | > 10 years | Total |
|---|---|---|---|---|---|---|---|---|
| **Insurance contracts** | | | | | | | | |
| Non-Life GMM | 51 | 18 | 16 | 15 | 14 | 64 | 59 | 236 |
| Life GMM | 180 | 174 | 169 | 164 | 157 | 702 | 2,123 | 3,668 |
| | | | | | | | | |
| **Reinsurance contracts** | | | | | | | | |
| Non-Life GMM | -1 | -1 | -1 | -1 | -1 | -3 | -7 | -14 |
| Life GMM | -4 | -4 | -4 | -3 | -3 | -15 | -28 | -61 |
| | | | | | | | | |
| **Total expected release of the CSM** | **227** | **188** | **180** | **174** | **167** | **747** | **2,146** | **3,829** |

### 7.5.13.7 Claims development table Non-life

The table below is a ten-year summary of movements in gross cumulative claims in connection with the Non-life portfolio for the period from 2014 to 2024.

**Ten-year summary of changes in gross cumulative claims**

| 31 December 2024 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | Claims year Total |
|---|---|---|---|---|---|---|---|---|---|---|---|
| At year end | | | | | | | | | | | |
| 1st claim year | 2,027 | 2,216 | 2,237 | 2,348 | 2,418 | 2,614 | 3,206 | 3,469 | 4,366 | 4,391 | |
| 2016 | 2,017 | | | | | | | | | | |
| 2017 | 2,051 | 2,262 | | | | | | | | | |
| 2018 | 2,062 | 2,310 | 2,312 | | | | | | | | |
| 2019 | 2,052 | 2,295 | 2,375 | 2,367 | | | | | | | |
| 2020 | 2,047 | 2,314 | 2,382 | 2,445 | 2,464 | | | | | | |
| 2021 | 2,009 | 2,251 | 2,338 | 2,449 | 2,510 | 2,621 | | | | | |
| 2022 | 2,033 | 2,274 | 2,325 | 2,483 | 2,514 | 2,630 | 3,091 | | | | |
| 2023 | 2,031 | 2,265 | 2,335 | 2,499 | 2,554 | 2,682 | 3,168 | 3,509 | | | |
| 2024 | 2,044 | 2,279 | 2,339 | 2,500 | 2,518 | 2,684 | 3,210 | 3,529 | 4,391 | | |
| **Estimates of undiscounted gross cumulative claims 31 December 2024** | **2,044** | **2,279** | **2,339** | **2,500** | **2,518** | **2,684** | **3,210** | **3,529** | **4,391** | **4,391** | |
| Cumulative gross paid claims | 1,859 | 2,051 | 2,060 | 2,113 | 2,084 | 2,108 | 2,417 | 2,548 | 3,151 | 2,013 | |
| **Gross liabilities claims years 2015 to 2024** | **185** | **228** | **279** | **387** | **435** | **575** | **793** | **981** | **1,240** | **2,379** | **7,482** |
| Gross liabilities claims years before 2015 | | | | | | | | | | | 1,048 |
| Effect of discounting | | | | | | | | | | | -1,365 |
| Effect of the risk adjustment margin for non-financial risk | | | | | | | | | | | 153 |
| Other | | | | | | | | | | | 32 |
| **Gross liabilities for incurred claims** | | | | | | | | | | | **7,350** |

Gross claims in the claims development table include the Aegon NL claims as from the acquisition date.

## Ten-year summary of changes in gross cumulative claims

| | | | | | | | | | | | Claims year |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 31 December 2023 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | Total |
| At year end | | | | | | | | | | | |
| 1st claim year | 1,975 | 2,027 | 2,216 | 2,237 | 2,348 | 2,418 | 2,614 | 3,206 | 3,469 | 4,366 | |
| 2015 | 1,953 | | | | | | | | | | |
| 2016 | 1,959 | 2,017 | | | | | | | | | |
| 2017 | 1,951 | 2,051 | 2,262 | | | | | | | | |
| 2018 | 1,945 | 2,062 | 2,310 | 2,312 | | | | | | | |
| 2019 | 1,936 | 2,052 | 2,295 | 2,375 | 2,367 | | | | | | |
| 2020 | 1,911 | 2,047 | 2,314 | 2,382 | 2,445 | 2,464 | | | | | |
| 2021 | 1,893 | 2,009 | 2,251 | 2,338 | 2,449 | 2,510 | 2,621 | | | | |
| 2022 | 1,894 | 2,033 | 2,274 | 2,325 | 2,483 | 2,514 | 2,630 | 3,091 | | | |
| 2023 | 1,895 | 2,031 | 2,265 | 2,335 | 2,499 | 2,554 | 2,682 | 3,168 | 3,509 | | |
| **Estimates of undiscounted gross cumulative claims** | | | | | | | | | | | |
| **31 December 2023** | **1,895** | **2,031** | **2,265** | **2,335** | **2,499** | **2,554** | **2,682** | **3,168** | **3,509** | **4,366** | |
| Cumulative gross paid claims | 1,736 | 1,825 | 2,011 | 2,015 | 2,055 | 2,010 | 2,020 | 2,295 | 2,351 | 2,130 | |
| **Gross liabilities claims years 2014 to 2023** | **159** | **205** | **254** | **319** | **443** | **545** | **662** | **873** | **1,158** | **2,236** | **6,855** |
| Gross liabilities claims years before 2014 | | | | | | | | | | | 994 |
| Effect of discounting | | | | | | | | | | | -1,289 |
| Effect of the risk adjustment margin for non-financial risk | | | | | | | | | | | 135 |
| Other | | | | | | | | | | | 15 |
| **Gross liabilities for incurred claims** | | | | | | | | | | | **6,710** |

## 7.5.14 Liabilities arising from direct participating insurance contracts

See accounting policies F1.

### 7.5.14.1 Life – direct participating insurance contracts

**Changes in liabilities arising from direct participating insurance contracts by remaining coverage and incurred claims current year VFA**

| | Liabilities for remaining coverage | | Liabilities for incurred claims | Total |
|---|---|---|---|---|
| | Excluding loss component | Loss component | | |
| **At 1 January 2024** | **35,790** | **75** | **228** | **36,093** |
| | | | | |
| **Changes in the income statement** | | | | |
| Insurance contract revenue of which: | -1,081 | - | - | -1,081 |
| Contracts recognised from transition date and retrospective approach | -994 | - | - | -994 |
| Contracts under the fair value approach | -87 | - | - | -87 |
| | | | | |
| **Insurance service expenses** | | | | |
| New incurred claims and benefits | - | -12 | 779 | 767 |
| Losses and reversals of losses on onerous contracts | - | 6 | - | 6 |
| **Claims and benefits** | **-** | **-6** | **779** | **772** |
| | | | | |
| Other insurance service operating expenses | - | - | 155 | 155 |
| Amortisation of insurance acquisition cash flows | 4 | - | - | 4 |
| **Insurance service operating expenses** | **4** | **-** | **155** | **159** |
| | | | | |
| **Total insurance service expenses** | **4** | **-6** | **934** | **932** |
| | | | | |
| Investment components | -1,263 | - | 1,263 | - |
| | | | | |
| **Insurance service result** | **-2,340** | **-6** | **2,197** | **-149** |
| | | | | |
| Net finance result from insurance contracts | 3,072 | - | - | 3,071 |
| **Total changes in the income statement** | **732** | **-7** | **2,197** | **2,922** |
| | | | | |
| **Cashflows** | | | | |
| Premiums received | 1,557 | - | - | 1,557 |
| Insurance service expenses paid, including investment components | - | - | -2,203 | -2,203 |
| Insurance acquisition cash flows | -12 | - | - | -12 |
| **Total cash flows** | **1,545** | **-** | **-2,203** | **-658** |
| | | | | |
| Other | 20 | - | - | 20 |
| | | | | |
| **At 31 December 2024** | **38,087** | **68** | **222** | **38,377** |

### Changes in liabilities arising from direct participating insurance contracts by remaining coverage and incurred claims prior year VFA

| | Liabilities for remaining coverage | | Liabilities for incurred claims | Total |
|---|---|---|---|---|
| | Excluding loss component | Loss component | | |
| **At 1 January 2023** | **10,270** | **101** | **104** | **10,475** |
| | | | | |
| **Changes in the income statement** | | | | |
| Insurance contract revenue of which: | -603 | - | - | -603 |
| Contracts recognised from transition date and retrospective approach | -498 | - | - | -498 |
| Contracts under the fair value approach | -106 | - | - | -106 |
| | | | | |
| **Insurance service expenses** | | | | |
| New incurred claims and benefits | - | -5 | 402 | 397 |
| Losses and reversals of losses on onerous contracts | - | -16 | - | -16 |
| **Claims and benefits** | **-** | **-20** | **402** | **382** |
| | | | | |
| Other insurance service operating expenses | - | - | 124 | 124 |
| Amortisation of insurance acquisition cash flows | 4 | - | - | 4 |
| **Insurance service operating expenses** | **4** | **-** | **124** | **128** |
| | | | | |
| **Total insurance service expenses** | **4** | **-20** | **526** | **509** |
| | | | | |
| Investment components | -838 | - | 838 | - |
| | | | | |
| **Insurance service result** | **-1,437** | **-20** | **1,364** | **-94** |
| | | | | |
| Net finance result from insurance contracts | 2,542 | -6 | - | 2,536 |
| **Total changes in the income statement** | **1,105** | **-26** | **1,364** | **2,442** |
| | | | | |
| **Cashflows** | | | | |
| Premiums received | 1,283 | - | - | 1,283 |
| Insurance service expenses paid, including investment components | -1 | - | -1,367 | -1,368 |
| Insurance acquisition cash flows | -4 | - | - | -4 |
| **Total cash flows** | **1,278** | **-** | **-1,367** | **-89** |
| | | | | |
| Changes in the composition of the group | 23,226 | - | - | 23,226 |
| Other | -89 | - | 128 | 39 |
| | | | | |
| **At 31 December 2023** | **35,790** | **75** | **228** | **36,093** |

## Changes in liabilities arising from direct participating insurance contracts by measurement component current year VFA

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, Contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | |
| **At 1 January 2024** | **34,288** | **541** | **1,264** | **1,072** | **193** | **36,093** |
| **Changes in the income statement** | | | | | | |
| ***Changes that relate to future services*** | | | | | | |
| - Changes in estimates that adjust the CSM | -139 | 51 | 88 | 63 | 25 | - |
| - Changes in estimates that do not adjust the CSM, ie losses on groups of onerous contracts and reversals of such losses | 18 | -29 | - | - | - | -10 |
| - Effects of contracts initially recognised in the period | 12 | 4 | - | - | - | 16 |
| ***Changes that relate to current services*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -102 | -72 | -30 | -102 |
| - Release of the risk adjustment for non-financial risk | - | -40 | - | - | - | -40 |
| - Experience adjustments | -14 | - | - | - | - | -14 |
| **Insurance service result** | **-122** | **-14** | **-13** | **-8** | **-5** | **-149** |
| Net finance result from insurance contracts | 3,060 | 2 | 9 | - | 9 | 3,071 |
| **Total changes in the income statement** | **2,938** | **-12** | **-4** | **-8** | **4** | **2,922** |
| **Cash flows** | | | | | | |
| Premiums received | 1,557 | - | - | - | - | 1,557 |
| Insurance service expenses paid, including investment components | -2,203 | - | - | - | - | -2,203 |
| Insurance acquisition cash flows | -12 | - | - | - | - | -12 |
| **Total cash flows** | **-658** | **-** | **-** | **-** | **-** | **-658** |
| Other | 20 | - | - | - | - | 20 |
| **At 31 December 2024** | **36,587** | **530** | **1,260** | **1,063** | **197** | **38,377** |

For more information on changes in estimates, see section 7.5.13.4.

## Changes in liabilities arising from direct participating insurance contracts by measurement component prior year (VFA)

| | Estimates of the present value of the future cash flows | Risk adjustment for non-financial risk | CSM | | | Total |
|---|---|---|---|---|---|---|
| | | | Total | Of which, Contracts recognised from transition date and retrospective approach | Of which, contracts under fair value approach | |
| **At 1 January 2023** | **10,244** | **69** | **162** | **-** | **162** | **10,475** |
| **Changes in the income statement** | | | | | | |
| ***Changes that relate to future services*** | | | | | | |
| - Changes in estimates that adjust the CSM | -24 | 30 | -6 | -32 | 27 | - |
| - Changes in estimates that do not adjust the CSM, ie losses on groups of onerous contracts and reversals of such losses | -22 | -11 | - | - | - | -33 |
| - Effects of contracts initially recognised in the period | 13 | 4 | - | - | - | 18 |
| ***Changes that relate to current services*** | | | | | | |
| - CSM recognised in profit or loss for services provided | - | - | -65 | -32 | -33 | -65 |
| - Release of the risk adjustment for non-financial risk | - | -17 | - | - | - | -17 |
| - Experience adjustments | 4 | - | - | - | - | 4 |
| **Insurance service result** | **-29** | **6** | **-71** | **-64** | **-7** | **-94** |
| Net finance result from insurance contracts | 2,498 | 2 | 36 | -1 | 37 | 2,536 |
| **Total changes in the income statement** | **2,469** | **7** | **-35** | **-65** | **30** | **2,442** |
| **Cash flows** | | | | | | |
| Premiums received | 1,283 | - | - | - | - | 1,283 |
| Insurance service expenses paid, including investment components | -1,368 | - | - | - | - | -1,368 |
| Insurance acquisition cash flows | -4 | - | - | - | - | -4 |
| **Total cash flows** | **-89** | **-** | **-** | **-** | **-** | **-89** |
| Changes in the composition of the group | 21,624 | 465 | 1,137 | 1,137 | - | 23,226 |
| Other | 39 | - | - | - | - | 39 |
| **At 31 December 2023** | **34,288** | **541** | **1,264** | **1,072** | **193** | **36,093** |

At year-end 2024, the liabilities included a guarantee provision for a carrying amount of € 58 million (2023: € 63 million) and a provision related to unit-linked insurance contracts of € 36 million (2023: € 37 million). These provisions relate to compensation for the costs of these contracts.

An amount of € 417 million (2023: € 229 million) of the liabilities arising from direct participating insurance contracts is related to the a.s.r. pension DC plans.

For more information on the assumptions used and changes in estimates, see section 7.5.13.4.

## 7.5.14.2 Contracts issued and acquired in the period

The following tables summarise the effect on the measurement components of insurance contracts arising from the initial recognition of contracts that were initially recognised in the year.

**Contracts issued and acquired: Liabilities arising from direct participating insurance contracts**

| 2024 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Insurance service expenses payable | 39 | 25 | - | 64 |
| Insurance acquisition cash flows | 8 | 4 | - | 12 |
| **Estimates of the present value of future cash outflows** | **47** | **29** | **-** | **76** |
| | | | | |
| Estimates of the present value of future cash inflows | -47 | -17 | - | -64 |
| Risk adjustment for non-financial risk | - | 4 | - | 4 |
| CSM | - | - | - | - |
| **Losses recognised on initial recognition** | **-** | **16** | **-** | **16** |

**Contracts issued and acquired: Liabilities arising from direct participating insurance contracts**

| 2023 | Profitable contracts issued | Onerous contracts issued | Contracts acquired | Total |
|---|---|---|---|---|
| Insurance service expenses payable | - | 64 | 21,624 | 21,689 |
| Insurance acquisition cash flows | - | 5 | - | 5 |
| **Estimates of the present value of future cash outflows** | **-** | **69** | **21,624** | **21,693** |
| | | | | |
| Estimates of the present value of future cash inflows | -1 | -55 | -23,226 | -23,282 |
| Risk adjustment for non-financial risk | - | 4 | 465 | 469 |
| CSM | - | - | 1,137 | 1,137 |
| **Losses recognised on initial recognition** | **-** | **18** | **-** | **18** |

## 7.5.14.3 Expected release of the CSM

The following table illustrates when a.s.r. expects to recognise the remaining CSM as revenue.

**Expected release of the CSM**

| | < 1 year | 1-2 years | 2-3 years | 3-4 years | 4-5 years | 5-10 years | > 10 years | Total |
|---|---|---|---|---|---|---|---|---|
| **2024** | **94** | **88** | **82** | **76** | **71** | **280** | **570** | **1,260** |
| 2023 | 97 | 90 | 85 | 79 | 73 | 278 | 562 | 1,264 |

## 7.5.14.4 Pre-recognition cash flows

Pre-recognition cash flows amounting € 11 million (2023: € 11 million) mainly concern acquisition cash flows relating to insurance contracts, specifically Werknemerspensioen, not yet recognised.

## 7.5.15 Employee benefits

See accounting policy G.

**Employee benefits**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Post-employment benefits pensions | 4,974 | 5,160 |
| Post-employment benefits other than pensions | 35 | 39 |
| **Post-employment benefit obligation** | **5,010** | **5,199** |
| | | |
| Other long-term employee benefits | 27 | 19 |
| | | |
| **Total** | **5,037** | **5,218** |

The employee benefits decreased by € 181 million to € 5,037 million (2023: € 5,218 million) primarily due to the increase in the discount rate from 3.42% in 2023 to 3.51% in 2024. The remeasurements resulted in an increase of € 112 million in equity in the actuarial gains and losses.

An amount of € 4,839 million (2023: € 5,018 million) of the employee benefits is expected to be settled more than twelve months after the balance sheet date.

**Costs of post-employment and other long-term employee benefits**

| | 2024 | 2023 |
|---|---|---|
| Post-employment benefits pensions | -238 | -198 |
| Post-employment benefits other than pensions | -1 | 1 |
| **Total** | **-239** | **-197** |
| | | |
| **Cost of post-employment and other long-term employee benefits** | **-239** | **-197** |

The costs of the post-employment benefits pensions relate to the current DC pension plan of a.s.r., the previous DB plans of a.s.r. and Aegon NL, plus the DC plans of the other group companies.

### 7.5.15.1 Post-employment benefits pensions

a.s.r. has a number of DC and DB post-employment benefit plans for its employees and former employees. The majority of employees are formally employed by a.s.r. A limited number of employees are employed by other group companies. The pension plans of other group companies are disclosed in a separate section in this section.

a.s.r. life and Aegon life, insurance companies and group entities, are the insurers of the majority of the post-employment DB plans. As a.s.r. life and Aegon life hold the investments that are meant to cover the employee benefit obligation for the DB plans, they do not qualify as plan assets in accordance with IAS 19 and are therefore included in financial assets. a.s.r. life is also the insurer of the current pension DC plans.

#### a.s.r. employees

All pension buildup for existing and new employees as of 1 January 2021 are included in the post-employment DC plans. All employees who commenced service between 1 January 2006 and 31 December 2020 are included in one post-employment DB plan ('Basic plan'). All other employees remain active within the existing plan at the date of first employment. Previous plans for former employees are also still active.

The recognised expenses for the DC plan in 2024 amounts to € 83 million (2023 € 60 million).

The DC plan has two components with defined benefit elements with a marginal impact; survivors' pension and the option to buy a guaranteed income. Both components are accounted for in the same way as the DC plan.

The past service cost of € 7 million pre-tax presented in 2023 mainly relates to the RVU obligation in relation to the Aegon NL employees that entered the employment of a.s.r.

The methods and techniques used to calculate the DB obligations are based on IAS 19 requirements and calculated by an independent actuary.

The benefits under these plans are dependent on factors such as years of service and compensation. Pension obligations are determined using mortality tables, the rate of employee turnover, wage drift and economic assumptions for factors such as inflation, and the discount rate.

As per 31 December 2020, the contribution to the DB pension scheme ended, therefore no accrual rate and pensionable salary and minimum franchise is required for this scheme.

- The DB pension scheme had a retirement age of 68 years;
- The DB scheme was based on average-salary pension; and
- Future inflation indexation agreements are in force.

#### Former Aegon employees

Former employees of Aegon NL are still covered by a number of Aegon NL post-employment benefit plans. Aegon NL has issued DC plans and DB plans.

The contribution payable to a DC plan for services provided is recognised as an expense in the income statement. An asset (or liability) is recognised to the extent that the contribution paid exceeds (or falls short of) the amount due for services provided. With the integration of Aegon NL and a.s.r. on 1 October 2023, the Aegon DC plan with Aegon IORP became non-contributory; from that date, the employees of Aegon NL are included in the DC plan of a.s.r.

The DB obligation is based on the terms and conditions of the plan applicable on the balance sheet date. In measuring the DB obligation Aegon NL uses the projected unit credit method and actuarial assumptions that represent the best estimate of future variables. The benefits are discounted using an interest rate based on the internal curve for high quality corporate bonds, that are denominated in the currency in which the benefits will be paid and that have terms to maturity that approximate the terms of the related pension liability. Actuarial assumptions used in the measurement of the liability include the discount rate, estimated future wage inflation, mortality rates and price inflation.

As per 31 December 2019, the contribution to the DB pension scheme ended, therefore no accrual rate and pensionable salary and minimum franchise is required for this scheme.

- The DB pension scheme had a retirement age of 68 years;
- The DB scheme was based on average-salary pension; and
- Future inflation indexation agreements are in force.

## Other group companies employees

The other group companies, which are entities mainly operating in the Distribution and Services segment, have DC plans, insured with a.s.r. life. The recognised expenses for these DC plans in 2024 amounts to € 19 million (2023: € 13 million).

## Net defined benefit liability

**Defined benefit obligation for all the above mentioned plans**

| | 2024 | 2023 |
|---|---|---|
| **Net defined benefit liability at 1 January** | **5,160** | **2,722** |
| | | |
| **Included in income statement** | | |
| Current service cost, contributions by employer | - | 1 |
| Interest cost | 175 | 142 |
| Past service cost | - | -7 |
| Other | -2 | -2 |
| **Total** | **174** | **134** |
| | | |
| **Remeasurement of liabilities included in OCI** | | |
| Discount rate change | -64 | 155 |
| Other assumptions change | -40 | -6 |
| Experience adjustments | -48 | 11 |
| **Total** | **-151** | **160** |
| | | |
| Benefits | -211 | -160 |
| Changes in the composition of the group | - | 2,340 |
| Other | 2 | -37 |
| **Net defined benefit liability at 31 December** | **4,974** | **5,160** |
| | | |
| **At 31 December** | | |
| Defined benefit obligation | 4,974 | 5,160 |
| Fair value of plan assets | - | - |
| **Net defined benefit liability** | **4,974** | **5,160** |

### a.s.r. employees

Employees account for 19% (2023: 20%) of the DB obligation, 55% (2023: 52%) of the DB obligation relates to former employees currently receiving pension benefits, 24% (2023: 25%) of the DB obligation relates to deferred pensioners and 2% (2023: 3%) of the DB obligation relates to other members.

The discount rate was 3.51 % at 31 December 2024 (31 December 2023: 3.42%), resulting in a € 28 million decrease (2023: € 81 million increase) in the DB obligation.

As per 31 December 2024 the duration of the DB obligation was 13 years (2023: 14 years).

The change in other assumptions amounts is € - 20 million (2023: nil) primarily due to updated mortality rates of participants to the closed DB pension scheme.

### Former Aegon employees

The DB obligation of Aegon NL classifies as multiple-employer contract. a.s.r. has an obligation to pay part of the guarantee premium, which is an insurance premium to pay for the guarantee provided by Aegon life. Each year when there is a decision related to additional entitlements stemming from indexation, a new guarantee premium is calculated. This premium is based on the total of entitlements, including the previous annual layers of indexation bought in the past. The indexation annuity, which is based on contractual tariff, is extracted from the indexation depot. The guarantee premium, which is calculated based on the difference between the current market price and the contractual tariff for indexation, is paid in full by a.s.r. to Aegon life, and subsequently 29% thereof is recovered from Aegon Ltd. (2024: € 4 million; 2023: € 4 million). These contributions from Aegon Ltd. are set out in the formal terms of the plan, and thus affect remeasurements of the net DB liability. An amount of € 80 million (2023: € 69 million) was netted of the DB obligation and included in OCI.

Employees account for 0% (2023 0%) of the DB obligation, 55% (2023 54%) of the DB obligation relates to former employees currently receiving pension benefits, 43% (2023 44%) of the DB obligation relates to deferred pensioners and 2% (2023 2%) of the DB obligation relates to other members.

The discount rate was 3.51 % at 31 December 2024 (31 December 2023: 3.42%) , resulting in a € 22 million decrease (2023: € 83 million increase) in the DB obligation. As per 31 December 2024 the duration of the DB obligation was 14 years (2023: 14 years). The change in other assumptions amounts to € -20 million (2023 € -6 million) primarily due to updated mortality rates of participants to the closed DB pension scheme.

### Experience adjustments

Experience adjustments are actuarial gains and losses that have arisen due to differences between actuarial assumptions. The following table provides information about experience adjustments with respect to qualifying plan assets and the DB obligation:

**Experience adjustments**

| (in € thousands) | 2024 | 2023 |
|---|---|---|
| Experience adjustments to qualifying investments, gain (loss) | - | - |
| As a % of liabilities as at 31 December | 0.0% | 0.0% |
| Experience adjustments to defined benefit obligation, gain (loss) | 47,989 | -10,580 |
| As a % of liabilities as at 31 December | 1.0% | -0.2% |

## Assumptions

**The principal actuarial assumptions and parameters at year-end**

| | 2024 | 2023 |
|---|---|---|
| Discount rate | 3.5% | 3.4% |
| Mortality (years) a.s.r. | 19.9 | 20.1 |
| Mortality (years) Aegon | 21.1 | 21.1 |

In the calculation of the DB obligation the:

- Discount rate is based on an internal curve for high quality corporate bonds;
- For the a.s.r. pension scheme the most recent mortality table 'a.s.r. 2024 prognosetafel' is used, in combination with a.s.r. specific experience factors for the pension portfolio;
- For the Aegon NL pension scheme the 'a.s.r. 2024 prognosetafel' is used, in combination with a.s.r. specific experience factors for the pension portfolio;
- The period of indexation is based on the expected duration of the separate account to fund the future inflation indexation.

The sensitivity of the above actuarial assumptions to feasible possible changes at the reporting date to one of the relevant actuarial assumptions whilst other assumption remain constant, would have affected the DB obligation by the amounts shown below:

**Sensitivity of actuarial assumptions**

| | Increase | Decrease |
|---|---|---|
| Discount rate (1% movement) | -497 | 622 |
| Future mortality (1 year movement) | -131 | 130 |

## Non-qualifying plan assets

The portfolios of global investments related to the ended DB pension schemes of a.s.r. and former Aegon NL are considered non-qualifying plan assets. The non-qualifying assets, which are managed by a group company, are not presented as part of the net DB obligation.

For the non-qualifying assets backing the post-employment benefit plans, a.s.r. has drawn up general guidelines for the asset mix based on criteria such as geographical location and ratings. To ensure the investment guidelines remain in line with the conditions of the post-employment benefit obligations, a.s.r. regularly performs Asset Liability Management (ALM) studies. Transactions in the non-qualifying assets are done within the guidelines. As the post-employment benefit plans are a liability on group level, the underlying insurance and market risks are in scope of a.s.r.'s risk policies (section 7.8).

The overall interest-rate risk of the Group is managed using interest-rate swaps and swaptions. a.s.r. manages the interest rate risk through an overlay interest hedging strategy using swaps and swaptions for the company as a whole (see section 7.8.3). The swaps and swaptions are not specifically allocated to the respective post-employment benefit plans.

a.s.r. has separate accounts to fund future inflation indexation for the employees and former employees included in the a.s.r. post-employment defined benefit plan. As such this has been included in the DB obligation. The fair value of these assets amounted to € 348 million (2023: € 330 million) for a.s.r. and € 548 million (2023: € 603 million) in relation to Aegon NL. The Aegon NL non-qualifying plan assets are ringfenced and amount to € 2,366 million (2023: € 2,374 million).

### 7.5.15.2 Post-employment benefits other than pensions

The other post-employment benefits plans consist of personnel arrangements for financial products (such as mortgages and health insurance), which remain in place after retirement.

**Changes in the defined benefit obligation**

| | 2024 | 2023 |
|---|---|---|
| **Defined benefit obligation at 1 January** | **39** | **7** |
| | | |
| **Included in income statement** | | |
| Past service cost | - | -1 |
| Other | 2 | 1 |
| **Total** | **2** | **-** |
| | | |
| **Remeasurement of liabilities included in OCI** | | |
| Other assumptions change | -1 | 2 |
| **Total** | **-1** | **2** |
| | | |
| Benefits | -4 | -2 |
| Other | - | 32 |
| | | |
| **Defined benefit obligation at 31 December** | **35** | **39** |

Experience adjustments are actuarial gains and losses that have arisen due to differences between actuarial assumptions. The following table provides information about experience adjustments with respect to qualifying plan assets and the DB obligation:

**Experience adjustments to defined benefit obligation**

| (in € thousands) | 2024 | 2023 |
|---|---|---|
| Experience adjustments to defined benefit obligation, loss (gain) | 661 | -258 |
| As a % of liabilities as at 31 December | 1.9% | -0.7% |

**Principal actuarial assumptions and parameters at year-end**

| | 2024 | 2023 |
|---|---|---|
| Discount rate | 3.3% | 3.3% |

In accordance with a.s.r.'s policy, discounts on employee mortgages have been fixed in amounts granted on the reference date December 2017 and for former Aegon NL employees on the reference date January 2023.

In the calculation of the DB obligation the:
- Discount rate is based on an internal curve for high quality corporate bonds;
- For a.s.r. post-employment benefit obligations the most recent mortality table 'a.s.r. 2024 prognosetafel' is used, in combination with a.s.r. specific experience factors for the pension portfolio;
- For former Aegon NL post-employment benefit obligations the 'a.s.r. 2024 prognosetafel' is used, in combination with a.s.r. specific experience factors for the pension portfolio.

The sensitivity of the above actuarial assumptions to feasible possible changes at the reporting date to one of the relevant actuarial assumptions whilst other assumption remain constant, would have affected the DB obligation by the amounts of € 1 million increase (2023: € 1 million increase) or € 1 million decrease (2023: € 1 million decrease) as a result of a movement of the discount rate by 1%.

### 7.5.15.3 Other long-term employee benefits

Other long-term employee benefits consist of the employer's share of liabilities arising from long-term services, such as jubilee benefits.

**Changes in other long-term employee benefits**

| | 2024 | 2023 |
|---|---|---|
| **Net liability as at 1 January** | **19** | **12** |
| | | |
| Total expenses | 10 | 1 |
| Actuarial gains and losses | - | 1 |
| Other | -2 | 5 |
| | | |
| **Net liability as at 31 December** | **27** | **19** |

**Underlying assumptions**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Discount rate | 3.1% | 3.2% |
| Salary increases | 2.1% | 2.5% |
| Expected remaining service years a.s.r. | 8.4 | 8.3 |
| Expected remaining service years former Aegon NL | 8.4 | 8.7 |

## 7.5.16 Provisions

**Changes in provisions**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 414 | 18 |
| Additional foreseen amounts | 37 | 369 |
| Reversal of unused amounts | -3 | -5 |
| Usages in course of year | -34 | -12 |
| Changes in the composition of the group | -1 | 44 |
| **At 31 December** | **413** | **414** |

The provisions were created for:
- Settlement to the claimants for unit-linked products;
- VAT and legal issues;
- Employee restructuring expenses;
- Retention of disability risk instead of insuring it with the Employee Insurance Agency (*Uitvoeringsinstituut Werknemersverzekeringen* - UWV);
- Dismantling costs wind turbines; and
- Other expenses.

The provision for the settlement to the claimants for unit-linked products is a provision to cover cost from legal and operational actions related to the transparency and cost discussion of investment insurance policies. At the end of November 2023, a.s.r. and five consumer protection organisations agreed on a settlement to be paid to the claimants to a maximum of € 250 million. The agreement became final on 19 February 2025, as at least 90% of the affiliate customers agreed to the settlement.

It has also been decided to set up a leniency scheme for customers who are not affiliate with the consumer protection organisations for distressing cases that are assessed on their merits. This initiative is to resolve long-lasting and historical disputes concerning unit-linked life insurances. The provision is calculated as the best estimate of the expenditure required to settle these claims, taking into account the settlements reached, management's opinion and consultation with its legal advisors. The provision recognised by a.s.r. to finalise the unit-linked life insurance claims amounts to € 300 million (2023: € 300 million) as a result of the settlement offer made in 2023. In addition, € 36 million (2023: € 37 million) is recognised in the insurance liabilities as remaining portion of the previous agreements. See section 7.7.7.2 for details of the contingent liability relating to unit-linked products.

The provision for VAT and legal issues is based on best estimates available at year-end, making allowance for expert opinions.

The provisions for employee restructuring are based on arrangements agreed in the Collective Bargaining Agreement, restructuring plans, and on decisions made by a.s.r.'s management. The restructuring provision amounting to € 57 million (2023: € 51 million) relates mainly to the reorganisation of a.s.r. Nederland due to the integration of Aegon NL entities and the consequential program to achieve a lower cost level. This program will be continued in 2025.

The timing of the outflow of resources related to these provisions is uncertain because of the unpredictability of the outcome and the time required for the settlement of disputes.

An amount of € 368 million (2023: € 381 million) of the provisions is expected to be settled within twelve months after the balance sheet date.

## 7.5.17 Borrowings

See accounting policies U and V.

**Borrowings**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Loans | 3,061 | 5,363 |
| Lease liabilities | 74 | 88 |
| **Total Borrowings** | **3,135** | **5,451** |

As at year-end, borrowings had the following terms to maturity:

**Maturity of borrowings**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Maturity - Falling due within 1 year | 115 | 1,022 |
| Maturity - Falling due between 1 and 5 years | 846 | 2,481 |
| Maturity - Falling due after 5 years | 2,174 | 1,948 |
| **Maturity Borrowings** | **3,135** | **5,451** |

At year-end 2024, the fair value of borrowings was € 3,136 million (2023: € 5,520 million). For information regarding the fair value, see section 7.7.1.2. The average interest rate payable on loans was 4.18% (2023: 2.61%). The average incremental borrowing rate on the lease liabilities was 3.81% (2023: 1.95%).

On 20 March 2024, Aegon hypotheken closed a transaction under the Dutch SAECURE programme to sell Class A mortgage backed securities (RMBS). 'SAECURE 22' consisted of a principal amount of € 600 million of class A notes.

In 2023 Aegon life restructured 'SAECURE 17', by expanding 'SAECURE 17' with new mortgage loans and extend the FORD for the next 5 years. After the restructuring 'SAECURE 17' exists of € 4,350 million of class A notes with a first optional redemption date in January 2030.

The following structured entities are group companies and have been consolidated:

- SAECURE 17 B.V.;
- SAECURE 18 NHG B.V.;
- SAECURE 20 B.V.;
- SAECURE 21 B.V.;
- SAECURE 22 B.V.;
- Aegon Hypotheken Financiering B.V.;
- Aegon Hypotheken Prefunding B.V.;
- Delphinus 2023-I B.V.
- Orcinus 2023 B.V.

The structured entities relate to the funding or securitisation of mortgage loans. a.s.r. holds no shares in the structured entities. The contractual agreements with these entities do not include provisions in which a.s.r. could be required to provide financial support in certain circumstances. a.s.r. has not provided, nor has intentions to provide, financial or other support without having a contractual obligation to do so.

## 7.5.18 Savings deposits

**Savings deposits**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 11,967 | - |
| Deposits | 23,192 | 13,381 |
| Withdrawals | -23,433 | -12,805 |
| Interest credited | 140 | 69 |
| Other | 104 | 64 |
| Changes in the composition of the group | -11,969 | 11,258 |
| **At 31 December** | **-** | **11,967** |

With the sale of Knab, a.s.r. no longer has savings deposits on the balance sheet, see section 7.4.6.

## 7.5.19 Due to banks

See accounting policy E.

The amounts due to banks increased from € 5,445 million to € 5,550 million as a result of the increase in liability recognised for cash collateral under ISDAs (International Swaps and Derivatives Association) and Client Clearing Agreements (CCA) concluded with counterparties and Repurchase agreements. There is no significant difference between the carrying amount and the fair value of these liabilities (see section 7.7.1.2). The average interest rate for the cash collateral received in 2024 is 3.65% and based on €STR (2023: 3.21%). Additionally the amount decreased because of the sell of Knab and the termination of the unsecured Revolving Credit Facility (RCF).

€ 517 million (2023: € 383 million) of cash on the balance sheet has been borrowed by entering into repurchase agreements. The asset recognised for cash collateral paid on repurchase agreements is presented under other financial assets. The liability recognised for cash collateral received on repurchase agreements is presented under due to banks. The liability related to cash collateral received on derivate instruments is also included in due to banks.

a.s.r.'s unsecured Revolving Credit Facility (RCF) amounts to € 600 million in 2024 (2023: € 600 million). The RCF can be used for multiple purposes including investment purposes, balance sheet management and short-term cash flow management. As per the year - end 2024 the RCF is undrawn and fully available.

An amount of € 5,158 million due to banks (2023: € 4,718 million) is expected to be settled within twelve months after the balance sheet date.

## 7.5.20 Other liabilities

**Other liabilities**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **Financial liabilities** | | |
| Due to customers | 249 | 216 |
| Trade payables | 371 | 554 |
| | | |
| **Non-financial liabilities** | | |
| Deferred income | 11 | 11 |
| Short-term employee benefits | 44 | 28 |
| Other non-financial liabilities | 647 | 567 |
| | | |
| **Total other liabilities** | **1,322** | **1,376** |

The carrying value of other liabilities approximates their fair value (see section 7.7.1.2 for further information on other financial liabilities).

An amount of € 184 million (2023: € 63 million) of the other liabilities is expected to be settled more than one year after the balance sheet date.

# 7.6 Notes to the consolidated income statement

## 7.6.1 Insurance contract revenue

See accounting policy W1.

**Insurance contract revenue**

| 2024 | Non-life | Life | Total |
|---|---|---|---|
| **Contracts not measured under the PAA** | | | |
| Amounts relating to changes in liabilities for remaining coverage: | | | |
| - Expected insurance claims, benefits and expenses | 1,786 | 3,459 | 5,245 |
| - Release of the risk adjustment for non-financial risk for risk expired | 23 | 191 | 214 |
| - CSM recognised in profit or loss for services provided | 148 | 312 | 461 |
| - Other/ experience adjustments arising from premiums not relating to future service | 66 | 18 | 84 |
| Recovery of insurance acquisition cash flows | 24 | 6 | 31 |
| | **2,047** | **3,987** | **6,034** |
| | | | |
| **Contracts measured under the PAA** | **3,567** | **-** | **3,567** |
| | | | |
| **Insurance contract revenue** | **5,614** | **3,987** | **9,601** |

**Insurance contract revenue**

| 2023 | Non-life | Life | Total |
|---|---|---|---|
| **Contracts not measured under the PAA** | | | |
| Amounts relating to changes in liabilities for remaining coverage: | | | |
| - Expected insurance claims, benefits and expenses | 1,465 | 2,362 | 3,827 |
| - Release of the risk adjustment for non-financial risk for risk expired | 33 | 120 | 154 |
| - CSM recognised in profit or loss for services provided | 70 | 210 | 280 |
| - Other/ experience adjustments arising from premiums not relating to future service | 94 | 17 | 111 |
| Recovery of insurance acquisition cash flows | 24 | 6 | 30 |
| | **1,686** | **2,716** | **4,402** |
| | | | |
| **Contracts measured under the PAA** | **3,693** | **-** | **3,693** |
| | | | |
| **Insurance contract revenue** | **5,379** | **2,716** | **8,095** |

The increase in total Non-life (€ 235 million) and Life (€ 1,271 million) insurance contract revenue is mostly related to the acquired activities of Aegon NL. Furthermore, the Non-life increase is also driven by organic growth of the P&C and Disability portfolios.

The insurance contract revenue related to the a.s.r. and Aegon NL post-employment benefit plans of € 254 million (2023: € 182 million) are not included in the life figures since these have been eliminated in the consolidation process.

**Insurance Contract Revenue reconciliation**

| | 31 December 2024 | | 31 December 2023 | |
|---|---|---|---|---|
| | Notes to the consolidated balance sheet | Notes to the consolidated income statement | Notes to the consolidated balance sheet | Notes to the consolidated income statement |
| 7.5.13.1 Insurance contracts Non-Life | 5,614 | | 5,379 | |
| 7.5.13.2 Insurance contracts Life | 2,906 | | 2,113 | |
| 7.5.14.1 Life - Direct participating insurance contracts | 1,081 | | 603 | |
| 7.6.1 Insurance contract revenue Non-Life | | 5,614 | | 5,379 |
| 7.6.1 Insurance contract revenue Life | | 3,987 | | 2,716 |
| **Insurance contract revenue** | **9,601** | **9,601** | **8,095** | **8,095** |

## 7.6.2 Insurance service expenses

See accounting policy W2.

Total insurance service expenses increased by € 1,112 million to € 8,739 million comprising claims and benefits (€ 989 million increase) and insurance service operating expenses (€ 123 million increase). The increase in insurance service expenses was mostly in the Life segment, this increase was mainly driven by the acquired activities of Aegon NL.

## 7.6.3 Net result from reinsurance contracts

See accounting policy W1.

**Net result from reinsurance contracts**

| | 2024 | 2023 |
|---|---|---|
| Allocation of reinsurance premiums paid | -678 | -392 |
| Amounts recoverable from reinsurers | 559 | 331 |
| Changes in amounts recoverable arising from changes in liability for incurred claims | 29 | 34 |
| **Net result from reinsurance contracts** | **-90** | **-27** |

## 7.6.4 Direct investment income

See accounting policy W3.

**Direct investment income**

| | 2024 | 2023 |
|---|---|---|
| Interest income from investments at FVTPL | 2,160 | 1,435 |
| Interest income from derivatives | 3,449 | 2,168 |
| Interest income from debt instruments at amortised cost | 184 | 107 |
| **Total interest income** | **5,793** | **3,710** |
| | | |
| Dividends received | 385 | 283 |
| Investment income related to direct participating insurance contracts | 11 | 10 |
| Rental income from investment property | 144 | 91 |
| Other direct investment income | 18 | 44 |
| **Total dividend and other investment income** | **558** | **428** |
| | | |
| **Total direct investment income** | **6,351** | **4,137** |

Interest income increased mainly due to the assets acquired through the acquisition of Aegon NL. In addition, more interest income from derivatives is recognised compared to last year due to increasing interest rates.

For equity instruments measured at FVOCI, dividends received during the year amount to € 61 million (2023: € 72 million), of which € 8 million (2023: € 19 million) relates to instruments derecognised during the year.

The effective interest method has been applied to an amount of € 184 million (2023: € 107 million) of the interest income from financial instruments measured at amortised cost. Included within interest income is nil (2023: nil) of interest received on impaired fixed-income securities.

The interest income from interest derivatives and interest expenses on interest derivatives (see section 7.6.8) is not netted in the income statement. However, the net interest result on interest derivatives amounts to € 54 million (2023: € 138 million).

## 7.6.5 Net fair value gains (and losses)

See accounting policy D and E.

**Net fair value gains (and losses) per category**

| | 2024 | 2023 |
|---|---|---|
| **Net fair value gains (and losses) on financial instruments measured at FVTPL** | | |
| Investments | | |
| - Real estate equity funds | 219 | -203 |
| - Mortgage equity funds | 50 | -5 |
| - Government bonds | -441 | 814 |
| - Corporate bonds | 210 | 364 |
| - Asset-backed securities | 1 | -6 |
| - Other investment funds | 123 | 81 |
| - Other equity funds | 32 | 30 |
| - Mortgage loans | 982 | 251 |
| - Private loans | 87 | 236 |
| Investments related to direct participating insurance contracts | 3,218 | 2,325 |
| Derivatives | -253 | 956 |
| Cash and cash equivalents | 23 | -4 |
| | **4,250** | **4,839** |
| | | |
| **Net fair value gains (and losses) on financial instruments not measured at FVTPL** | | |
| Net foreign exchange gains (and losses) | -2 | - |
| Derecognition of financial liabilities at amortised cost | - | -1 |
| | **-2** | **-1** |
| | | |
| **Other net fair value gains (and losses)** | | |
| Investment property, property for own use and plant | 211 | -91 |
| | **211** | **-91** |
| | | |
| **Total net fair value gains (and losses)** | **4,459** | **4,747** |

Net fair value gains and losses are mainly due to movements in interest rates, revaluations and includes fair value gains and losses on assets acquired through the acquisition of Aegon NL. Net fair value gains and losses for investments related to direct participating insurance contracts are mainly due to movements in interest rates as well as movements in stock market prices.

## 7.6.6 Impairments

See accounting policy C and E.

**Impairments**

| | 2024 | 2023 |
|---|---|---|
| Intangible assets | - | -13 |
| Property, plant and equipment | -3 | - |
| Financial assets at amortised cost | 1 | -22 |
| | | |
| **Total impairments** | **-2** | **-36** |
| | | |
| **Impairments are presented in the following income statement line items:** | | |
| Impairments on financial assets | 1 | -22 |
| Other expenses | -3 | -13 |
| | | |
| **Total impairments** | **-2** | **-36** |

In 2023, the impairment in intangible assets related to an impairment of goodwill in segment Distribution and Services, see section 7.5.1.

For more information regarding loss allowance see section 7.8.4.7.

## 7.6.7 Net finance income and expenses from (re)insurance contracts

See accounting policy W4.

The table on the next page shows the sources of finance income and expenses recognised in profit or loss and other comprehensive income in relation to the total net finance expenses from (re)insurance contracts.

**Investment and (re)insurance finance result current period**

| 2024 | Non-Life | Life GMM | Life VFA | Other | Total |
|---|---|---|---|---|---|
| **Investment income** | | | | | |
| Direct investment income | 480 | 5,424 | 11 | 436 | 6,351 |
| Net fair value gains (and losses) | 203 | 1,068 | 3,218 | -29 | 4,459 |
| Net impairment (loss)/reversal on financial assets | 1 | - | - | | 1 |
| Amounts recognised in other comprehensive income | 57 | 180 | - | 7 | 243 |
| **Total investment income** | **740** | **6,671** | **3,229** | **414** | **11,054** |
| | | | | | |
| **Net finance expenses from insurance contracts** | | | | | |
| Changes in fair value of underlying items of direct participating contracts | - | - | -3,232 | - | -3,232 |
| Effects of risk mitigation option | - | - | 180 | - | 180 |
| Interest accreted | -312 | -2,023 | -24 | - | -2,360 |
| Effect of changes in interest rates and other financial assumptions | 44 | -323 | 4 | - | -275 |
| Effect of measuring changes in estimates at current rates and adjusting the CSM at rates on initial recognition | -4 | -67 | - | - | -71 |
| Net foreign exchange loss | - | - | - | - | - |
| **Total net finance expenses from insurance contracts** | **-272** | **-2,414** | **-3,072** | **-** | **-5,757** |
| | | | | | |
| **Net finance income from reinsurance contracts** | | | | | |
| Interest accreted | 11 | 9 | - | - | 20 |
| Other | -1 | 7 | - | - | 6 |
| **Total net finance income from reinsurance contracts** | **10** | **16** | **-** | **-** | **26** |
| | | | | | |
| **Total** | **478** | **4,273** | **157** | **414** | **5,322** |

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**Investment and (re)insurance finance result prior period**

| 2023 | Non-Life | Life GMM | Life VFA | Other | Total |
|---|---|---|---|---|---|
| **Investment income** | | | | | |
| Direct investment income | 392 | 3,583 | 10 | 152 | 4,137 |
| Net fair value gains (and losses) | 186 | 2,245 | 2,325 | -9 | 4,747 |
| Net impairment (loss)/ reversal on financial assets | - | 1 | - | -23 | -22 |
| Amounts recognised in other comprehensive income | 56 | 162 | - | 10 | 227 |
| **Total investment income** | **634** | **5,991** | **2,335** | **130** | **9,089** |
| | | | | | |
| **Net finance expenses from insurance contracts** | | | | | |
| Changes in fair value of underlying items of direct participating contracts | - | - | -2,288 | - | -2,288 |
| Effects of risk mitigation option | - | - | -239 | - | -239 |
| Interest accreted | -225 | -1,348 | -19 | - | -1,592 |
| Effect of changes in interest rates and other financial assumptions | -33 | -1,232 | 10 | - | -1,255 |
| Effect of measuring changes in estimates at current rates and adjusting the CSM at rates on initial recognition | 5 | 164 | - | - | 169 |
| **Total net finance expenses from insurance contracts** | **-253** | **-2,416** | **-2,536** | **-** | **-5,205** |
| | | | | | |
| **Net finance income from reinsurance contracts** | | | | | |
| Interest accreted | 8 | -3 | - | - | 5 |
| Other | 2 | -14 | - | - | -11 |
| **Total net finance income from reinsurance contracts** | **10** | **-16** | **-** | **-** | **-6** |
| | | | | | |
| **Total** | **391** | **3,558** | **-201** | **130** | **3,878** |

See section 7.6.5 for more information regarding net fair value gains and (losses).

Amounts recognised in other comprehensive income relate to revaluation of equity and debt instruments held at FVOCI.

## 7.6.8 Other finance expenses

**Breakdown of the other finance expenses**

| | 2024 | 2023 |
|---|---|---|
| **Other finance expenses on financial liabilities not measured at fair value** | | |
| Subordinated liabilities | -115 | -115 |
| Borrowings | -179 | -74 |
| Due to banks | -149 | -75 |
| Other financial liabilities | -3 | -2 |
| | | |
| **Other finance expenses on other liabilities** | | |
| Employee benefits | -176 | -142 |
| Derivatives | -3,395 | -2,030 |
| Other finance or fee expenses | -1 | -11 |
| | | |
| Interest expenses on financial assets | -13 | -3 |
| | | |
| **Total other finance expenses** | **-4,031** | **-2,451** |

The increase in finance expenses on employee benefits relates to the acquisition of Aegon partly offset by the accrual on the DB obligation of post-employment benefits pensions as a result of a decreased discount rate, see section 7.5.15. The interest expense is calculated based on interest rates as of 31 December of the previous year. (31 December 2023: 3.42%; 31 December 2022: 3.67%).

Finance expenses on derivatives increased due to increased variable interest rates and the acquisition of Aegon NL.

Other finance expenses increased by € 1,580 million mainly due to higher expenses on derivatives contracts (€ 1,365 million) caused by higher variable interest rates. In combination with € 1,281million higher interest income on derivatives as part of the Direct investment income line, the net interest income on derivative contracts decreased by € 84 million.

## 7.6.9 Fee income

**Fee income**

| | 2024 | 2023 |
|---|---|---|
| Asset management for third parties | 144 | 85 |
| Other fee income | 374 | 243 |
| | | |
| **Total fee income** | **518** | **328** |

Other fee income mainly relates to the fee income from the Distribution and Services entities.

The increase of fee income is mostly related to the acquired activities of Aegon NL.

## 7.6.10 Other income

**Other income**

| | 2024 | 2023 |
|---|---|---|
| Proceeds from sales of property developments | 16 | 25 |
| Revenues generated by wind farms and solar parks | 43 | 63 |
| Revenues projects | 12 | 10 |
| Other income | 35 | 273 |
| | | |
| **Total other income** | **107** | **372** |

In 2024, other income related mainly to electricity yields.

## 7.6.11 Operating and other expenses

**Operating and other expenses**

| | 2024 | 2023 |
|---|---|---|
| Salaries and wages | -567 | -444 |
| Social security contributions | -81 | -62 |
| Employee benefit charges | -113 | -84 |
| Employee discounts | -3 | -3 |
| Other short-term employee benefits | -33 | -24 |
| **Total cost of own staff** | **-797** | **-617** |
| | | |
| Cost of external staff | -204 | -146 |
| Consultancy costs and fees | -209 | -144 |
| Marketing, advertising and public relations expenses | -19 | -44 |
| Technology and system costs | -165 | -120 |
| Amortisation of other intangible assets (section 7.5.1) | -47 | -26 |
| Depreciation of property, plant and equipment (section 7.5.2) | -29 | -24 |
| Restructuring provision expenses | -27 | -58 |
| Commission expenses | -789 | -707 |
| Costs associated with sale of development property | -13 | -7 |
| Operating expenses of wind farms and solar parks | -28 | -29 |
| Impairments on non-financial assets | -3 | -13 |
| Realised losses on derecognition of associates and joint ventures at equity method | -2 | - |
| Other | -73 | -372 |
| | | |
| Amounts attributed to insurance acquisition cash flows | 38 | 22 |
| Insurance acquisition cash flows recognised in profit or loss | -8 | -15 |
| | | |
| **Total operating and other expenses** | **-2,376** | **-2,300** |

**Presentation of the operating and other expenses in the income statement**

| | 2024 | 2023 |
|---|---|---|
| Total operating expenses are presented in the following income statement line items: | | |
| Insurance service operating expenses | -1,350 | -1,227 |
| Investment operating expenses | -205 | -146 |
| Other expenses | -821 | -927 |
| | | |
| **Total operating and other expenses** | **-2,376** | **-2,300** |

In 2023 'Other' expense related mainly to an expense of € 300 million for the settlement agreement with the consumer protection organisations on the unit-linked products (€ 250 million) and an additional provision of € 50 million to facilitate individual claims of customers in distressing situations (see section 7.5.16).

**Segmentation of a.s.r.'s internal workforce**

| Segments | 2024 | 2023 |
|---|---|---|
| Non-life | 1,728 | 1,810 |
| Life | 752 | 735 |
| Asset Management | 771 | 808 |
| Banking | - | 438 |
| Distribution and Services | 2,436 | 2,396 |
| Holding and Other | 1,687 | 1,807 |
| | | |
| **Total workforce** | **7,373** | **7,994** |

Employees related to administrative activities and overhead are allocated to segment Holding and Other.

## 7.6.12 Income tax expense

**Income tax (expense) / gain**

| | 2024 | 2023 |
|---|---|---|
| Current taxes for the current period | -91 | -99 |
| Current taxes referring to previous periods | 156 | -6 |
| **Total current tax** | **66** | **-105** |
| | | |
| Deferred taxes arising from current period | -448 | -169 |
| **Total deferred tax** | **-448** | **-169** |
| | | |
| **Total income tax (expense) / gain** | **-383** | **-275** |

The expected income tax expense is determined by applying the tax rate in the Netherlands to the result before tax. In 2024, this rate was 25.8% (2023: 25.8%). The enacted tax rate for 2025 will be 25.8%.

The impact of the current tax to previous periods is to a highly extent set off in the deferred taxes arising from current period.

**Reconciliation of expected income tax (expense) / gain with the actual income tax (expense) / gain**

| | 2024 | 2023 |
|---|---|---|
| Result before tax from continuing operations | 1,447 | 1,278 |
| Current tax rates | 25,8% | 25,8% |
| **Expected income tax expense** | **-373** | **-330** |
| | | |
| **Effects of:** | | |
| Tax on interest on other equity instruments | 15 | 12 |
| Tax-exempt dividend | 11 | 9 |
| Tax-exempt capital gains | -1 | 1 |
| Tax-exempt associates and joint ventures | 2 | 1 |
| Tax-exempt other income | -3 | 6 |
| Changes in impairments | -2 | -6 |
| Adjustments for taxes due on previous financial years | -15 | - |
| Other effects | -16 | 32 |
| | | |
| **Total income tax (expense) / gain** | **-383** | **-275** |

The result is almost entirely earned and taxable in the Netherlands.

The effective income tax rate is 26.5% (2023: 21.5%).

### International Tax Reform – Pillar II Model rules (Amendments to IAS 12)

The EU Directive Pillar Two, implemented in the Netherlands as the “Wet minimum belasting”, and is effective for accounting periods beginning on or after 1 January 2024, applies to multinational enterprises and large-scale domestic groups with consolidated revenues of € 750 million or more in at least two out of the last four years. These revenues, as defined by the OECD, include any form of income and are therefore not limited to revenue recognised in accordance with IFRS 15. a.s.r. operates in the Netherlands as a large-scale domestic group and should, in principle, be subject to the top-up tax rules under Pilar 2. a.s.r. has determined that any top-up tax due under Pillar 2 is an income tax within the scope of IAS 12 and accounts for it as a current tax when it is incurred.

However, a.s.r. has assessed the potential exposure to Pillar 2 and does not expect the impact of the Pillar 2 income taxes to be material. This is because a.s.r. can rely on:

- The domestic group exemption during the first five years after the Pillar 2 legislation comes into effect; and
- The Transitional CbCR Safe Harbour rules during the first three years after the Pillar 2 legislation comes into effect, which allows a.s.r. to reduce the top-up tax to zero.

Although a.s.r. could reduce any top-up tax to zero during the first five years by applying a combination of the domestic group exemption and the Transitional CbCR Safe Harbour rules, a.s.r. notes that it applies the temporary mandatory relief from recognising and disclosing information about deferred taxes related to Pillar 2 income taxes.

a.s.r. will continue to monitor the developments of Pillar 2 legislation, the applicability of the domestic group exemption, and the applicability of the CbCR Safe Harbour rules on the Group's financial position.

# 7.7 Other notes

## 7.7.1 Fair value of assets and liabilities

See accounting policy B.

### 7.7.1.1 Financial assets and liabilities measured at fair value

**Breakdown of financial assets measured at fair value**

| 31 December 2024 | Fair value based on quoted prices in an active market Level 1 | Fair value based on observable market data Level 2 | Fair value not based on observable market data Level 3 | Total fair value |
|---|---|---|---|---|
| **Investments at FVTPL** | | | | |
| **Investments - own risk** | | | | |
| Real estate equity funds | - | - | 5,428 | 5,428 |
| Mortgage equity funds | - | - | 2,031 | 2,031 |
| Debt equity funds | 12 | 64 | 562 | 639 |
| Government bonds | 14,516 | 1,259 | - | 15,774 |
| Corporate bonds | 9,854 | 767 | - | 10,621 |
| Asset-backed securities | - | - | 3,023 | 3,023 |
| Other investment funds | 740 | 720 | 608 | 2,068 |
| Equities | 553 | - | - | 553 |
| Mortgage loans | - | - | 25,398 | 25,398 |
| Private loans | 29 | 9,535 | 19 | 9,584 |
| | **25,704** | **12,346** | **37,070** | **75,119** |
| | | | | |
| **Investments related to direct participating insurance contracts** | | | | |
| Real estate equity funds | 243 | - | - | 243 |
| Mortgage equity funds | - | - | 352 | 352 |
| Debt equity funds | 18 | - | - | 18 |
| Government bonds | 6,373 | - | - | 6,373 |
| Corporate bonds | 3,375 | - | - | 3,375 |
| Asset-backed securities | - | - | 333 | 333 |
| Other investment funds | 299 | 224 | 373 | 896 |
| Derivatives | -31 | 104 | - | 73 |
| Equities | 16,078 | - | - | 16,078 |
| Mortgage loans | - | - | 1,421 | 1,421 |
| Private loans | - | 245 | - | 245 |
| Other investments | 2,493 | 1,124 | - | 3,617 |
| | **28,850** | **1,697** | **2,478** | **33,025** |
| | | | | |
| **Investments at FVOCI** | | | | |
| Equities | 2,643 | - | 53 | 2,696 |
| Preference shares | - | 129 | 4 | 134 |
| Other participating contracts | 11 | - | - | 11 |
| | **2,654** | **129** | **57** | **2,841** |

**Breakdown of financial assets measured at fair value**

| 31 December 2024 | Fair value based on quoted prices in an active market Level 1 | Fair value based on observable market data Level 2 | Fair value not based on observable market data Level 3 | Total fair value |
|---|---|---|---|---|
| **Derivatives** | | | | |
| Foreign exchange contracts | - | 46 | - | 46 |
| Interest rate contracts | | | | |
| - Swaps | - | 10,644 | - | 10,644 |
| - Options | - | 704 | - | 704 |
| - Futures | 52 | - | - | 52 |
| Equity index contracts | 31 | 13 | - | 44 |
| Inflation linked swaps | - | 277 | - | 277 |
| | **84** | **11,684** | **-** | **11,767** |
| | | | | |
| **Cash and cash equivalents** | 2,564 | 1,629 | - | 4,194 |
| | | | | |
| **Total financial assets measured at fair value** | **59,855** | **27,485** | **39,606** | **126,946** |

**Breakdown of financial liabilities measured at fair value**

| 31 December 2024 | Fair value based on quoted prices in an active market Level 1 | Fair value based on observable market data Level 2 | Fair value not based on observable market data Level 3 | Total fair value |
|---|---|---|---|---|
| **Financial liabilities** | | | | |
| | | | | |
| **Derivatives** | | | | |
| Foreign exchange contracts | - | 189 | - | 189 |
| Interest rate contracts | | | | |
| - Swaps | - | 8,334 | - | 8,334 |
| - Options | - | 49 | - | 49 |
| - Futures | 3 | - | - | 3 |
| Equity index contracts | - | 55 | - | 55 |
| Inflation linked swaps | - | 37 | - | 37 |
| | **3** | **8,663** | **-** | **8,666** |
| | | | | |
| **Total financial liabilities measured at fair value** | **3** | **8,663** | **-** | **8,666** |

## Breakdown of financial assets measured at fair value

| 31 December 2023 | Fair value based on quoted prices in an active market<br>Level 1 | Fair value based on observable market data<br>Level 2 | Fair value not based on observable market data<br>Level 3 | Total fair value |
|---|---|---|---|---|
| **Investments at FVTPL** | | | | |
| **Investments - transferred under repurchase agreements** | | | | |
| Government bonds | 213 | - | - | 213 |
| | **213** | **-** | **-** | **213** |
| | | | | |
| **Investments - own risk** | | | | |
| Real estate equity funds | - | - | 5,253 | 5,253 |
| Mortgage equity funds | - | - | 997 | 997 |
| Debt equity funds | 19 | 70 | 684 | 772 |
| Government bonds | 15,109 | 745 | - | 15,854 |
| Corporate bonds | 9,204 | 744 | - | 9,948 |
| Asset-backed securities | - | - | 3,013 | 3,013 |
| Other investment funds | 606 | 974 | 572 | 2,153 |
| Equities | 247 | - | - | 247 |
| Mortgage loans | - | - | 24,494 | 24,494 |
| Private loans | 32 | 8,932 | 12 | 8,976 |
| | **25,217** | **11,465** | **35,024** | **71,706** |
| | | | | |
| **Investments related to direct participating insurance contracts** | | | | |
| Real estate equity funds | 278 | - | - | 278 |
| Mortgage equity funds | - | - | 271 | 271 |
| Debt equity funds | 18 | - | - | 18 |
| Government bonds | 6,013 | - | - | 6,013 |
| Corporate bonds | 2,936 | - | - | 2,936 |
| Asset-backed securities | - | - | 351 | 351 |
| Other investment funds | 518 | 258 | 421 | 1,197 |
| Derivatives | 12 | 86 | - | 98 |
| Equities | 14,252 | - | - | 14,252 |
| Mortgage loans | - | - | 1,357 | 1,357 |
| Private loans | - | 208 | - | 208 |
| Other investments | 1,989 | 1,386 | - | 3,375 |
| | **26,016** | **1,937** | **2,400** | **30,352** |

## Breakdown of financial assets measured at fair value

| 31 December 2023 | Fair value based on quoted prices in an active market<br>Level 1 | Fair value based on observable market data<br>Level 2 | Fair value not based on observable market data<br>Level 3 | Total fair value |
|---|---|---|---|---|
| **Investments at FVOCI** | | | | |
| Government bonds | 280 | 79 | - | 359 |
| Corporate bonds | 461 | 60 | - | 521 |
| Equities | 2,291 | - | 58 | 2,348 |
| Preference shares | - | 75 | 4 | 79 |
| Other participating contracts | 5 | - | - | 5 |
| | **3,036** | **214** | **62** | **3,312** |
| | | | | |
| **Derivatives** | | | | |
| Foreign exchange contracts | - | 57 | - | 57 |
| Interest rate contracts | | | | |
| - Swaps | - | 11,655 | - | 11,655 |
| - Options | - | 709 | - | 709 |
| - Futures | 1 | 77 | - | 78 |
| Equity index contracts | 29 | 21 | - | 49 |
| Inflation linked swaps | - | 358 | - | 358 |
| | **29** | **12,878** | **-** | **12,907** |
| | | | | |
| **Cash and cash equivalents** | 6,262 | 1,648 | - | 7,910 |
| | | | | |
| **Total financial assets measured at fair value** | **60,774** | **28,141** | **37,486** | **126,401** |

### Breakdown of financial liabilities measured at fair value

| 31 December 2023 | Fair value based on quoted prices in an active market Level 1 | Fair value based on observable market data Level 2 | Fair value not based on observable market data Level 3 | Total fair value |
|---|---|---|---|---|
| **Financial liabilities** | | | | |
| | | | | |
| **Derivatives** | | | | |
| Foreign exchange contracts | - | 116 | - | 116 |
| Interest rate contracts | | | | |
| - Swaps | - | 9,766 | - | 9,766 |
| - Options | - | 59 | - | 59 |
| - Futures | 90 | - | - | 91 |
| Equity index contracts | - | 79 | - | 79 |
| Inflation linked swaps | - | 21 | - | 21 |
| | **90** | **10,041** | **-** | **10,132** |
| | | | | |
| **Total financial liabilities measured at fair value** | **90** | **10,041** | **-** | **10,132** |

Cash and cash equivalents (excluding money market instruments) are classified as level 1 when not subject to restrictions. Money market instruments are classified as level 2.

### Reclassification between categories

| 2024 | To level 1 | To level 2 | To level 3 | Total |
|---|---|---|---|---|
| **From** | | | | |
| Level 1: Fair value based on quoted prices in active market | - | 73 | - | **73** |
| Level 2: Fair value based on observable market data | 122 | - | - | **122** |
| Level 3: Fair value not based on observable market data | - | - | - | **-** |

Debt instrument funds are adjusted from level 2 to level 1 (€ 122 million) and from level 1 to level 2 (€ 73 million). Those movements are based respectively on increased and decreased observability of the inputs during the period.

### Reclassification between categories

| 2023 | To level 1 | To level 2 | To level 3 | Total |
|---|---|---|---|---|
| **From** | | | | |
| Level 1: Fair value based on quoted prices in active market | - | 125 | - | **125** |
| Level 2: Fair value based on observable market data | 145 | - | - | **145** |
| Level 3: Fair value not based on observable market data | - | - | - | **-** |

Debt instrument funds are adjusted from level 2 to level 1 (€ 145 million) and from level 1 to level 2 (€ 125 million). Those movements are based respectively on increased and decreased observability of the inputs during the period.

The following two tables show the movement in financial assets measured at fair value including investments relating to direct participating insurance contracts and investment property that are categorised within level 3.

### Changes in financial assets classified as FVOCI categorised within level 3

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 62 | 71 |
| | | |
| Unrealised gains and losses recognised in other comprehensive income | -4 | -9 |
| | | |
| **At 31 December** | **57** | **62** |

### Changes in financial assets at FVTPL categorised within level 3

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 37,424 | 15,016 |
| | | |
| Changes in value of investments, realised/unrealised gains and losses: | | |
| - Fair value gains and losses | 1,394 | 158 |
| | | |
| Purchases | 6,492 | 5,725 |
| Disposals | -3,467 | -3,400 |
| Repayments | -2,193 | -1,357 |
| | | |
| Exchange rate differences | 8 | -6 |
| Other changes | -110 | -170 |
| Changes in the composition of the group | - | 21,456 |
| | | |
| **At 31 December** | **39,548** | **37,424** |
| | | |
| **Total revaluations of investments, held at end of period, recognised in the income statement** | **1,381** | **217** |

**Unobservable inputs used in determining the fair value for financial assets measured at fair value (recurring basis) that are categorised within level 3**

*Investments at FVOCI*

The main non-observable market input for the equities classified as level 3 is the net asset value as published by the investee. It is estimated that a 10% increase in valuation of these equities would have no impact on net result due to the non-recycling nature of equity treatment, but would increase equity by € 5 million (2023: € 6 million), being approximately 0.1% (before tax) (2023: 0.1% (before tax)) of total equity.

*Investments at FVTPL*

The mortgage loan portfolio is classified as level 3 'not measured on the basis of market observable market data'. Non-observable market inputs are used in the valuation methods, in addition to the observable market inputs. The valuation method used to determine the fair value of the mortgage loan portfolio is based on the mortgage spread of the risk-free interest rate curve and assumptions for unexpected full prepayments, originating costs, and the options related to early redemption and moving. A slight increase in the mortgage spread used would result in a significant decrease in fair value, and vice versa.

The mortgage loan portfolio consists of high quality mortgages with a relatively fixed return, limited arrears. The mortgage loan portfolio consists only of Dutch mortgages with a limited counterparty default risk in line with the strategic investment plan, see section 7.8.4.

The fair value of asset-backed securities is based on quotes retrieved from brokers or data vendors. The quotes are validated monthly and challenged if deemed necessary. The fair value of securitisations are determined based on a discounted cash flow model in case market quotes are insufficiently liquid.

The main non-observable market input for the other investment funds classified as level 3 is the net asset value as published by the investee. It is estimated that a 10% increase in valuation of these equities would increase result before tax and equity by € 61 million (2023: € 57 million), being approximately 0.7% (before tax) (2023: 0.6% (before tax)) of total equity.

The method of determining the fair value of the mortgage equity funds is based on the valuation of the underlying mortgage loans. The discounting curve used in this valuation is based on the two lowest tariffs in the market, excluding that of a.s.r.

The table on the next page discloses the sensitivities to non-observable market inputs for the real estate equity funds.

**Unobservable and observable inputs used in determination of fair value**

31 December 2024

| | Fair value | Valuation technique | Gross | Gross theoretical rental value (€) | Gross | Gross yield (%) |
|---|---|---|---|---|---|---|
| **Investments at fair value through profit or loss** | | | | | | |
| Real estate equity funds associates | 3,485 | DCF | | 118,027,068 | | 3.4% |
| Real estate equity funds third parties | 1,943 | | | | | |
| **Total real estate equity funds** | **5,428** | | | | | |

**Unobservable and observable inputs used in determination of fair value**

31 December 2023

| | Fair value | Valuation technique | Gross | Gross theoretical rental value (€) | Gross | Gross yield (%) |
|---|---|---|---|---|---|---|
| **Investments at fair value through profit or loss** | | | | | | |
| Real estate equity funds associates | 3,357 | DCF | | 116,418,080 | | 3.5% |
| Real estate equity funds third parties | 1,896 | | | | | |
| **Total real estate equity funds** | **5,253** | | | | | |

The significant inputs to the level 3 values of real estate equity funds associates are disclosed in accounting policy B.

An increase (decrease) in the gross yield in isolation will result in a lower (higher) fair value of the real estate equity funds associates. An increase (decrease) in the theoretical rental value in isolation will result in a higher (lower) fair value.

The main non-observable market input for the real estate equity funds third parties is the net asset value as published by the investee. An increase or decrease in the net asset value of equities classified as level 3 will have a direct proportional impact on the fair value of the investment.

## 7.7.1.2 Financial assets and liabilities not measured at fair value

**Breakdown of financial assets and liabilities not measured at fair value**

| | Fair value based on quoted prices in an active market | Fair value based on observable market data | Fair value not based on observable market data | | |
|---|---|---|---|---|---|
| 31 December 2024 | Level 1 | Level 2 | Level 3 | Total fair value | Total carrying value |
| **Financial assets** | | | | | |
| Mortgage loans | - | - | 2,576 | 2,576 | 2,624 |
| Private loans | - | - | 9 | 9 | 9 |
| Other financial assets | 2,559 | 494 | - | 3,053 | 3,053 |
| **Total financial assets not measured at fair value** | **2,559** | **494** | **2,585** | **5,639** | **5,687** |
| | | | | | |
| **Financial liabilities** | | | | | |
| Subordinated liabilities | - | 2,205 | - | 2,205 | 2,007 |
| Borrowings | - | 3,062 | 74 | 3,136 | 3,135 |
| Due to banks | 5,429 | 121 | - | 5,550 | 5,550 |
| Other financial liabilities | 24 | 605 | - | 629 | 620 |
| **Total financial liabilities not measured at fair value** | **5,453** | **5,993** | **74** | **11,520** | **11,312** |

**Breakdown of financial assets and liabilities not measured at fair value**

| 31 December 2023 | Fair value based on quoted prices in an active market<br>Level 1 | Fair value based on observable market data<br>Level 2 | Fair value not based on observable market data<br>Level 3 | Total fair value | Total carrying value |
|---|---|---|---|---|---|
| **Financial assets** | | | | | |
| Mortgage loans | - | - | 14,308 | 14,308 | 14,590 |
| Private loans | - | - | 178 | 178 | 185 |
| Other financial assets | 2,827 | 599 | - | 3,426 | 3,425 |
| **Total financial assets not measured at fair value** | **2,827** | **599** | **14,485** | **17,911** | **18,200** |
| | | | | | |
| **Financial liabilities** | | | | | |
| Subordinated liabilities | - | 2,118 | - | 2,118 | 2,005 |
| Borrowings | - | 5,432 | 88 | 5,520 | 5,451 |
| Savings deposits | - | - | 12,121 | 12,121 | 11,967 |
| Due to banks | 5,245 | 200 | - | 5,445 | 5,445 |
| Other financial liabilities | 63 | 713 | - | 776 | 770 |
| **Total financial liabilities not measured at fair value** | **5,308** | **8,463** | **12,209** | **25,980** | **25,637** |

The method of determining the fair value of the mortgage loans at amortised cost is the same to that of mortgage loans held at FVTPL. For information regarding the measurement of the fair value of the mortgage loans, see section 7.7.1.1.

Amounts due to banks classified as level 1 primarily comprise the liability recognised for the cash collateral received.

### 7.7.1.3 Property (including land and buildings for own use and plant)

**Breakdown of the fair value of the investment property, land and buildings for own use and plant**

| 31 December 2024 | Fair value based on quoted prices in an active market<br>Level 1 | Fair value based on observable market data<br>Level 2 | Fair value not based on observable market data<br>Level 3 | Total fair value |
|---|---|---|---|---|
| Investment property | - | - | 3,364 | 3,364 |
| Land and buildings for own use | - | - | 164 | 164 |
| Plants | - | - | 386 | 386 |
| | | | | |
| **Total** | **-** | **-** | **3,913** | **3,913** |

**Breakdown of the fair value of the investment property, land and buildings for own use and plant**

| 31 December 2023 | Fair value based on quoted prices in an active market<br>Level 1 | Fair value based on observable market data<br>Level 2 | Fair value not based on observable market data<br>Level 3 | Total fair value |
|---|---|---|---|---|
| Investment property | - | - | 3,051 | 3,051 |
| Land and buildings for own use | - | - | 168 | 168 |
| Plants | - | - | 417 | 417 |
| | | | | |
| **Total** | **-** | **-** | **3,636** | **3,636** |

The property portfolio are classified as a level 3 'not measured on the basis of market observable market data'. Non- observable market inputs are used in the valuation methods, in addition to the observable market inputs. The fair value measurement at reporting date is based on valuations by independent professional appraisers. These valuations have been performed annually, with quarterly updates, for the entire portfolio of investment property, buildings for own use and plant. Independent professional appraisers use reference transactions of comparable properties, in combination with the DCF and income capitalisation method, to determine the fair value of the property or plant. The reference transactions of comparable objects of the property portfolio are generally based on observable data consisting of the land register 'Kadaster' and the rural land price monitor as published by the Dutch Government 'Grondprijsmonitor' in an active property market.

The property has a relatively fixed return. The property portfolio is well diversified and consists of residential, retail, offices and rural property, throughout the Netherlands. The retail portfolio focusses on high street locations with relative low vacancy rates. The following table shows a breakdown of the fair value and vacancy rates of the portfolio of investment property.

## Breakdown of investment property

| | Fair value | | Vacancy rate | |
|---|---|---|---|---|
| | 31 December 2024 | 31 December 2023 | 2024 | 2023 |
| Retail | 153 | 155 | 3.1% | 3.9% |
| Residential | 2,512 | 2,347 | 1.7% | 1.7% |
| Rural | 220 | 207 | - | - |
| Offices | 399 | 287 | 15.4% | 10.4% |
| Property under development | 67 | 43 | 100.0% | 100.0% |
| Parking | 13 | 13 | - | - |
| **Total** | **3,364** | **3,051** | **5.2%** | **3.9%** |

The movements in plant and investment property measured at fair value (recurring basis) that are categorised within level 3 are presented in section 7.5.2 and section 7.5.3.

The significant inputs to the level 3 values of investment property are disclosed in accounting policy B.

An increase (decrease) in the gross yield in isolation will result in a lower (higher) fair value of the investment property and land and buildings for own use. An increase (decrease) in the theoretical rental value in isolation will result in a higher (lower) fair value.

The significant unobservable and observable inputs to the Level 3 values of plant are the energy prices and market interest rates. An increase (decrease) of the discount rate will lead to a lower (higher) fair value measurement

The table below discloses the sensitivities to non-observable market inputs for the property portfolio (excluding property under development, parking and plant).

## Unobservable and observable inputs used in determination of fair value

31 December 2024

| | Fair value | Valuation technique | Gross | Gross theoretical rental value (€) | Gross | Gross yield (%) |
|---|---|---|---|---|---|---|
| **Investment property - Fair value model** | | | | | | |
| Retail | 153 | DCF | total | 10,744,691 | mean | 7.0% |
| | | | max | 1,871,288 | max | 11.6% |
| | | | min | 104,781 | min | 2.4% |
| Residential | 2,512 | DCF | total | 126,143,320 | mean | 5.0% |
| | | | max | 5,438,948 | max | 11.8% |
| | | | min | 5,179 | min | 2.6% |
| Rural | 220 | DCF | total | 5,646,002 | mean | 2.6% |
| | | | max | 2,043,427 | max | 3.8% |
| | | | min | 12,900 | min | 1.5% |
| Offices | 399 | DCF | total | 19,446,857 | mean | 4.9% |
| | | | max | 6,440,939 | max | 9.5% |
| | | | min | 60,128 | min | 3.4% |
| Property under development | 67 | | | | | |
| Parking | 13 | | | | | |
| **Land and buildings for own use** | **163** | DCF | total | 14,465,170 | mean | 9.1% |
| | | | max | 8,663,755 | max | 22.1% |
| | | | min | 1,542,905 | min | 6.8% |
| **Plant** | **386** | | | | | |
| **Total** | **3,913** | | | | | |

**Unobservable and observable inputs used in determination of fair value**

31 December 2023

| | Fair value | Valuation technique | Gross | Gross theoretical rental value (€) | Gross | Gross yield (%) |
|---|---|---|---|---|---|---|
| **Investment property - Fair value model** | | | | | | |
| Retail | 155 | DCF | total | 11,834,440 | mean | 7.6% |
| | | | max | 1,775,241 | max | 10.4% |
| | | | min | 9,149 | min | 3.6% |
| Residential | 2,347 | DCF | total | 107,232,363 | mean | 4.6% |
| | | | max | 5,277,404 | max | 25.9% |
| | | | min | 4,807 | min | 2.6% |
| Rural | 207 | DCF | total | 5,675,431 | mean | 2.7% |
| | | | max | 733,743 | max | 7.1% |
| | | | min | 3,578 | min | 0.5% |
| Offices | 287 | DCF | total | 19,006,243 | mean | 6.6% |
| | | | max | 6,246,961 | max | 9.6% |
| | | | min | 58,024 | min | 3.9% |
| Property under development | 42 | | | | | |
| Parking | 13 | | | | | |
| **Land and buildings for own use** | **167** | DCF | total | 14,446,774 | mean | 8.9% |
| | | | max | 8,645,359 | max | 17.4% |
| | | | min | 1,542,905 | min | 6.9% |
| **Plant** | **417** | | | | | |
| **Total** | **3,636** | | | | | |

## 7.7.2 Cash flows from operating activities

**Cash flows from operating activities**

| (in € millions) | 2024 | 2023 |
|---|---|---|
| **Cash generated from operating activities** | | |
| Result before tax from continuing and discontinued operations | 1,608 | 1,389 |
| | | |
| **Adjustments on non-cash items included in result:** | | |
| Revaluation through profit or loss | 540 | 59 |
| Retained share of result of associates and joint ventures | -16 | -8 |
| Depreciation and amortisation | 113 | 78 |
| Impairments | 28 | 36 |
| Addition to provision | 37 | 363 |
| Other | -25 | -133 |
| | | |
| **Changes in operating assets and liabilities:** | | |
| Net (increase) / decrease in investment property | -86 | -43 |
| Net (increase) / decrease in investments | -1,992 | 2,649 |
| Net (increase) / decrease in investments related to direct participating contracts | 545 | 132 |
| Net (increase) / decrease in derivatives | -930 | -1,381 |
| Net (increase) / decrease in savings deposits | -102 | 644 |
| Net (increase) / decrease in amounts due to banks | 616 | 2,281 |
| Net (increase) / decrease in reinsurance contracts | -48 | 31 |
| Net increase / (decrease) in liabilities arising from insurance contracts | -1,007 | -1,178 |
| Net increase / (decrease) in liabilities arising from direct participating contracts | -658 | -83 |
| Net (increase) / decrease in other operating assets and liabilities | 780 | -1,157 |
| Income tax received (paid) | -102 | -82 |
| **Cash flows from operating activities** | **-699** | **3,597** |
| | | |
| **Further details on cash flows from operating activities:** | | |
| Interest received | 5,793 | 3,710 |
| Interest paid | -3,587 | -2,188 |
| Dividend received | 383 | 280 |
| | | |
| **Further details on lease payments:** | | |
| Total cash outflow for leases | -15 | -11 |

## 7.7.3 Offsetting of financial assets and liabilities

The following tables include information about rights to offset and the related arrangements. The amounts included consist of all recognised financial instruments that are presented net in the balance sheet under the IFRS-EU offsetting requirements (legal right to offset and intention to settle on a net basis) and amounts presented gross in the balance sheet but subject to enforceable master netting arrangements or similar arrangements.

a.s.r. mitigates credit risk in derivative contracts by entering into collateral agreements, where practical, and in ISDA master netting agreements for each of the legal entities of a.s.r. to facilitate a.s.r.'s right to offset credit risk exposure. The credit support agreement will normally dictate the threshold over which collateral needs to be pledged by a.s.r. or its counterparty. Transactions requiring a.s.r. or its counterparty to post collateral are typically the result of over-the-counter derivative trades, comprised mostly of interest rate swaps, currency swaps and credit swaps. These transactions are conducted under terms that are usual and customary to standard borrowing, derivative, securities lending and securities borrowing activities, as well as requirements determined by exchanges where the bank acts as intermediary.

### Offsetting of financial assets

| | Gross amounts of recognised financial assets | Gross amounts of recognised financial liabilities set off in the statement of financial position | Net amounts of financial assets presented in the statement of financial position | Related amounts not set off in the statement of financial position | | Net amount |
|---|---|---|---|---|---|---|
| Financial assets subject to offsetting, enforceable master netting arrangements and similar agreements | | | | Financial instruments | Cash Collateral received (excluding surplus) | |
| **31 December 2024** | | | | | | |
| Derivatives | 11,704 | - | 11,704 | 8,149 | 3,261 | 294 |
| **Total financial assets** | **11,704** | **-** | **11,704** | **8,149** | **3,261** | **294** |
| **31 December 2023** | | | | | | |
| Derivatives | 12,821 | - | 12,821 | 9,210 | 3,579 | 32 |
| **Total financial assets** | **12,821** | **-** | **12,821** | **9,210** | **3,579** | **32** |

### Offsetting of financial liabilities

| | Gross amounts of recognised financial liabilities | Gross amounts of recognised financial assets set off in the statement of financial position | Net amounts of financial liabilities presented in the statement of financial position | Related amounts not set off in the statement of financial position | | Net amount |
|---|---|---|---|---|---|---|
| Financial liabilities subject to offsetting, enforceable master netting arrangements and similar agreements | | | | Financial instruments | Cash Collateral pledged (excluding surplus) | |
| **31 December 2024** | | | | | | |
| Derivatives | 8,664 | - | 8,664 | 8,149 | 515 | - |
| **Total financial liabilities** | **8,664** | **-** | **8,664** | **8,149** | **515** | **-** |
| **31 December 2023** | | | | | | |
| Derivatives | 10,131 | - | 10,131 | 9,210 | 833 | 88 |
| **Total financial liabilities** | **10,131** | **-** | **10,131** | **9,210** | **833** | **88** |

## 7.7.4 Related party transactions

A related party is a person or entity that has significant influence over another entity, or has the ability to affect the financial and operating policies of the other party. Parties related to a.s.r. include associates, joint ventures, key management personnel, close family members of any person referred to above, entities controlled or significantly influenced by any person referred to above and any other affiliated entity.

The Group regularly enters into transactions with related parties during the conduct of its business. These transactions mainly involve loans, deposits and commissions, and are conducted on terms equivalent to those that prevail in at arm's length transactions.

### Positions and transactions between a.s.r., associates, joint ventures and other related parties

The table below shows the financial scope of a.s.r.'s related party transactions:

- Associates;
- Joint ventures;
- Aegon Ltd. and its group companies (since Aegon Ltd. has significant influence over a.s.r.).

**Financial scope of a.s.r.'s related party transactions current year**

| | Associates | Joint ventures | Aegon Ltd. Group | Total |
|---|---|---|---|---|
| **2024** | | | | |
| **Balance sheet items with related parties as at 31 December** | | | | |
| Loans and receivables | 46 | 1 | 8 | 55 |
| | | | | |
| **Transactions in the income statement for the financial year** | | | | |
| Interest income | 1 | - | - | 1 |
| Fee income | 39 | - | 22 | 61 |
| Operating and other expenses | 2 | - | 78 | 80 |

**Financial scope of a.s.r.'s related party transactions prior year**

| | Associates | Joint ventures | Aegon Ltd. Group | Total |
|---|---|---|---|---|
| **2023** | | | | |
| **Balance sheet items with related parties as at 31 December** | | | | |
| Loans and receivables | 44 | 1 | 4 | 49 |
| Other liabilities | 140 | - | - | 140 |
| | | | | |
| **Transactions in the income statement for the financial year** | | | | |
| Fee income | 75 | - | 12 | 87 |
| Operating and other expenses | 1 | - | 35 | 36 |

No provisions for impairments have been recognised on the loans and receivables for the years 2024 and 2023.

*Aegon Ltd. group*

Aegon Ltd. has an exclusive right until 4 July 2028 to nominate up to two members of the Supervisory Board (if Aegon Ltd. holds more than 20% of the shares it may nominate two members, if it holds 20% or less but more than 10% of the shares it may nominate one member). In addition, Aegon Ltd. has the right to designate its nominees for the Audit and Risk Committee and the ESG Committee if certain conditions are met. Furthermore, in case the incumbent CEO of a.s.r. does not serve the full term due to earlier resignation or dismissal, the appointment of the successor requires the unanimous vote of all Supervisory Directors in office.

Transitional service agreements (TSAs) safeguard the availability of services between a.s.r. and Aegon Ltd. group (including its subsidiaries), during the integration of the Aegon entities obtained with the business combination of 2023, such as IT infrastructure and asset management services. Prices are determined on an at arm's length basis. To ensure full disentanglement from the Aegon Ltd. group over the integration period, strict timelines and a strong governance have been put in place. The amounts outstanding are unsecured and will be settled in cash. No guarantees have been given or received.

The DB obligation of former Aegon NL classifies as multiple-employer contract. For more information, see section 7.5.15.1.

In 2024, a.s.r. paid € 188 million dividend to Aegon Ltd. (2023: € 68 million).

*Key management personnel*
The remuneration of the key management personnel is disclosed in section 7.7.5.

At 4 July 2023 the Management Board (MB) was introduced and replaced the Business Executive Committee (BEC). The three members of the Executive Board (EB) are also members of the MB. The members of the MB have mortgage loans with a.s.r. amounting to € 2,282 thousand (2023: € 2,413 thousand). The mortgages have been issued subject to normal employee conditions. The employee conditions include limits and thresholds to the amounts that qualify for a personnel interest-rate discount. For mortgage loans higher than € 340 thousand arm's length condition apply. The average interest on the mortgage loans for MB-members is 2.44% (2023: 2.45%). In 2024, the mortgage loans of MB-members were settled for an amount of € 131 thousand (2023: € 89 thousand). The Supervisory Board (SB) has no mortgage loans.

## 7.7.5 Key management personnel remuneration

Transactions with key management personnel (MB members and SB) are transactions with related parties. Additional information on the remuneration of members of the MB and SB is disclosed in the remuneration report; see section 5.3.

**Annual remuneration key management personnel**

| Amounts in € thousands | Executive board | MB members | SB[1] | Total 2024 | Executive board | MB members[2] | BEC members[3] | SB[4] | Total 2023 |
|---|---|---|---|---|---|---|---|---|---|
| **Fixed compensation** | | | | | | | | | |
| Base salary in cash | 2,987 | 1,392 | 413 | 4,792 | 2,635 | 717 | 1,510 | 283 | 5,145 |
| Base salary in shares | 713 | 145 | - | 858 | 323 | 66 | - | - | 389 |
| Fees | - | - | 115 | 115 | - | - | - | 100 | 100 |
| Fringe benefits[5] | 82 | 77 | - | 159 | 63 | 36 | 109 | | 208 |
| **Other** | | | | | | | | | |
| Extraordinary items[6] | - | 51 | - | 51 | - | - | - | - | - |
| Pension expense[7] | 785 | 342 | - | 1,127 | 525 | 120 | 330 | - | 976 |
| **Total remuneration** | **4,567** | **2,007** | **527** | **7,101** | **3,547** | **940** | **1,949** | **382** | **6,818** |

In the table above, 'Executive Board' refers to the three members of the EB as at 31 December 2024. In 2023, a.s.r. revised the remuneration policy for EB and MB members. The revised remuneration policy is an add-on to the existing policy to acquire a.s.r. shares under the ESPP, resulting from the transaction with Aegon NL.

The number of shares that are allocated (granted) to MB members is 2,004 shares (2023: 1,035 shares). The shares are purchased by the MB at a discount of 18.5%. The average grant price of the share is € 36.57 (2023: € 32.12), which is equal to the opening stock price on the Euronext Amsterdam stock exchange on the 1st trading day after the salary-payment date in each month in the period January to December 2024 (2023: July to December), taken into consideration the aforementioned discount.

The personnel conditions, e.g. discount on non-life insurance products, that apply to all personnel also apply to key management personnel. No discount is provided on life insurance products.

1 H. Hintzen left the SB as of 29 May 2024. B. Elfring was appointed as member of the SB of a.s.r. and as a committee member of the SB of a.s.r. on 29 May 2024. The remuneration figures reflect a partial year as member of the SB.
2 J.F. Sappelli was appointed as CHRO and member of the MB of a.s.r. on 4 July 2023. R.E. Dekker was appointed CRO and member of the MB of a.s.r. on 4 July 2023. W. van den Berg was appointed COO Life and member of the MB of a.s.r. on 4 July 2023. The remuneration figures for 2023 reflect a partial year.
3 One director left the BEC in 2023. The remuneration figures reflect a partial year as a member of the BEC.
4 D. Jansen Heijtmajer was appointed as a Member of the SB of a.s.r. and as Member of the N&ESG Committee of the SB of a.s.r. on 4 July 2023. E. Friese was appointed as a Member of the SB of a.s.r. and as Member of the A&RC Committee of the SB of a.s.r. on 4 July 2023. The remuneration figures reflect a partial year as member of the SB.
5 Variations arise as a result of the fiscal treatment of lease vehicles depending on the price and private use of the car, personal allowance and social security.
6 In 2024, based on existing rights before the Aegon NL transaction, a number of Aegon Ltd. shares were settled in cash to MB members (former Aegon Ltd. employees).
7 The annual pension expenditure is based on a premium table. Further changes in the cost of pension benefits are mainly due to the impact of age. The pension costs include DC pensions based on maximum pensionable salary cap, compensation for the maximum pensionable salary cap (to be used for pensions at the employees' discretion), and VPL. The amount presented is excluding amounts related to the indexation of the defined benefit plan, as they are not expenses in the current year.

## 7.7.6 Employee Share Purchase Plan

In 2019 a.s.r. issued an employee share purchase plan (ESPP or 'the plan'). a.s.r. employees are thereby given the opportunity to acquire a.s.r. shares at a discount. a.s.r. can suspend or withdraw the plan at any time. There is no option under the plan for either a.s.r. or the employee to settle in cash or other assets. Therefore the plan is an equity-settled share-based payments plan.

In 2023, a.s.r. has introduced the revised remuneration policy for EB and MB members, see section 7.7.5.

Under the terms of the plan the granting and vesting is predefined. The grant date of the plan is the moment the employee registers to participate in the plan. The shares vest immediately on the transaction date when cash is received from the employee, unconditionally, subject only to a post-vesting transfer restriction of five years. Otherwise, there are no specific restrictions to the share (i.e. voting power, dividend restrictions).

The employees purchase the shares at a discount of 18.5%. The fair value of the a.s.r. share with a lock-up of five years at the grant date equals the purchased price by the employee. The ESPP has an impact on equity through the adjustment in the treasury shares and retained earnings. See section 7.5.11.5 Treasury shares for more information.

The number of shares purchased by employees during the reporting period was 268 thousand for an amount of € 9 million (2023: 159 thousand for an amount of € 5 million).

## 7.7.7 Contingent liabilities and assets

### 7.7.7.1 General claims and disputes

The Group is a respondent in a number of claims, disputes and legal proceedings arising from the normal conduct of business.

Provisions are formed for such occurrences if, in management's opinion and after consultation with its legal advisors, a.s.r. is likely to have to make payments and the payable amount can be estimated with sufficient reliability. The costs of the compensation scheme for unit-linked insurance contracts have been fully recognised in the financial statements based on management's best knowledge of current facts, actions, claims, complaints and events. Provisions are recognised in the liabilities arising from insurance contracts (see section 7.5.13) and legal provisions (see section 7.5.16).

Dutch insurers see an increase in insurance policies complaints / claims based on grounds other than the cost compensation. Current and possible future legal proceedings could have a substantial financial and reputational impact. However it is not possible at this time to make reliable estimates of the number of expected proceedings, possible future precedents and the financial impact of current and possible future proceedings. Currently there are no indications that such a provision would be necessary for a.s.r.

As for other claims and legal proceedings, against a.s.r. known to management (and for which, in accordance with the defined principles, no provision has been formed), management believes, after having sought expert advice, that these claims have no chance of success, or that a.s.r. can successfully mount a defence against them, or that the outcome of the proceedings is unlikely to result in a significant loss for a.s.r. For further information related to the Unit-Linked Products (beleggingsverzekeringen), see section 7.7.7.2.

### 7.7.7.2 Pending litigation portfolio and product-related issues

**Unit-linked products (beleggingsverzekeringen)**

Since the end 2006 the unit-linked policies (beleggingsverzekeringen) received negative attention in the media and from political and regulatory sources. The criticism and scrutiny on unit-linked life insurance products led to significant compensation arrangements and product improvement programmes by Dutch insurance companies, including a.s.r. However, individual customers as well as policyholder advocate groups and their representatives continue to focus on the fees and charges included in products, alleged transparency aspects, as well as that consumers feel they did not receive sufficient compensation based on the compensation arrangements.

*Proceedings in which a.s.r. is involved*

a.s.r. is currently subject to a number of collective actions:

- Vereniging Woekerpolis.nl
- Consumentenbond / ConsumentenClaim
- Stichting Wakkerpolis

The claims have been rejected by a.s.r. and a.s.r. defends itself in these legal proceedings.

In November 2023, in order to resolve these long-lasting and historical disputes a.s.r. initiated a settlement agreement with five consumer protection organisations. The settlement is not an acknowledgement of too high costs, risk premiums and/or charges. a.s.r. also set up a leniency scheme for customers who are not affiliate with a consumer protection organisation for distressing cases that are assessed on their merits. On 19 February 2025 it was announced that the agreement that was reached in November 2023 with the five customer protection groups is final. More than 90% of the affiliated customers have accepted a personal offer. All existing collective proceedings against a.s.r. will be withdrawn once the settlement has been fully executed. No new (collective) proceeding will be initiated by the organisations nor their individual representatives against a.s.r. See section 7.5.16 for details.

**Optas**

In 2019 Optas had been merged into Aegon life, based on prior approval and instruction by the DNB. A limited number of policyholders opposed the merger and appealed the permission of DNB at the administrative Court. On 13 February 2023 the administrative Court granted the objections and annulled the permission granted by the DNB. The Court found that DNB should have required that all policyholders should have been individually informed in writing regarding the merger and given the possibility to oppose the merger. The Court also found that DNB should have shared all (including those marked classified and sensitive) documents relating to the permission to the objectors. Based on the law (Wft) the legality of the merger is not affected by an administrative annulment. This has been confirmed by ruling of the civil Court in a case against Aegon life, that is now subject of a pending appeal in cassation. Though Aegon life does not expect the pending litigation at the civil Court to have a material impact, if any, there can be no assurances that these matters, will not ultimately result in a material adverse effect on a.s.r.'s business, results of operations and financial position.

#### 7.7.7.3 Obligations and guarantees

a.s.r. has entered into private loans agreements € 502 million (2023: € 492 million) and private equity agreements € 100 million (2023: € 100 million). Other commitments mainly consist of future purchases of interests in investment funds and amounts to € 463 million (2023: € 337 million).

a.s.r. has irrevocable facilities of € 1,223 million (2023: € 1,752 million) which mainly relate to mortgage loan offers issued. Mortgage loan commitments represent undrawn mortgage loan facilities provided and outstanding proposals on mortgages. The sale of mortgage loans relates to pre-announced redemptions on mortgage loans and amounts to € 74 million (2023: € 18 million).

Investment obligations for an amount of € 345 million (2023: € 467 million) have been assumed / issued for investment property.

The sale of real estate which relates to properties that are under contract to be sold as per 31 December 2024 amounts to € 17 million (2023: € 87 million). Real estate commitments represent the committed pipeline of investments in real estate projects.

Investment obligations and guarantees for a total amount of € 3 million (2023: € 15 million) have been issued for real estate development projects and the acquisition of property. Those guarantees were issued by principals for the execution of projects for the benefit of clients.

The share of contingent liabilities incurred in relation to interests in joint ventures amounts to € 14 million (2023: € 14 million). These contingent liabilities, not shown in the statement of financial position, relate to investment obligations entered into by a.s.r. (for its share of approximately 50%) for real estate development projects of Amvest.

In October 2017, Aegon NL sold its shares in Unirobe Meeùs Groep (UMG) for € 295 million to Aon Groep Nederland. a.s.r. (after the business combination with Aegon NL) indemnifies and holds Aon Groep Nederland group (including UMG) harmless (until 2027) for and against any damage incurred resulting from Unit Linked Insurances claims prior to 1 January 2017 with respect to UMG’s portfolio of Unit Linked Policies. The aggregate liability for a.s.r. is maximised at an amount equal to the purchase price.

The Dutch guarantee fund for motorised traffic has a latent claim on all insurers offering legal liability products. In line with the advice of the guarantee fund a.s.r.'s contingent liability is € 13 million (2023: € 13 million).

#### 7.7.7.4 Expected future lease payments

The following table sets out the expected future lease payments for investment property and plants, showing the undiscounted lease payments to be received after the reporting date.

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| To be received within 1 year | 39 | 37 |
| To be received between 1 and 2 years | 30 | 30 |
| To be received between 2 and 3 years | 24 | 25 |
| To be received between 3 and 4 years | 18 | 20 |
| To be received between 4 and 5 years | 16 | 15 |
| To be received after 5 years | 98 | 97 |
| **Total undiscounted lease payments** | **226** | **224** |

The investments properties, in retail, residential, offices and rural markets are leased to third parties, consisting of various lease terms in a range between shorter than one year and undetermined period with competitive rents mostly indexed to consumer prices. The plants are leased to third parties with lease terms longer than ten years.

### 7.7.8 Events after the balance sheet date

On 30 January 2025, a.s.r. closed a transaction under the Dutch Delphinus programme to sell Class A mortgage backed securities (RMBS). ‘Delphinus 2025-I’ consisted of a principal amount of € 500 million of class A notes.

In February 2025, the settlement agreement between a.s.r. and the five consumer protection organisations (see section 7.5.16 and section 7.7.7.2) became effective, given that more than 90% of the affiliated customers of these organisations have accepted the terms and conditions. All collective proceedings of these five consumer protection organisations against Aegon NL and a.s.r. have been terminated. a.s.r. will proceed with the implementation of an individual arrangement for special cases (for unaffiliated customers that have not previously received compensation).

On 19 February 2025, a.s.r. has announced a share buyback of € 125 million starting on 20 February 2025, which is expected to be completed before 20 May 2025.

## 7.7.9 List of principal group companies

**List of principal group companies**

| Company | Equity interest | Rate of control | Seat | Segment |
|---|---|---|---|---|
| ASR Aanvullende Ziektekostenverzekeringen N.V.[1] | 100.00 | 100.00 | Utrecht | Non-life |
| ASR Basis Ziektekostenverzekeringen N.V.[1] | 100.00 | 100.00 | Utrecht | Non-life |
| ASR Schadeverzekering N.V.[1] | 100.00 | 100.00 | Utrecht | Non-life |
| ASR Wlz-uitvoerder B.V. | 100.00 | 100.00 | Utrecht | Non-life |
| ASR Ziektekostenverzekeringen N.V.[2] | 100.00 | 100.00 | Utrecht | Non-life |
| ASR Levensverzekering N.V.[1] | 100.00 | 100.00 | Utrecht | Life |
| ASR Utrecht Real Estate Investments Netherlands B.V. | 100.00 | 100.00 | Amsterdam | Life |
| ASR Premiepensioeninstelling N.V.[3] | 100.00 | 100.00 | Amsterdam | Life |
| Aegon Cappital B.V.[3] | 100.00 | 100.00 | Den Haag | Life |
| Aegon Levensverzekering N.V.[1] | 100.00 | 100.00 | Den Haag | Life |
| Aegon Spaarkas N.V.[3] | 100.00 | 100.00 | Den Haag | Life |
| Aegon DL B.V.[2] | 100.00 | 100.00 | Den Haag | Life |
| Amvest Home Free B.V.[2] | 100.00 | 100.00 | Zeist | Life |
| Vastgoedmaatschappij Inpa B.V.[2] | 100.00 | 100.00 | Den Haag | Life |
| Orcinus 2023 B.V. | 0.00 | 100.00 | Utrecht | Life |
| Delphinus 2023-I B.V. | 0.00 | 100.00 | Utrecht | Life |
| SAECURE 17 B.V. | 0.00 | 100.00 | Amsterdam | Life |
| SAECURE 18 NHG B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| SAECURE 20 B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| SAECURE 21 B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| SAECURE 22 B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| Aegon Hypotheken Financiering B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| Aegon Hypotheken Prefunding B.V. | 0.00 | 100.00 | Amsterdam | Asset Management |
| ASR Hypotheken B.V.[2] | 100.00 | 100.00 | Utrecht | Asset Management |
| ASR Real Estate B.V.[2,3] | 100.00 | 100.00 | Utrecht | Asset Management |
| ASR Vermogensbeheer N.V.[2,3] | 100.00 | 100.00 | Utrecht | Asset Management |
| Aegon Hypotheken B.V.[1] | 100.00 | 100.00 | Den Haag | Asset Management |
| dRA Exploitatie B.V.[3] | 100.00 | 100.00 | Lochem | Distribution & Services |
| BSB Assurantiën B.V.[3] | 85.00 | 85.00 | Geleen | Distribution & Services |
| Anac Backoffice B.V.[3] | 100.00 | 100.00 | Eindhoven | Distribution & Services |
| ASR Vitaliteit & Preventieve Diensten B.V. | 100.00 | 100.00 | Utrecht | Distribution & Services |
| Assurantiekantoor Lodewijk B.V.[3] | 100.00 | 100.00 | Wezep | Distribution & Services |
| Bedrijfsartsengroep Holding B.V. | 100.00 | 100.00 | Heerenveen | Distribution & Services |
| Boval Assurantiën B.V.[3] | 100.00 | 100.00 | Velserbroek | Distribution & Services |
| Corins B.V. | 100.00 | 100.00 | Amsterdam | Distribution & Services |

1 Registered insurance companies
2 These are companies for which a statement of joint and several liability under section 403, Book 2 of the Dutch Civil Code has been issued.
3 Other Wft registered companies

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| Company | Equity interest | Rate of control | Seat | Segment |
|---|---|---|---|---|
| Dutch ID B.V. | 100.00 | 100.00 | Velserbroek | Distribution & Services |
| Felison Assuradeuren B.V.[1] | 100.00 | 100.00 | Velserbroek | Distribution & Services |
| Van Helvoort Assuradeuren B.V.[1] | 100.00 | 100.00 | Gemert | Distribution & Services |
| Van Helvoort Registermakelaars in Assurantiën B.V.[1] | 100.00 | 100.00 | Gemert | Distribution & Services |
| PoliService B.V.[1] | 100.00 | 100.00 | Hardinxveld-Giessendam | Distribution & Services |
| Supergarant Verzekeringen B.V.[1] | 100.00 | 100.00 | Leidschendam | Distribution & Services |
| Van Kampen Geld B.V.[1] | 100.00 | 100.00 | Hoorn | Distribution & Services |
| Van Kampen Groep Holding B.V.[1] | 100.00 | 100.00 | Hoorn | Distribution & Services |
| ZZP Nederland Verzekeringen B.V.[1] | 100.00 | 100.00 | Groningen | Distribution & Services |
| D&S Holding B.V.[2] | 100.00 | 100.00 | Velserbroek | Distribution & Services |
| D&S Participaties B.V.[2] | 100.00 | 100.00 | Velserbroek | Distribution & Services |
| Advies van a.s.r. B.V.[1] | 100.00 | 100.00 | Den Haag | Distribution & Services |
| Aegon Bemiddeling B.V.[1] | 100.00 | 100.00 | Den Haag | Distribution & Services |
| Robidus Groep B.V. | 95.00 | 95.00 | Den Haag | Distribution & Services |
| Obra Services B.V.[2] | 95.00 | 95.00 | Zaandam | Distribution & Services |
| Robidus Risk Consulting B.V.[2] | 95.00 | 95.00 | Zaanstad | Distribution & Services |
| Robidus Services B.V.[2] | 95.00 | 95.00 | Zaanstad | Distribution & Services |
| Robidus Solutions B.V.[2] | 95.00 | 95.00 | Zaanstad | Distribution & Services |
| Nedasco B.V.[1] | 100.00 | 100.00 | Amersfoort | Distribution & Services |
| GHW Assurantiegroep B.V.[1] | 100.00 | 100.00 | Nijmegen | Distribution & Services |
| Bastiaens & Cox B.V.[1] | 100.00 | 100.00 | Venlo | Distribution & Services |
| De Regt Adviesgroep B.V.[1] | 100.00 | 100.00 | Den Haag | Distribution & Services |
| TKP Pensioen B.V. | 100.00 | 100.00 | Groningen | Distribution & Services |
| Administratie- en Adviesbureau voor Belegging en Krediet (A.B.K.) B.V.[2] | 100.00 | 100.00 | Amersfoort | Holding & Other |
| ASAM N.V.[2] | 100.00 | 100.00 | Utrecht | Holding & Other |
| ASR Betalingscentrum B.V.[2] | 100.00 | 100.00 | Utrecht | Holding & Other |
| ASR Deelnemingen N.V.[2] | 100.00 | 100.00 | Utrecht | Holding & Other |
| ASR Nederland N.V. | 100.00 | 100.00 | Utrecht | Holding & Other |
| ASR Service Maatschappij N.V.[2] | 100.00 | 100.00 | Rotterdam | Holding & Other |
| ASR Vastgoed Projecten B.V. | 100.00 | 100.00 | Utrecht | Holding & Other |
| ASR Vooruit B.V.[1] | 100.00 | 100.00 | Utrecht | Holding & Other |
| Aegon Administratie B.V.[2] | 100.00 | 100.00 | Den Haag | Holding & Other |
| Aegon Global Investment Fund B.V.[2] | 100.00 | 100.00 | Den Haag | Holding & Other |
| Aegon Innovation Investments B.V.[2] | 100.00 | 100.00 | Den Haag | Holding & Other |
| Aegon Loans B.V. | 100.00 | 100.00 | Den Haag | Holding & Other |
| Aegon Administratieve Dienstverlening B.V. | 100.00 | 100.00 | Den Haag | Holding & Other |
| Servicemaatschappij "De Hoofdpoort" N.V.[2] | 100.00 | 100.00 | Utrecht | Holding & Other |

The principal group companies are located in the Netherlands. For notes to equity interests in associates and joint ventures, see section 7.5.4. The list of equity interests which are required under Sections 379 and 414, Book 2 of the Dutch Civil Code has been filed with the Trade Register of the Chamber of Commerce in Utrecht.

1 Other Wft registered companies
2 These are companies for which a statement of joint and several liability under section 403, Book 2 of the Dutch Civil Code has been issued.

The statements of joint and several liability under section 403, Book 2 of the Dutch Civil Code for Obra Services B.V., Robidus Risk Consulting B.V., Robidus Services B.V. and Robidus Solutions B.V. have all been issued by Robidus Groep B.V. All other statement of joint and several liability in the list of principal group companies have been issued by a.s.r. Nederland N.V.

Certain structured entities, in which a.s.r. does not hold any shares, are consolidated. For more information on these structured entities, see section 7.5.17.

## 7.7.10 Profit appropriation

The EB will propose to the AGM to distribute a final dividend of € 409 million in dividend on ordinary shares over 2024. Including the interim dividend of € 245 million the total dividends to shareholder amount to € 654 million. The remaining result will be transferred to retained earnings in accordance with Article 37 of the Articles of Association of a.s.r.

# 7.8 Risk management

Risk management (RM) is an integral part of a.s.r.'s day-to-day business operations. a.s.r. applies an integrated approach to managing risks, ensuring that strategic targets are met. Value is created by striking the right balance between risk, return and capital whilst ensuring that obligations to stakeholders are met.

## 7.8.1 Risk management system

It is of great importance to a.s.r. that risks within all business segments are timely and adequately controlled. In order to do so, a.s.r. implemented a RM framework based on internationally recognised and accepted standards (such as COSO ERM and ISO 31000 RM principles and guidelines). Using this framework, material risks that a.s.r. is, or can be, exposed to, are identified, measured, managed, monitored, reported and evaluated. The RM framework is both applicable to a.s.r. group and the underlying (legal) business entities.

### 7.8.1.1 Risk Management Framework

The figure shows the RM framework as applied by a.s.r.


**Risk Management framework**

The RM framework consists of risk strategy (including risk appetite), risk governance, systems and data, risk policies and procedures, risk culture, and RM process. The RM framework contributes to achieving the strategic, tactical and operational objectives as set out by a.s.r. The overall effectiveness of the RM framework is evaluated as part of the regular internal review of the system of governance.

**Risk strategy (incl. risk appetite)**

Risk strategy is defined to contain at least the following elements:

- Strategic, tactical and operational objectives that are pursued;
- The risk appetite in pursuit of those strategic, tactical and operational objectives.

a.s.r.'s risk strategy aims to ensure that decisions are made within the boundaries of the risk appetite, as stipulated annually by the EB and the MB (see chapter Risk strategy and risk appetite).

**Risk governance**
Risk governance can be seen as the way in which risks are managed, through a sound risk governance structure and clear tasks and responsibilities, including risk ownership. a.s.r. employs a risk governance framework that entails the tasks and responsibilities of the Risk Management organisation and the structure of the Risk committees (see chapter Risk governance).

**Systems and data**
Systems and data support the RM process and provide management information to the risk committees and other relevant bodies. a.s.r. finds it very important to have qualitatively adequate data, models and systems in place, in order to be able to report and steer correct figures and to apply risk-mitigating measures timely. To ensure this, a.s.r. has designed a policy for data quality and model validation in line with Solvency II. Tools, models and systems are implemented to support the RM process by giving guidance to and insights into the key risk indicators, risk tolerance levels, boundaries and actions, and remediation plans to mitigate risks (see chapter Systems and data).

**Risk policies and procedures:**
Risk policies and procedures are part of the a.s.r. policy house. Policy documents are submitted for approval to the relevant (risk) committee in accordance with the applicable governance. Policies are evaluated annually, tested against internal and external market developments, and changes in laws and regulations, and updated as necessary in accordance with the governance defined in the policy.

Each risk policy must include at least:

- The scope within a.s.r. to which the policy applies.
- A demonstrable and consistent link with relevant laws and regulations and/or strategy.
- Key requirements to achieve the policy's objectives.
- The risk categories to which the policy line applies
- Description of the method for controlling the risk.
- Specific risk tolerances and limits within the relevant risk categories in accordance with the risk appetite statements.
- The frequency and content of regular stress tests and the circumstances that would justify ad-hoc stress tests.
- The processes and reporting procedures applied.
- Exceptions and Escalations.

The classification of risks within a.s.r. is performed in line with, but is not limited to, the Solvency II risks. Each risk category consists of one or more policies or procedures that explicates how risks are identified, measured and controlled within a.s.r. (see chapter Risk policies and procedures).

**Risk culture**
An effective risk culture is one that enables and rewards individuals and groups for taking risks in an informed manner. It is a term describing the values, beliefs, knowledge, attitudes and understanding about risk. All the elements of the RM framework combined make an effective risk culture.

Within a.s.r. risk culture is an important element that emphasises the human side of Risk Management. The MB has a distinguished role in expressing the appropriate norms and values (tone at the top). a.s.r. employs several measures to increase the risk awareness and, in doing so, the risk culture (see chapter Risk culture).

**Risk management process**
The RM process contains all activities within the RM processes to structurally 1) identify risks; 2) measure risks; 3) manage risks; 4) monitor and report on risks; and 5) evaluate the risk profile and RM framework. At a.s.r., the RM process is used to implement the risk strategy in the steps mentioned. These five steps are applicable to the risks within the company to be managed effectively (see chapter Risk Management process).

Based on the integration of Aegon NL, the beneficial elements from Aegon's Risk Management (RM) framework are incorporated into the a.s.r. RM framework. The main developments in 2024 include the integration and refinement of risk appetite, risk management policies and procedures, control frameworks and reports, as well as the redesign and standardisation of the Governance, Risk, and Compliance (GRC) tooling Cerrix.

### 7.8.1.1.1 Risk management strategy and risk appetite
a.s.r.'s risk strategy aims to ensure that decisions are made within the boundaries of the risk appetite, as stipulated annually by the EB and the MB.

Risk appetite is defined as the level and type of risk a.s.r. is willing to bear in order to meet its strategic, tactical and operational objectives. The risk appetite is formulated to give direction to the management of the (strategic) risks. The risk appetite contains a number of qualitative and quantitative risk appetite statements and is defined for both financial (FR) and non-financial risks (NFR). The statements highlight the risk preferences and limits of the organisation and are viewed as key elements for the realisation of the strategy. The statements and limits are defined at both group level and at legal entity level and are determined by the a.s.r. risk committee and approved by the SB.

The statements are evaluated yearly to maintain alignment with the strategy. Since 2024, we have adopted a new, more detailed taxonomy for non-financial risks consisting of two levels. This means that in each risk report, risk colours are assigned to both level 1 risks and level 2 risks. The risk taxonomy at level 1 has remained largely the same, however the number of risk categories at this level (generic level) has changed from 8 to 6. The risk categories "Sustainability" and "Outsourcing" have been moved to level 2. The level 2 risk categories have been introduced. This second level provides more depth and substantiation of the 'main categories' (19 risks in total).

The NFR statements have not changed compared to 2023. The year 2024 focused on data collection and reporting of non-financial risks according to the new taxonomy. FR statements have not been changed at a.s.r. group level.

**Risk appetite statement ASR Nederland N.V. 2024**

| | | |
|---|---|---|
| 1a | ASR Nederland N.V. places long-term value creation at the forefront of its (strategic) operations and ensures that all stakeholders' interests (customer, society, employee, investors) are met in a balanced and sustainable way. | NFR |
| 1b | ASR Nederland N.V. acts in accordance with the a.s.r. sustainability objectives and sufficiently manages its sustainability risks. | NFR |
| 1c | ASR Nederland N.V. provides customers with a digital environment that handles matters easily and quickly, whereby the customer data quality is in order. | NFR |
| 2a | ASR Nederland N.V. has effective and controlled (business) processes. | NFR |
| 2b | ASR Nederland N.V. manages its internal and external outsourcing in a controlled and effective manner. | NFR |
| 3 | ASR Nederland N.V. processes information safely (in accordance with availability, confidentiality and integrity requirements) and is cyber threat resilient. | NFR |
| 4 | ASR Nederland N.V. has controlled projects (in terms of timeliness, budget and/ or quality). | NFR |
| 5a | ASR Nederland N.V. has reliable financial reports, whereby IFRS and Solvency II data quality is in order. | NFR |
| 5b | ASR Nederland N.V. maintains a moderate risk appetite for losses resulting from modelling incidents, including events such as flawed and/or inadequately documented methods, model design and development, assumptions and expert judgment; poor data quality; coding errors; inappropriate use of models; or misinterpretation of model results. | NFR |
| 6a | ASR Nederland N.V. meets the legitimate expectations and interests of its stakeholders and puts customer interests first in its proposition. a.s.r. therefore offers products and services that are cost-efficient, useful, safe and understandable for customers, distribution partners, society and a.s.r. By acting with integrity, a.s.r.'s reputation is protected and strengthened. | NFR |
| 6b | ASR Nederland N.V. only wants to do business with relationships who are honest and reliable. a.s.r. therefore does not enter into or continue a business relationship with parties involved in crimes, socially undesirable acts and/or unethical behavior, including money laundering and terrorist financing. a.s.r. takes appropriate measures to guarantee its sound and controlled business operations and thus protect and strengthen its reputation. | NFR |
| 6c | ASR Nederland N.V. handles personal data with care, including those of its customers. a.s.r. processes personal data lawfully, fairly and transparently, taking into account the principles of purpose limitation, data minimization, accuracy and storage limitation and taking measures to ensure the integrity and confidentiality of personal data. By taking appropriate measures, a.s.r. maintains a sound and ethical operational management and thus protects and strengthens its reputation. | NFR |
| 7 | ASR Nederland N.V. has a minimum SCR ratio of 120%. | FR |
| 8 | ASR Nederland N.V. remains within the bandwidth of periodically reassessed market risk budgets. | FR |
| 9 | ASR Nederland N.V. has at least a single A rating and therefore holds an AA rating in accordance with the S&P Capital Model. | FR |
| 10 | ASR Nederland N.V. assesses the amount of dividend payments against the current and expected future solvency ratio and economic outlook. Dividend payments are in line with the conditions laid down in the capital and dividend policy of ASR Nederland N.V. | FR |
| 11 | ASR Nederland N.V. has a maximum financial leverage ratio of 40%. Financial leverage ratio = Debt / (Debt + Equity). | FR |
| 12 | ASR Nederland N.V. has a maximum double leverage ratio of 135%.Double leverage ratio = Total value of associates / (equity attributable to shareholders + hybrids and subordinated liabilities). | FR |
| 13 | ASR Nederland N.V. has a minimum interest coverage ratio of 4. Interest coverage ratio = EBIT operational / interest expense. | FR |
| 14 | a. ASR Nederland N.V. is capable of releasing liquidities worth up to € 2 billion over a 1-month period following stress.<br>b. ASR Nederland N.V. remains capable of meeting its collateral requirements in the event of an (instant) increase of 3% interest rate. | FR |
| 15 | ASR Nederland N.V. generates a robust and high-quality operational ROE, i.e. pursues an overall ROE > 12% and seeks an ROE > 10% for individual investment decisions, where in exceptional cases an ROE > 8% is accepted. | FR |
| 16 | ASR Nederland N.V. (excl. ASR Ziektekosten) has a maximum combined ratio of 99%. The management target is 96%. | FR |
| 17 | ASR Nederland N.V. has a total SCR market risk which will be a maximum of 50% of the total risk. | FR |

### 7.8.1.1.2 Risk governance

a.s.r.'s risk governance can be described by:

- risk ownership;
- the implemented three lines model and associated (clear delimitation of) tasks and responsibilities of key function holders; and
- the risk committee structure to ensure adequate decision making.

**Risk ownership**

The EB has the final responsibility for risk exposures and management within the organisation. Part of the responsibilities have been delegated to persons that manage the divisions where the actual risk-taking takes place. Risk owners are accountable for one or more risk exposures that are inextricably linked to the department or product line they are responsible for. Through the risk committee structure, risk owners provide accountability for the risk exposures.

### Three lines model

The risk governance structure is based on the ‘three lines’ model. The three lines model consists of three lines with different responsibilities with respect to the ownership of controlling risks. The table below provides insight in the organisation of the three lines model within a.s.r.

| Three lines model | |
|---|---|
| **First line**<br>• Executive Board / Management Board<br>• Management teams of the business lines and their employees<br>• Finance & risk decentral | **Ownership and implementation**<br>• Responsible for the identification and the risks in the daily business<br>• Has the day-to-day responsibility for operations (sales, pricing, underwriting, claims handling, etc.) and is responsible for implementing risk frameworks and policies. |
| **Second line**<br>• Group Risk Management department<br>- Risk management function<br>- Actuarial function<br>• Compliance<br>- Compliance function | **Policies and monitoring implementation by 1st line**<br>• Challenges the 1st line and supports the 1st line to achieve their business objectives in accordance with the risk appetite<br>• Has sufficient countervailing power to prevent risk concentrations and other forms of excessive risk taking<br>• Responsible for developing risk policies and monitoring the compliance with these policies |
| **Third line**<br>• Audit department<br>- Internal audit function | **Independent assessment of 1st and 2nd lines**<br>• Responsible for providing dedicated assurance services and oversees and assesses the functioning and the effectiveness of the first two lines of defence |

*Positioning of key functions*

Within the risk governance, the key functions (compliance, risk, actuarial and audit) are organised in accordance with Solvency II regulation. They play an important role as countervailing power of management in the decision-making process. The four key functions are independently positioned within a.s.r. In all the risk committees one or more key functions participate. The second line report to the CRO, which is a member of the management board. All key functions have direct communication lines with the EB and can escalate to the chairman of the Audit & Risk Committee of the SB. Furthermore, the key functions have regular meetings with the supervisors of the Dutch Central Bank (DNB) and / or The Dutch Authority for the Financial Markets (AFM).

*Group Risk Management*

GRM is responsible for the execution of the RM function (RMF) and the Actuarial Function (AF). The department is led by the RMF holder. At year-end GRM consists of the following four sub-departments:
- Operational Risk Management;
- Financial Risk Management;
- Model Validation;
- Methodology.

*Operational Risk Management*

Operational Risk Management (ORM) is responsible for second-line strategic and operational (including IT) RM and the enhancement of the risk awareness for a.s.r. and its subsidiaries. The responsibilities of ORM include the development of risk policies and procedures, the annual review and update of the risk strategy (risk appetite), the coordination of the SRA process leading to the risk priorities and emerging risks and Own Risk and Solvency Assessment (hereafter: ORSA) scenarios and the monitoring of the non-financial risk profile. For the management of operational risks, a.s.r. has a solid Risk-Control framework in place that contributes to its long-term solidity. The quality of the framework is continuously enhanced by the analysis of operational incidents, periodic risk assessments and monitoring by the RMF. ORM actively promotes risk awareness at all levels to contribute to the vision of staying a socially relevant insurer.

*Financial Risk Management*

Financial Risk Management (FRM) is responsible for the second line financial RM and supports both the AF and RMF. An important task of FRM is to be the countervailing power to the EB and management in managing financial risks for a.s.r. and its subsidiaries. FRM assesses the accuracy and reliability of the market risk, counterparty risk, insurance risk and liquidity risk, risk margin and best estimate liability. As part of the AF, FRM reviews the technical provisions, monitors methodologies, assumptions and models used in these calculations, and assesses the adequacy and quality of data used in the calculations. Furthermore, the AF expresses an opinion on the underwriting policy and determines if risks related to the profitability of new products are sufficiently addressed in the product development process. The AF also expresses an opinion on the adequacy of reinsurance arrangements. Other responsibilities of financial RM are e.g. support monitoring Solvency II compliancy (e.g. changes in Solvency II regulation), updating policies on valuation and risk, activities related to the DNB, assessment of the ORSA (financial parts), assessment of strategic initiatives.

*Model Validation*

Model Validation (MV) is responsible for performing validation activities or having them carried out in accordance with the drawn up annual model validation plan. MV is responsible for supervising compliance with the model validation policy, discussing and challenging the (draft) validation reports and advising the Model Committee. The MV is a separate sub-department within GRM. The MV is part of the RMF and operates independent of the AF.

*Methodology*
Methodology is responsible for establishing methodologies for Partial Internal Model (hereafter: PIM). The Methodology department is responsible for setting up the internal model, including documentation and maintenance of the documentation. It also handles continuous education by: (1) updating training materials; (2) providing training sessions; (3) assessing the suitability of training levels. Additionally, it analyses the functioning of the internal model, periodically calibrates the internal model parameters, monitors the suitability of the internal model, and conducts annual comparisons of PIM and SF results.

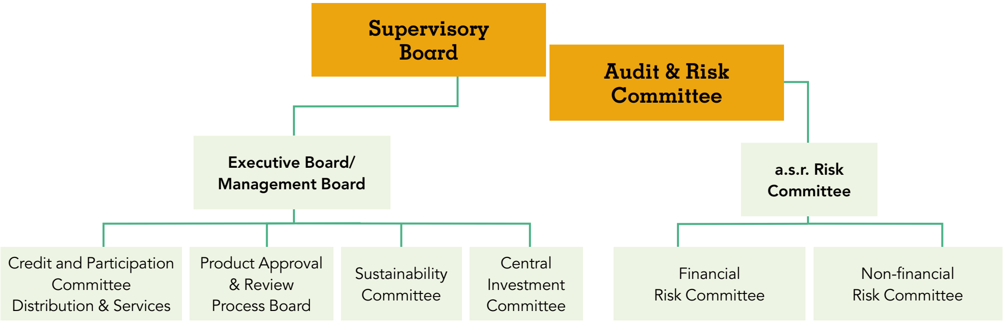
*Compliance*
The responsibilities of Compliance include the development of compliance policies and procedures, the annual review and update of the compliance risk strategy (risk appetite) and the monitoring of the non-financial risk profile concerning compliance risks. An important task of Compliance is to be the countervailing power to the EB and other management in managing compliance risks for a.s.r. and its subsidiaries. The mission of the compliance function is to enhance and ensure a controlled and sound business operation.

As second line, Compliance encourages the organisation to comply with relevant rules and regulations, ethical standards and the internal standards derived from them ('rules') by providing advice and formulating policies. Compliance supports the first line in the identification of compliance risks and assesses the effectiveness of RM on which Compliance reports to the relevant risk committees. In doing so, Compliance uses a compliance risk and monitoring framework. In line with RM, Compliance also creates further awareness to comply with the rules and desired ethical behaviour. Compliance coordinates interaction with regulators in order to maintain effective and transparent relationships with those authorities.

*Audit*
The Audit department, the third line, provides an independent opinion on governance, risk and management processes, with the goal of supporting the EB and other management of a.s.r. in achieving the corporate objectives. To that end, Audit evaluates the effectiveness of governance, risk and management processes, and provides pragmatic advice that can be implemented to further optimise these processes. In addition, senior management can engage Audit for specific advisory projects.

*Risk committee structure*
a.s.r. has established a structure of risk committees with the objective to monitor the risk profile for a.s.r. group, its legal entities and its business lines in order to ensure that it remains within the risk appetite and the underlying risk tolerances and risk limits. When triggers are hit or likely to be hit, risk committees make decisions regarding measures to be taken, being risk-mitigating measures or measures regarding governance, such as the frequency of their meetings. For each of the risk committees a statute is drawn up in which the tasks, composition and responsibilities of the committee are defined. In the first half of 2024 the committee structure was further rationalised, which led to the elimination of the separate committees for Aegon entities.

**Risk committee structure**




*Audit & Risk Committee*
The Audit & Risk Committee was established by the Supervisory Board to gain support, among other things, in the following matters:
- Assessment of the risk appetite proposal and quarterly monitoring of the risk profile;
- Assessment of the annual report, including the financial statements of a.s.r.;
- The relationship with the independent external auditor, including the assessment of the quality and independence of the independent external auditor and the proposal by the SB to the AGM to appoint the independent external auditor;
- The performance of the audit function, compliance function, the AF and the RMF;
- Compliance with rules and regulations; and
- The financial position.

The Audit & Risk Committee has four members of the SB, one of whom acts as the chairman.

*a.s.r. risk committee*
The a.s.r. risk committee monitors a.s.r.'s overall risk profile on a quarterly basis. At least annually, the a.s.r. risk committee determines the risk appetite statements, limits and targets for a.s.r. This relates to the overall a.s.r. risk appetite and the subdivision of risk appetite by financial and non-financial risks. The risk appetite is then submitted to the a.s.r. Audit & Risk Committee, which advises the SB on the approval of the risk appetite. The a.s.r. risk committee also monitors the progress made in managing risks included in the risk priorities and emerging risks of the EB.

All members of the MB participate in the a.s.r. risk committee, which is chaired by the CEO. The involvement of the EB ensures that risk decisions are being addressed at the appropriate level within the organisation. In addition to the EB, the Key Functions (Risk management, Compliance, Internal audit, Actuarial function) are members of the Committee.

*Non-Financial Risk Committee*
The Non-Financial Risk Committee (NFRC) discusses, advises and decides upon non-financial risk policies and procedures. The most relevant non-financial risk policies are approved by the a.s.r. risk committee. The NFRC monitors a.s.r.'s overall non-financial risk profile, in particular whether non-financial risks of a.s.r.

and the business entities are managed adequately and whether the risk profile stays within the agreed risk limits. If the risk profile exceeds the limits, the NFRC takes mitigating actions. The NFRC reports to the a.s.r. risk committee. The NFRC is chaired by a member of the EB. The NFRC discusses the most important risks from the underlying non-financial risk committees (Business Risk Committee (BRC).

*Financial Risk Committee*
The Financial Risk Committee (FRC) discusses, advises and decides upon financial risk policies. The most relevant financial risk policies are approved by the a.s.r. risk committee. The FRC monitors that financial risks of a.s.r. and the business entities are managed adequately and monitors that the risk profile stays within the agreed risk limits. If the risk profile exceeds the limits, the NFR takes mitigating actions. The FRC reports to the a.s.r. risk committee. The Chairman of the FRC is the CFO. In mid-2024, the committee structure was further rationalised. The FRC now oversees the financial risk for all entities, leading to the dissolution of the separate committees for Aegon entities.

*Credit and Participation Committee Distribution & Services*
In the Credit and Participation Committee Distribution & Services (hereafter: CPC D&S), acquisition, credit, and combined participation and credit proposals (D&S proposals) within the scope of the Distribution and Services segment of a.s.r. (D&S segment) are assessed. The CPC D&S is authorised to decide on proposals with a total investment between € 2 million and € 7.5 million. The management of D&S is independently authorised for decisions up to € 2 million. Decisions on proposals above € 7.5 million are reserved for the Board of Directors, with advice from the CPC D&S. The chair of the CPC D&S is the CFO of a.s.r.

*Product Approval and Review Process Board*
The Product Approval & Review Process Board (PARP Board) is responsible for the final decision-making process around the introduction of new products and adjustments in existing products. The committee evaluates if potential risks in newly developed products are sufficiently addressed. New products need to be developed in such a way that they are cost efficient, reliable, useful and secure for our clients. New products also need to have a strategic fit with a.s.r.'s mission to be a solid and trustful insurer. In addition, the risks of existing products are evaluated, as requested by the PARP as a result of product reviews. The PARP Board is chaired by the managing Director of Services.

*Sustainability Committee*
The Sustainability Committee (hereafter: SC) aims to review and advise on central and decentralised draft policies related to sustainability before these policies are submitted for approval to the Board of Directors or the competent committee. Additionally, dilemmas, complications, and conflicting interests in the field of sustainability (including ESG and CDD/KYC) that arise at a.s.r. and/or one of the (sub)committees are discussed. The chair of the SC is the Director of Communications.

*Central Investment Committee*
In addition to the risk committee structure, the Central Investment Committee (CIC) monitors tactical decisions and the execution of the investment policy. It takes investment decisions within the boundaries of the strategic asset allocation as agreed upon in the FRC. The CIC bears particular responsibility for investment decisions exceeding the mandate of the investment department. The CIC is chaired by the CFO.

### 7.8.1.1.3 Systems and data
GRC tooling is implemented to support the RM process by giving guidance and insight into the key risk indicators, risk tolerance levels, boundaries and actions and remediation plans to mitigate risks. The availability, adequacy and quality of data and IT systems is important in order to ensure that correct figures are reported and risk mitigating measures can be taken in time. It is important to establish under which conditions the management information that is submitted to the risk committees has been prepared and which quality safeguards were applied in the process of creating this information. This allows the risk committees to ascertain whether the information is sufficient to base further decisions upon.

a.s.r. has a Data Quality policy in place to support the availability of correct management information. This policy is evaluated on an annual basis and revised at least every three years to keep the standards in line with the latest developments on information management. The quality of the information is reviewed based on the following aspects, based on Solvency II:
- completeness (including documentation of accuracy of results)
- adequacy
- reliability
- timeliness

Adherence to this policy is ensured by the three lines model. With a Central Data Office, additional measures are taken to increase maturity in data management practices.

The data risk governance and committee structure in place ensures that ownership and decision making regarding assumptions and the plausibility of the results is effectively organised.

The information involved tends to be sensitive. To prevent unauthorised persons from accessing it, it is disseminated using a secure channel or protected files. a.s.r.'s information security policy contains guidelines in this respect.

a.s.r.'s information security policy is based on relevant laws and market standards, like ISO 2700x, COBIT 2019, NIST Cybersecurity framework, SOC2 principles, PCI DSS, COSO, BS 25999, ISO 31000, ITIL. These standards describes best practices for the implementation of information security. For the Digital Operational Resilience Act (hereafter: DORA), important changes in 2024 per DORA pillar are:

- ICT Risk Management: a strengthened, centralised, and top-down approach has been adopted through an IT Risk Framework for ICT governance and risk management. Best practice controls are now mandatory and implemented via comply-or-explain principles.
- Incident Management: IT incident monitoring has been intensified with a new process to promptly notify and report major DORA incidents to regulators. There is now more focus on business continuity rather than solely IT continuity.
- Digital Resilience: focus on the critical and important business functions, with controls formalised or adjusted as necessary to comply with DORA.
- Management of Third-Party Risk: concentration risks and critical suppliers have been identified. Reporting has been improved, and a processing register along with mandatory reporting templates have been implemented. Where necessary, contracts with third-party suppliers have been revised.

- ICT Information Sharing: information exchange between a.s.r., other financial institutions, and regulators has been improved, with active contributions to collaborations.

From 2025, a.s.r. meets the DORA regulations, and DORA will be part of a.s.r.'s information security policy.

There are technical solutions for accomplishing this, by enforcing a layered approach (defence-in-depth) of technical measures to avoid unauthorised persons to compromise a.s.r. data and systems. In this perspective, one may think of methods of logical access management, intrusion detection techniques, in combination with firewalls are aimed at preventing hackers and other unauthorised persons from accessing information stored on a.s.r. systems. Nevertheless, confidential information can also have been committed to paper. On top of technical measures a.s.r. implemented physical measures and measures that help create the desired level of awareness of personnel as part of the information security environment. The resilience of these measures is actively tested.

When user defined models (e.g. spreadsheets) are used for supporting the RM framework, the ‘a.s.r. Standard for End user computing’ defines and describes best practices in order to guard the reliability and confidentiality of these tools and models. a.s.r. recognises the importance of sound data quality and information management systems.
The management of IT and data risks of the implemented tools, models and systems (including data) is part of the Operational (IT) RM.

### 7.8.1.1.4 Risk policies and procedures

a.s.r. has established guidelines, including policies that cover all main risk categories (market, counterparty default, liquidity, underwriting, strategic and operational). These policies address the accountabilities and responsibilities regarding management of the different risk types. Furthermore, the methodology for risk measurement is included in the policies. The content of the policies is aligned to create a consistent and complete set. GRM maintains the risk policies, Compliance maintains the compliance policies and both GRM and Compliance monitor the proper implementation in the business. New risk policies or updates of existing risk policies are approved by the risk committees as mentioned previously. a.s.r. has drawn up an integrated policy calendar which includes all risk related documents. This guarantees that policies are drawn up and reassessed in a timely manner and that tasks and responsibilities are clear.

a.s.r. employees gain risk management knowledge and skills through the implementation of risk management policies, procedures and practices and the execution and testing of controls within business processes for sound and controlled business operations. Training courses that cover the main risk-related topics, presentations, workshops, gamification and the use of governance, risk & compliance tooling also contribute to this. Courses include, for example, sustainability risk specifically ESG factors to better understand and identify material risks. In addition, risk management employees keep their knowledge and skills up to date through training courses - including in the context of permanent education - that cover specific risk-related topics.

### 7.8.1.1.5 Risk culture

Risk awareness is a vital component of building a sound risk culture within a.s.r. that emphasises the human aspect in the management of risks. In addition to gaining sufficient knowledge, skills, capabilities and experience in RM, it is essential that an organisation enables objective and transparent risk reporting in order to manage them more effectively.

The MB clearly recognises the importance of RM and is therefore represented in all of the major group level risk committees. Risk Management is involved in the strategic decision-making process, where the company’s risk appetite is always considered. The awareness of risks during decision-making is continually addressed when making business decisions, for example by discussing and reviewing risk scenarios and the positive and / or negative impact of risks before finalising decisions.

It is very important that this risk awareness trickles down to all parts of the organisation, and therefore management actively encourages personnel to be aware of risks during their tasks and projects, in order to avoid risks or mitigate them when required. The execution of risk analyses is embedded in daily business in, for example, projects, product design and outsourcing.

In doing so, a.s.r. aims to create a solid risk culture in which ethical values, desired behaviours and understanding of risk in the entity are fully embedded. Integrity is of the utmost importance at a.s.r.: this is translated into a code of conduct and strict application policies for new and existing personnel, such as taking an oath or solemn affirmation when entering the company, and the ‘fit and proper’ aspect of the Solvency II regulation, ensuring that a.s.r. is overseen and managed in a professional manner.

Furthermore, a.s.r. believes it is important that a culture is created in which risks can be discussed openly and where risks are not merely perceived to be negative and highlight that risks can also present a.s.r. with opportunities. Risk Management (both centralised and decentralised) and Compliance are positioned as such, that they can communicate and report on risks independently and transparently, which also contributes to creating a proper risk culture.

### 7.8.1.1.6 Risk management process

The RM process typically comprises of five important steps: 1) identifying; 2) measuring; 3) managing; 4) monitoring and reporting; and 5) evaluating. a.s.r. has defined a procedure for performing risk analyses and standards for specific assessments. The five different steps are explained in this chapter.

*Identifying*
Management should endeavour to identify all possible risks that may impact the strategic, tactical and operational objectives of a.s.r., ranging from the larger and / or more significant risks posed on the overall business, down to the smaller risks associated with individual projects or smaller business lines. Risk identification comprises of the process of identifying and describing risk sources, events, and the causes and effects of those events.

*Measuring*
After risks have been identified, quantitative or qualitative assessments of these risks take place to estimate the likelihood and impact associated with them. Methods applicable to the assessment of risks are:
- Sensitivity analysis
- Stress testing
- Scenario analysis
- Expert judgments (regarding likelihood and impact)

- Portfolio analysis

*Managing*
Typically, there are four strategies to managing risk:
- *Accept*: risk acceptance means accepting that a risk might have consequences, without taking any further mitigating measures.
- *Avoid*: risk avoidance is the elimination of activities that cause the risk.
- *Transfer*: risk transference is transferring the impact of the risk to a third party.
- *Mitigate*: risk mitigation involves the mitigation of the risk likelihood and / or impact.

RM strategies are chosen in a way that ensures that a.s.r. remains within the risk appetite tolerance levels and limits.

*Monitoring and reporting*
The risk identification process is not a continuous exercise. Therefore, risk monitoring and reporting are required to capture changes in environments and conditions. This also means that RM strategies could, or perhaps should, be adapted in accordance with risk appetite tolerance levels and limits.

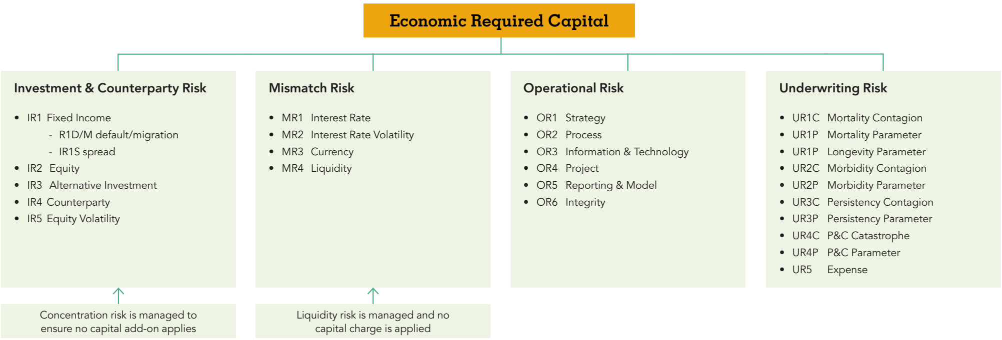
*Evaluating*
The evaluation step is twofold. On the one hand, evaluation means risk exposures are evaluated against risk appetite tolerance levels and limits, taking (the effectiveness of) existing mitigation measures into account. The outcome of the evaluation could lead to a decision regarding further mitigating measures or changes in RM strategies. On the other hand, the RM framework (including the risk management processes) is evaluated by the RM function, in order to continuously improve the effectiveness of the RM framework as a whole.

## 7.8.1.2 a.s.r.'s risk categories

a.s.r. is exposed to a variety of risks. Aegon life and Aegon spaarkas use a PIM to calculate the solvency position. a.s.r. is currently in the process of expanding the PIM to a.s.r. life. In 2024, the Internal Model Approval Process (IMAP) for a.s.r. life has started. The project aims to implement the expanded model for FY 2025, subject successful completion of the project and approval by DNB. Introduction of PIM to a.s.r. life results in a positive outlook for FY 2025.

As a result of PIM, the risk universe of Aegon life and Aegon spaarkas is therefore different and captures all material risks that the company is exposed to. The emerging risk process ensures that the risk universe will remain up to date. An overview of Aegon life and Aegon spaarkas risk universe is provided in the following graph.

### Risk universe PIM entities




For the other insurance entities there are six main risk categories that a.s.r. recognises, as described below and furhter explained in the following risk paragraphs. The most important risks from the risk universe for the PIM entities are explained within these six risk categories used for the Solvency II Standard Formula (SF). In addition, a.s.r. recognises sustainability risks arising from environmental, social or governance (ESG) events or conditions. These risks can be financial and non-financial and can be both strategic and operational. This means that all six main risk categories that a.s.r. recognises can be affected by sustainability risks. In chapter 6 of the annual report and in the paragraph climate change, a.s.r. briefly describes how a.s.r. identifies, measures and manages climate risks and opportunities for its business.

a.s.r. is working on integrating the different risk categories into a single overarching risk taxonomy. This harmonised overarching taxonomy will consist of both the Solvency II SF risk categories and the risk categories from the PIM and is expected to be implemented in 2025.

**Insurance risk**
Insurance risk is the risk that premium and / or investment income or outstanding reserves will not be sufficient to cover current or future payment obligations, due to the application of inaccurate technical or other assumptions and principles when developing and pricing products. a.s.r. recognises the following insurance risks:
- Life insurance risk
- Health insurance risk
- Non-life insurance risk

**Market risk**
The risk of changes in values caused by market prices or volatility of market prices differing from their expected values. The following types of market risk are distinguished:
- Interest rate risk
- Equity risk
- Property risk
- Spread risk
- Currency risk

- Concentration risk / market concentration risk

**Counterparty default risk**
Counterparty default risk is the risk of losses due to the unexpected failure to pay or credit rating downgrade of counterparties and debtors. Counterparty default risk exists in respect of the following counterparties:
- Reinsurers
- Consumers
- Intermediaries
- Counterparties that offer cash facilities
- Counterparties with which derivatives contracts have been concluded
- Healthcare providers
- Zorginstituut Nederland

**Liquidity risk**
Liquidity risk is the risk that a.s.r. is not able to meet its financial obligations to policyholders and other creditors when they become due and payable, at a reasonable cost and in a timely manner.

**Operational risk**
Operational risk is the risk of losses caused by weak or failing internal procedures, weaknesses in the action taken by personnel, weaknesses in systems or because of external events. The following subcategories of operational risk are used:
- Process
- Information technology
- Project
- Reporting & Model
- Integrity

**Strategic risk**
Strategic risk is the risk of a.s.r. or its business lines failing to achieve the objectives due to incorrect decision-making, incorrect implementation and / or an inadequate response to changes in the environment. Such changes may arise in the following areas:
- Macro-economic
- Geopolitical instability
- Climate change and energy transition
- Cyber and information security
- Regulation
- Biodiversity
- Social tensions
- Pandemics

Strategic risk may arise due to a mismatch between two or more of the following components: the objectives (resulting from the strategy), the resources used to achieve the objectives, the quality of implementation, the economic climate and / or the market in which a.s.r. and / or its business lines operate.

### 7.8.1.3 Climate change & Biodiversity
In addition to the six main categories, a.s.r. recognises sustainability risks arising from environmental, social or governance (ESG) events or conditions. These risks can be financial and non-financial and can be both strategic and operational. This means that all six main risk categories that a.s.r. recognises can be affected by sustainability risks.

Climate-related risks are divided into physical, transition and reputational risks. Physical risks arise from more frequent and severe climate events. Physical risks can be acute, such as extreme weather events, or chronic when they arise from gradual changes such as water shortages or rising temperatures. Transition risks result from the process of adjustment towards a climate-neutral society. The failure to appropriately address these adjustments can result in reputational risk.

**Technical provisions**
The net impact of climate change and biodiversity loss on the current Solvency II Technical Provisions or SCR estimation is considered to be limited. In the previous years several assessments have been performed that substantiate this. E.g. the impact of sustainability factors on the portfolio has been assessed. Based on the portfolio characteristics and product features the potential adverse effect on the value of liabilities has been assessed. In addition an assessment is made to identify the impact of sustainability factors to the prudential risks. Based on these and other analysis the limited net impact is confirmed. For the Life and Pension business the impact of climate change on life expectancy is considered to be limited. Increased inflation caused by social or geopolitical factors is adequately valued in the liabilities. The inflation sensitivity of the technical provisions is hedged with inflation swaps and inflation bonds. The Non-life business is characterised by a short contract boundary, most premiums can therefore yearly be adjusted to the gradually impact of climate change.

In 2024 the double materiality assessment was finalised, including the financial materiality assessment (see section 6.1.4.3). The double materiality assessment did not result in different conclusions regarding the scope of the Actuarial Function (AF). The material financial risks that were identified are related to climate change, biodiversity loss and consumers and/or end-users. These risks are related to future developments (medium- and long term horizons) and are not directly related to the current Solvency II Technical provisions. E.g. the future development of climate change does not have impact on current frequency and severity of events. The AF has continuously attention for developments of ESG risks and the potential impact on the technical liabilities, the reinsurance contracts and pricing- and underwriting policies.

Based on the assessments a.s.r. does not consider ESG to have impact on the method or results of current Solvency II Technical Provisions or SCR estimation. The ESG risks are expected to be within the limits of the Solvency II Capital Requirement. This conclusion is applicable to both the a.s.r. and Aegon portfolios.

Reference is made to section 6.1.3.4 for more information how a.s.r. identifies, measures and manages climate risks and opportunities for its business.

**Risk assessments**
Transition risks apply in particular to investments and financing. The scenario analysis for transition risks is performed by considering the proposal from the Strategic Asset Allocation (SAA) 2024 under four climate

scenarios. The dynamically managed market risk budgets are resilient to the climate impact with regard to the development of the SII ratio over the coming 20 years.

The ORSA assesses the overall solvency needs of a.s.r. in the context of the strategic plans making allowance for the current and expected solvency positions, the risk appetite and solvency targets. Physical climate risks are mainly associated with the Non-life portfolio and adequately priced in the products. Physical climate risks (a major storm and major flood) are assessed in the ORSA combined business scenario's for the Non-life portfolio. Within life and health insurance, the impact is mainly in the longer term and was not quantified in the standard ORSA horizon of 5 years. Therefore, since the ORSA 2023, a.s.r. introduced a climate scenario with a horizon of 10 years. Starting point for this climate scenario is the failed transition, which is the most negative scenario from the SAA study. In addition a.s.r. Real estate, Non-Life, Health and Disability are exposed to physical climate risk.

As part of the CSRD project a.s.r. started the double materiality assessment in 2023 and finalised the assessment in 2024. This assessment led to identification of material sustainability topics that are included in the Sustainability Statements (chapter 6). Furthermore, a.s.r. is in the process of integrating the risk management activities related to CSRD sustainability reporting in its existing integrated risk management framework and governance. In 2024 risks have been identified and controls have been determined to ensure the correctness, completeness and timeliness of the sustainability reporting in particular with respect to newly disclosed items. The aforementioned risks and controls have been included in the reporting manuals which have been drafted at the level of each individual product line. Furthermore, a governance structure has been in place for addressing sustainability matters, including reporting. a.s.r. is in the process of integrating the risk management activities related to CSRD sustainability reporting in its existing integrated risk management framework and governance. By having this fully integrated it will enhance organisational efficiency, strengthen reliable reporting, and ensure compliance with the regulatory requirements.

Overall, climate risks as a result of climate change and the energy transition are incorporated into a.s.r.'s risk appetite and part of the regular risk management processes such as the annual group-wide SRA process. Material climate risks identified in the SRA process, including storms and floods, are incorporated into the scenario analysis of the ORSA and quantified by the business actuary teams.

## 7.8.2 Insurance risk

Insurance risk is the risk that future insurance claims and benefits cannot be covered by premium and / or investment income, or that insurance liabilities are not sufficient, because future expenses, claims and benefits differ from the assumptions used in determining the best estimate liability. Insurance risk manifests itself in both the Non-life and the Life portfolio. The Non-life portfolio covers the property and casualty, disability and healthcare sectors. The Life portfolio consists of individual life and funeral and pensions business.

Risk-mitigating measures are used to reduce and contain the volatility of results or to decrease the possible negative impact on value as an alternative for the capital requirement. Proper pricing, underwriting, reinsurance, claims management, and diversification are the main risk mitigating actions for insurance risks.

By offering a range of different insurance products, with various product benefits and contract lengths, and across Life, Disability and Health and P&C insurance risk, a.s.r. reduces the likelihood that a single risk event will have a material impact on a.s.r.'s financial condition.

The solvency buffer is held by a.s.r. to cover the risk that claims may exceed the available insurance provisions and to ensure its solidity. The solvency position of a.s.r. is determined and continuously monitored in order to assess if a.s.r. meets the regulatory requirements.

Aegon life and Aegon spaarkas use a Partial Internal Model (PIM) to calculate the solvency position. The PIM contains Internal Models for (i) mortality risk and (ii) longevity risk. For the other risks, the Solvency II standard formula is applied. a.s.r. life, a.s.r. non-life and a.s.r. health use the Solvency II standard formula (SF) to calculate the solvency position.
The Solvency Capital Requirement (SCR) for each insurance risk is determined as the change in own funds caused by a predetermined shock which is calibrated to a 1-in-200-year event. The basis for these calculations are the Solvency II technical provisions which are calculated as the sum of a best estimate and a risk margin.
The insurance risk arising from the insurance portfolios of a.s.r. is as follows:

**Insurance risk - required capital**

| | 31 December 2024 | | 31 December 2023 | |
|---|---|---|---|---|
| (in € million) | Total | IM | Total | IM |
| Life insurance risk | 2,757 | 1,039 | 2,820 | 1,013 |
| Health insurance risk | 1,572 | - | 1,508 | - |
| Non-life insurance risk | 745 | - | 706 | - |
| **Total excluding diversification between insurance risks** | **5,074** | **1,039** | **5,034** | **1,013** |

The Life insurance risk decreased meanly as a result of non-economic assumption changes and portfolio developments.

The Health and Non life insurance risk increased as a result of the growth of the sum insured.

### Solvency II sensitivities

a.s.r. has assessed the impact of various sensitivities on the solvency ratio. The sensitivities as at 31 December 2024 and 2023, expressed as impact on the group solvency ratio (in percentage points) are as follows:

### Solvency II sensitivities - insurance risks

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Type of risk (%-points) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| Expenses +10% | -5 | -5 | -1 | -1 | -6 | -6 |
| Mortality rates, all products -5% | -5 | -5 | - | - | -5 | -5 |
| Lapse rates -10% | - | - | - | - | - | - |

### Solvency II sensitivities - explanation

| Risk | Scenario |
|---|---|
| Expense risk | Measured as the impact of a 10% increase in expense levels. |
| Mortality risk | Measured as the impact of a 5% decrease in all mortality rates. |
| Lapse risk | Measured as the risk of a 10% decrease in lapse rates. |

The table shows that the SCR sensitivities in 2024 are (almost) similar to the sensitivities of 2023. The impact on the ratio is the opposite if a reversed scenario is taken into account.

## 7.8.2.1 Life Insurance risk

The Life portfolio can be divided into Individual life and Funeral and Pensions. The insurance contracts are sold primarily to retail and wholesale clients through intermediaries.

The products are sold as insurance products in cash or unit-linked contracts. With respect to products in cash, the investment risk is fully borne by the insurer whereas, in the case of unit-linked products, the majority of the investment risk is for the policyholder's account.

The solvency capital requirement (SCR) for Life insurance risks is determined per policy for the Funeral and Life portfolio and per participant for the Pension portfolio. All shocks are applied to each policy/participant and an SCR value is only determined if applying the shock leads to a higher best estimate.

The following Life insurance risks are involved:

### Mortality risk

Mortality risk is associated with (re)insurance obligations, such as endowment or term assurance policies, where a payment or payments are made in case of the policyholder's death during the contract term. The required capital for this risk under SF is calculated as the change in own funds of a permanent increase of mortality rates by 15% for all ages and each policy. For Aegon life and Aegon spaarkas an Internal Model is used to calculate the risk factor. This contains shocks on both the level (experience) and the trend (population) of the mortality table. It projects mortality rates by age and gender.

### Longevity risk

Longevity risk is associated with (re)insurance obligations where payments are made until the death of the policyholder and where a decrease in mortality rates results in higher technical provisions. The required capital for this risk under SF is calculated as the change in own funds of a permanent decrease of mortality rates by 20%. For Aegon life and Aegon spaarkas an Internal Model is used to calculate the risk factor. This contains shocks on both the level (experience) and the trend (population) of the mortality table. It projects mortality rates by age and gender.

### Disability-morbidity risk

Morbidity or disability risk is associated with all types of insurance compensating or reimbursing losses (e.g. loss of income, adverse changes in the best estimate of the liabilities) caused by changes in the morbidity or disability rates. Solvency II prescribes a 35% increase in disability rates for the first year, 25% for subsequent years, combined with a decrease in recovery rates of 20%. The disability-morbidity risk is calculated on policy level by increasing the experience percentage with 35% for the first year and 25% in the second. For the IBNR reserve the shock is simplified to an average of 30% for the 2-year IBNR cashflow. Because revalidation risk is very small, no shock is modelled for this risk.

### Lapse risk

Lapse risk is the risk of losses (or adverse changes in the best estimate of the liabilities) due to an unanticipated (higher or lower) rate of policy lapses, terminations, changes to paid-up status (cessation of premium payment) and surrenders.

Lapse risk arises from economic losses due to policyholder behaviour deviating from expectations. Insurance contracts typically provide policyholders with a variety of options that they may or may not exercise. Lapse risk is the risk that actual policyholder behaviour deviates from the assumptions built into the reserve calculations. This includes assumptions about lapses, withdrawals, premium payment levels, allocation of funds, and the utilisation of possible options in the products.

In general, a lapse shock is only applied if a Solvency II lapse event is actually considered possible under the conditions of the insurance contract. For instance a paid-up policy that cannot be surrendered is not taken into account.

The effect of the lapse risk is equal to the highest result of a permanent increase in lapse rates of 50%, a permanent decrease in lapse rates of 50% or a mass lapse event (an instant lapse event of 40% of all policies). For the mass lapse event, the lapse risk is calculated as the maximum on policy level of a mass surrender or a mass paid-up event.

Within the Individual life portfolio there is a group of policies directly linked to a mortgage loan ('Spaarhypotheken'). In case the mortgage loan is not provided by a.s.r., but by another party, which is the case for most of these policies, the interest that a.s.r. reimburses to the policyholder is claimed from the party that has provided the mortgage loan. This cashflow of interests from the provider of the mortgage loan to a.s.r. represents an asset. The cashflow and value of this asset depends on the cashflow of the linked savings policy. Therefore, the change in this asset value due to mortality or lapse is taken into account when determining the SCR for Life insurance risks.

Prepayment risk on mortgages constitutes an important component of lapse risk; it is the risk of higher or lower prepayments that anticipated, including early redemption rates, thus impacting the value of the mortgage portfolio. Mortgage prepayment risk is divided into two categories: parameter risk (lapse persistency mortgages), which describes financial losses due to adverse misestimation of best estimate prepayment parameter, and contagion risk (lapse contagion liabilities), which describes financial losses due to contagion events causing temporary adverse deviations from best estimate prepayment behaviour.

### Expense risk

A calculation is made of the effect on own funds of a permanent increase in costs used for determining the best estimate. It consists of an increase in the costs of 10% and an increase in the cost inflation of 1 percentage point per year. For investment costs only an increase of 10% applies, since it has been substantiated that increases due to inflation including a shock can be absorbed by the Best Estimate itself and asset management for external parties.

### Life catastrophe risk

Catastrophe risk arises from extreme events which are not captured in the other Life insurance risks, such as pandemics. The capital requirement for this risk is calculated as a 1.5 per mille increase in mortality rates in the first projected year for (re)insurance obligations where the increase in mortality rates leads to an increase in technical provisions.

### Employee benefits

a.s.r. has a number of defined benefit plans for own staff in place. These are schemes, under which staff are awarded pension benefits upon retirement, usually dependent on one or more factors such as years of service and salary. The defined benefit obligation is calculated by independent actuaries at each reporting date. Due to the acquisition of Aegon NL the ended defined benefit plan for own staff of Aegon NL was added to the defined benefit obligation per 2023.

Pension obligations are calculated using the projected unit credit method. Inherent to this method is the application of actuarial assumptions to discount rates, mortality rates and consumer price indices.

The assumptions are reviewed and updated at each reporting date based on available (market) data. The discount rate (31 December 2024: 3.51%) is based on the return (zero coupon rate) of high-quality corporate bonds (AA rating) and the cash flow pattern of the pension obligation. For SCR purposes, the IFRS value of the own pension contract is based on the IAS19 valuation methodology. The explanatory guidelines explain that the IAS19 valuation is consistent with Solvency II.

As of 1 January 2021 a defined contribution plan is in place. The accrued pensions (until 1 January 2021) will remain guaranteed at a.s.r. life and are not transferred to the defined contribution plan. The former employees of Aegon NL were added to the defined contribution plan as of 1 October 2023.

### Other information

Within a.s.r. life the longevity risk is dominant and arises from group pension business and individual annuities. The longevity risk is partly offset by mortality risk that arises from the funeral portfolio and individual policies with mortality. The other main risks a.s.r. life is exposed to are expense risk and lapse risk.

The table summarises the required capital for abovementioned life insurance risks based on the standard model after application of Loss Absorbing Capacity of Technical Provisions (LAC TP). The impact of LAC TP increased in 2024 to € 165 million (2023: € 156 million).

**Life insurance risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Mortality risk | 237 | 238 |
| Longevity risk | 1,855 | 1,792 |
| Disability-morbidity risk | 24 | 20 |
| Lapse risk | 474 | 464 |
| Expense risk | 861 | 998 |
| Revision risk | 0 | 0 |
| Catastrophe risk | 246 | 181 |
| Lapse persistency mortgages | 216 | 342 |
| Lapse contagion liabilities | 78 | 100 |
| Diversification | -1,234 | -1,315 |
| **Life insurance risk** | **2,757** | **2,820** |

For expense risk and lapse persistency mortgages the impact has decreased mainly due to the assumption updates. Catastrophe risk has increased mainly due to the complete modelling of product "Doen Pensioen" and new business "Doen Pensioen" and "Werknemers Pensioen".

For the Life portfolio, the provision at year-end (provided figures are without reductions resulting from reinsurance contracts) can be broken down as follows under Solvency II:

**Life portfolio - technical provisions per segment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **Insurance with profit participation** | | |
| Best estimate | 21,106 | 23,238 |
| Risk margin | 846 | 950 |
| **Technical provision** | **21,952** | **24,188** |
| **Other life insurance** | | |
| Best estimate | 30,640 | 28,426 |
| Risk margin | 1,048 | 1,040 |
| **Technical provision** | **31,687** | **29,466** |
| **Index-linked and unit-linked insurance** | | |
| Best estimate | 37,119 | 34,677 |
| Risk margin | 585 | 600 |
| **Technical provision** | **37,704** | **35,277** |
| **Total** | | |
| **Best estimate** | **88,865** | **86,341** |
| **Risk margin** | **2,478** | **2,589** |
| **Technical provision** | **91,343** | **88,930** |

In 2024 the technical provision increased with € 2,413 million. This was mainly caused by the development of economic parameters, which has an upward effect on the BEL of the traditional portfolio, however the growth in the unit linked portfolio is dominant. The risk margin decreased in 2024 with € 111 million, mainly due to change in the non-economic assumptions for death rates and expenses.

#### 7.8.2.1.1 Managing Life insurance risk

Life insurance risk is mitigated by pricing, underwriting policies and reinsurance.

Pricing is based on profit capacity calculations. A calculation is made of the price required to cover the insurance liabilities, expenses and risks.

Underwriting policies describe the types of risks and the extent of risk a.s.r. is willing to accept. Policyholders may be subjected to medical screening for both Individual life and Funeral insurance.

**Reinsurance**

Reinsurance and other risk-mitigating measures are used to reduce the volatility of results or to decrease the possible negative impact on value as an alternative to the capital requirement. Reinsurance arrangements have been set up to mitigate the effects of catastrophes on earnings.
The level of retention in different reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios. This includes taking account of the cost of reinsurance on the one hand, and the risk that is retained on the other.

In order to optimise its balance sheet risks, a.s.r. entered into a reinsurance agreement with Legal and General Re in 2015. The share of Legal and General Re is on behalf of a specific buy-out portfolio. The total share of the reinsurances for a.s.r. amounts to € 114 million per 31 December 2024.

Per 31 December 2019, Aegon life entered into an indemnity swap, Sunrise, with Canada Life Reinsurance. The underlying portfolio corresponded to around € 7.5 billion of liabilities. Per 31 December 2021, Aegon life entered into a new indemnity swap, Solaris, external party is Reinsurance Group of America. The underlying portfolio amounts to approximately € 5 billion. Both agreements cover the longevity risk associated with Aegon's policyholders, including deferred pensioners and in-payment policies of pensioners and dependents during the full run-off of these policies.

Both agreements are collateralised to mitigate any potential counterparty risk and the agreements have no impact on the services and guarantees that Aegon provides to its policyholders. At year-end 2024 € 332 million (market value € 358 million) has been posted as collateral with respect to the longevity reinsurance contract with Canada Life Reinsurance (2023: € 375 million collateral, market value € 334 million) and € 159 million (market value € 161 million) has been posted as collateral with respect to the longevity reinsurance contract with RGA (2023: € 200 million collateral, market value € 178 million).

Together, these two agreements mitigate approximately 40% of the longevity risk exposure of Aegon life. As such, these agreements strongly reduce the concentration of Aegon's risk exposure in longevity risk and help to diversify the risk profile of Aegon life.

### 7.8.2.2 Health insurance risk and Non-life insurance risk

#### 7.8.2.2.1 Health insurance risk

The Health insurance portfolio of a.s.r. is diverse. The portfolio can be divided into two main product types:
- SLT Health portfolio (Similar to Life Techniques) Income Protection, which can be divided into:
  - Individual Disability (Zelfstandigen)
  - Group Disability (WIA)
  - Premium waiver in case of disability (PVI)
- NSLT Health portfolio (Not Similar to Life Techniques), which can be divided into:
  - Income Protection (Sickness, and Individual and Group Accident)
  - Medical Expenses (Basic and Supplementary)

The insurance contracts are sold primarily to retail and wholesale clients through intermediaries.

The Health insurance portfolio of a.s.r. contains the following insurance risks:

- SLT Health risk
  - This risk is applicable to the SLT Health portfolio. The calculation is scenario-based, according to the standard formula.
- NSLT Health risk
  - This risk is applicable to the NSLT Health portfolio. The calculation is factor-based. The risk is calculated similarly to the Non-life insurance risk.
- Health Catastrophe risk
  - This risk is applicable to the entire Health portfolio. The calculation is scenario-based.

**SLT Health Risk**

*Mortality risk*

Mortality risk is associated with (re)insurance obligations where payments are made upon the death of the policyholder and where an increase in mortality rates results in higher technical provisions. The required capital is calculated as the change in own funds of a permanent 15% increase in mortality rates. The increase in mortality rates is applied to portfolios where payments are contingent on mortality risk. The increase in mortality rates leads to an increase of the own funds. Therefore the mortality risk is zero for the Health portfolio.

*Longevity risk*

Longevity risk is associated with (re)insurance obligations where payments are made until the death of the policyholder and where a decrease in mortality rates results in higher technical provisions. The required capital is calculated as the change in own funds of a permanent 20% decrease in mortality rates. The decrease in mortality rates is applied to portfolios where payments are contingent on longevity risk.

*Disability-morbidity risk*

Morbidity or disability risk is the main risk to the SLT Health portfolio. The scenario analysis consists of a 35% increase in disability rates for the first year, 25% for subsequent years, combined with a decrease in revalidation rates of 20%.

*Expense risk*

A calculation is made of the effect of a permanent increase in costs, which is used for determining the best estimate. The scenario analysis contains an increase in the costs of 10% and an increase in the cost inflation of 1 percentage point per year.

*Revision risk*

The revision risk is the risk that a higher benefit is caused by either inflation or a revision of the disability percentage. Benefits that are sensitive to inflation and / or an increase in the disability percentage will be increased by 4%.

*Lapse risk*

Lapse risk is the risk of losses (or adverse changes in the best estimate of the liabilities) due to an unanticipated (higher or lower) rate of policy lapses, terminations, changes to paid-up status (cessation of premium payment) and surrenders. The effect of the lapse risk is equal to the highest result of a permanent 50% increase in lapse rates, a permanent 50% decrease in lapse rates or a mass lapse event (40% mass lapse). For the SLT Health portfolio, the mass lapse event is dominant.

*Future management action*

According to the insurance conditions, a.s.r. non-life has the ability to adjust the premiums and insurance conditions group wise in the future for the disability portfolio. Therefore, the contract boundary of the disability contracts without an individual risk assessment at acceptance is equal to the contract term. For contracts with an individual risk assessment at acceptance, the contract boundary is equal to the end age, because the contracts will be tacitly renewed until the end age is reached, without repeating the risk assessment. These contracts with an individual risk assessment involve the Individual Self-employed and the Individual Employees portfolio's. For these portfolio's, a.s.r. non-life applies a future management action (FMA), as noted in article 23 of the Delegated Acts. The trigger, as defined in the FMA, is hit in the Income Protection Disability-Morbidity Risk (article 156 DA) scenario.

For a number of Loyalis products within the group disability portfolio, it is determined annually whether the insured amounts are indexed. For the majority of the portfolio, there is a conditional indexation based on a (discretionary) management decision, based among other things on interest result. In a financially unfavourable year, there is the possibility of not paying out indexation, which is a FMA as noted in article 23 of the Delegated Acts.

**NSLT Health Risk**

*NSLT Premium and reserve risk*

The premium risk is the risk that the premium is not adequate for the underwritten risk. The premium risk is calculated over the maximum of the expected earned premium of the next year, and the earned premium of the current year. The reserve risk is the risk that the current reserves are insufficient to cover their run-off over a 12 month time horizon.

The NSLT Premium and reserve risk can be split into the following insurance risks:

- Medical Expense
  - The premium risk is the risk that the premium is not adequate for the underwritten risk. The premium risk is calculated over the maximum of the expected earned premium of the next year, and the earned premium of the current year.
    Reserve risk is the risk that the current reserves are insufficient to cover the claims over a 12-month time horizon.
- Income Protection
  - This component is calculated for policies for which an increase in mortality rates or morbidity rates or disability rates leads to an increase in the best estimate. There are three scenarios, which are calculated for all NSLT Health and portfolios.

*NSLT lapse risk*

The basic and additional health insurance are compulsory insurance contracts for one year without intermediate possibility of termination and therefore lapse risk is negligible for the basic health insurance.

**Health catastrophe risk**

*Medical Expense*

A health catastrophe for the NSLT Health portfolio is an unexpected future event with a duration of one year. The risk is determined ultimo year. The amount of catastrophe risk is apparent from the number of insured and parameters for mass accident scenario and pandemic scenario that have been approved by

DNB in consultation with Health Insurers Netherlands. Accident concentration is not applicable for NSLT Health. The catastrophe risk has a projection of one year (T) following from the contract boundary of one year in accordance with the Dutch Health Insurance Act. After year T the risk is 'zero'. Catastrophe risk for a.s.r. health supplementary equals zero because these contracts have a maximum compensation for claims.

*Income Protection Mass accident scenario*
In this scenario, an accident takes place during a major public event. The risk is that 10% of the attendees are killed, 3.5% are permanently disabled, 16.5% are disabled for 12 months and 30% need medical attention.

*Income Protection Accident concentration scenario*
In this scenario, an accident takes place on site, with the most of our insured at the same location. The risk is that 10% of those present are killed, 3.5% are permanently disabled, 16.5% are disabled for 12 months and 30% need medical attention.

*Income Protection Pandemic scenario*
In this scenario, there is a pandemic, which causes 1% of those affected to be hospitalised and 20% to see a local practitioner.

The table summarises the required capital for abovementioned Health insurance risks based on the standard model.

**Health insurance risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Health SLT | 1,234 | 1,187 |
| Health Non-SLT | 499 | 472 |
| Catastrophe Risk (subtotal) | 88 | 88 |
| Diversification (negative) | -249 | -239 |
| **Health (Total)** | **1,572** | **1,508** |
| Mortality risk | - | - |
| Longevity risk | 79 | 66 |
| Disability-morbidity risk | 1,021 | 985 |
| Expense risk | 156 | 145 |
| Revision risk | 288 | 276 |
| Lapse risk | 296 | 295 |
| Diversification (negative) | -605 | -581 |
| **Health SLT (subtotal)** | **1,234** | **1,187** |
| Medical expenses insurance and proportional reinsurance | 155 | 162 |
| Income protection insurance and proportional reinsurance | 403 | 370 |
| Diversification (negative) | -59 | -60 |
| **Health Non-SLT (subtotal)** | **499** | **472** |
| Mass accident risk | 27 | 27 |
| Accident concentration risk | 75 | 75 |
| Pandemic risk | 38 | 37 |
| Diversification (negative) | -51 | -51 |
| **Catastrophe risk (subtotal)** | **88** | **88** |

The SCR for the Health Non-SLT risk differs from the sum of the amounts reported in the OTSO QRTs. This difference is caused due to a diversification benefit on group level.

For the SLT Health portfolio, the provision at year-end can be broken down as follows under Solvency II.

**SLT Health portfolio - technical provisions per segment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Best estimate | 4,968 | 4,657 |
| Risk margin | 545 | 584 |
| **Technical provision** | **5,513** | **5,241** |

For the NSLT Health portfolio, the provision at year-end can be broken down as follows under Solvency II.

**NSLT Health portfolio - technical provisions per segment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Best estimate | 603 | 612 |
| Risk margin | 60 | 61 |
| **Technical provision** | **663** | **673** |

## 7.8.2.2.2 Non-life insurance risk

Non-life Insurance risk can be broken down into:

- Premium and reserve risk
- Non-life catastrophe risk
- Lapse risk

### Premium- and reserve risk

The premium- and reserve risk is derived at the level of a legal entity based on the standard model. The premium- and reserve risk is the risk that the premium respectively the reserve is not adequate for the underwritten risk. The reserve risk is associated with historical years, and the premium risk is associated with the future year(s). The premium risk is calculated over the maximum of the expected earned premium for the next year and the earned premium for the current year. For the calculation of the premium- and reserve risk, several input data and parameters are necessary, as described in the standard model. The geographical spread, when a (re)insurer underwrites products in different countries, is not relevant for a.s.r. non-life as there is no material exposure outside the Netherlands.

### Non-life Catastrophe Risk Module

Catastrophe risk is defined as the risk of loss or adverse change in the value of insurance liabilities, resulting from significant uncertainty of pricing and provisioning assumptions related to extreme or exceptional events. The Non-life SCR Catastrophic Risk Module used, consists of natural catastrophe risk (Windstorm and Hail), man-made catastrophe risk (Fire, Motor and Liability) and other Non-life catastrophe risk. The Non-life Catastrophe Risk Module is derived at the level of a legal entity based on the standard model.

### Lapse risk

The lapse risk is the loss in basic own funds caused by the discontinuance of 40% of the policies for which discontinuation would result in an increase of technical provisions (without the risk margin). The calculation is based on the type of discontinuance which most negatively affects the basic own funds, which is for Non-life immediately termination of the policy.

The table summarises the required capital for abovementioned Non-life insurance risks based on the standard model.

**Non-life insurance risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Premium and reserve risk | 670 | 640 |
| Lapse risk | 58 | 51 |
| Catastrophe risk | 193 | 175 |
| Diversification (negative) | -177 | -160 |
| **Non-life insurance risk** | **745** | **706** |
| Natural catastrophe risk | 168 | 148 |
| Man-made catastrophe risk | 94 | 91 |
| Other non-life catastrophe risk | 19 | 20 |
| Diversification (negative) | -87 | -85 |
| **Catastrophe risk (subtotal)** | **193** | **175** |

For the Non-life portfolio, the provision at year-end can be broken down as follows under Solvency II:

**Non-life portfolio - technical provisions per segment**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Best estimate | 1,872 | 1,802 |
| Risk margin | 108 | 105 |
| **Technical provision** | **1,980** | **1,907** |

## 7.8.2.2.3 Managing Health and Non-life insurance risk

Health and Non-life insurance risk is managed by monitoring claims frequency, the size of claims, inflation, handling time, benefit and claims handling costs, and biometrical risks (disability, recovery, illness, death). Concentration risk also qualifies as an insurance risk.

In recent years, measures have been taken to improve profitability and reduce risk. Examples are: premium increases, stricter acceptance criteria, shorter claims filing terms and making use of the claims reassessment arrangement between the Dutch Association of insurers and social security institute UWV. Effects are being monitored closely and assessed to be effective.

**Claims frequency, size of claim and inflation**
To mitigate the risk of claims, a.s.r. bases its underwriting policy on claims history and risk models. The policy is applied to each client segment and to each type of activity. In order to limit claims and / or ensure that prices are adjusted correctly, the acceptance policy is continually refined using a number of indicators and statistical analyses. The product lines also use knowledge or expectations with respect to future trends to estimate the frequency, size and inflation of claims. The risk of unexpected major damage claims is contained by policy limits, the concentration of risk management and specific risk transfer contracts (e.g. reinsurance).

**Handling time**
The time required for handling and settling claims is an important factor. The settlement of claims that have a long handling time, such as liability claims, can take many years. Analyses are performed regularly and based on a.s.r.'s experience in similar cases, historical trends – such as the pattern of liabilities – increases in risk exposure, payment of damages, the scale of current and not yet settled damage claims, court rulings and economic conditions.

**Benefit and claims handling costs**
Taking estimated future inflation into account, benefit and claims handling costs are managed based on regular reviews and related actions.

**Disability risk**
Disability risk is controlled by means of regular evaluation of historical claims patterns, expected future developments and price adjustments. Disability risk is mitigated by a.s.r. through underwriting criteria and a proactive reintegration policy. a.s.r. non-life ended the mitigation of its disability risk through reinsurance in 2023. The Individual Health SLT portfolio and a small part (Aegon) of the Group Health SLT portfolio is reinsured by a reinsurance contract. For the a.s.r. part of the portfolio this consists of inactive contracts only, for the Aegon part there is one remaining contract active until 1 January 2026. The reinsuring cash flows concern existing claims and are calculated separately in the cash flows models.

**Concentration risk**
Geographically, the risk exposure of a.s.r. on its health and Non-life portfolio is almost entirely concentrated in the Netherlands. Concentration of insurance risks is particularly prevalent in the fire risk portfolio (i.e. home and content, with storm and flood risk forming the most important factor). Storm and flood risk is managed by means of suitable reinsurance (see also 'Reinsurance').

There is also a concentration of risk in group disability schemes. Group disability contracts are underwritten within the scope of disability cover for employees in the Netherlands (WIA).

**Reinsurance**
When deemed effective in terms of capital relief versus costs incurred, a.s.r. enters into reinsurance agreements to mitigate Non-life insurance risks. Reinsurance can be taken out for each separate claim (per risk), for the accumulation of claims due to natural disasters or to human actions (per event), or for both these risks.

The level of retention in the various reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios, taking into account of the cost of reinsurance on the one hand, and the risk that is retained on the other.

## 7.8.3 Market risk

Market risk is the risk of potential losses due to adverse movements in financial market variables. Exposure to market risk is measured by the impact of movements in financial variables such as equity prices, interest rates and property prices.
The various types of market risk which are discussed in this section, are:

- interest rate risk (including interest rate volatility risk)
- equity risk (including equity volatility risk)
- property risk
- currency risk
- spread risk
- concentration risk

Aegon life and Aegon Spaarkas use a PIM to calculate the market risks. The PIM contains separate modules for (i) interest rate risk, (ii) equity risk, (iii) property risk and (iv) spread risk. For the other risks, the Solvency II SF is applied. a.s.r. life, a.s.r. non-life and a.s.r. health use the Solvency II SF to calculate the solvency position. The total market risk is therefore the sum of the SF and IM.

The table below summarises the required capital for market risks based on the SF and IM and including Deterministic Adjustment (DA).

## Market risk - required capital

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Interest rate (volatility) risk | 1,465 | 1,281 |
| Equity (volatility) risk | 1,892 | 1,678 |
| Property risk | 1,709 | 1,602 |
| Currency risk | 403 | 226 |
| Spread risk | 2,218 | 2,091 |
| Concentration risk | 0 | 0 |
| Diversification | -2,235 | -2,074 |
| **Market Risk** | **5,452** | **4,803** |

The main market risks of a.s.r. are interest rate, equity, property and spread risk. This is in line with the risk budgets based on the strategic asset allocation study. The total market risk amounted to € 5,452 million per year-end 2024 (2023: € 4,803 million). This increase is mainly the result of the increase of the equity portfolio, due to positive returns on equity markets and transactions.

The total market risk of € 5,452 million can be split into a SF component of € 3,485 million (2023: € 3,086 million) and an IM component of € 1,966 million (2023: € 1,716 million).

a.s.r. accepts and manages market risk for the benefit of its customers and other stakeholders. a.s.r.'s risk management and control systems are designed to ensure that these market risks are managed effectively and efficiently, aligned with the risk appetite for the different types of market risks. Market risk reports are submitted to FRC at least once a month. In these reports different types of market risks are monitored and tested against the limits according to the financial risk policies.

The value of investment funds at year-end 2024 was € 10,755 million (2023: € 8,250 million). a.s.r. applies the look through approach for investment funds to assess the market risk.

As part of PIM the DA is identified for Aegon life to mitigate volatility caused by the basis risk between (i) the EIOPA VA reference portfolio and (ii) the asset portfolio of Aegon life. The value of the DA at year-end 2024 was € -148 million (2023: € 88 million). Note that the DA is not included in the required capital for market risks when determining the diversification between risks. In the presented figures the DA is excluded in the market risk. Including DA the market risk for 2024 amounted to € 5,304 million.

The diversification effect shows the effect of having a well-diversified investment portfolio.

### Solvency II sensitivities

The Solvency II SCR is a Value at Risk-measure. Therefore, Solvency II ratio sensitivities are disclosed as the alternative analysis, instead of IFRS sensitivities, as permitted by IFRS. The sensitivities of the solvency ratio as at 31 December 2024, expressed as the impact on the group solvency ratio (in percentage points) are as presented in the table below. The total impact is split between the impact on the solvency ratio related to movement in the available capital and the required capital. The sensitivities are based on the situation per 31 December 2024 and include Financial Institutions.

## Solvency II sensitivities - market risks

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Scenario (%-point) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| UFR 3.2% | -1 | -4 | - | - | -1 | -4 |
| Interest rate +0.5% (2024 incl. UFR=3.30% / 2023 incl. UFR=3.45%) | -4 | -2 | +3 | +3 | -1 | +1 |
| Interest rate -0.5% (2024 incl. UFR=3.30% / 2023 incl. UFR=3.45%) | +4 | +2 | -3 | -4 | +1 | -2 |
| Interest steepening +10 bps | -1 | -1 | - | - | -1 | -1 |
| Volatility Adjustment -10 bps | -10 | -10 | +6 | +5 | -4 | -5 |
| Spread shock sovereigns +50bp en VA +8bp (2023: VA +10bp) | -7 | -5 | +6 | +3 | -2 | -2 |
| Mortgage spread +50 bps | -12 | -10 | +4 | +3 | -8 | -7 |
| Equity prices -20% | -10 | -7 | +14 | +9 | +3 | +1 |
| Property values -10% | -11 | -10 | +2 | +2 | -9 | -8 |
| Spread widening +75bp en VA +19bp (2023: VA +17bp) | +15 | +14 | -7 | -6 | +7 | +7 |
| Inflation +30 bps | -1 | -1 | - | - | -1 | -2 |

**Solvency II sensitivities - explanation**

| Risk | Scenario |
|---|---|
| Interest rate risk - UFR 3.2% | Measured as the impact of a lower UFR. For the valuation of liabilities, the extrapolation to the UFR of 3.2% after the last liquid point of 20 years remained unchanged. The impact on available capital, required capital and ratio relates to a comparison with a solvency ratio measured at a UFR=3.30% for 2024 (UFR=3.45% for 2023). |
| Interest rate risk (incl. UFR=3.30% / 3.45%) | Measured as the impact of a parallel 0.5% upward and downward movement of the interest rates. For the liabilities, the extrapolation to the UFR (UFR=3.30% for 2024 and UFR=3.45% for 2023) after the last liquid point of 20 years remained unchanged. |
| Interest steepening | Measured as the impact of a linear steepening of the interest rate curve between 20Y and 30Y of 1 bps to 10 bps. |
| Volatility Adjustment | Measured as the impact of a 10 bps decrease in the Volatility Adjustment. |
| Government spread | Measured as the impact of an increase of spread on Government bonds of 50 bps. At the same it is assumed that the Volatility Adjustment will increase by +8bp (2023: +10bp). |
| Mortgage spread | Measured as the impact of a 50 bps increase of spreads on mortgages. |
| Equity risk | Measured as the impact of a 20% downward movement in equity prices. |
| Property risk | Measured as the impact of a 10% downward movement in the market value of real estate. |
| Spread risk (including impact of spread movement on VA) | Measured as the impact of an increase of spread on loans and corporate bonds of 75 bps. At the same time, it is assumed that the Volatility Adjustment will increase by +19bp (2023: +17bp) based on reference portfolio. |
| Inflation risk | Measured as the impact of a 30 bps parallel increase of the inflation rates (EUSWI-curve). The extrapolation of the UFI remains unchanged. |

### 7.8.3.1 Interest rate risk

Interest rate risk is the risk that the value of assets or liabilities will change due to fluctuations in interest rates. a.s.r. is exposed to interest rate risk, as both its assets and liabilities are sensitive to movements in long- and short-term interest rates. Insurance products are exposed to interest rate risk. Especially the life insurance products are long-term and therefore particularly sensitive to interest rate risk. The interest rate risk of insurance products depends, besides the term to maturity, on interest rate guarantees and profit-sharing features.

Interest rate risk is managed by aligning fixed-income investments to the profile of the liabilities. Among other instruments, swaptions and interest rate swaps are used for hedging the specific interest rate risk arising from interest rate guarantees and profit sharing features in life insurance products. An interest rate risk policy is in place for a.s.r. as well as for the registered insurance companies. Interest rate risk reports are submitted to the FRC at least once a month. In these reports the interest rate risk is monitored and tested against the limits according to the financial risk policies.

The required capital for interest rate risk is determined by calculating the impact on the available capital due to changes in the yield curve.

The Solvency II SF interest rate risk is the maximum loss of (i) an upward shock and (ii) a downward shock of the yield curve.

- The used shocks vary by maturity and the absolute shocks are higher for shorter maturities (descending: 75% to 20% and ascending: -70% to -20%):
- The yield curve up shock contains a minimum shock of 100bps;
- The yield curve down shock is zero in case the yield curve is negative;
- The yield curves of all currencies are shocked simultaneously.
- All adjustments (credit spread, volatility adjustment) on the yield curve are considered constant.
- The yield curve is extrapolated to the UFR. The yield curve after shock is not extrapolated again to the UFR.

The Solvency II IM for interest rate risks differ from the standard formula results for the following reasons:

- The Solvency II PIM interest rate curve shocks are calibrated based on historical market data;
- The Solvency II PIM assumes that the UFR does not change in a shock scenario, while the standard formula interest rate shock assumes that the whole curve moves, including the UFR;
- In addition, the Solvency II PIM includes a capital requirement for interest rate volatility risk. This is defined as the risk of adverse financial impacts due to the difference in interest rate volatility sensitivity between assets and liabilities.

a.s.r. has assessed various scenarios to determine the sensitivity to interest rate risk. The impact on the solvency ratio is calculated by determining the difference in the change in available and required capital and include financial institutions.

**Solvency II sensitivities - interest rate**

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Scenario (%-point) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| UFR 3.2% | -1 | -4 | - | - | -1 | -4 |
| Interest rate +0.5% (2024 incl. UFR=3.30% / 2023 incl. UFR=3.45%) | -4 | -2 | +3 | +3 | -1 | +1 |
| Interest rate -0.5% (2024 incl. UFR=3.30% / 2023 incl. UFR=3.45%) | +4 | +2 | -3 | -4 | +1 | -2 |
| Interest steepening +10 bp | -1 | -1 | - | - | -1 | -1 |
| Volatility Adjustment -10 bp | -10 | -10 | +6 | +5 | -4 | -5 |

### 7.8.3.2 Equity risk

The equity risk takes into account the risk arising from the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of equities. Exposure to equity markets exists in both assets and liabilities. Asset exposure exists through direct equity investments. In order to maintain a good understanding of the actual equity risk, a.s.r. applies the look-through approach for investment funds to assess the equity risk. The equity risk of insurance products depends on guarantees, profit-sharing features and fees charged to 'gesepareerde beleggingdepot' (GB) clients.

The Solvency II SF equity risk is determined by calculating the impact on the available capital due to an immediate drop in equity prices.

- Equities listed in regulated markets in countries in the EEA or OECD are shocked by 39% together with the symmetric adjustment (type I).
- Equities in countries that are not members of the EEA or OECD, unlisted equities, alternative investments, or investment funds in which the look-through principle is not possible, are shocked by 49% together with the symmetric adjustment (type II).
- Investments of a strategic nature are shocked by 22%.
- The equity capital of the renewable investments qualifying as an infrastructure investment (e.g. wind farm Wieringermeer) is shocked by 30% together with the symmetric adjustment.

The Solvency II IM includes an equity shock, which differs from the standard formula shock:

- Equity risk shocks are calibrated based on Aegon life's own portfolio.
- The equity exposures are also shocked for equity volatility risks.

**Solvency II sensitivities - equity prices**

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Scenario (%-point) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| Equity prices -20% | -10 | -7 | +14 | +9 | +3 | +1 |

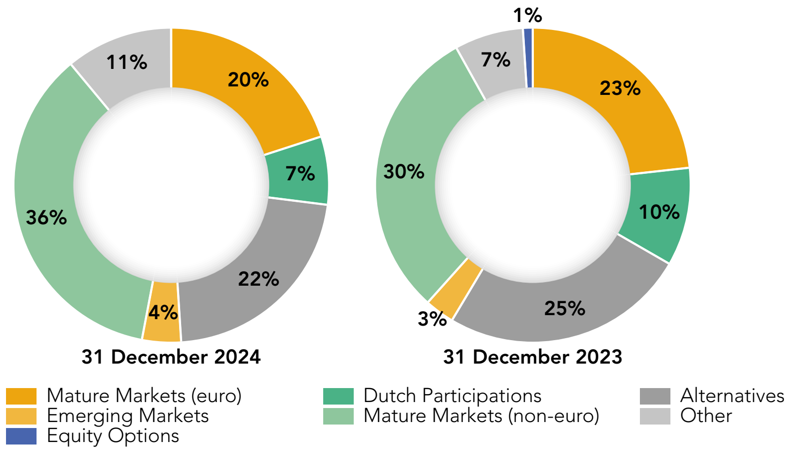
**Composition of equity portfolio**

The total fair value of equities and similar investments at year-end 2024 was € 4,732 million (2023: € 3,738 million). The increase of the equity portfolio is both due to transactions and positive returns on the equity markets. Please note that the total fair value of equities and similar investments referred to in this section does not include "Assets held for index-linked and unit-linked contracts". Although the risks of these assets are primarily for the policyholders, guarantees within certain products may transfer some of the risk to a.s.r.

The equities are diversified across the Netherlands (including participating interests), other European countries and the United States. A limited part of the portfolio consists of investments in emerging markets and alternatives. A portfolio of equity derivatives with a value of € -13 million is in place to mitigate the equity risk.

The table shows the exposure of the equity portfolio to different categories. The total value is including the equities in externally managed funds. The category Other contains the investments of ASR infrastructure Renewables (AIR) in windmill - and solarparks which are in scope of 'Qualifying infrastructure equities other than corporate' (€ 392 million).

**Composition equity portfolio**



### 7.8.3.3 Property risk

The property risk takes into account the risk arising from the sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of real estate. The property risk depends on the total exposure to real estate. In order to maintain a good understanding of the actual property risk, a.s.r. applies the look through approach for investment funds and participations which activities are primarily real estate investments.

The Solvency II SF property risk is determined by calculating the impact on the available capital due to an immediate drop in property prices by 25%. Both assets and liabilities are taken into account. The product Agrarische Impact Erfpacht (AIE) has effectively a lower charge due to the underlying risk mitigating characteristics of this product.

The Solvency II IM for property risk includes an IM property shock on the real estate portfolio, calibrated on the portfolio itself as opposed to a 25% shock in the SF.

The sensitivity of the solvency ratio to changes in property value is monitored on a monthly basis. Sensitivity of regulatory solvency (Solvency II) to changes in property prices is shown in the following table.

**Solvency II sensitivities - property values**

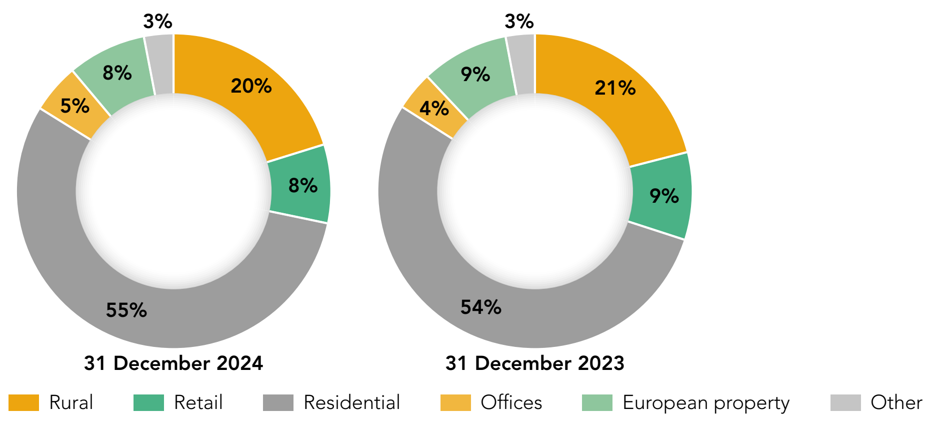
| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Scenario (%-point) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| Property values -10% | -11 | -10 | +2 | +2 | -9 | -8 |

**Composition of property portfolio**

The property risk depends on the total exposure to property, which includes both property investments and property held for own use. The fair value of property was € 9,712 million at year-end 2024 (2023: € 9,193 million). The increase of the real estate portfolio is both due to transactions and positive returns on the real estate markets.

Please note that the total exposures to property referred to in this section does not include "Assets held for index-linked and unit-linked contracts". Although the risks of these assets are primarily for the policyholders, guarantees within certain products may transfer some of the risk to a.s.r.

**Composition property portfolio**




### 7.8.3.4 Currency risk

Currency risk measures the impact of losses related to changes in currency exchange rates. The table provides an overview of the currencies with the largest exposures. a.s.r. has currency risk to insurance products in mainly American dollars (USD) and Australian dollars (AUD).

A currency risk policy is in place for a.s.r. as well as for the registered insurance companies. For different investment categories a.s.r. has defined a target hedge ratio. Currency risk reports are submitted to KLFC at least once a month. In these reports the currency risk is monitored and tested against the limits according to the financial risk policies.

The required capital for currency risk is determined by calculating the impact on the available capital due to a change in exchange rates. Both assets and liabilities are taken into account and a look-through approach is applied for investment funds. For each currency the maximum loss due to an upward and a downward shock of 25% is determined except for a small number of currencies where lower shocks are applied (a.o. Danish crown).

**Currency risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| SCR currency risk - required capital | 403 | 226 |

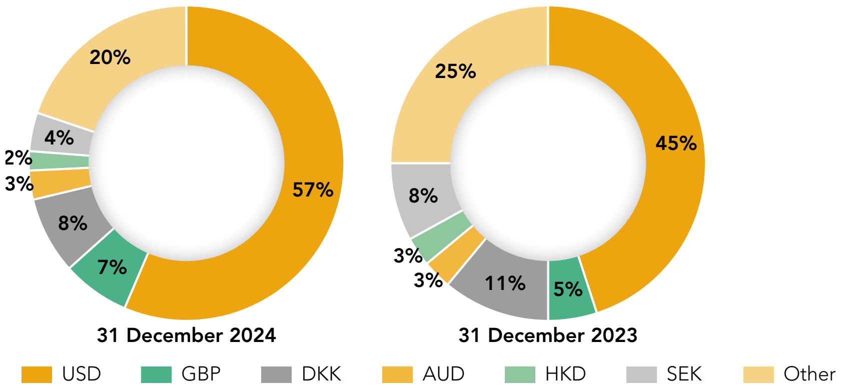
In 2024 the Solvency II SF currency risk has increased with € 177 million. The increase in currency risk is the result of a changed hedge policy in 2024.

### Specification currencies with largest exposure

The total foreign exchange exposure at year-end 2024 was € 1,523 million (2023: € 772 million). The increase in 2024 (approximately € 856 million) is the result of a changed hedge policy in 2024.

Please note that the total foreign exchange exposure referred to in this section does not include "Assets held for index-linked and unit-linked contracts". Although the currency risk of these assets are primarily for the policyholders, guarantees within certain products may transfer some of the risk to a.s.r.

### Composition currency portfolio




## 7.8.3.5 Spread risk

Spread risk arises from the sensitivity of the value of assets and liabilities to changes in the level of credit spreads on the relevant risk-free interest rates. a.s.r. has a policy of maintaining a well-diversified high-quality investment grade portfolio while avoiding large risk concentrations. Going forward, the volatility in spreads will continue to have possible short-term effects on the market value of the fixed income portfolio. In the long run, the credit spreads are expected to be realised and contribute to the growth of the own funds. Exposure to spread risk exists in both assets and liabilities. Asset exposure exists mainly through fixed income investments and mortgages. In order to maintain a good understanding of the actual spread risk, a.s.r. applies the look-through approach for investment funds. The spread risk of insurance products depends on guarantees and profit-sharing features.

The Solvency II SF spread risk is equal to the sum of the capital requirements for bonds, structured products and credit derivatives. Bonds and loans guaranteed by governments or international organisations could be in scope of counterparty default risk instead of spread risk. The capital requirement depends on (i) the market value, (ii) the modified duration and (iii) the credit quality category.

The Solvency II PIM for spread risk includes an IM spread shock which differs from the standard formula:

- Spread shocks are calibrated on the basis of Aegon life's fixed income portfolio.
- In contrast to the standard formula, government bonds are shocked with a factor larger than zero.
- Mortgages are in scope of the spread risk module, while under the standard formula mortgages are in scope of counterparty default risk. Hence, as a result, the spread risk inherent in a.s.r.'s mortgage portfolio is partly included in this section and partly under counterparty default risk. In particular, the mortgage portfolios of Aegon life and Aegon spaarkas are included in this section since these entities use the Partial Internal Model (PIM), while the mortgage portfolios of a.s.r. life, a.s.r. non-life and a.s.r. health are included under counterparty default risk since these entities apply the Solvency II Standard Formula (SF).
- Furthermore, the Solvency II PIM makes use of a dynamic volatility adjustment approach within Aegon life, while the standard formula does not. The Dynamic Volatility Adjustment (DVA) methodology follows an asset-only approach, ensuring spread widening is the biting scenario.
- The performance of the fixed income portfolio is assessed under a broad range of credit scenarios and the model determines which part of the (short-term) losses experienced by the assets are recouped.

The sensitivity to spread risk is measured as the impact of an increase of spread on loans and corporate bonds of 75 bps. The VA is based on a reference portfolio. An increase of 75 bps of the spreads on loans and corporate bonds within the reference portfolio leads to an increase of the VA with 19 bps in 2024 (2023: 17 bps). The credit spread sensitivity remained at +7 increase in solvency ratio for a 75 bps spread shock, combined with a 19 bps VA shock.

### Solvency II sensitivities - spread risk

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|---|---|---|---|---|---|
| Scenario (%-point) | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 | 31 December 2024 | 31 December 2023 |
| Spread +75 bp / VA +19bp (2023: VA +17bp) | +15 | +14 | -7 | -6 | +7 | +7 |

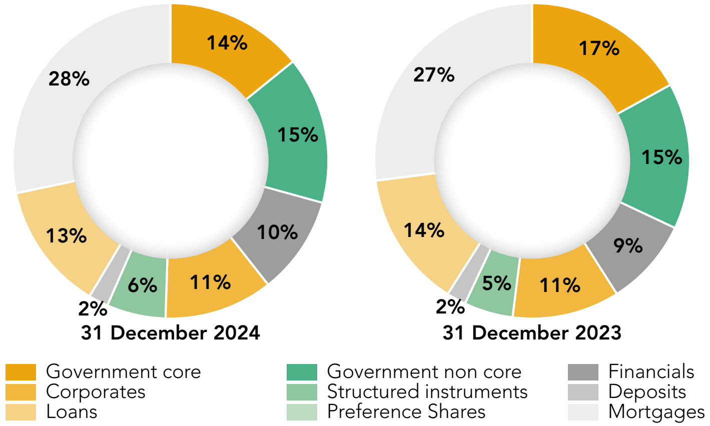
### Composition of fixed income portfolio

Spread risk is managed on a portfolio basis within limits and risk budgets established by the relevant risk committees. Where relevant, credit ratings provided by the external rating agencies are used to determine risk budgets and monitor limits. A limited number of fixed-income investments do not have an external rating. These investments are generally assigned an internal rating. Internal ratings are based on methodologies and rating classifications similar to those used by external agencies.

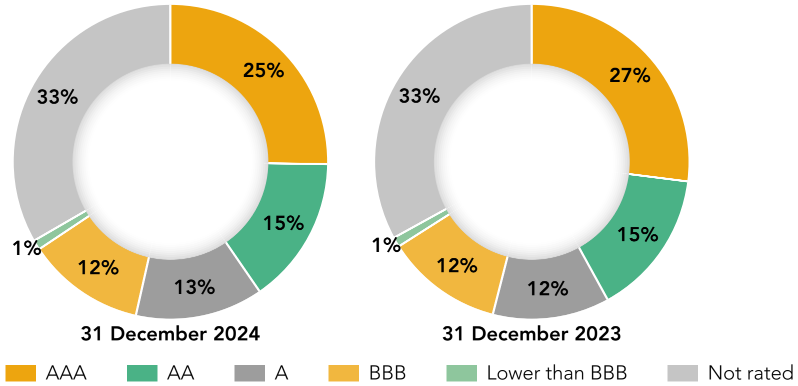
The following tables provide a detailed breakdown of the fixed-income exposure by (i) rating class and (ii) sector. Assets in scope of spread risk are, by definition, not in scope of counterparty default risk. The total exposure of assets in scope of spread risk is € 54,693 million (2023: € 51,911 million). The portfolio composition is similar to 2023.

Please note that the total fixed-income exposure referred to in this section does not include "Assets held for index-linked and unit-linked contracts". Although the risks of these assets are primarily for the policyholders, guarantees within certain products may transfer some of the risk to a.s.r.

**Composition fixed income portfolio by sector**




**Composition fixed income portfolio by rating**




### 7.8.3.6 Market risk concentrations

Concentrations of market risk constitute an additional risk to an insurer. Concentration risk is the concentration of exposures to the same counterparty. Other possible concentrations (region, country, etc.) are not in scope. The capital requirement for concentration risk is determined in three steps:

1. determine the exposure above threshold. The threshold depends on the credit quality of the counterparty;
2. calculation of the capital requirement for each counterparty, based on a specified factor depending on the credit quality;
3. aggregation of individual capital requirements for the various counterparties.

According to the spread risk module, bonds and loans guaranteed by a certain government or international organisation are not in scope of concentration risk. Bank deposits can be excluded from concentration risk if they fulfil certain conditions.

a.s.r. continuously monitors exposures in order to avoid concentrations in a single obligor outside of the risk appetite and has an overall limit on the total level of the required capital for market risk concentrations. The calculation of the market risk concentrations applies to the total investment portfolio, where, in line with Solvency II, government bonds are not included.

The required capital for market risk concentrations is nil as per year-end 2024 (2023: nil).

## 7.8.4 Counterparty default risk

Counterparty default risk reflects possible losses due to unexpected default or deterioration in the credit standing of counterparties and debtors. Counterparty default risk affects several types of assets:

- mortgages
- savings-linked mortgage loans
- derivatives
- reinsurance
- receivables
- cash and cash equivalents
- expected credit loss

Assets that are in scope of spread risk are, by definition, not in scope of counterparty default risk and vice versa. The Solvency II regime makes a distinction between two types of exposures:

- Type 1: These counterparties generally have a rating (reinsurance, derivatives, current account balances, deposits with ceding companies and issued guarantee (letter of credit). The exposures are not diversified.
- Type 2: These counterparties are normally unrated (receivables from intermediaries and policyholders, mortgages with private individuals or SMEs). The exposures are generally diversified.

The total capital requirement for counterparty risk is an aggregation of the capital requirement for type 1 exposure and the capital requirement for type 2 exposure by taking 75% correlation.

**Counterparty default risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **Type 1** | 159 | 190 |
| **Type 2** | 234 | 136 |
| **Diversification (negative)** | -24 | -20 |
| | | |
| **Total** | 369 | 305 |

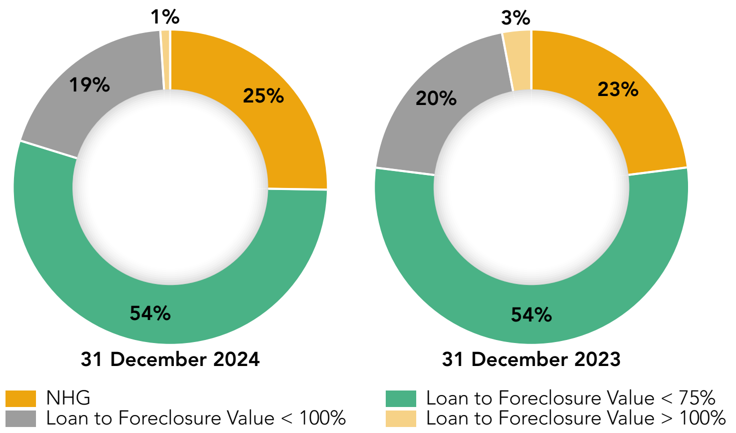
In 2024 the Solvency II SF Counterparty default has increased with € 64 million. The counterparty risk type 1 is lower compared to previous year, mainly due to the decreased cash position. The counterparty risk type 2 was higher per year-end 2024, mainly due to the increase of the mortgage portfolio.

### 7.8.4.1 Mortgages

Mortgages are granted for the account and risk of third parties and for a.s.r.'s own account. The a.s.r. portfolio consists only of Dutch mortgages with a limited counterparty default risk. The fair value of a.s.r.'s mortgage portfolio in scope of Counterparty default risk was € 11,846 million at year-end 2024 (2023: € 10,285 million[1]).

Please note that the mortgages of both Aegon life and Aegon spaarkas are in scope of Solvency II IM spread risk.

**Composition mortgage portfolio**

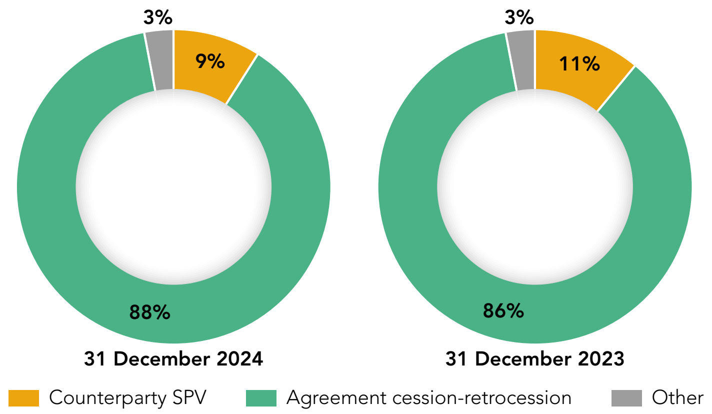



The Loan-to-Value ratio is based on the value of the mortgage according to Solvency II principals with respect to the a.s.r. calculated collateral. The percentage of mortgages which are in arrears for over three months remained stable at 0.04% in 2024 (2023: 0.04%).

### 7.8.4.2 Savings-linked mortgage loans

The counterparty default risk of the savings-linked mortgage loans ('Spaarlossen') depends on the counterparty. For 9% of the portfolio, the counterparties are Special Purpose Vehicles. The risk is limited due to the robust quality of the mortgages in the Special Purpose Vehicles in combination with the tranching. a.s.r. has a cession-retrocession agreement with the counterparty for 88% of the portfolio, for which the risk is limited. Effectively, a.s.r. recognises the underlying receivable from the counterparty (or in the case of insolvency of the counterparty the mortgage loans transfers as collateral), mitigating the counterparty default risk of the savings-linked mortgage loans.

**Composition savings-linked mortgage loans portfolio**




### 7.8.4.3 Derivatives

Over the Counter (OTC) derivatives are primarily used by a.s.r. to manage the interest-rate risks incorporated into the insurance liabilities. Interest-rate derivatives are traded with a well-diversified and qualitative dealer panel with whom there is an established International Swaps and Derivatives Association (ISDA) contract and a Credit Support Annex (CSA) in place. These CSAs include specific agreements on the exchange of collateral limiting market and counterparty risk. The outstanding value of the interest rate derivative positions is matched by collateral received from eligible counterparties, minimising the net counterparty default risk. In addition, a sizeable part of the interest-rate swap portfolio (and virtually all new interest rate swaps) are centrally cleared, which significantly reduces counterparty default risk.

1 The 2023 figure is adjusted compared to the 2023 report (€ 9,975 million) for participations in Aegon mortgages (impact € +310 million).

### 7.8.4.4 Reinsurance

a.s.r. collaborates with reinsurers. When entering into reinsurance contracts a.s.r. requires the counterparty to be rated at least single A. With respect to long-tail business and other sectors, the minimum permitted rating is single A.

The table shows the exposure to reinsurers which are in scope of counterparty default risk. The total exposure to reinsurers at year-end 2024 was € 340 million (2023: € 355 million). Counterparty default risk is immaterial for Aegon life's reinsurance exposure and therefore not in scope of the Composition table.

**Composition reinsurance counterparties by rating**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| AAA | 0% | 0% |
| AA | 87% | 87% |
| A | 11% | 10% |
| NR | 2% | 0% |
| **Total** | **100%** | **100%** |

### 7.8.4.5 Receivables

The receivables with a counterparty default risk amounted to € 2,317 million at year-end 2024. This mainly consists of insurance and intermediaries receivables (€ 232 million), reinsurance receivables (€ 21 million) and other (non-insurance) receivables (€ 2,064 million).

### 7.8.4.6 Cash and cash equivalents

The current accounts in scope of counterparty default risk amounted € 2,494 million in 2024 (2023: € 4,303 million), this excludes commercial papers.

**Composition cash accounts by rating**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| AAA | 40 | 773 |
| AA | 176 | 514 |
| A | 2,278 | 3,017 |
| Lower than A | 0 | 0 |
| **Total** | **2,494** | **4,303** |

### 7.8.4.7 Expected credit loss

The recognition and measurement of impairments is forward-looking, and apply to all financial assets measured at amortised cost and at FVOCI. Initially, a provision is required for credit losses expected within the next 12 months. This is referred to as 'Stage 1'. If there is a significant increase in credit risk between the moment of origination and the reporting date, but the exposure is not in default, the exposure is in 'Stage 2'. If the exposure is in default, this is referred to as 'Stage 3'. For both 'Stage 2' and 'Stage 3', a provision is required for expected credit losses over the remaining lifetime of the financial asset.

**Expected credit loss measurement**

The impairment requirements outline a 'three-stage' model for impairment based on changes in credit quality since initial recognition as summarised below:

1. A financial instrument that is not credit-impaired on initial recognition is classified into 'Stage 1' and has its credit risk continuously monitored by a.s.r.:
   a) If a significant increase in credit risk ('SICR') since initial recognition is identified, the financial instrument is moved to 'Stage 2' but is not yet deemed to be credit impaired.
   b) If the financial instrument is credit-impaired, the financial instrument is then moved to 'Stage 3'.
2. Financial instruments in Stage 1 have their ECL measured at a 12-month expected credit losses that result from default events possible within the next 12 months.
3. Financial instruments in Stages 2 or 3 have their ECL measured based on expected credit losses on a lifetime basis.

ECL is measured on either a 12-month basis (Stage 1) or lifetime basis (Stages 2/3) depending on whether a significant increase in credit risk has occurred since initial recognition or whether an asset is considered to be credit-impaired.

Expected credit losses are the discounted product of the Probability of Default (PD), Exposure at Default (EAD), and Loss Given Default (LGD), defined as follows:

- PD represents the likelihood of a borrower defaulting on its financial obligation, either over the next 12 months (12-month PD), or over the remaining lifetime (lifetime PD) of the obligation;
- EAD is based on the amounts a.s.r. expects to be owed at the time of default, over the next 12 months (12-month EAD) or over the remaining lifetime (lifetime EAD);
- LGD represents a.s.r.'s expectation of the extent of the loss on a defaulted exposure. LGD varies by type of counterparty, type and seniority of the claim, and availability of collateral or other credit support. LGD is expressed as a percentage loss per unit of exposure at the time of default (EAD). LGD is calculated on a 12-month or lifetime basis, where the 12-month LGD is the percentage of loss expected to be made if the default occurs in the next 12 months, and the lifetime LGD is the percentage of loss expected to be made if the default occurs over the remaining expected lifetime of the loan.

A pervasive concept in measuring ECL is that it should consider forward-looking information. a.s.r. has performed historical analyses to identify the key economic variables impacting credit risk and expected credit losses for each portfolio. Expert judgment was also applied in this process.

a.s.r. employs separate models to calculate ECL on the following asset classes:

- Mortgage loans;
- Consumer loans;
- SME loans; and
- Debt securities.

Debt securities are covered by a single model because these portfolios are all managed in a similar fashion. Asset classes not covered by the ECL calculations are considered either to have immaterial credit risk or to be short-term in nature. Given the need to adapt the models to the different portfolio characteristics, all ECL models use different key judgments and assumptions.

The following tables show the changes in the loss allowance between the beginning and end of the year due to these factors (excluding Other financial assets at amortised cost):

### Changes in loss allowance of government and corporate bonds measured at FVOCI

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | 1 | - | - | 1 |
| Changes in the composition of the group | -1 | - | - | -1 |
| **Loss allowance at 31 December** | - | - | - | - |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | - | - | - | - |
| Changes in the composition of the group | 1 | - | - | 1 |
| **Loss allowance at 31 December** | **1** | **-** | **-** | **1** |

### Changes in loss allowance of mortgage loans measured at amortised cost

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | 1 | 1 | - | 3 |
| Changes in the composition of the group | -1 | -1 | - | -2 |
| **Loss allowance at 31 December** | - | - | - | - |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | - | - | - | - |
| Stage transfers | - | -1 | - | -1 |
| Changes in models/risk parameters | - | -1 | - | - |
| Changes in the composition of the group | 1 | 3 | - | 4 |
| **Loss allowance at 31 December** | **1** | **1** | **-** | **3** |

### Changes in loss allowance private loans measured at amortised cost

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Purchased or Originated Credit-Impaired | Total |
|---|---|---|---|---|---|
| At 1 January | 2 | 1 | 2 | - | 5 |
| Changes in the composition of the group | -2 | -1 | -2 | - | -5 |
| **Loss allowance at 31 December** | - | - | - | - | - |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Purchased or Originated Credit-Impaired | Total |
|---|---|---|---|---|---|
| At 1 January | - | - | - | - | - |
| Stage transfers | -4 | 3 | 1 | - | - |
| Net remeasurement of loss allowance | 1 | 1 | 2 | - | 3 |
| Repayments | -1 | -1 | -1 | - | -3 |
| Changes in models/risk parameters | -1 | -1 | 1 | - | -1 |
| Changes in the composition of the group | 6 | - | - | - | 6 |
| Other changes | - | - | -1 | - | -1 |
| **Loss allowance at 31 December** | **2** | **1** | **2** | **-** | **5** |

The total of undiscounted ECL at initial recognition for purchased or originated credit-impaired financial assets recognised during 2023 amounts to € 0 million.

The following tables further specify the changes in gross carrying amounts to help explain their significance for the changes in the loss allowance for the same portfolios as discussed above. The gross carrying amounts in these tables are the clean values, thus excluding the accrued interest.

### Changes in gross carrying amounts of government and corporate bonds measured at FVOCI

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | 874 | - | - | 874 |
| Changes in the composition of the group | -874 | - | - | -874 |
| **Gross carrying amount at 31 December** | - | - | - | - |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | - | - | - | - |
| Repayments | -70 | - | - | -70 |
| Disposals | -45 | - | - | -45 |
| Changes in the composition of the group | 970 | - | - | 970 |
| Other changes | 18 | - | - | 18 |
| **Gross carrying amount at 31 December** | **874** | **-** | **-** | **874** |

## Changes in gross carrying amounts of mortgage loans measured at amortised cost

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | 14,121 | 414 | 18 | 14,552 |
| Stage transfers | 34 | -34 | - | - |
| Purchases and originations | 408 | 2 | - | 410 |
| Repayments | -322 | -7 | -1 | -330 |
| Changes in the composition of the group | -11,730 | -320 | -13 | -12,063 |
| Other changes | 55 | - | - | 55 |
| **Gross carrying amount at 31 December** | **2,566** | **55** | **4** | **2,624** |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Total |
|---|---|---|---|---|
| At 1 January | - | - | - | - |
| Stage transfers | 506 | -510 | 4 | - |
| Purchases and originations | 964 | 14 | - | 979 |
| Repayments | -538 | -48 | -1 | -586 |
| Changes in the composition of the group | 12,763 | 957 | 14 | 13,734 |
| Other changes | 425 | - | - | 425 |
| **Gross carrying amount at 31 December** | **14,121** | **414** | **18** | **14,552** |

## Changes in gross carrying amounts of private loans measured at amortised cost

| 2024 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Purchased or Originated Credit-Impaired | Total |
|---|---|---|---|---|---|
| At 1 January | 164 | 15 | 6 | 3 | 188 |
| Repayments | -1 | - | - | - | -1 |
| Changes in the composition of the group | -155 | -15 | -6 | -3 | -179 |
| **Gross carrying amount at 31 December** | **9** | **-** | **-** | **-** | **9** |

| 2023 | Stage 1 (12-month ECL) | Stage 2 (Lifetime ECL) | Stage 3 (Lifetime ECL) | Purchased or Originated Credit-Impaired | Total |
|---|---|---|---|---|---|
| At 1 January | - | - | - | - | - |
| Stage transfers | -33 | 29 | 4 | - | - |
| Purchases and originations | 5 | - | - | - | 5 |
| Repayments | -42 | -14 | 3 | -7 | -60 |
| Changes in the composition of the group | 236 | - | - | 10 | 246 |
| Other changes | -1 | - | -1 | - | -2 |
| **Gross carrying amount at 31 December** | **164** | **15** | **6** | **3** | **188** |

## 7.8.5 Liquidity risk

Liquidity risk is the risk that a.s.r. is not able to meet its financial obligations to policyholders and other creditors when they become due and payable, at a reasonable cost and in a timely manner. Liquidity risk is not quantified in the SCR of a.s.r. and is therefore separately discussed.

a.s.r. recognises different levels of liquidity management. First, short-term liquidity management which covers the day-to-day cash requirements and aims to meet short term liquidity risk targets. Second level covers the medium-tolong-term liquidity management. This, among others, considers the strategic matching of liquidity & funding needs in different business conditions in which market liquidity risk could materialise. Finally stress liquidity management refers to the ability to respond to a potential crisis situation as a result of a market event and/or an a.s.r.-specific event.

a.s.r. experienced changes in the liquidity as a result of cash variation margin in- and outflow related to the ISDA/CSA- and Clearing agreements of derivatives. Cash outflow was financed by returning earlier received cash collateral to counterparties and, when necessary, by liquidating assets. As at 31 December 2024 a.s.r. is a net receiver of cash collateral. Other sources of liquidity risk are (unexpected) lapses in the insurance portfolios and catastrophe risk. a.s.r. monitors its liquidity risk via different risk reporting and monitoring processes including cash management reports, cash flow forecasts, liquidity stress tests and liquidity dashboards in which liquidity outflows are calculated for different (stress) scenarios. For long-term liquidity management purposes, liquidity is also taken into account in the strategic asset allocation process.

a.s.r.'s liquidity management principle consists of three components. First, a well-diversified funding base in order to provide liquidity for cash management purposes. A portion of assets must be held in overnight liquidity (directly available) and invested in unencumbered marketable securities so it can be used for collateralised borrowing or asset sales. In order to cover liquidity needs in stress events a.s.r. has committed repo-facilities in place to ensure liquidity under all market circumstances. Second, the strategic asset allocation should reflect the expected and contingent liquidity needs of liabilities. Finally, an adequate and up-to-date treasury mandate, liquidity policy and contingency plan are in place to enable management to act effectively and efficiently in times of crisis.

In managing the liquidity risk from financial liabilities, a.s.r. relies on holding liquid assets comprising cash and cash equivalents and investment grade securities for which there is an active and liquid market. These assets can be readily sold or lend to meet liquidity requirements. As at 31 December 2024, a.s.r. had cash (€ 3,372 million), short-term secured deposits (€ 653 million) and liquid government bonds (€ 15,775 million).

The following table shows the contractual undiscounted cash flows of the insurance liabilities based on Solvency II. All other line items as well as the total carrying value are based on IFRS principles.

The insurance liabilities include the impact of expected lapses and mortality as well as non profit sharing cash flows. Profit sharing cash flows of insurance liabilities are not taken into account, nor are equities, property and swaptions. Furthermore, cash flows of the pension benefit obligations are taken into account.

**Contractual cash flows**

| | Payable on demand | < 1 years | 1-5 years | 5-10 years | > 10 years | Carrying value |
|---|---|---|---|---|---|---|
| **31 December 2024** | | | | | | |
| Insurance liabilities | 712 | 4,352 | 29,731 | 23,847 | 75,592 | 102,633 |
| Pension Benefit Obligation | - | 125 | 1,012 | 1,292 | 6,001 | 5,037 |
| Derivatives liabilities | - | 768 | 2,091 | 1,996 | 3,310 | 8,666 |
| Financial liabilities | 4,397 | 1,448 | 1,322 | 1,052 | 3,070 | 11,312 |
| Future interest payments | - | 228 | 750 | 746 | 1,226 | - |
| **Total** | **5,109** | **6,922** | **34,906** | **28,932** | **89,199** | **127,647** |

| | Payable on demand | < 1 years | 1-5 years | 5-10 years | > 10 years | Carrying value |
|---|---|---|---|---|---|---|
| **31 December 2023** | | | | | | |
| Insurance liabilities | 621 | 4,752 | 27,817 | 23,555 | 78,211 | 99,384 |
| Pension Benefit Obligation | - | 122 | 999 | 1,289 | 6,388 | 5,218 |
| Derivatives liabilities | - | 1,520 | 2,508 | 2,802 | 4,630 | 10,132 |
| Savings deposits | 9,105 | 820 | 1,048 | 525 | 470 | 11,967 |
| Financial liabilities | 3,950 | 2,535 | 3,205 | 1,422 | 2,544 | 13,670 |
| Future interest payments | - | 323 | 890 | 672 | 1,315 | - |
| **Total** | **13,676** | **10,072** | **36,467** | **30,265** | **93,558** | **140,371** |

The insurance contract liabilities contractual cash flows for the period 1-5 years can be split into: 1-2 years € 13,455 million (2023 € 11,688 million), 2-3 years € 5,525 million (2023 € 5,523 million), 3-4 years € 5,479 million (2023 € 5,346 million) and 4-5 years € 5,271 million (2023 € 5,260 million).

When the amount payable is not fixed the amount reported is determined by reference to the conditions existing at the reporting date.

Financial liabilities payable on demand include the liability recognised for cash collateral received under ISDAs, concluded with counterparties. The related cash collateral received is recognised as cash and cash equivalents, and not part of the liquidity risk exposure table.

## 7.8.6 Operational risk

Operational risk concerns the risk of direct and / or indirect losses which can occur within a.s.r. as a result of inadequate or failing (changing) internal processes, people, systems and/or as a result of external events. Operational risks occurred are most times being caused by the failure of processes, people, systems, external events or a combination of these factors.

**Operational risk - required capital**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| SCR operational risk - required capital | 430 | 437 |

The SCR for operational risk amounts to € 430 million at the end of 2024 (2023: € 437 million) and is determined with the standard formula under Solvency II. The operational risk is based on the basic SCR, the volumes of premiums and technical provisions, and the amount of expenses.

There is no benefit of diversification for operational risk.

## 7.8.7 Strategic and operational risk management

The system of internal control includes the management of risks at different levels in the organisation, both operational and strategic.

### 7.8.7.1 Strategic Risk Management

Strategic risk management aims to identify and manage the most important risks that may impact a.s.r.'s strategic objectives. The process of strategic risk analysis (SRA) is designed to identify, measure, manage, monitor, report and evaluate those risks that are of strategic importance to a.s.r.:

**Identifying**
Through the SRA process, identification of risks is structurally organised through the combined top-down and bottom-up SRA approach. The SRA outcomes are jointly translated into 'risk priorities' and 'emerging risks', in which the most important risks for a.s.r. are represented.

**Measuring**
Through the SRA process, the likelihood and impact of the identified risks are assessed, taking into account (the effectiveness of) risk mitigating measures and planned improvement actions. Information from other processes is used to gain additional insights into the likelihood and impact. One single risk priority can take multiple risks into account. In this manner, the risk priorities provide (further) insights into risk interdependencies.

**Managing**
As part of the SRA processes, the effectiveness of risk mitigating measures and planned measures of improvement is assessed. This means risk management strategies are discussed, resulting in refined risk management strategies.

**Monitoring and reporting**
The output of the SRA process is translated into day-to-day risk management and monitoring and reporting, both at group level and business line levels. At group level, the risk priorities are discussed in the a.s.r. risk committee and the Audit & Risk Committee. At the level of the business lines, risks are discussed in the BRC's.

**Evaluating**
Insights regarding likelihood and impact are evaluated against solvency targets in the SRA process. Based on this evaluation, conclusions are formulated regarding the adequacy of solvency objectives at group and individual legal entity level.

**Climate change**
One of the areas within Strategic Risk Management concerns climate change. For a.s.r., climate change is a direct and indirect risk, both to its assets and liabilities. In section 5.4.3 Identified risks and 6.2.1 Climate change, the relevant climate related risks for a.s.r. are discussed including how these risks are managed. Climate change related risks have had no direct impact on the valuation in the current accounting and disclosures of a.s.r.'s assets and liabilities.

### 7.8.7.2 Operational Risk Management

Operational Risk Management (ORM) involves the management of all possible risks that may influence the achievement of the business goals and that can cause financial or reputational damage. ORM includes the identification, analysis, prioritisation and management of these risks in line with the risk appetite. The policy on ORM is drafted and periodically evaluated under the coordination of ORM. The policy is implemented in the (decentralised) business entities under the responsibility of the management boards. A variety of risks is covered by ORM policies, such as the Process, IT, outsourcing, project, reporting policy etc.

**Identifying**
With the operational targets as a starting point, each business entity performs risk assessments to identify events that could influence these targets. In each business entity the a first line risk manager facilitates the periodic identification of the key operational risks. All business processes are taken into account to identify the risks. All identified risks are prioritised and recorded in a risk-control framework.

The risk policies prescribe specific risk analyses to be performed to identify and analyse the risks. For IT systems, Information Security Analyses (DIVA - Dienstverlening en Informatie Veiligheids Analyse) have to be performed and for large outsourcing projects a specific risk analysis is required.

**Measuring**
All risks in the risk-control frameworks are assessed on likelihood and impact. Where applicable, the variables are quantified, but often judgments of subject matter experts are required. Based on the estimation of the variables, each risk is labelled with a specific level of concern (1 to 4). Gross risks with a level of concern 3 or 4 are considered 'key'.

**Managing**
For each risk, identified controls are implemented into the processes to keep the level of risk within the agreed risk appetite (level of concern 1 or 2). In general, risks can be accepted, mitigated, avoided or transferred. A large range of options is available to mitigate operational risks, depending on the type. An estimation is made of the net risk, after implementing the control(s). A more effective and efficient approach to managing risks is required driven by increased complexity of processes, data processing and the need for a timely and accurate view on the risk profile. a.s.r. is therefore in the process of shifting towards a more automated approach to manage risks, for example automated controls, data analysis and the use of AI for reporting purposes.

**Monitoring and reporting**
The effectiveness of ORM is periodically monitored by the first line risk manager at each business line or legal entity. For each key control in the risk-control framework a testing calendar is established based on auditing standards. Each key control is tested regularly and the outcomes of the effectiveness of the management of key risks are reported to the (local) management. Outcomes are also reported to the NFRC and a.s.r. risk committee.

**Evaluating**
Periodically, yet at least annually, the risk-control frameworks and ORM policies are evaluated to see if revisions are necessary. The risk management function also challenges the business segments and legal entities regarding their risk-control frameworks.

### Operational incidents

Operational incidents are reported to GRM, in accordance with the operational risk policy. Root cause analyses are performed to evaluate the causes of losses in order to learn from these experiences. An overview of the largest operational incidents and the level of operational losses is reported to the NFRC. Actions are defined and implemented to avoid repetition of operational incidents.

### ICT

Through IT risk management, a.s.r. devotes attention to the confidentiality, integrity and availability of ICT, including End User Computations. The logical access control for key systems used in the financial reporting process remains a high priority in order to enhance the integrity of applications and data. The logical access control procedures also prevents fraud by improving segregation of duties and by offsetting current and desired access levels within the systems and applications. Proper understanding of information, security and cyber risks is essential and the reason for which continuous actions are carried out to create awareness among employees. All of a.s.r.'s security measures are tested periodically. To increase cyber resilience, a.s.r. is participating in de DNB Threat Intel Based Ethical Red Teaming exercise.

### Business Continuity Management

Operations and the execution of critical processes can be disrupted significantly by unforeseen circumstances or calamities. Preparation and practice enable a.s.r. to resume its most important business activities with limited interruptions and to react quickly and effectively during such situations.

Critical processes and the people, assets and technology needed to run them are identified during the Business Impact Analysis. The factors and calamities that can threaten the availability these processes are identified in the Threat Analysis. If the impact of certain events can be unacceptable large, mitigating actions are taken. In response to the large dependence of a.s.r. of automated systems, cyber threats are always addressed during these analyses.

a.s.r. defines a crisis as: one or more business lines are (in danger of being) disrupted due to a calamity or potentially suffering reputational damage beyond the acceptable. In order to manage the crisis, and to be able to react timely, efficiently and effectively, a.s.r. has set up a crisis organisation.

There is a central crisis team led by a member of the board. Additionally each business line has its own team to deal with smaller crises. The measures to ensure continuity of critical processes are tested regularly and all crisis teams are trained annually to be able to act effectively during such situations. The plans to deal with the various scenarios, including cyber threats, are also practiced periodically.

### Recovery and Resolution

a.s.r. has to comply with Dutch legislation that addresses the recovery and settlement of insurance companies ('Wet herstel en afwikkeling van verzekeraars' in Dutch). The objective is that insurance companies and supervisors are better prepared against a crisis and that insurance companies can recover from a crisis without government aid. On 5 April 2023 a new policy rule on resolvability of insurance companies was published. The policy rule specifies the criteria DNB has to take into account when identifying impediments to resolution in relation to Dutch insurance companies.

As part of the legislation a.s.r. is obliged to have a Preparatory Crisis Plan ('Voorbereidend Crisisplan' in Dutch) in place that has been approved by DNB. In 2024, a.s.r.'s Preparatory Crisis Plan is updated and helps to be prepared and supports the organisation in various scenarios of extreme financial stress. The Preparatory Crisis Plan describes and quantifies the measures that can be applied to handle a crisis situation and to resume business. These measures are tested in the scenario analysis, in which the effects of each recovery measure on a.s.r.'s financial position (solvency and liquidity) are quantified. The required preparations for implementing the measures, their implementation time and effectiveness, potential obstacles, impact on clients and operational effects are also assessed. The main purpose of the Preparatory Crisis Plan is to increase the chances of early intervention in the event of a financial crisis situation and to further guarantee that the interest of clients and other stakeholders are protected.

### Reasonable assurance and model validation

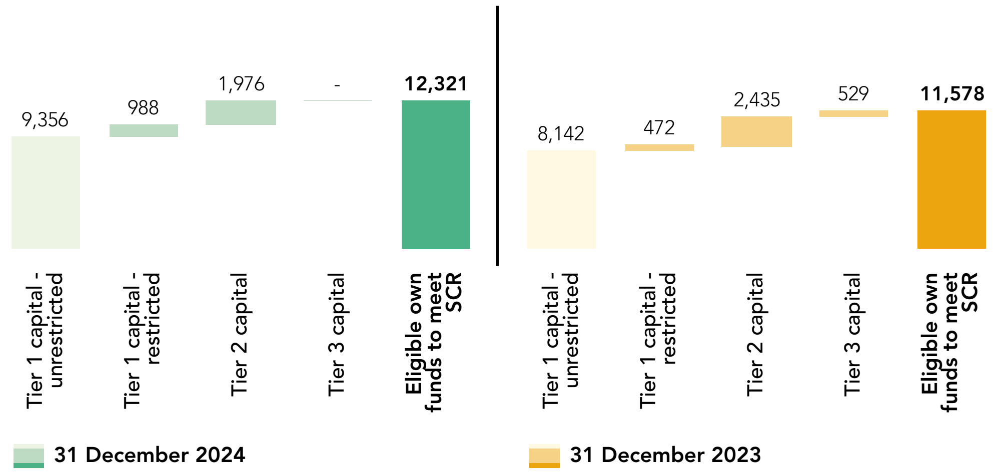
a.s.r. aims to obtain reasonable assurance regarding the adequacy and accuracy of the outcomes of models that are used to provide best estimate values and solvency capital requirements. To this end, multiple instruments are applied, including model validation. Two times a year a model inventory is performed by the product lines to determine if and when a model (re)validation is required. Triggers for model (re)validation are diverse, e.g. regulation, conversions, analysis of change. Materiality is determined by means of an assessment of impact and complexity. Impact and complexity is expressed in terms of High (H), Medium (M), or Low (L). The model inventories are discussed in the Model Committee.

In the pursuit of reasonable assurance, model risk is mitigated and unacceptable deviations are avoided, against acceptable costs.

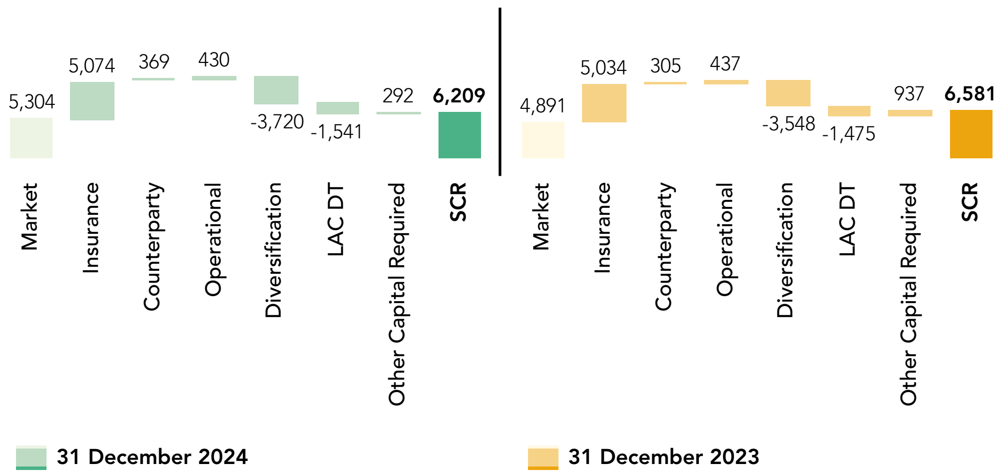
# 7.9 Capital management

## Key figures

### Eligible own funds




### SCR




The Solvency II ratio increased to 198% (31 December 2023: 176%) and includes a deduction for share buyback (€ 100 million), interim dividend 2024 (€ 244 million) and final dividend 2024 (€ 409 million) and positive impact from the Knab transaction.

The EOF increased to € 12,321 million (31 December 2023: € 11,578 million) mainly driven by positive expected excess returns on investments (€ +957 million), value of new business (€ +117 million) and market and operational developments (€ +698 million), partly offset by the decrease in eligible own funds due to the Knab transaction (€ -254 million) and capital management actions (dividend € -653 million and share buyback € -100 million).

The SCR decreased to € 6,209 million (31 December 2023: € 6,581 million), driven by the Knab transaction (€ -649 million) and capital release (€ -79 million), partly compensated by an increase following market and operational developments (€ +356 million), among which model changes for LAC DT and harmonisation of mortgage valuation of a.s.r. and Aegon.

Other Capital Required relate to other financial sectors such as de Hoop and TKP (2023 includes Knab).

**Reconciliation total IFRS equity vs EOF Solvency II**

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| **IFRS equity** | 9,833 | 9,377 |
| Adjustments | -898 | -997 |
| Elimination intangible assets | -633 | -715 |
| Gross revaluation insurance liabilities | 2,421 | 2,045 |
| Other revaluations | -801 | -615 |
| **Excess of assets over liabilities** | **9,922** | **9,096** |
| Subordinated liabilities in OF | 2,964 | 2,907 |
| Other EOF items | -566 | -425 |
| **Eligible own funds to meet SCR** | **12,321** | **11,578** |

The table above presents the reconciliation of IFRS equity to the solvency II. The main differences between the IFRS equity and EOF Solvency II are:

- Adjustment of other equity instruments (the other equity instruments excludes any discretionary interest);
- Elimination of intangible assets, such as goodwill, as this is not recognised under Solvency II;
- Net revaluation of insurance liabilities due to differences between IFRS 17 and SII, such as the applied yield curve. This is after tax-impact of 25.8%;
- Other revaluations for example the revaluation of Financial Institutions;
- The addition of subordinated liabilities and other equity instruments (excluding any discretionary interest);
- Other EOF items, for example foreseeable dividend and non-available minority interest.

## 7.9.1 Capital management objectives

### Management

Overall capital management is administered at group level. a.s.r. currently intends to consider investing capital above the management target Solvency II ratio (calculated based on the partial internal model) of 160% with the objective of creating value for its shareholders. If and when a.s.r. operates at a certain level (which may change over time) that is considerably above the management target, and it assesses that it cannot invest this capital in value-creating opportunities for a prolonged period of time, a.s.r. may decide, but is not obliged, to return (part of this) capital to its shareholders.

If a.s.r. chooses to return capital, it plans to do so in a form that is efficient for shareholders at that time. a.s.r. actively manages its in-force business, which is expected to result in free capital generation over time. Additionally, business improvement and balance sheet restructuring should improve the capital generation capacity while advancing the risk profile of the company. The legal entities are individually capitalised and excess capital over management's targets for the legal entities is intended to be upstreamed to the holding company as far as is needed for amongst others covering external dividend, coupon payments on hybrids / senior financing instruments and holding costs and in so far the local regulations and the internal risk appetite statement allow. Excess capital that is upstreamed to the holding company is added to and managed in the holding cash buffer until it is further distributed and used to cover dividends, coupons and other holding expenses. The capital and cash attribution to the holding is closely monitored and managed on a continuous basis.

### Objectives

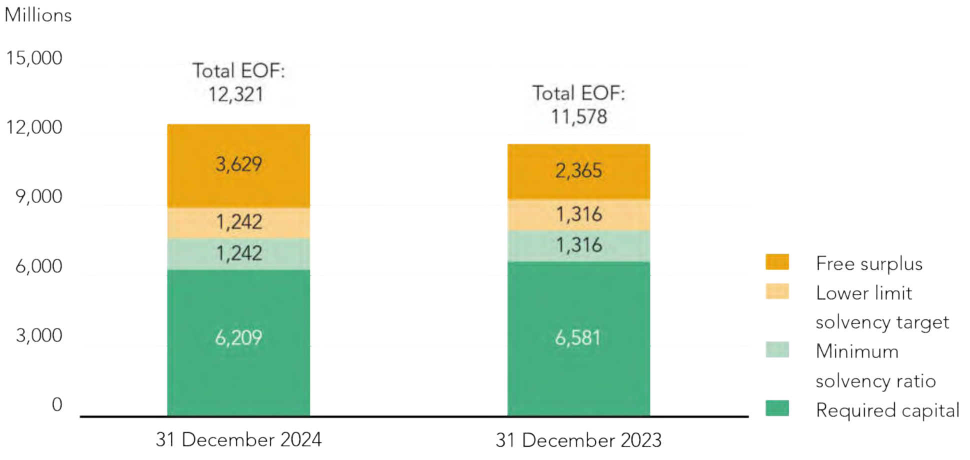
The group is committed to maintain a strong capital position in order to be a robust and sustainable insurer for its policyholders and other stakeholders. The objective is to maintain a solvency ratio well above the minimum levels as defined in the risk appetite statements and above the relevant management threshold levels. Sensitivities are periodically performed for principal risks and annual stress tests are performed to test a.s.r.'s robustness to withstand moderate to severe scenarios. An additional objective is to achieve a combination of a capital position and a risk profile that supports at least a 'single A' rating by Standard & Poor's.

The SCR is reported on a quarterly basis and proxies are made on both a monthly and weekly basis. The internal minimum solvency ratio for a.s.r. as formulated in the risk appetite statement is 120%. The lower limit solvency target is 140%. The management threshold level for the solvency ratio is above 160%. The solvency ratio stood at 198% at 31 December 2024 including financial institutions and after final dividend, which was comfortably above the internal requirement of 120% and the management threshold level of 160%.

In accordance with a.s.r.'s dividend policy, the liquidity of the underlying entities is not taken into account for the liquidity position of the group. However, the capital is recognised in the capital position of the group, since a.s.r. has the ability to realise the capital of this OTSO, for example by selling the entity. Specifically regarding a.s.r. health basic in 2024, no dividend or capital withdrawals have taken place.

The graph shows how the eligible own funds of a.s.r. relate to the different capital targets.

### Market value own funds under SCR




## 7.9.2 Solvency ratio and a.s.r. ratings

SCR The required capital stood at € 6,209 million per 31 December 2024 (2023: € 6,581 million). The required capital (before diversification) consists for 2024 € 5,452 million out of market risk and the insurance risk amounted to € 5,074 million.

a.s.r.'s Solvency II ratio, including financial institutions, complied during 2024 with the applicable externally imposed capital requirement. The capital requirements of the financial institutions fall under a different sectoral supervision regime.

The table presents the solvency ratio at group level as at the date indicated.

### Eligible own funds to meet the SCR

| | 31 December 2024 | 31 December 2023 |
|---|---|---|
| Eligible Own Funds Solvency II | 11,968 | 10,460 |
| Required capital | 6,006 | 5,718 |
| | | |
| **Solvency II ratio excluding Financial Institutions** | **199%** | **183%** |
| | | |
| Eligible Own Funds Solvency II | 12,321 | 11,578 |
| Required capital | 6,209 | 6,581 |
| | | |
| **Solvency II ratio including Financial Institutions** | **198%** | **176%** |

The Solvency II ratio stood at 199% (excluding financial institutions) at 31 December 2024 (2023: 183%). The Solvency II ratio including financial institutions stood at 198% as at 31 December 2024 (2023: 176%). The Solvency II ratios presented are not final until filed with the regulators.

After a 1-in-200 shock a.s.r. suffers an economic loss equal to the BSCR* which is defined as the basic SCR (BSCR) plus operational risk (OR) plus the adjustment for the Loss Absorbing Capacity of the Technical Provisions (LAC TP). This loss (corrected for any tax exempted losses) may be partly offset by the Loss Absorbing Capacity of Deferred Taxes (LAC DT). The LAC DT is calculated according to the requirements as stated in the Solvency II (SII) regulations, which provide a principle-based approach for the LAC DT substantiation.

In 2024, different from previous year, the same (harmonised) projection model is used for all Solvency II entities within a.s.r., albeit with entity-specific input. The amount of LAC DT in the consolidated SCR at group level consists of the sum of the LAC DT of all Solvency II entities within a.s.r. adjusted for the group diversification effects. This results in a LAC DT of € 1,541 million (2023: € 1,475 million). In this year's reassessment experts decided to decrease the top bucket floors for a.s.r. life and a.s.r. non-life by 5% to 80% and 85% respectively to align with the top bucket floor for Aegon life and to provide a sufficient buffer to limit future volatility. For the other entities a.s.r. decided to keep the top bucket floors at their current levels.

Furthermore, the a.s.r. SCR includes LAC TP which is the part of the technical provisions that can be used to absorb some of the SCR shock losses, as the expected future profit sharing to policyholders will be reduced if actual losses would arise. LAC TP amounted to € 165 million at year-end 2024 (2023: € 156 million).

On 8 January 2025, the amendments to the Solvency II Directive have been published in the Official Journal of the European Union. The changes contained in the amended Directive must be incorporated into national legislation by 29 January 2027, and become applicable to insurers as of 30 January 2027.

The amendments consist of various changes to the Solvency II framework, affecting most notably the liability discount curve, the risk margin and the volatility adjustment (VA), the Dynamic volatility Adjustment (DVA) and the long term impact of the climate change transition plan on the Solvency II requirements. The amendments to the Solvency II Directive will require amendments to the Solvency II Delegated Regulation and/or the introduction of additional delegated acts and guidelines, to be developed by EIOPA.

In addition to the revisions to the Solvency II Directive, an agreement was reached on the Insurance Recovery and Resolution Directive (IRRD), which provides for recovery and resolution framework for insurance companies at European level and to be implemented by EU member states, comparable to the Act on Insurance Recovery and Resolution, currently in force in the Netherlands.

a.s.r. ratings Standard & Poor's confirmed the single A rating of a.s.r., a.s.r. life, a.s.r. non-life, Aegon life on 12 November 2024.

**Ratings per legal entity**

| Ratings Standard & Poor's | Type | Rating | Outlook | Rating & outlook since |
|---|---|---|---|---|
| ASR Nederland N.V. | ICR | BBB+ | Positive | 12 September 2024 |
| ASR Levensverzekering N.V. | IFSR | A | Positive | 12 September 2024 |
| ASR Levensverzekering N.V. | ICR | A | Positive | 12 September 2024 |
| ASR Schadeverzekering N.V. | IFSR | A | Positive | 12 September 2024 |
| ASR Schadeverzekering N.V. | ICR | A | Positive | 12 September 2024 |
| Aegon Levensverzekering N.V. | IFSR | A | Positive | 12 September 2024 |
| Aegon Levensverzekering N.V. | ICR | A | Positive | 12 September 2024 |

ICR: Issuer Credit Rating

IFSR: Insurer Financial Strength Rating

Rating reports can be found on the corporate website: www.asrnl.com.

## 7.9.3 Additional information

**1. Capital Market transactions**
On 20 March 2024, a.s.r. has successfully priced € 500 million perpetual subordinated 8.25 year Restricted Tier 1 capital securities ("New Securities"). The New Securities were priced at a fixed rate coupon of 6.625% per annum until the first reset date on 27 June 2032. The New Securities are first callable six months prior to the first reset date and on each interest payment thereafter.

In 2024, the 2014 5% perpetual T2 hybrid capital instrument of € 500 million has been fully redeemed.

**2. Share buyback programme**
In 2024, it was determined that the expected developments of the OCC combined with a robust balance sheet will allow for the resumption of additional capital distribution to shareholders. This was interrupted in 2022 following the announcement of the transaction with Aegon Netherlands. For the financial years 2024, the intention was determined and communicated during the Capital Markets Day 2024 to buy back treasury shares for an amount of € 125 million. This will be decided with the publication of the full annual results with a test of whether the conditions set in the capital and dividend policy for the purchase of own shares have been met.

On 7 November 2024, ASR Nederland N.V. (a.s.r.) announced a share buyback program of € 100 million in own shares following the successful completion of the sale of Knab to BAWAG. The buyback program was completed on 11 December, 2024. In total there are 2.213.413 shares of a.s.r. repurchased at an average price of € 45.18 per share. An independent broker, appointed by a.s.r., carried out the repurchase.

**3. Dividend**
a.s.r. has proposed a total dividend of € 3.12 per share over the full year 2024 (2023: € 2.89 per share). Taking into account the interim dividend of € 1.16 per share, the final dividend amounts to € 1.96 per share. The final dividend amounts to € 409 million based on the number of shares per 31 December 2024. a.s.r. maintains a progressive dividend policy which increases dividend by mid to high single digit annual growth until 2026.

# 7.10 Operating result

a.s.r. manages its business primarily using operational key performance indicators (KPIs). The operating result is the KPI covering the overall profitability of the business. Furthermore, a.s.r. uses other operational measures such as the Non-Life ratio, the life operating expenses as well as the availability and creation of capital, based on the Solvency II partial internal model, as key figures in business decision making (see section 7.9).

The operating result is managed and presented at the consolidated a.s.r. and at a segment level (see section 7.4.3) and is also a key profitability indicator at business line level. The operating result is an inclusive measure covering all result components that can be influenced by the regular business. As such the operating result is the single bottom line performance indicator covering the performance of the business.

Operating result as presented below is an Alternative Performance Measure (non-GAAP financial measure) and is not a measure of financial performance under IFRS. Because it is not determined in accordance with IFRS, operating result as presented by a.s.r. may not be comparable to other similarly titled measures of performance of other companies.

In 2024 a.s.r. made the following amendments to the operating result:

- The result of pre-recognition interest rate hedged developments prior to initial CSM recognition. The impact of this amendment is € 18 million on the operating result for 2024;
- In the Operating Investment and Finance Result (OIFR) calculation, the interest accretion on the CSM is aligned with the interest accretion under IFRS. The impact of this amendment is € 35 million on the operating result for 2024;
- The treatment of intercompany transactions and eliminations between group companies in continued and discontinued operations. The impact of this amendment is € 13 million on the operating result for 2024.

Additional information on these amendments is presented in the subsequent sections in this paragraph.

## Definition of operating result

Operating result is calculated by using the result before tax from continuing operations reported in accordance with IFRS, adjusted for the following:

1. **Adjustments to the insurance service result:**

- The impact of changes to future services on onerous contracts;
- The impact of changes of inflation on the Liability for Incurred Claims;
- The amortisation of pre recognition interest rate hedged developments prior to initial CSM recognition. With effect from 2024, when a.s.r. explicitly hedges pre recognition interest movements to protect the profitability of new business Level of Aggration (LoA), the valuation of this interest rate hedge as per date of initial recognition CSM will be added to CSM of this new business LoA. Consequently, the interest hedge will be amortised over the remaining period of the LoA, equal to the period of release of the CSM of the respective LoA.;

2. **Adjustments to the investment and finance result:** investment and finance result, excluding investment operating expenses, is replaced by an Operating Investment and Finance Result (which is part of the Operating Result) and is defined as the expected return on the investments in excess of the expected interest accrual on the insurance liabilities, the investment operating expenses, all hybrid expenses (including hybrid expenses through OCI) and the UFR drag for each reporting period.

The operating result should reflect the operational performance of a.s.r. and should exclude revaluation effects on the assets and (insurance related) liabilities as a result of interest and spread movements and/or equity and real estate market movements.

If a.s.r. is to value the present value of future cash flows, it is common market practice to make use of a forward curve (based on the current discount curve) plus a certain premium reflecting the risk of invested assets. This premium is defined as the implied spread at the beginning of the period over which the result is calculated.

The expected return is calculated as:

- For the fixed income investments: the market value of the fixed income assets at the beginning of the period multiplied by the total of the one year forward swap rate and the implied spread at the beginning of the period;

- For equities and real estate investments: the market value of the equity and real estate assets at the beginning of the period multiplied by a total return assumption;
- For Insurance related liabilities: the market value of the insurance related liabilities at the beginning of the period multiplied by the one-year forward rate of the IFRS17 curve (i.e. including the Liability Illiquidity Premium and Credit Risk Adjustment);
- The other assets / liabilities at the beginning of the period multiplied by the forward curve.

The implied spread per fixed income asset category is defined as the required increase above the forward swap curve to determine the current market value. The implied spreads are calculated quarterly. a.s.r. has defined five fixed income asset categories that each have an implied spread.

The balance sheet at the beginning of the period is based on a.s.r.'s look-through principle, i.e. all assets in the same asset category have a similar risk-profile (e.g. fixed income funds are classified as fixed income and not as equities, real estate funds are classified as real estate, etc.).

For real estate and equity investments, a.s.r. applies a total return assumption of 5.5% and 6.6% (pre-tax) respectively. This assumption is evaluated each year;

3. **Other adjustments and incidental items**:

- Model- and methodological changes of a fundamental nature, in the measurement of the insurance liabilities;
- Results of non-core operations;
- Non-recurring or one-off items related to the ongoing business;
- Non-recurring or one-off items not related to the ongoing business, such as (non-exhaustive) restructuring costs, regulatory costs not related to business activities, changes in own pension arrangements and expenses related to mergers and acquisitions (M&A) activities and start-ups.

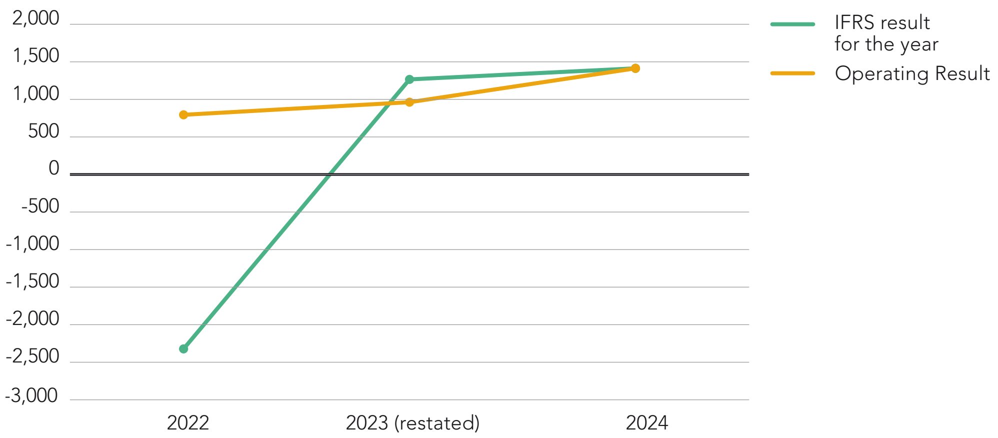
The treatment of intercompany transactions and eliminations between group companies has been split into continued and discontinued operations. In cases where the a.s.r. group continues to provide services to a discontinued operation subsequent to the disposal, the elimination of intragroup transactions between the continuing operations and the discontinued operation before the disposal will be treated in a way that reflects the continuance of these transactions, and as such impacts the operating result. This could have an impact on insurance service result, investment and finance result and other adjustments and incidental items.

The RoE, which is based on the operating result, is defined as:
i. The operating result adjusted for the applicable tax divided by
ii. The IFRS equity adjusted for the unrealised capital gains reserve that may be reclassified subsequently to profit or loss and equity components of discontinued operations and non-core activities.

## Historical comparison

a.s.r. introduced the operating result in 2015 prior to the IPO. The operating result has since been the KPI for managing the profitability of the business. The comparison under IFRS 17 (2022-2024) is shown separately.

**IFRS 17 result versus operating result**




The three-year comparison of of the IFRS 17 result and the operating result shows that, as expected, the volatility of the IFRS figures has increased significantly. In 2022 this was mainly driven by sharply rising interest rates resulting in significant revaluations. Operating result is less sensitive to financial market developments, as, amongst others, the Operating Investment and Finance Result is based on a standard return.

In 2023 and 2024, IFRS result exceeded operating result mainly due to the downward adjustment of investment and finance result to the normalised operating investment and finance result (see below). The 2023 have been restated due to the sale of Knab.

## Reconciliation of IFRS result for the year to operating result

The reconciliation of the IFRS result for the year to the operating result is presented as follows:

### IFRS result to operating result

| | 2024 | 2023 |
|---|---|---|
| **Result before tax** | **1,447** | **1,278** |
| Minus adjustments related to the insurance service result | 5 | -75 |
| Minus adjustments related to the investment and finance result | 173 | 611 |
| Minus adjustments related to the other result | -158 | -231 |
| | | |
| **Operating result** | **1,428** | **973** |

In 2023 and 2024, IFRS result exceeded operating result mainly due to the downward adjustment of investment and finance result to the normalised operating investment and finance result (see below).

In 2024, adjustments related to the insurance service result (€ 5 million) mainly consist of changes to future services as part of losses on onerous contracts.

Adjustments related to the investment and finance result (€ 173 million) were mainly related to revaluations due to market developments to arrive at normalised investment returns in the operating result.

Adjustments related to the other result of € -158 million mainly consist of the following items:

- the cost of integration of Aegon NL (€ - 83 million)
- restructuring provision expenses (€ - 27 million);
- amortisation of other intangible assets identified in business combinations (€ - 42 million).

In 2023, adjustments related to the insurance service result (€ -75 million) mainly consist of the noneconomic assumption update for inflation in the liability of incurred claims of Disability (€ -87 million).

The IFRS result before tax in 2023 (€ 1,278 million) is primarily adjusted in relation to the investment and finance result (€ 611 million) which mainly related to fair value revaluations driven by decreasing interest rates in 2023.

Adjustments related to the other result of € - 231 million) million mainly consist of provisions made following the agreement with claim organisations on Unit Linked-life insurance transparency of in total € 300 million which includes an additional provision of € 50 million to facilitate individual claims of customers in distressing situations. This was partly offset by the purchase gain on the Aegon transaction.

# 7.11 Company financial statements

## 7.11.1 Company balance sheet

**Company balance sheet**

| (in € millions and before profit appropriation) | Note | 31 December 2024 | 31 December 2023 (restated) |
|---|---|---|---|
| **Non-current assets** | | | |
| Intangible assets | 7.11.3.4 | 295 | 363 |
| Property, plant and equipment | 7.11.3.5 | 230 | 256 |
| Subsidiaries | 7.11.3.6 | 10,660 | 11,478 |
| Loans to group companies | 7.11.3.7 | 123 | 378 |
| Investments | 7.11.3.8 | 252 | 596 |
| **Total non-current assets** | | **11,560** | **13,072** |
| | | | |
| **Current assets** | | | |
| Other receivables | 7.11.3.10 | 6,391 | 6,154 |
| Cash and cash equivalents | 7.11.3.11 | 715 | 121 |
| **Total current assets** | | **7,106** | **6,276** |
| | | | |
| **Total assets** | | **18,666** | **19,348** |

| (in € millions and before profit appropriation) | Note | 31 December 2024 | 31 December 2023 (restated) |
|---|---|---|---|
| **Equity** | | | |
| Share capital | 7.11.3.12 | 34 | 34 |
| Share premium reserve | 7.11.3.12 | 4,070 | 4,070 |
| Legal reserves | 7.11.3.12 | 857 | 842 |
| Actuarial gains and losses | 7.11.3.12 | -175 | -288 |
| Retained earnings | 7.11.3.12 | 3,402 | 2,830 |
| Treasury shares | 7.11.3.12 | -109 | -7 |
| | | | |
| Net result for the year | | 946 | *1,086* |
| *Less: interim dividend* | | *-245* | *-228* |
| Unappropriated result | 7.11.3.12 | 701 | 858 |
| **Equity attributable to shareholders** | | **8,779** | **8,339** |
| Other equity instruments | 7.11.3.12 | 1,007 | *1,004* |
| **Equity attributable to holders of equity instruments** | | **9,786** | **9,343** |
| | | | |
| **Provisions** | | | |
| Employee benefits | 7.11.3.13 | 5,036 | 5,218 |
| Other provisions | 7.11.3.14 | 79 | 84 |
| **Total provisions** | | **5,115** | **5,302** |
| | | | |
| **Long-term liabilities** | | | |
| Subordinated liabilities | 7.11.3.15 | 2,007 | 2,005 |
| Borrowings | 7.11.3.16 | 826 | 845 |
| Debts to group companies | 7.11.3.17 | 208 | 1,001 |
| Deferred tax liabilities | 7.11.3.9 | 430 | 319 |
| **Total long-term liabilities** | | **3,470** | **4,169** |
| | | | |
| **Current liabilities** | | | |
| Due to banks | 7.11.3.18 | - | 200 |
| Other liabilities | 7.11.3.19 | 295 | 334 |
| **Total current liabilities** | | **295** | **534** |
| | | | |
| **Total equity and liabilities** | | **18,666** | **19,348** |

The numbers following the line items refer to the relevant sections in the notes to the company financial statements.

## 7.11.2 Company income statement

**Company income statement**

| (in € millions) | Note | 2024 | 2023 |
|---|---|---|---|
| Operating expenses | 7.11.3.20 | -279 | -211 |
| Impairments | | - | -1 |
| Other expenses | | -1 | -3 |
| Other income | | 1 | 124 |
| | | | |
| **Income from subsidiaries and investments** | | | |
| Share of result in subsidiaries | | 1,402 | 1,115 |
| Investment income | 7.11.3.21 | 225 | 72 |
| Fair value gains and losses | | 10 | 21 |
| Interest expenses | 7.11.3.22 | -255 | -101 |
| | | | |
| **Result before tax** | | **1,104** | **1,016** |
| | | | |
| Income tax (expense) / gain | | 81 | 70 |
| **Result after tax from continuing operations** | | **1,185** | **1,086** |
| | | | |
| **Discontinued operations** | | | |
| Result after tax from discontinued operations | | -240 | - |
| | | | |
| **Net result** | | **946** | **1,086** |

## 7.11.3 Notes to the company financial statements

### 7.11.3.1 Changes in comparative figures

The impact of these changes on a.s.r.'s profit before tax and shareholders returns is summarised in section 7.3.2.

### 7.11.3.2 Accounting policies

The company financial statements are prepared in accordance with Title 9, Book 2 of the Dutch Civil Code. The consolidated financial statements of a.s.r. for 2024 have been prepared in accordance with IFRS – including the IAS and Interpretations – as accepted within the EU and with part 9 of the book of the Dutch Civil Code. In accordance with Section 362(8), Book 2 of the Dutch Civil Code, the same accounting policies for the recognition and measurement of assets and liabilities and determination of results applied to the company financial statements are applied to the consolidated financial statements.

Investments in group companies are recognised, using the equity method, in accordance with the accounting policies used in a.s.r.'s consolidated financial statements whereby the goodwill, if any, is presented separately. The share of profit of group companies is reported in conformity with the accounting policies used in a.s.r.'s consolidated financial statements.

Lease contracts are disclosed using IFRS 16 based on the option under RJ 292.1.

Unless stated otherwise, all amounts presented in these financial statements are in millions of €. Calculations in the tables are made using unrounded figures. As a result rounding differences can occur.

### 7.11.3.3 Acquisitions and legal mergers

In 2024, there were no acquisitions and legal mergers for a.s.r.

On July 2023, a.s.r. acquired the shares of Aegon NL. Following the acquisition, on 1 October 2023, Aegon NL has legally merged with a.s.r. As a result, Aegon NL ceased to exist as a separate legal entity.

## 7.11.3.4 Intangible assets

**Intangible assets**

| | 2024 | 2023 |
|---|---|---|
| Goodwill | 17 | 17 |
| Intangible assets | 277 | 346 |
| **Total intangible assets** | **295** | **363** |

The goodwill relates to the acquisition of BNG Vermogensbeheer in 2016 (€ 4 million) and to the acquisition of Generali in 2018 (€ 13 million). No impairments were deemed necessary. For more information see section 7.5.1.

Intangibles assets mainly relates to the intangible assets acquired through the acquisition of Aegon NL in 2023 and relates mainly to customer relationships, trade names and software. Intangible assets are amortized straight-line over their useful life, which is determined individually (between 5 and 20 years).

## 7.11.3.5 Property and equipment

**Property and equipment**

| | 2024 | 2023 |
|---|---|---|
| **Right-of-use assets:** | | |
| Land and buildings owned by subsidiary | 210 | 230 |
| Vehicles | 6 | 6 |
| Other | 15 | 20 |
| **Total property and equipment** | **230** | **256** |

The right-of-use assets includes property and equipment that is leased by a.s.r. Land and buildings owned by subsidiary relates mainly to the a.s.r. head office, which is owned by a.s.r. life.

**Changes in property and equipment**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 256 | 219 |
| Additions | 1 | 2 |
| Depreciation | -20 | -13 |
| Remeasurement | - | 10 |
| Impairments | -3 | - |
| Other changes | - | -3 |
| Changes in the composition of the group | -4 | 42 |
| **At 31 December** | **230** | **256** |
| Gross carrying amount as at 31 December | 364 | 378 |
| Accumulated depreciation as at 31 December | -131 | -122 |
| Accumulated impairments as at 31 December | -3 | - |
| **Net carrying value as at 31 December** | **230** | **256** |

Depreciation of property and equipment is recorded in the operating expenses (see section 7.11.3.20).

## 7.11.3.6 Subsidiaries

**Subsidiaries**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 11,478 | 5,781 |
| Additions | 10 | 13 |
| Share of result | 1,402 | 1,115 |
| Dividend received | -1,587 | -1,194 |
| Revaluations | 198 | 202 |
| Other changes | 13 | -9 |
| Changes in the composition of the group | -854 | 5,570 |
| **At 31 December** | **10,660** | **11,478** |

The changes in the composition of the group relate to Aegon NL (2023) and Knab (2024).

### 7.11.3.7 Loans to group companies

**Loans to group companies**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 378 | 68 |
| Issues | 30 | 305 |
| Repayments | -285 | - |
| Revaluations | 1 | 1 |
| Accrued interest | -1 | 4 |
| **At 31 December** | **124** | **378** |

The loans to group companies with a principal amount of € 121 million (2023: € 376 million) are expected to be settled more than one year after the balance sheet date and have an average interest rate of 6.15% (2023: 6.22%). Interest income on loans to group companies amounts to € 6 million (2023: € 6 million). The repayment relates to Knab.

### 7.11.3.8 Investments

In 2024 excess cash is invested in short term corporate bonds (2023: short term government bonds).

### 7.11.3.9 Deferred tax liabilities

The deferred tax liabilities mainly arises from the difference in commercial and fiscal valuation of employee benefits (including the assets resulting from the insurance contracts, which are administrated by a.s.r. life and Aegon life) amounting to € 252 million (2023: € 180 million). These also consist of intangible fixed assets, investment property and technical provision valuations to market value.

### 7.11.3.10 Other receivables

The other receivables include receivables from group companies, which include the receivable (reimbursement right) with respect to insurance contracts for the pension plan of a.s.r. administered by a.s.r. life and Aegon life amounting to € 6,133 million (2023: € 6,044 million). The value is equal to the value of the related insurance contracts administered by a.s.r. life and Aegon life, which are both eliminated in the consolidated financial statements. The remaining portion of the receivables from group companies is payable on demand.

### 7.11.3.11 Cash and cash equivalents

Cash and cash equivalents are fully and freely available.

## 7.11.3.12 Equity

### Statement of changes in equity

| | Share capital | Share premium reserve | Legal reserves | Actuarial gains and losses | Retained earnings | Treasury shares | Unappropriated result | Other equity instruments | Equity |
|---|---|---|---|---|---|---|---|---|---|
| **At 1 January 2024** | **34** | **4,070** | **842** | **-288** | **2,830** | **-7** | **858** | **1,004** | **9,343** |
| Appropriation of the result previous year | - | - | - | - | 858 | - | -858 | - | - |
| Net result for the year | - | - | - | - | | - | 946 | - | 946 |
| Dividend paid | - | - | - | - | -382 | - | -245 | - | -627 |
| Remeasurement of post-employment benefit obligation | - | - | | 113 | - | - | - | - | 113 |
| Unrealised change in value | - | - | 198 | - | -35 | - | - | - | 163 |
| Change in reserves required by law | - | - | -183 | - | 183 | - | - | - | - |
| Discretionary interest on other equity instruments | - | - | - | - | -63 | - | - | - | -63 |
| Issue of other equity instruments | - | - | - | - | - | - | - | 500 | 500 |
| Redemptions of other equity instruments | - | - | - | - | - | - | - | -502 | -502 |
| Cost of issue of other equity instruments | - | - | - | - | -5 | - | - | - | -5 |
| Treasury shares acquired (-) / sold | - | - | - | - | -2 | -102 | - | - | -103 |
| Other movements | - | - | - | - | 17 | - | - | 5 | 22 |
| **At 31 December 2024** | **34** | **4,070** | **857** | **-175** | **3,402** | **-109** | **701** | **1,007** | **9,786** |

| | Share capital | Share premium reserve | Legal reserves | Actuarial gains and losses | Retained earnings | Treasury shares | Unappropriated result | Other equity instruments | Equity |
|---|---|---|---|---|---|---|---|---|---|
| **At 1 January 2023** | **24** | **1,533** | **288** | **-168** | **5,389** | **-79** | **-1,841** | **1,004** | **6,150** |
| Appropriation of the result previous year | - | - | - | - | -1,841 | - | 1,841 | - | - |
| Net result for the year | - | - | - | - | | - | 1,086 | - | 1,086 |
| Dividend paid | - | - | - | - | -254 | - | -228 | - | -482 |
| Remeasurement of post-employment benefit obligation | - | - | - | -120 | - | - | - | - | -120 |
| Unrealised change in value | - | - | 202 | - | -20 | - | - | - | 182 |
| Change in reserves required by law | - | - | 352 | - | -352 | - | - | - | - |
| Discretionary interest on other equity instruments | - | - | - | - | -48 | - | - | - | -48 |
| Treasury shares acquired (-) / sold | - | - | - | - | -1 | -4 | - | - | -5 |
| Increase (decrease) in capital | 10 | 2,537 | - | - | -40 | 75 | - | - | 2,582 |
| Other movements | - | - | - | - | -1 | - | - | - | -1 |
| **At 31 December 2023** | **34** | **4,070** | **842** | **-288** | **2,830** | **-7** | **858** | **1,004** | **9,343** |

### Share capital
For a breakdown of the share capital, see section 7.5.11.1.

### Legal reserves
The legal reserves relate to the revaluation of investments in group companies. The legal reserves are maintained in relation to the (not yet received as dividend) share in the result (and other additions to equity) of group companies accounted for using the equity method since initial recognition reduced with the amount of dividend that a.s.r. is able to distribute without restrictions. The legal reserves are not freely distributable. See section 7.9 for more information on the regulatory restrictions.

### Treasury shares
For more information on treasury shares, see section 7.5.11.5.

### Other equity instruments
The other equity instruments relate to two different hybrid Tier 1 instruments (2023: two different hybrid Tier 1 and Tier 2 instruments) classified as equity. See section 7.5.11.6 for more information.

### Freely distributable items
The part of equity attributable to shareholders that is available for dividend distributions is limited by the Dutch Civil Code and the Dutch Supervisory Rules and Regulations (Solvency II requirements). The distribution of capital is restricted in accordance with the Dutch Civil Code for share capital and statutory reserves. The Solvency II requirements stipulate that a.s.r. must maintain a minimum amount of capital.

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The freely distributable reserves is based on the lowest outcome of the restrictions from the Dutch Civil Code and the Solvency II requirements. This is further explained in the table below:

**Distributable items**

| | 2024 | 2023 |
|---|---|---|
| Equity attributable to shareholders | 8,779 | 8,339 |
| Non distributable items | | |
| - Share capital[1] | 34 | 34 |
| - Legal reserves | 857 | 842 |
| **Distributable items based on the Dutch Civil Code** | **7,889** | **7,463** |
| | | |
| Reserves available for financial supervision purposes | 12,321 | 11,578 |
| Solvency II requirement under the Financial Supervision Act | 6,209 | 6,581 |
| **Distributable items based on the Solvency II requirements** | **6,112** | **4,997** |
| | | |
| **Freely distributable items (lower of the values above)** | **6,112** | **4,997** |

For more information on Solvency II capital management objectives see section 7.9.1.

## 7.11.3.13 Employee benefits

Employee benefits can be broken down as follows (see section 7.5.15 for further details):

**Employee benefits**

| | 2024 | 2023 |
|---|---|---|
| Post-employment benefits pensions | 4,974 | 5,160 |
| Post-employment benefits other than pensions | 35 | 39 |
| **Post-employment benefit obligation** | **5,010** | **5,199** |
| | | |
| Other long-term employee benefits | 27 | 19 |
| | | |
| **Total** | **5,036** | **5,218** |

1 Less the nominal value of treasury shares if applicable

## 7.11.3.14 Other provisions

**Changes in provisions**

| | 2024 | 2023 |
|---|---|---|
| At 1 January | 84 | 3 |
| Additional provisions | 28 | 65 |
| Reversal of unused amounts | -1 | -1 |
| Utilised in course of year | -32 | -9 |
| Changes in the composition of the group | - | 25 |
| | | |
| **At 31 December** | **79** | **84** |

Provisions primarily relate to provisions for employee restructuring and retained disability risk. See section 7.5.16 for more information.

The timing of the outflow of resources related to these provisions is uncertain because of the unpredictability of the outcome and time required for the settlement of disputes.

An amount of € 52 million (2023: € 70 million) of the provisions is expected to be settled within twelve months after the balance sheet date.

## 7.11.3.15 Subordinated liabilities

For information regarding the subordinated liabilities see section 7.5.12.

## 7.11.3.16 Borrowings

**Borrowings**

| | 2024 | 2023 |
|---|---|---|
| Loans | 597 | 596 |
| Lease liabilities | 229 | 248 |
| | | |
| **Total borrowings** | **826** | **845** |

The loans relate to the issue of the green senior bond under the a.s.r. Green Finance Framework of € 600 million in 2023. The bond has a maturity of 5 years with a fixed rate coupon of 3.625%.

The lease liabilities consist primarily € 215 million (2023: € 220 million) of the lease of the a.s.r. head office from a.s.r. life. The interest rate for the lease of the head office is 1.5% (2023: 1.5%). The maturity of this contract is 31 years, which includes the total of five extension options of five years each.

An amount of € 15 million (2023: € 20 million)of the lease liabilities is expected to be settled within twelve months after the balance sheet date.

## 7.11.3.17 Debts to group companies

Debts to group companies with a principal amount of € 205 million (2023: € 996 million) have an average interest rate of 3.86 % in 2024 (2023: 3.92%). The maturity of the loans varies from 1 - 3 years. An amount of € 30 million of the debt to group companies is expected to be settled less than or equal to one year after the balance sheet date.

There is no significant difference between the carrying amount of the debt to group companies and the fair value of these liabilities. No securities or guarantees have been agreed and no collateral is posted.

## 7.11.3.18 Due to banks

In 2024, due to banks amounted to € nil (2023: € 200 million).

## 7.11.3.19 Other liabilities

**Other liabilities**

| | 2024 | 2023 |
|---|---|---|
| Short-term employee benefits | 27 | 18 |
| Trade payables | 24 | 10 |
| Other liabilities | 243 | 306 |
| | | |
| **Total other liabilities** | **295** | **334** |

The carrying amount of other liabilities is a good approximation of their fair value.

## 7.11.3.20 Operating expenses

The operating expenses of € 279 million (2023: € 211 million) are operating expenses relating to holding activities. The increase in the operating expenses is mainly due to the integration of Aegon NL entities. See section 7.6.11 for the total operating expenses of the Group. Operating expenses also include depreciation of the right-of-use assets owned by subsidiaries of € 16 million (2023: € 12 million).

The average number of employees working for a.s.r. is 7,684 (2023: 6,154), all working in the Netherlands. a.s.r. allocates expenses to subsidiaries according to the extent to which the expenses incurred can be related to the activities of the subsidiary. This allocation is reassessed each year.

## 7.11.3.21 Investment income

The investment income of € 225 million (2023: € 72 million) mainly increased as a result of an increase in the interest income relating to the employee benefits obligation allocated to the holding.

## 7.11.3.22 Interest expense

The interest expense relates primarily to the interest on subordinated liabilities, interest owed to credit institutions and to the interest on the lease liabilities.

## 7.11.3.23 Auditor’s fees

The following fees for the financial years have been charged by KPMG Accountants N.V. to a.s.r., its subsidiaries and other consolidated entities, on an accrual basis.

**Auditor’s fee**

| Amounts in € thousands | 2024 | 2023 | |
|---|---|---|---|
| | KPMG | KPMG | Other auditor |
| Audit of the financial statements | 16,714 | 15,410 | 6,144 |
| Other audit engagements | 2,818 | 1,712 | 2,076 |
| | | | |
| **Total audit fees** | **19,532** | **17,123** | **8,220** |

Fees for audit engagements include fees paid for the audit of the consolidated and company financial statements, quarterly reports and other reports.

In the above mentioned years no fees were paid for tax-related advisory services to KPMG Accountants N.V. and no fees were paid to other KPMG networks, other than KPMG Accountants N.V.

## 7.11.3.24 Related parties

A related party is a person or entity that has significant influence over another entity, or has the ability to affect the financial and operating policies of the other party. Parties related to a.s.r. include associates, joint ventures, members of the EB and MB, members of the SB, close family members of any person referred to above, entities controlled or significantly influenced by any person referred to above and any other affiliated entity.

a.s.r. enters into transactions with related parties during the conduct of its business. These transactions mainly involve loans, debts, deposits and commissions, and are conducted on terms equivalent to those that prevail in arm's length transactions.

- Related party transactions in relation to members of the EB, MB and SB are mentioned in section 7.7.4 of the consolidated financial statements. In this chapter are also the related party transactions in relation to Aegon Ltd and its group companies (since Aegon Ltd. has significant influence over a.s.r.) mentioned.
- The remuneration of the EB and SB members of a.s.r. is disclosed in section 7.7.5 of the consolidated financial statements.
- The loans (including interest income) and debts to group companies are described in 7.11.3.7 respectively 7.11.3.17 of the financial company statements.

The post-employment benefit plan of a.s.r. is administered by a.s.r. life and Aegon life. For information regarding to this plan reference is made to section 7.11.3.10 of this company financial statements.

## 7.11.3.25 Contingent liabilities

### Joint and several liability

a.s.r. forms a fiscal unity for corporate income tax and VAT with nearly all of its subsidiaries. The company and its subsidiaries that form part of the fiscal unity are jointly and separately liable for taxation payable by the fiscal entity.

A statement of joint and several liability under section 403, Book 2 of the Dutch Civil Code has been issued by a.s.r. for the companies identified in section 7.7.9.

Utrecht, 25 March 2025

**Executive Board**
Jos Baeten
Ewout Hollegien
Ingrid de Swart

**Supervisory Board**
Joop Wijn
Bob Elfring
Sonja Barendregt
Gisella Eikelenboom
Gerard van Olphen
Daniëlle Jansen Heijtmajer
Lard Friese

8

# Appendix

# 8.1 About this report

## Scope

In this integrated Annual Report, a.s.r. provides a transparent overview of its activities and results for the reporting year starting at 1 January 2024 and lasting up to and including 31 December 2024. The financial information in this Annual Report has been consolidated for a.s.r. and all its group entities. All qualitative information relates to a.s.r. as a whole, unless a specific business line is explicitly mentioned. All non-financial quantitative information for 2024 includes a.s.r. and its group entities, unless stated otherwise. The full list of principal group companies and associates can be found in section 7.4.1.

## Standards

The consolidated financial statements of a.s.r. have been prepared in accordance with IFRS – including the IAS and Interpretations – as adopted by the EU, and with the financial reporting requirements included in Title 9, Book 2 of the Dutch Civil Code, where applicable. Pursuant to the options offered by Section 362, Book 2 of the Dutch Civil Code, a.s.r. has prepared its company financial statements in accordance with the same principles as those used for the consolidated financial statements. All amounts quoted in these financial statements are in euros and rounded to the nearest million, unless otherwise indicated. Calculations are made using unrounded figures. As a result, rounding differences can occur. The Group Solvency II ratio in this Annual Report is based on the existing Partial Internal Model for Aegon Life and Spaarkas. The other insurance entities in the group calculate their solvency capital requirement in accordance with the Solvency II Standard Formula. The Group Solvency II ratio includes financial institutions. In addition to the information in this Annual Report, a.s.r. also publishes a separate Solvency and Financial Condition Report.

a.s.r. prepares the management report in accordance with BW 2:391 and the EU Directive 2013/34/EU on the annual financial statements, the sustainability statements in accordance with the CSRD, including the reporting requirements of the ESRS, consolidated financial statements and related reports of certain types of undertakings and the Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting. This report offers an overview of key developments and performance of a.s.r. and shows how a.s.r. deals with key risks, opportunities, and uncertainties. The topics presented are based on a stakeholder dialogue and materiality analysis, conducted with the EB and different a.s.r. stakeholders.

## Comparative figures

The comparative income statement and operating result of 2023 do not include the figures of Aegon NL prior to the closing of the Aegon NL transaction which took place on 4 July 2023. Practically this only includes the H2 2023 figures from Aegon NL. For more information, see section 7.3.2.

## Process

The information in this Annual Report is delivered by various staff functions and business segments. For the preparation of the Annual Report, a steering group (SG) and a review group (RG) have been set up to guide the process and review the content. The SG represents the CEO, the Director Group Finance, Head of Sustainability & Benchmarks and Reporting, and the Director Corporate Communication. The RG is represented by Board Members, directors and relevant key functions. Before gathering information and writing the Annual Report, the SG decided on the structure and key messages of the report. The reporting specialists then translated the outcomes and decisions into draft reports, which were reviewed by a committee of members from the SG and RG. During the reporting process, the review group delivered feedback on the draft Annual Report. The final draft texts of the Annual Report are discussed in the respective meetings of the EB, the A&RC and the SB. Disclosure of the Annual Report is subject to the approval of the EB and the SB.

## Audit and assurance of the auditor

The consolidated financial statements 2024 have been audited by a.s.r.'s external auditor, KPMG. KPMG's audit opinion can be found in section 8.2.2. In addition to the financial results, KPMG performed a review - with a limited level of assurance - of the Sustainability Statements (section 6) in this Annual Report, including the incorporations by reference in other sections. KPMG's assurance report can be found in section 8.2.3.

# 8.2 Management and auditor reports

## 8.2.1 Statement of the Executive Board

a.s.r.'s consolidated and company financial and sustainability statements for 2024, as well as chapters 1-5 and 8 of the Annual Report, have been prepared in accordance with the IFRS and CSRD as adopted by the EU and with applicable Dutch law.

As required by Section 5:25c paragraph 2(c) of the Dutch Financial Supervision Act, the Executive Board (EB) declares that, to the best of its knowledge:

I. The financial statements provide a true and fair view of the assets, liabilities, financial positions and earnings of a.s.r. and the enterprises included in the consolidation taken as a whole;

II. The management report provides a fair view of the position at the balance sheet date and developments during the year under review and the enterprises included in the consolidation taken as a whole, together with a description of the principal risks confronting a.s.r.

In accordance with best practice 1.4.3 of the Dutch Corporate Governance Code of December 2022 and based on the evaluation carried out, the EB declares that, to the best of its knowledge:

I. The report provides sufficient insights into any failings in the effectiveness of the internal risk management and control systems with regard to the risks (see section 5.4);

II. The aforementioned systems provide reasonable assurance that the financial reporting does not contain any material inaccuracies (see section 5.4, 5.5, and 7.8);

III. Based on the current state of affairs, it is justified that the financial reporting is prepared on a going concern basis; and (see section 2, 3 and 7);

IV. The report states the material risks, and the uncertainties, to the extent that they are relevant to the expectation of the company's continuity for the period of twelve months after the preparation of the report. (see section 2.1, 2.6 and 7).

Utrecht, The Netherlands, 25 March 2025

Jos Baeten, CEO
Ewout Hollegien, CFO
Ingrid de Swart, COO/CTO

# 8.2.2 Independent auditor's report

## Independent auditor's report

To: the General Meeting of Shareholders and the Supervisory Board of ASR Nederland N.V.

## Report on the audit of the financial statements 2024 included in the annual report

### Our opinion[1]

In our opinion:

- the accompanying consolidated financial statements give a true and fair view of the financial position of ASR Nederland N.V. ('the Group' or 'ASR Nederland N.V.') as at 31 December 2024 and of its result and its cash flows for the year then ended, in accordance with IFRS Accounting Standards as endorsed by the European Union (EU-IFRS) and with Part 9 of Book 2 of the Dutch Civil Code.
- the accompanying company financial statements give a true and fair view of the financial position of ASR Nederland N.V. as at 31 December 2024 and of its result for the year then ended in accordance with Part 9 of Book 2 of the Dutch Civil Code.

### What we have audited

We have audited the financial statements 2024 of ASR Nederland N.V. based in Utrecht. The financial statements include the consolidated financial statements and the company financial statements.

The consolidated financial statements comprise:

1. the consolidated balance sheet as at 31 December 2024;
2. the following consolidated statements for 2024: the income statement, the statements of comprehensive income, changes in equity and cash flows; and
3. the notes comprising material accounting policy information and other explanatory information.

The company financial statements comprise:

1. the company balance sheet as 31 December 2024;
2. the company income statement for 2024; and
3. the notes comprising a summary of the accounting policies and other explanatory information.

### Basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing. Our responsibilities under those standards are further described in the 'Our responsibilities for the audit of the financial statements' section of our report.

We are independent of ASR Nederland N.V. in accordance with the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics).

We designed our audit procedures in the context of our audit of the financial statements as a whole and in forming our opinion thereon. The information in respect of going concern, fraud and non-compliance with laws and regulations, climate-related risks and the key audit matters was addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Information in support of our opinion

**Summary**

| Materiality |
|---|
| Materiality of EUR 120 million, based on total equity (approx. 1.2%) |

| Group Audit |
|---|
| - 99% of total equity covered by audit procedures |
| - 96% of total assets covered by audit procedures |
| - 99% of total revenue covered by audit procedures |

| Risk of material misstatements related to Fraud, NOCLAR, Going concern and Climate-related risks |
|---|
| Fraud risks: presumed risk of management override of controls and presumed risk of fraudulent revenue recognition identified and incorporated in our audit response. |
| Non-compliance with laws and regulations (NOCLAR) risks: no reportable risk of material misstatements related to NOCLAR risks identified. |
| Going concern risks: no going concern risks identified. |
| Climate-related risks: our risk assessment procedures related to climate-related risks did not result in the identification of a risk of material misstatement. |

| Key audit matters |
|---|
| - Valuation of insurance contract liabilities and related assets |
| - Valuation of hard-to-value assets |
| - Sale of Knab (Aegon Bank N.V.) |

**Materiality**

Based on our professional judgement we determined the materiality for the financial statements as a whole at

1 KPMG Accountants N.V., a Dutch limited liability company registered with the trade register in the Netherlands under number 33263683, is a member firm of the global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee.

EUR 120 million (2023: EUR 120 million). The materiality is determined with reference to total equity and amounts to approximately 1.2%.

We consider total equity as the most appropriate benchmark, based on our assessment of the general information needs of users of the financial statements of listed financial institutions predominantly active in the insurance business. Total equity is a key metric, as it is important for the dividend paying potential of the Group and it is relevant for the assessment of the financial performance of the Group, including its performance under Solvency II. We have also taken into account misstatements and/or possible misstatements that in our opinion are material for the users of the financial statements for qualitative reasons.

We agreed with the Audit & Risk Committee of the Supervisory Board that misstatements identified during our audit in excess of EUR 6 million would be reported to them, as well as smaller misstatements that in our view, must be reported on qualitative grounds.

**Scope of the group audit**

ASR Nederland N.V. is a Dutch insurance company at the head of a group of components. The financial information of this group is included in the (consolidated) financial statements of ASR Nederland N.V.

In 2024, the Group is structured along five (in 2023 six, including Banking) operating segments: Non-life, Life, Asset Management, Distribution & Services and lastly Holding & Other, some of which comprising of multiple legal entities. Since we are ultimately responsible for the group audit, we are responsible for directing, supervising and performing the group audit. In this respect, we have determined the nature and extent of audit procedures to be carried out for group entities, or so-called components.

This year, we applied the revised group auditing standard in our audit of the financial statements. The revised standard emphasizes the role and responsibilities of the group auditor. The revised standard contains new requirements for the identification and classification of components, scoping, and the design and performance of audit procedures across the Group.

We performed risk assessment procedures throughout our audit to determine which of the ASR Group's components are likely to include risks of material misstatement to the ASR Nederland N.V.'s financial statements. To appropriately respond to those assessed risks, we planned and performed further audit procedures, either at component level or centrally.

We identified 11 components associated with a risk of material misstatement. For 10 out of these 11 components we involved component auditors. We as group auditor audited the remaining component.

In supervising and directing our component auditors, we:

- Held risk assessment discussions with the component auditors to obtain their input to identify matters relevant to the group audit.
- All components in scope for group reporting purposes are audited by KPMG Netherlands. We sent detailed audit instructions to all component auditors, covering significant areas such as the identified risks of material misstatement on a group level and further set out the information that is required to be reported to the group audit team. We received written communication about the results of the work performed at component level.
- We set component performance materiality levels considering the component's size and risk profile. Component materiality ranges from EUR 4.5 million to EUR 70 million, based on the mix of their relative size and the nature of the risks of material misstatements identified for the components, in order to reduce aggregation risk to an acceptable level.
- We held conference calls and/or had meetings with the audit teams or component auditors to discuss relevant developments, understand and evaluate their work and attend meetings with local management. During these calls/meetings, the planning, risk assessment, procedures performed, findings and observations reported to the group auditor were discussed in more detail and any additional work deemed necessary by the group audit team was then performed.
- Inspected the work performed by 10 component auditors and evaluated the appropriateness of audit procedures performed and conclusions drawn from the audit evidence obtained, and the relation between communicated findings and work performed. In our inspection we mainly focused on the valuation of the insurance contract liabilities (and indirectly the best estimate liabilities under Solvency II) and the valuation of the hard to value assets as well as procedures performed to address the risk of management override and the fraud risk over revenue recognition.

The consolidation of the financial information of components in the group, the disclosures in the financial statements and certain accounting topics that are performed on a group level were further covered by the group audit team. Procedures performed by the group audit team included, but were not limited to, substantive procedures with respect to the sale of Knab, equity and certain elements of the valuation of insurance contract liabilities.

We have performed procedures for 99% of total equity, 96% total assets and 99% of total revenue. At group level, we assessed the aggregation risk in the remaining financial information and concluded that there is a less than reasonable possibility of a material misstatement.

We consider that the scope of our group audit forms an appropriate basis for our audit opinion. Through performing the procedures mentioned above we obtained sufficient and appropriate audit evidence about the Group's financial information to provide an opinion on the financial statements as a whole.

## Audit response to the risk of fraud and non-compliance with laws and regulations

*Introduction*

In sections 5.4, 5.5 and 7.8.1.2 of the annual report, the Executive Board describes its procedures in respect of the risk of fraud and non-compliance with laws and regulations, and the Supervisory Board reflects on this in chapter 5.2.

As part of our audit, we have gained insights into ASR Nederland N.V. and its business environment, and assessed the design and implementation and, where considered appropriate, tested the operating effectiveness of the Group's risk management in relation to fraud and non-compliance.

Our procedures included, among other things, assessing the Group's code of conduct, whistleblowing procedures, incidents register and its procedures to investigate indications of possible fraud and non-compliance. Furthermore, we performed relevant inquiries with the Executive Board and the Audit & Risk Committee of the Supervisory Board and other relevant functions, such as Internal Audit, Legal, Group Compliance, Group Risk Management and business line CFRO's. We corroborated these inquiries with the results of our inspection of correspondence with relevant supervisory authorities and regulators. Moreover, we have involved forensic specialists in our audit procedures.

*Non-compliance with laws and regulations*

As a result from our risk assessment, we identified the following laws and regulations as those most likely to have a material effect on the financial statements in case of non-compliance:

- Financial Supervision Act ('Wet op het financieel toezicht' (Wft)) (including the European Solvency II directives);
- regulation related to financial and economic crime (FEC), including Wwft;
- General Data Privacy Regulation (GDPR).

Our procedures did not result in the identification of a reportable risk of material misstatement in respect of non-compliance with laws and regulations.

*Fraud risk*

Based on the above and on the auditing standards, we identified the following fraud risks that are relevant to our audit, including the relevant presumed risks laid down in the auditing standards in respect of management override of controls and revenue recognition.

We have responded as follows:

**Management override of controls (a presumed fraud risk)**

- **Risk:**
  - Management is in a unique position to manipulate accounting records and prepare fraudulent financial statements by overriding controls that otherwise appear to be operating effectively, such as in the areas of: accounting estimates that require significant judgement such as valuation of insurance contract liabilities and related assets and the valuation of hard-to-value assets.
- **Responses:**
  - We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness of internal controls that mitigate fraud risks, such as processes related to journal entries and estimates. Where we considered whether there could be an opportunity for fraud, we performed supplemental detailed risk-based testing.
  - As part of the fraud risk assessment, we performed data analysis of the journal entries population to determine if specific journal entries met the high-risk criteria for testing and evaluated key estimates and judgements for bias by ASR Nederland N.V., including retrospective reviews of prior years' estimates. Where we identified instances of unexpected journal entries or other risks through our data analytics, we performed additional audit procedures to address each identified risk, including testing of transactions against source information.
  - We incorporated elements of unpredictability in our audit, such as, randomly selected real estate properties under construction and visiting the sites to verify the existence of the properties.

We refer to the key audit matters that provide information of our approach related to areas of higher risk due to accounting estimates where management makes significant judgements.

**Revenue recognition (a presumed risk)**

- **Risk and response**

Revenue from insurance contracts is generally recognised over time as the insurer provides coverage to the policyholder. The revenue recognised is based on the fulfilment of the performance obligations over the coverage period. Revenue stemming from contracts accounted for under the General Measurement Model (GMM) approach and the Variable Fee Approach (VFA) are to a large extent determined by the key assumptions used for the measurement of the related insurance contract liabilities.

There is a presumed management incentive to overstate the insurance contract revenue. The company recognises insurance revenue which reflects the reduction in the liability for remaining coverage that relates to services provided in the period.

Based on the aforementioned, we concluded that the presumed fraud risk on revenue recognition is linked to the key audit matter 'Valuation of insurance contract liabilities and related assets' and in particular related to the valuation of the insurance contract liabilities for life and disability insurance contracts applying the GMM and/or VFA.

We communicated our risk assessment, audit responses and results to the Executive Board and the Audit & Risk Committee of the Supervisory Board. Our audit procedures did not reveal indications and/or reasonable suspicions of fraud that are considered material for our audit.

**Audit response to going concern**

As explained in section 7.1.1 of the annual report, the Executive Board has performed its going concern assessment and has not identified any significant going concern risks. To assess the Executives Board's assessment, we have performed, inter alia, the following procedures:

- We considered the Executive Board's assessment of the going concern risks, including all relevant information of which we are aware as a result of our audit.
- We assessed whether the scenarios included in the Own Risk Solvency Assessment (ORSA) and Preparatory Crisis

Plan that were submitted to DNB and other regulatory correspondence indicate a significant going concern risk.
- We analysed the Group's financial position and Solvency II ratio as at year-end and compared it to internal minimum capital requirements as set by the Executive Board, the previous financial year and sensitivities of the regulatory capital position to identify potential significant going concern risks.
- We evaluated whether the Executive Board's assessment of going concern, including the Solvency II ratio and sensitivities of the regulatory capital position, is adequately disclosed in section 7.8 'Risk management' of the financial statements.

The outcome of our risk assessment procedures on the going concern assessment, including our consideration of findings from our audit procedures on other areas, did not give reason to perform additional audit procedures on the Executive Board's going concern assessment.

**Audit response to climate-related risks**

The Executive Board is responsible for preparing the financial statements in accordance with the applicable financial reporting framework, including considering whether the implications from climate-related risks and commitments have been appropriately accounted for and disclosed.

ASR Nederland N.V. has set out its commitments and ambitions relating to climate change in the chapters 6 'Sustainability Statements' and 6.2.1 'Climate Change' of the annual report. As included in section 6.2.1.4 'Targets and metrics' the Group aims to:

- reduce the emissions of the investment portfolios for own account by 25% in 2030 compared to 2023 (base year);
- ensure that the insurance portfolio is climate neutral by 2050, starting with an absolute emission reduction of 26% in the non-life insurance portfolio by 2030 compared to 2022 (base year); and
- reduce the emissions of ASR's own buildings in Utrecht, Rotterdam, Enschede, Heerlen, Den Haag and Leeuwarden by 42% in 2030 compared to 2023 (base year).

Management assessed, against the background of the company's business and operations, how climate-related risks and opportunities and the company's own commitments and ambitions could have a significant impact on its business or could impose the need to modify its strategy and operations. Management has considered the impact of both transition and physical risks on the financial statements in accordance with the applicable financial reporting framework on both sides of the balance sheet: through the valuation of investments on the asset side and insurance exposure on the liability side.

Section 6.2.1 'Climate change' provides an overview of ASR Nederland N.V.'s approach to identify and assess climate-related risks. Climate-related risks are also covered in section 7.8.1.3 'Climate change & Biodiversity' of the financial statements. The Executive Board described the climate-related risks and concluded that climate-related risks have limited impact on the accounts and its disclosures and have been appropriately accounted for and disclosed.

As part of our audit, we have performed a risk assessment of the potential impact of climate-related risk and the Group's commitments and ambitions in respect of climate change on the 2024 accounts and disclosures, including significant judgements and estimates in the financial statements to determine whether the financial statements are free from material misstatement.

In doing so, we performed the following:

- We have made inquiries of the Management Board and Risk Management personnel from both the first and second line of defence to understand the extent of the potential impact of climate-related risk on the financial reporting and the impact on the material individual assets, liabilities and/or disclosures in the financial statements.
- We have evaluated climate-related fraud risk factors and we considered the potential pressure, such as Management Board remuneration, to achieve targets tied to climate change or sustainability metrics. This did not result in a fraud risk.
- We inspected minutes and other documentation (such as the Strategic Asset Allocation study and the Own Risk and Solvency Assessment (ORSA) as well as external communications by ASR Nederland N.V. regarding significant climate-related commitments, strategies and plans made by the Management Board.
- The Group has disclosed that it has prepared its Sustainability Statements in accordance with the European Sustainability Reporting Standards (ESRS). We have read, and considered as part of our risk assessment, these Sustainability Statements, which includes information over material sustainability matters relating to material impacts, risks and opportunities relating to climate change. As part of this, we have read and considered the information reported over the connectivity of the Sustainability Statements with the financial statements, more specifically relating to anticipated financial effects of sustainability matters, such as climate change, biodiversity loss and consumers and/or end-users, as included in section 7.8.1.3 'Climate change & Biodiversity'.
- We involved KPMG climate change subject matter experts, to support us in understanding how climate-related risks and opportunities may affect the entity, in order to understand (potential) implications on its accounting in the current year's financial statements.

Based on our risk assessment procedures, we did not identify a risk of material misstatement specific to climate-related risk and thus no further audit response was considered necessary.

Furthermore, we have read the disclosure on climate-related risk information as included in the annual report and considered whether such information contains material inconsistencies with the financial statements, or with our knowledge obtained through our audit, in particular as described above and our knowledge obtained otherwise.

## Our key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements. We have communicated the key audit matters to the Executive Board and the Audit & Risk Committee of the Supervisory Board. The key audit matters are not a comprehensive reflection of all matters discussed.

The key audit matters ‘Acquisition accounting for Aegon Nederland N.V.’ and 'Adoption of IFRS 17 insurance contracts’ are not included, as these key audit matters were specifically related to the reporting year 2023.

For our audit of insurance contract liabilities under IFRS 17, we cover certain critical processes and controls that also form part of the Solvency II reporting chain and for determining the valuation of the best estimate liabilities. For that reason, the key audit matter ‘Solvency II disclosures’ on which we reported last year has no longer been included.

In 2023, ASR Nederland N.V. and the five consumer protection organisations agreed on a settlement. All legal procedures are discontinued and no new legal proceedings shall be initiated by the consumer protection organisations. The agreement became final in February 2025 as more than 90% of the affiliated customers agreed to the settlement. As the potential significance is reduced, this matter is no longer included as a key audit matter.

In 2024, the sale of Knab was announced and subsequently completed and included as a key audit matter. Our audit response is detailed in the key audit matter ‘Sale of Knab (Aegon Bank N.V.)’.

## Valuation of insurance contract liabilities and related assets

**Description**
ASR Nederland N.V. has insurance contract liabilities (hereafter: ‘insurance liabilities’) amounting to EUR 102.6 billion (of which EUR 100.6 billion relates to GMM and VFA insurance liabilities) as at 31 December 2024.

The valuation of insurance contract liabilities and related assets involves the use of cash flow models and valuation methodologies and requires significant management judgement over uncertain outcomes, mainly the ultimate settlement value of long-term liabilities.

Elements that give rise to a significant risk of error are the selection of assumptions in estimating the fulfilment cash flows under the GMM and VFA. Key assumptions for the valuation of life insurance contracts relate to expenses (especially in relation to the anticipated cost savings) and the discount curve. For disability contracts key assumptions relate to inflow and transition probabilities and the discount curve.

As referred to in the section ‘Audit response to the risk of fraud and non-compliance with laws and regulations’ in this audit report, we have included the risk of fraud that management may influence assumptions to manage the outcome of calculations and measurements. The expectation of when claims will be incurred is reflected in the release from the liabilities from remaining coverage for expected claims and expenses. This release is the basis for revenue recognition. We consider the most critical assumptions in this regard the expense assumption for life insurance contracts and the inflow and transition probabilities assumption for disability contracts.

During 2024, the Group continued harmonizing assumptions and methods between the life entities. The main impacts of this harmonization process on non-economic assumptions led to changes in estimates for inflation, mortality, and expenses. Additionally, the Group reassessed the defined coverage units for similar products, resulting in further changes in estimates. These changes are disclosed in section 7.5.13.4 and have been incorporated into our audit response.

Given the financial significance, the level of judgement required and the inherent risk of fraud, we considered the valuation of insurance contract liabilities for life and disability insurance contracts applying the GMM and VFA a key audit matter.

**Our response**
Our audit approach included testing the design and implementation of internal controls around the valuation of the insurance contract liabilities, as well as substantive audit procedures.

Our procedures over internal controls focused on controls around the relevance and reliability of data, the controls around assumption setting and the internal review procedures performed by the actuarial functions of the underlying insurance businesses. We also assessed the process for the internal validation and implementation of models used for the valuation of the insurance contract liabilities and related assets.

With the assistance of our actuarial specialists, the substantive audit procedures we performed included the following:

- assessment of the appropriateness of the data, assumptions and methodologies applied in the valuation of the insurance contract liabilities and related assets for all significant components;
- assessment of the appropriateness of assumptions used in the valuation of the insurance contract liabilities and related assets for all significant components by reference to company data as well as relevant market and industry data. We performed specific procedures in response to the impact of the Aegon integration on the expense assumptions and of the disability developments on the inflow and transition probabilities assumptions;
- for life insurance contracts, we performed specific procedures in response to the appropriateness of management’s estimate of the expense cash flows, assessing the main assumptions underlying the expected costs development, inflation assumptions, future cost savings and cost synergies resulting from the Aegon integration, and the appropriateness of the allocation keys used to allocate holding expenses to the insurance entities and determine the cost per policy;
- for disability contracts, we performed specific procedures regarding the appropriateness of the inflow and transition probabilities assumption and assessed that this is in line with historical data and expected developments;
- assessment and testing of the appropriateness of the discount curve and challenge on the methodology used to determine the discount curve, including management’s assessment of the selection of the first smoothing point and the liability illiquidity premium. We assessed that the liability illiquidity premium is derived from ASR Nederland N.V.’s current asset portfolio using a top-down approach, which includes an adjustment for expected credit loss;

- we performed specific procedures to assess the appropriateness of the changes in estimates for assumptions related to inflation, mortality and expenses, as well as the selection of coverage units for similar products. We challenged management's selection of elements in the assumption harmonisation and verified that these changes are accounted for in accordance with IAS 8;
- analysis of developments in actuarial results (which includes a retrospective review by comparing the expected claims and expenses with the incurred claims and expenses) and movements in the insurance contract liabilities and related assets, the risk adjustment, and contractual service margin for each of the significant components and made corroborative inquiries with management and the second line actuarial department; and
- assessment of the completeness, accuracy and relevance of the required disclosures, including disclosures on assumptions about the future and estimation uncertainty; in particular related to the uncertainty associated with the integration of the Aegon business.

**Our observation**
Overall, we found management's assumptions reasonable and the valuation of the insurance contract liabilities and related assets using the GMM and VFA to be appropriate.

We also found the notes on the insurance contract liabilities and related assets in sections 7.3.4.A 7.5.13 and 7.5.14 to be adequate. Our audit procedures did not reveal indications and/or reasonable suspicion of fraud that are considered material to our audit.

## Valuation of hard-to-value assets

**Description**
ASR Nederland N.V. invests in various categories of investments. These consist of financial assets and liabilities measured at fair value as disclosed in section 7.7.1.1 and property as disclosed in section 7.7.1.3 (including land and buildings for own use and plant).

Additionally, the fair value of investments not carried at fair value is separately disclosed in section 7.7.1.2.

Of the fair value of the investments, 40% (2023: 44%) is classified as Level 3 investments (fair value not based on observable market data).

Fair value measurement, especially the valuation of less liquid Level 3 assets, is subjective and involves management judgement in relation to valuation techniques and assumptions. For these illiquid investments, estimation uncertainty is high, especially due to inflation and interest movements. This is mainly applicable to the illiquid investments noted below. Within the key assumptions and the fair value measurement based on net asset value (NAV) noted below, there is a higher degree of complexity, subjectivity and estimation uncertainty. Further, due to the magnitude of the hard-to-value assets, the valuation of the key elements indicated above are considered to include a significant risk of error.

This risk specially relates to the uncertainty of the NAV for the following illiquid investments:

- real estate equity funds;
- equity funds;
- equity funds, and;
- investment funds.

Furthermore, the risk specifically relates to the selection of the following key assumptions for the following illiquid investments:

- for property investments, the estimated rental income, yield, forecast of future market rents and discount rate, and;
- for mortgages and wind and solar farms (which is accounted for under property, plant and equipment), the discount rate.

Given the financial significance and the increased level of judgement required, we considered the valuation of hard-to-value assets a key audit matter.

**Our response**
With the assistance of our valuation specialists, we performed the following procedures:

- assessment of ASR Nederland N.V.'s governance, processes and design and implementation of internal controls with respect to the valuation of hard to value assets;
- inspection of documentation and held discussions with management's internal and external experts regarding their judgements and resulting valuations in relation to real estate;
- we performed substantive audit procedures on selected high-risk property investments. This selection is based on the relative size of the objects within their respective asset class and the development of the fair value during the year and was aimed at an appropriate spread over regions and appraisers specifically for the rural investments. We discussed and challenged the assumptions and models used by the external appraisers. We tested their used discount rates and gross investment yields against available market data and object specific underlying data such as (market) rent levels, occupancy rates and contract renewals;
- we discussed and challenged the assumptions (e.g. energy prices and discount rate) and models used by management. We tested the assumptions against available market data; we challenged management's valuation of the plants (including wind and solar farms) by reviewing the documentation provided by them and we have compared the valuations with available external market data;
- we challenged management's valuation of real estate equity funds, mortgage equity funds, debt equity funds and other investment funds by reviewing the documentation provided by the external fund managers and we compared the movements in valuations with available external market data;
- assessed valuation models used and the (internal) validation thereof for the determination of the fair value of the mortgage loans; tested the source data and developed an independent expectation of the fair value based on market-available data, such as offer rates to determine the implied discount rate; and assessed whether the fair values established by management fall within the acceptable fair value range.
- we carried out a retrospective review of prior-year estimates, e.g. by reconciliation of valuations to financial

statements of investments (backtesting) or comparison to sales results; and
- assessing of the adequacy of the disclosures. This includes notes 7.7.1.1, 7.7.1.2 and 7.7.1.3 on fair value measurement and the market risk disclosure in note 7.8.3 as this note includes sensitivity analysis on the valuation uncertainties that exist on 31 December 2024.

**Our observation**
We found management's assumptions for the valuation of hard-to-value assets reasonable and the valuation acceptable. We also found the fair value and property disclosures to be adequate.

## Sale of Knab (Aegon Bank N.V.)

**Description**
On 1 February 2024, ASR Nederland N.V. entered into an agreement to sell Knab (Aegon Bank N.V.) to BAWAG Group AG. The transaction was closed on 1 November 2024, following approvals from regulatory authorities and advice from the works council.

Consequently, Knab's activities have been classified as 'held for sale' as from 1 February 2024 onwards.

IFRS 5 requires entities to measure non-current assets (or disposal group) classified as held for sale at the lower of their carrying amount and fair value less costs to sell. Consequently, ASR Nederland N.V. has recognised a book loss in 2024, as disclosed in section 7.4.6.'Discontinued operations'.

Given the complexity of IFRS 5 requirements and the unusual nature of the sale, we considered the sale of Knab as a key audit matter.

**Our response**
Our audit procedures primarily consisted of the following:

- assessment of ASR Nederland N.V.'s governance, processes and design and implementation of internal controls with respect to the sale of Knab;
- whether the carrying amounts were measured in accordance with the applicable IFRS standards immediately before the initial classification as held for sale;
- management's calculations of the lower of the carrying amount and fair value less costs to sell as of initial classification date, and assessed the accounting treatment of the result;
- and assessment of closing agreements, binders and elements included in the considerations received, as well as potential indemnities;
- re-performed the calculation of the loss on sale and vouched the loss on sale to relevant documentation (e.g. sale agreement) and the sales proceeds to the cash receipts;
- substantive audit procedures on the existence, accuracy and valuation of the loans, deposits, securities, derivatives and borrowings of Knab, as of the closing date, where these amounts are included in the loss of control accounting;
- whether following the loss of control, Knab has been derecognised correctly in line with IFRS 10; and
- the adequacy of the disclosures, including note 7.4.6. 'Discontinued operations' on discontinued operations, where the carrying amounts of Knab and the considerations received are presented in accordance with IFRS 5.

**Our observation**
Overall, we found management's accounting for the sale of Knab, and the resulting outcome, to be appropriate. We also found the disclosures on the discontinued operations in section 7.4.6.'Discontinued operations' to be adequate.

## Report on the other information included in the annual report

In addition to the financial statements and our auditor's report thereon, the annual report contains other information.

Based on the following procedures performed, we conclude that the other information:

- is consistent with the financial statements and does not contain material misstatements; and
- contains the information as required by Part 9 of Book 2 of the Dutch Civil Code for the management report and other information.

We have read the other information. Based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, we have considered whether the other information contains material misstatements.

By performing these procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720. The scope of the procedures performed is less than the scope of those performed in our audit of the financial statements.

The Executive Board is responsible for the preparation of the other information, including the information as required by Part 9 of Book 2 of the Dutch Civil Code.

## Report on other legal and regulatory requirements and ESEF

**Engagement**
We were initially appointed by the General Meeting of Shareholders as auditor of ASR Nederland N.V. on 22 May 2019, as of the audit for the year 2020 and have operated as statutory auditor ever since that financial year. We have been reappointed by the General Meeting of Shareholders on 29 May 2024 to continue to serve ASR Nederland N.V. as its external auditor for the financial years 2025 until and including 2029.

**No prohibited non-audit services**
We have not provided prohibited non-audit services as referred to in Article 5(1) of the EU Regulation on specific requirements regarding statutory audits of public-interest entities.

**Services rendered**
For the period to which our statutory audit relates, in addition to this audit, we have provided the following services to the company:

- assurance engagement for the benefit of external stakeholders, largely driven by regulatory requirements and ASR Nederland N.V.'s voluntary preparation of Sustainability Statements in accordance with the CSRD/ESRS in anticipation of the transposition of the CSRD into Dutch law.

**European Single Electronic Format (ESEF)**
ASR Nederland N.V. has prepared its annual report in ESEF. The requirements for this are set out in the Delegated Regulation (EU) 2019/815 with regard to regulatory technical standards on the specification of a single electronic reporting format (hereinafter: the RTS on ESEF).

In our opinion, the annual report prepared in XHTML format, including the (partly) marked-up consolidated financial statements as included in the reporting package by ASR Nederland N.V., complies in all material respects with the RTS on ESEF.

The Executive Board is responsible for preparing the annual report including the financial statements in accordance with the RTS on ESEF, whereby the Executive Board combines the various components into one single reporting package.

Our responsibility is to obtain reasonable assurance for our opinion whether the annual report in this reporting package complies with the RTS on ESEF. We performed our examination in accordance with Dutch law, including Dutch Standard 3950N 'Assurance-opdrachten inzake het voldoen aan de criteria voor het opstellen van een digitaal verantwoordingsdocument' (assurance engagements relating to compliance with criteria for digital reporting). Our examination included among others:

- obtaining an understanding of the entity's financial reporting process, including the preparation of the reporting package;
- identifying and assessing the risks that the annual report does not comply in all material respects with the RTS on ESEF and designing and performing further assurance procedures responsive to those risks to provide a basis for our opinion, including:
  - obtaining the reporting package and performing validations to determine whether the reporting package containing the Inline XBRL instance document and the XBRL extension taxonomy files have been prepared in accordance with the technical specifications as included in the RTS on ESEF;
  - examining the information related to the consolidated financial statements in the reporting package to determine whether all required mark-ups have been applied and whether these are in accordance with the RTS on ESEF.

## Description of responsibilities regarding the financial statements

**Responsibilities of the Executive Board and the Supervisory Board for the financial statements**
The Executive Board is responsible for the preparation and fair presentation of the financial statements in accordance with EU-IFRS and Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the Executive Board is responsible for such internal control as management determines is necessary to enable the preparation of the financial statements that are free from material misstatement, whether due to fraud or error. In that respect the Executive Board, under supervision of the Supervisory Board, is responsible for the prevention and detection of fraud and non-compliance with laws and regulations, including determining measures to resolve the consequences of it and to prevent recurrence.

As part of the preparation of the financial statements, the Executive Board is responsible for assessing the ASR Nederland N.V.'s ability to continue as a going concern. Based on the financial reporting frameworks mentioned, the Executive Board should prepare the financial statements using the going concern basis of accounting unless the Executive Board either intends to liquidate ASR Nederland N.V. or to cease operations, or has no realistic alternative but to do so. The Executive Board should disclose events and circumstances that may cast significant doubt on the company's ability to continue as a going concern in the financial statements.

The Supervisory Board is responsible for overseeing ASR Nederland N.V.'s financial reporting process.

**Our responsibilities for the audit of the financial statements**
Our objective is to plan and perform the audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence for our opinion.

Our audit has been performed with a high, but not absolute, level of assurance, which means we may not detect all material errors and fraud during our audit.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. The materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.

A further description of our responsibilities for the audit of the financial statements is located at the website of de 'Koninklijke Nederlandse Beroepsorganisatie van Accountants' (NBA, Royal Netherlands Institute of Chartered Accountants) at www.nba.nl/eng_beursgenoteerd_20241203 This description forms part of our auditor's report.

Utrecht, 25 March 2025
KPMG Accountants N.V.

A.J.H. Reijns RA

KPMG

## 8.2.3 Limited assurance report on the Sustainability Statements

To: the Supervisory Board of ASR Nederland N.V.

**Our conclusion**
We have performed a limited assurance engagement on the consolidated Sustainability Statements 2024 of ASR Nederland N.V. based in Utrecht (hereinafter: the company). The Sustainability Statements include the section 6. Sustainability Statements of the accompanying management report including the information incorporated in the Sustainability Statements by reference (hereinafter: the sustainability statements).

Based on the procedures performed and the assurance evidence obtained, nothing has come to our attention that causes us to believe that the sustainability statements are not, in all material respects:

- prepared in accordance with the European Sustainability Reporting Standards (ESRS) as adopted by the European Commission and in accordance with the double materiality assessment process carried out by the company to identify the information reported pursuant to the ESRS; and
- compliant with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation).

**Basis for our conclusion**
We performed our limited assurance engagement on the sustainability statements in accordance with Dutch law, including Dutch Standard 3810N 'Assurance-opdrachten inzake duurzaamheidsverslaggeving' (Assurance engagements relating to sustainability reporting) which is a specified Dutch standard that is based on the International Standard on Assurance Engagements (ISAE) 3000 (Revised) 'Assurance engagements other than audits or reviews of historical financial information'. Our responsibilities under this standard are further described in the section 'Our responsibilities for the assurance engagement on the sustainability statements section of our report.

We are independent of ASR Nederland N.V. in accordance with the 'Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten' (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence). Furthermore, we have complied with the 'Verordening gedrags- en beroepsregels accountants' (VGBA, Dutch Code of Ethics for Professional Accountants).

We believe the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

**Emphasis of matters**
We draw attention to sections 6.1.1 and 6.1.2 of the sustainability statements. These disclosures set out that the sustainability statements have been prepared in a context of new sustainability reporting standards requiring entity-specific and temporary interpretations and addressing inherent measurement or evaluation uncertainties.

We also draw attention to sections 6.1.2 and 6.5 in the sustainability statements that identify the quantitative metrics and monetary amounts that are subject to a high level of measurement uncertainty and discloses information about the sources of measurement uncertainty and the assumptions, approximations and judgements the company has made in measuring these in compliance with the ESRS.

The comparability of sustainability information between entities and over time may be affected by the lack of historical sustainability information in accordance with the ESRS and by the absence of a uniform practice on which to draw, to evaluate and measure this information. This allows for the application of different, but acceptable, measurement techniques.

We draw attention to section 6.1.4.3 in the sustainability statements. This disclosure explains future improvements in the ongoing due diligence and double materiality assessment process, including robust engagement with affected stakeholders. Due diligence is an on-going practice that responds to and may trigger changes in the company's strategy, business model, activities, business relationships, operating, sourcing and selling contexts.

The double materiality assessment process may also be impacted in time by sector-specific standards to be adopted. The sustainability statements may not include every impact, risk and opportunity or additional entity-specific disclosure that each individual stakeholder (group) may consider important in its own particular assessment.

Our conclusion is not modified in respect to these matters.

**Corresponding information not subject to assurance procedures**
No reasonable or limited assurance procedures have been performed on the sustainability statements of prior year. Consequently, the corresponding sustainability information and thereto related disclosures for the period 2023 have not been subject to reasonable or limited assurance procedures.

Our conclusion is not modified in respect to this matter.

**Limitations to the scope of our assurance engagement**
In reporting forward-looking information in accordance with the ESRS, the Executive Board of the company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the company. The actual outcome is likely to be different since anticipated events frequently do not occur as expected. Forward-looking information relates to events and actions that have not yet occurred and may never occur. We do not provide assurance on the achievability of this forward-looking information.

The references to external sources or websites in the sustainability information are not part of the sustainability information as included in the scope of our assurance engagement. We therefore do not provide assurance on this information.

Our conclusion is not modified in respect to these matters.

**Responsibilities of the Executive Board and Supervisory Board for the sustainability statements**
The Executive Board is responsible for the preparation of the sustainability statements in accordance with the ESRS, including the double materiality assessment process carried out by the company as the basis for the sustainability statements and disclosure of material impacts, risks and opportunities in accordance with the ESRS. As part of the preparation of the sustainability statements, management is responsible for compliance with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). The Executive Board is also responsible for selecting and applying additional entity-specific disclosures to enable users to understand the company's sustainability-related impacts, risks or opportunities and for determining that these additional entity-specific disclosures are suitable in the circumstances and in accordance with the ESRS

Furthermore, the Executive Board is responsible for such internal control as it determines is necessary to enable the preparation of the sustainability statements that are free from material misstatement, whether due to fraud or error.

The Supervisory Board is responsible for overseeing the sustainability reporting process including the double materiality assessment process carried out by the company.

**Our responsibilities for the assurance engagement on the sustainability statements**
Our responsibility is to plan and perform the assurance engagement in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

Our assurance engagement is aimed to obtain a limited level of assurance to determine the plausibility of sustainability information. The procedures vary in nature and timing from, and are less in extent, than for a reasonable assurance engagement. The level of assurance obtained in a limited assurance engagement is therefore substantially less than the assurance that is obtained when a reasonable assurance engagement is performed.

**Description of our responsibilities for the assurance engagement on the sustainability statements**
We apply the quality management requirements pursuant to the Nadere voorschriften kwaliteitsmanagement (NV KM, regulations for quality management) and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our limited assurance engagement included among other things:

- Performing inquiries and an analysis of the external environment and obtaining an understanding of relevant sustainability themes and issues, the characteristics of the company, its activities and the value chain and its key intangible resources in order to assess the double materiality assessment process carried out by the company as the basis for the sustainability statements and disclosure of all material sustainability-related impacts, risks and opportunities in accordance with the ESRS.
- Obtaining through inquiries a general understanding of the internal control environment, the company's processes for gathering and reporting entity-related and value chain information, the information systems and the company's risk assessment process relevant to the preparation of the sustainability statements and for identifying the company's activities, determining eligible and aligned economic activities and preparing the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), without obtaining assurance evidence about the implementation, or testing the operating effectiveness, of controls.
- Assessing the double materiality assessment process carried out by the company and identifying and assessing areas of the sustainability statements, including the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) where misleading or unbalanced information or material misstatement, whether due to fraud or error, are likely to arise ('selected disclosures'). We designed and performed further assurance procedures aimed at assessing that the sustainability statements are free from material misstatement responsive to this risk analysis.
- Considering whether the description of the double materiality assessment process in the sustainability statements made by the Executive Board appears consistent with the process carried out by the company;
- Based on our professional judgement we determined materiality levels for each relevant part of the Sustainability Statements. When evaluating our materiality levels, we have taken into account quantitative and qualitative considerations.
- Performing analytical review procedures on quantitative information in the sustainability statements, including consideration of data and trends.
- Assessing whether the company's methods for developing estimates are appropriate and have been consistently applied for selected disclosures. We considered data and trends, however, our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate management's estimates;
- Analysing, on a limited sample basis, relevant internal and external documentation available to the company (including publicly available information or information from actors throughout its value chain) for selected disclosures;
- Reading the other information in the annual report to identify material inconsistencies, if any, with the sustainability statements;

- Considering whether:
  - the disclosures provided to address the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) for each of the environmental objectives, reconcile with the underlying records of the company and are consistent or coherent with the sustainability statements;
  - the disclosures provided to address the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) appear reasonable, in particular whether the eligible economic activities meet the cumulative conditions to qualify as aligned and whether the technical screening criteria are met; and
  - the key performance indicators disclosures have been defined and calculated in accordance with the Taxonomy reference framework as defined in Appendix 1 Glossary of Terms of the CEAOB Guidelines on limited assurance on sustainability reporting adopted on 30 September 2024 , and in compliance with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), including the format in which the activities are presented;
- Considering the overall presentation, structure and the fundamental qualitative characteristics of information (relevance and faithful representation: complete, neutral and accurate) reported in the sustainability statements, including the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation); and
- Considering, based on our limited assurance procedures and evaluation of the assurance evidence obtained, whether the sustainability statements as a whole, are free from material misstatement and prepared in accordance with the ESRS.

Utrecht, 25 March 2025
KPMG Accountants N.V.

A.J.H. Reijns RA

## 8.2.4 Stichting Continuïteit ASR Nederland

*For information purposes only*
Stichting Continuïteit ASR Nederland (the Foundation) was established on 26 May 2016. The Foundation has been established under Dutch law. Its objectives are to promote and protect the interests of a.s.r., its business and its stakeholders, and to counter possible influences that might threaten the continuity, independence, strategy and/or identity of a.s.r. or its business to such an extent that these could be considered contrary to the aforementioned interests.

a.s.r. has granted a call option to the Foundation under an agreement dated 27 May 2016; this agreement outlines the conditions under which the call option can be exercised. The call option is a continuous and repeatedly exercisable right, pursuant to which the Foundation is entitled to subscribe for preference shares, up to the lower of (a) the total number of shares that form a.s.r.'s issued capital at the time when the call option is exercised, less the number of preference shares already held by the Foundation at that time (if any) and less one, or (b) the maximum number of preference shares that may be issued under the authorised share capital as shown by the Articles of Association of a.s.r. at the time when the call option is exercised. The Foundation has the right to exercise the call option at any time, either fully or in part. The exercise price for preference shares issuable under the call option is equal to 25% of the nominal amount of those preference shares.

The call option is continuous in nature and can be exercised repeatedly and on more than one occasion, each time that the Foundation considers, or reasonably expects, there to be an act that is, in the opinion of the Foundation, materially contrary to the interests of a.s.r., its business or its stakeholders, which may include the following (to the extent materially contrary to the aforementioned interests), (i) the announcement of a public offer for shares in the capital of a.s.r., or the legitimate expectation that such a public offer will be announced, without agreement on the offer having been reached with a.s.r. or the offer being supported by a.s.r., and (ii) an activist shareholder (or group of activist shareholders acting in concert) in a.s.r. directly or indirectly representing at least 25% of the ordinary shares forming part of a.s.r.'s issued share capital.

Ultimately after the Foundation has held preference shares for a period of 20 months (or for such longer period as the Foundation deems appropriate given the facts and circumstances at hand), the Foundation may request, by means of a notice to that effect, that a.s.r. considers submitting, as soon as practicable, a proposal to the General Meeting for a resolution to cancel all preference shares. a.s.r. is free to propose such a resolution without this being requested by the Foundation if non-cancellation of the preference shares in a timely manner were to result in the Foundation being required to make a mandatory public offer in respect of a.s.r. In addition, if and when a.s.r. has issued preference shares to the Foundation, a.s.r. will convene a General Meeting, to be held within 20 months following such issuance, for the purpose of adopting a resolution on the cancellation of all such preference shares.

The Foundation has not exercised the call option and did not acquire any preference shares during the year under review.

The Foundation has an independent board. The membership of the Board of the Foundation is as follows:

- Mr. J.W. Winter (Chair);
- Mr. R.J. van de Kraats;
- Ms. M.E. Groothuis;

With effect from 1 July 2024, Mr. A.A.M. Deterink stepped down from the board and Mr R.J. van de Kraats was appointed.

The Board of the Foundation had two meetings in 2024. The matters discussed included the Business Combination with Aegon NL, the full-year 2023 results of a.s.r., the execution of a.s.r.'s strategy, the financing of a.s.r. and other developments in the markets in which a.s.r. operates and the general course of affairs at a.s.r. At these meetings, a representative of the EB of a.s.r. provided the Board of the Foundation with information on the developments within a.s.r. and the relationship with its stakeholders. The Board of the Foundation also monitored the developments of a.s.r. outside of its Board meetings, for instance through occasional contacts with the EB and the receipt of press releases issued by a.s.r.

The Foundation is an independent legal entity for the purpose of Section 5:71(1)(c) of the Dutch Financial Markets Supervision Act.

Utrecht, the Netherlands, 26 March 2025

Stichting Continuïteit ASR Nederland

Mr. J.W. Winter (Chair)

Mr. R.J. van de Kraats

Ms. M.E. Groothuis

## 8.2.5 Provisions of the Articles of Association regarding profit appropriation

Articles 35, 36 and 37 of the Articles of Association:

**Distributions – General Article 35**
35.1 A distribution can only be made to the extent that the Company's equity exceeds the Non-Distributable Equity

35.2 The Executive Board (EB) may resolve to make interim distributions, provided that it appears from interim accounts to be prepared in accordance with Section 2:105(4) of the Dutch Civil Code that the requirement referred to in Article 35.1 has been met and, if it concerns an interim distribution of profits, taking into account the order of priority described in Article 37.1.

35.3 Subject to Article 19.10, the EB may adopt, and amend from time to time, a dividend and reservation policy for the Company. Amendments to such a policy shall be discussed in the General Meeting.

35.4 The preferred shares do not carry any entitlement to distributions other than as described in Articles 12.2, 37.1 and 38.3.

35.5 Distributions on ordinary shares shall be made in proportion to the aggregate nominal value of those ordinary shares. Distributions on preferred shares (or to the former holders of preferred shares) shall be paid in proportion to the amounts paid up (or formerly paid up) on those preferred shares.

35.6 The parties entitled to a distribution shall be the relevant shareholders, usufructuaries and pledgees, as the case may be, at a date to be determined by the EB for that purpose. This date shall not be earlier than the date on which the distribution was announced.

35.7 The General Meeting may resolve, subject to Article 31.1, that all or part of such a distribution, instead of being made in cash, shall be made in the form of shares in the Company's capital or in the form of the Company's assets.

35.8 A distribution shall be payable no later than thirty days after the date on which such distribution was declared, unless the EB sets a different date. If it concerns a distribution in cash, such distribution shall be payable in such currency as determined by the EB.

35.9 A claim for payment of a distribution shall lapse after five years have expired after the distribution was declared.

35.10 For the purpose of calculating any distribution, shares held by the Company in its own capital shall not be taken into account. No distribution shall be made to the Company in respect of shares held by it.

**Distributions – Reserves**
**Article 36**
36.1 All reserves maintained by the Company shall be attached exclusively to the ordinary shares. The Company shall not attach any reserve to the preferred shares.

36.2 Subject to Article 31.1, the General Meeting is authorised to resolve to make a distribution from the Company's reserves.

36.3 Without prejudice to Articles 36.4 and 37.2, distributions from a reserve shall be made exclusively to the holders of ordinary shares.

36.4 The EB may resolve to charge amounts to be paid up on any class of shares against the Company's reserves, irrespective of whether those shares are issued to existing shareholders.

**Distributions – Profits**
**Article 37**
37.1 Subject to Article 35.1, the profits shown in the Company's annual accounts in respect of a financial year shall be appropriated as follows, and in the following order of priority:

a. To the extent that any preferred shares have been cancelled without the payment described in Article 12.2 paragraph b. having been made in full on those preferred shares and without any such deficit subsequently having been paid in full as described in this Article 37.1 or Article 37.2, any such deficit shall be paid to those who held those preferred shares immediately before such cancellation became effective;
b. To the extent that any Preferred Distribution (or part thereof) in relation to previous financial years has not yet been paid in full as described in this Article 37.1 or Article 37.2, any such deficit shall be paid on the preferred shares;

a. The Preferred Distribution shall be paid on the preferred shares in respect of the financial year to which the annual accounts pertain;
b. Subject to Article 19.10, the EB shall determine which part of the remaining profits shall be added to the Company's reserves; and
c. Any remaining profits shall be at the disposal of the General Meeting for distribution to the holders of ordinary shares.

37.2 To the extent that the distributions described in Article 37.1 paragraphs a. through c. (or any part thereof) cannot be paid out of the profits shown in the annual accounts, the deficit shall be paid out of the Company's reserves, subject to Articles 35.1 and 35.2.

37.3 Without prejudice to Article 35.1, a distribution of profits shall be made only after the adoption of the annual accounts that show that such distribution is allowed.

# 8.3 Reference tables

## 8.3.1 Datapoints that derive from other EU legislation

**Datapoints that derive from other EU legislation**

| Disclosure requirement | Data point | Sustainability statements \| Appendix | SFDR reference | Pillar 3 reference | Benchmark regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS 2 GOV-1 | 21 (d) | Board's gender diversity | x | | x | | 5.1.5 |
| ESRS 2 GOV-1 | 21 (e) | Percentage of board members who are independent | | | x | | 5.1.3<br>5.1.4 |
| ESRS 2 GOV-4 | 30 | Statement on due diligence | x | | | | 6.1.3.3 |
| ESRS 2 SBM-1 | 40 (d) i | Involvement in activities related to fossil fuel activities | x | x | x | | 2.3<br>2.4 |
| ESRS 2 SBM-1 | 40 (d) ii | Involvement in activities related to chemical production | x | | x | | 2.3<br>2.4 |
| ESRS 2 SBM-1 | 40 (d) iii | Involvement in activities related to controversial weapons | x | | x | | 2.3<br>2.4 |
| ESRS 2 SBM-1 | 40 (d) iv | Involvement in activities related to cultivation and production of tobacco | | | x | | 2.3<br>2.4 |
| ESRS E1-1 | 14 | Transition plan to reach climate neutrality by 2050 | | | | x | 6.2.1.2 |
| ESRS E1-1 | 16 (g) | Undertakings excluded from Paris-aligned Benchmarks | | x | x | | 6.2.1.2 |
| ESRS E1-4 | 34 | GHG emission reduction targets | x | x | x | | 6.2.1.4 |
| ESRS E1-5 | 38 | Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) | x | | | | Not material |
| ESRS E1-5 | 37 | Energy consumption and mix | x | | | | Not material |
| ESRS E1-5 | 40-43 | Energy intensity associated with activities in high climate impact sectors | x | | | | Not material |
| ESRS E1-6 | 44 | Gross Scope 1, 2, 3 and Total GHG emissions | x | x | x | | 6.2.1.4 |
| ESRS E1-6 | 53-55 | Gross GHG emissions intensity | x | x | x | | 6.2.1.4 |
| ESRS E1-7 | 56 | GHG removals and carbon credits | | | | x | 6.2.1.4 |
| ESRS E1-9 | 66 | Exposure of the benchmark portfolio to climate-related physical risks | | | x | | Phase-in, not reported in 2024 |
| ESRS E1-9 | 66 (a); 66 (c) | Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk | | x | | | Phase-in, not reported in 2024 |
| ESRS E1-9 | 67 (c) | Breakdown of the carrying value of its real estate assets by energy-efficiency classes | | x | | | Phase-in, not reported in 2024 |

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| Disclosure requirement | Data point | Sustainability statements \| Appendix | SFDR reference | Pillar 3 reference | Benchmark regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS E1-9 | 69 | Degree of exposure of the portfolio to climate-related opportunities | | | x | | Phase-in, not reported in 2024 |
| ESRS E2-4 | 28 | Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil | x | | | | Not material |
| ESRS E3-1 | 9 | Water and marine resources | x | | | | Not material |
| ESRS E3-1 | 13 | Dedicated policy | x | | | | Not material |
| ESRS E3-1 | 14 | Sustainable oceans and seas | x | | | | Not material |
| ESRS E3-4 | 28 (c) | Total water recycled and reused | x | | | | Not material |
| ESRS E3-4 | 29 | Total water consumption in m3 per net revenue on own operations | x | | | | Not material |
| ESRS 2- SBM 3 - E4 | 16 (a) i | | x | | | | 6.2.3.1 |
| ESRS 2- SBM 3 - E4 | 16 (b) | | x | | | | 6.2.3.1 |
| ESRS 2- SBM 3 - E4 | 16 (c) | | x | | | | 6.2.3.1 |
| ESRS E4-2 | 24 (b) | Sustainable land / agriculture practices or policies | x | | | | 6.2.3.3 |
| ESRS E4-2 | 24 (c) | Sustainable oceans / seas practices or policies | x | | | | 6.2.3.3 |
| ESRS E4-2 | 24 (d) | Policies to address deforestation | x | | | | 6.2.3.3 |
| ESRS E5-5 | 37 (d) | Non-recycled waste | x | | | | 6.2.4.3 |
| ESRS E5-5 | 39 | Hazardous waste and radioactive waste | x | | | | 6.2.4.3 |
| ESRS 2- SBM3 - S1 | 14 (f) | Risk of incidents of forced labour | x | | | | 6.1.4.4 |
| ESRS 2- SBM3 - S1 | 14 (g) | Risk of incidents of child labour | x | | | | 6.1.4.4 |
| ESRS S1-1 | 20 | Human rights policy commitments | x | | | | 6.3.1.2 |
| ESRS S1-1 | 21 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | x | | 6.3.1.2 |
| ESRS S1-1 | 22 | Processes and measures for preventing trafficking in human beings | x | | | | 6.3.1.2 |
| ESRS S1-1 | 23 | Workplace accident prevention policy or management system | x | | | | 6.3.1.2 |
| ESRS S1-3 | 32 (c) | Grievance/complaints handling mechanisms | x | | | | 6.3.1.2 |
| ESRS S1-14 | 88 (b) and (c) | Number of fatalities and number and rate of work-related accidents | x | | x | | 6.3.1.3 |
| ESRS S1-14 | 88 (e) | Number of days lost to injuries, accidents, fatalities or illness | x | | | | 6.3.1.3 |
| ESRS S1-16 | 97 (a) | Unadjusted gender pay gap | x | | x | | 6.3.1.3 |
| ESRS S1-16 | 97 (b) | Excessive CEO pay ratio | x | | | | 6.3.1.3 |
| ESRS S1-17 | 103 (a) | Incidents of discrimination | x | | | | 6.3.1.3 |
| ESRS S1-17 | 104 (a) | Non-respect of UNGPs on Business and Human Rights and OECD | x | | x | | 6.3.1.3 |
| ESRS 2- SBM3 – S2 | 11 (b) | Significant risk of child labour or forced labour in the value chain | x | | | | 6.1.4.4 |
| ESRS S2-1 | 17 | Human rights policy commitments | x | | | | 6.3.2.2 |
| ESRS S2-1 | 18 | Policies related to value chain workers | x | | | | 6.3.2.2 |
| ESRS S2-1 | 19 | Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines | x | | x | | 6.3.2.2 |
| ESRS S2-1 | 19 | Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 | | | x | | 6.3.2.2 |
| ESRS S2-4 | 36 | Human rights issues and incidents connected to its upstream and downstream value chain | x | | | | 6.3.2.2 |
| ESRS S3-1 | 16 | Human rights policy commitments | x | | | | Not material |

| Disclosure requirement | Data point | Sustainability statements \| Appendix | SFDR reference | Pillar 3 reference | Benchmark regulation reference | EU Climate Law reference | Section |
|---|---|---|---|---|---|---|---|
| ESRS S3-1 | 17 | Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines | x | | x | | Not material |
| ESRS S3-4 | 36 | Human rights issues and incidents | x | | | | Not material |
| ESRS S4-1 | 16 | Policies related to consumers and end-users | x | | | | 6.3.3.2 |
| ESRS S4-1 | 17 | Non-respect of UNGPs on Business and Human Rights and OECD guidelines | x | | x | | 6.3.3.2 |
| ESRS S4-4 | 35 | Human rights issues and incidents | x | | | | 6.3.3.2 |
| ESRS G1-1 | 10 (b) | United Nations Convention against Corruption | x | | | | 6.4.1.3 |
| ESRS G1-1 | 10 (d) | Protection of whistle- blowers | x | | | | 6.4.1.3 |
| ESRS G1-4 | 24 (a) | Fines for violation of anti-corruption and anti-bribery laws | x | | x | | 6.4.1.4 |
| ESRS G1-4 | 24 (b) | Standards of anti- corruption and anti-bribery | x | | | | 6.4.1.4 |

## 8.3.2 Minimum disclosure requirements

### 8.3.2.1 MDR - Policies

**E1**

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| The Environmental Policy Statement of Facilities | a.s.r.'s office locations | 2.2 | Management team of Facilities | Paris Proof standard |
| Policy on responsible investments | Assets under management of Asset Management | 2.1, 2.2, 2.3, 2.4 | Management team of Asset Management | Paris Agreement |
| ESG Policy of Real Estate | Assets under management of Real Estate | 1.1, 1.2, 2.1, 2.2, 2.3 | Management team of Real Estate | n/a |
| Mortgages Transition Plan | Mortgages | 1.1, 1.2, 2.1, 2.2, 2.4 | Management team of Mortgages | n/a |
| Policy on Sustainable Insurance | Non-life & Life insurance products and services. | 1.1, 1.2, 1.3, 2.1, 2.2, 2.3, 2.4 | Management teams of P&C, Income, Health, Pensions, Life Individual and Funeral | Paris Agreement |
| Procurement policy of Health | Healthcare sector in the Netherlands. | 2.2 | Management team of Health | Green Deal Sustainable Healthcare (GDDZ 3.0) |
| Further agreements | Procurement | 2.1, 2.2 | Management team of Procurement | |
| Code of Conduct for suppliers | Procurement | 2.1, 2.2 | Management team of Procurement | n/a |
| Outsourcing policy | Procurement | 2.1, 2.2 | Management team of Procurement | n/a |
| Procurement policy of IT | IT | 2.2 | Management team of IT | n/a |

## E2

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Procurement policy of Health | Health | 2.2 | Management team of Health | Green Deal Sustainable Healthcare Chain approach to pharmaceutical residues from water |

## E4

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Policy on Responsible Investments | Assets under management of Asset Management | 3.2, 4.1, 4.3 | Management team of Asset Management | UN Global Compact EU regulation UNESCO biosphere reserves, CITES convention UN CBD Marine Stewardship Council and its Chain of Custody standards and aquaculture Stewardship Council certification Finance for Biodiversity pledge TNFD framework of the United Nations Environment Programme Finance Initiative (UNEP FI) |
| Real Estate Biodiversity Framework | Assets under management of Real Estate | 3.1, 3.2, 3.3, 4.2, 4.3 | Management team of Real Estate | Finance for Biodiversity pledge TNFD framework of the United Nations Environment Programme Finance Initiative (UNEP FI) |
| Policy on Sustainable Insurance | Non-life and Life insurance products and services. | 3.2, 4.1, 4.3 | Management teams of P&C, Income, Health, Pensions, Life Individual and Funeral | TNFD framework of the United Nations Environment Programme Finance Initiative (UNEP FI) |

## E5

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| ESG Policy of Real estate | Assets under management of Real Estate | 5.1, 6.1 | Management team of Real Estate | n/a |
| Policy on Sustainable Insurance | P&C | 5.2, 7.2 | Management team of P&C | Erkend Duurzaam and Groen Gedaan |
| Procurement policy of Health | Health | 5.2, 7.2 | Management team of Health | Green Deal Sustainable Healthcare (GDDZ) 3.0. |

## S1

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Code of Conduct | All employees of a.s.r. | 8.1, 8.2, 9.1, 10.1, 10.2, 10.3 | HR & Compliance | None |
| Collective Labour Agreement | All employees of a.s.r. | 8.1, 8.2, 9.1, 10.1 | HR & Compliance | None |
| Human rights Policy | All employees of a.s.r. | 8.1, 8.2, 10.1, 10.2, 10.3 | HR & Compliance | None |
| Remuneration Policy | All employees of a.s.r. | 8.1, 8.2, 10.1, 10.2, 10.3 | HR & Compliance | None |
| Diversity, Equity and Inclusion Policy | All employees of a.s.r. | 8.1, 8.2, 10.1, 10.2, 10.3 | HR & Compliance | Talent to the Top mentoring programme TNO's Corporate Social Responsibility Performance ladder |
| Whistleblower Policy | All employees of a.s.r. | 8.1, 8.2, 9.1, 10.1, 10.2, 10.3 | HR & Compliance | Dutch Whistleblower Protection Act |
| Unwanted Behaviour Complaint Procedure | All employees of a.s.r. | 8.1, 8.2, | HR & Compliance | None |
| General Complaints Procedure Regulations | All employees of a.s.r. | 8.1, 8.2, 10.1, 10.2, 10.3 | HR & Compliance | None |
| The Other Plan 2024-2026 | All employees of a.s.r. | 8.2 | HR & Compliance | None |
| Privacy Policy | All employees of a.s.r. | 9.1 | HR & Compliance | None |
| Health and Safety Policy Plan | All employees of a.s.r. | 8.1 | HR & Compliance | None |
| Data Retention Policy | All employees of a.s.r. | 9.1 | HR & Compliance | None |
| General Data Protection Regulation | a.s.r and its subsidiaries | 9.1 | HR & Compliance | General Data Protection Regulation (GDPR) |

## S2

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Policy on Responsible Investments | Assets under management of Asset Management | 11.1 | Management team of Asset Management | OECD Guidelines for Multinational Enterprises OECD Watch National Contact Points database Business & Human Rights Recourse Centre allegations and litigations database |
| Human rights Policy | a.s.r. | 11.1 | Team Sustainability | UN Guiding principles |

**S4**

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Policy on Sustainable Insurance | Non-life and Life insurance products and services. | 12.1, 12.2 | Management teams of P&C, Income, Health, Pensions, Life Individual and Funeral | None |
| Privacy policy | Personal data handled by a.s.r. | 12.1, 12.2, 12.3 | Privacy expert, Legal, Compliance en BRM | Data Protection Impact Assessment |
| Data Retention policy | All data processed by a.s.r. | 12.1, 12.2, 12.3 | Compliance, Enterprise Risk Management (ERM) | None |
| Customer due diligence policy | New customers of a.s.r. | 12.1, 12.2 | Management teams of P&C, Income, Health, Pensions, Life Individual and Funeral | None |
| Communication policy | All communication of a.s.r. | 12.1, 12.2 | Corporate Communication | None |
| Policy for involving and informing clients | Clients of a.s.r. health | 12.1, 12.2 | Health | - IZA - GALA - WOZO - TAZ - Universal Declaration of Human Rights - UN Global Compact - UN Guiding Principles on Business and Human Rights, - OECD Guidelines for Multinational Enterprises |
| Whistleblower policy | Consumers of a.s.r. | 12.1, 12.2 | Compliance | None |
| Product Approval and Review Process policy | Products and Services a.s.r. actively offers, as well as existing (including non selling) products and services | 13.1, 13.2 | PARP committee | None |
| Responsible mortgage lending management policy | Mortgages | 14.1 | Management team of Mortgages | None |

**G1**

| Policy | Scope of policy | Relevant IRO | Accountable for implementation | Relevant third-party standards/initiatives (if applicable) |
|---|---|---|---|---|
| Code of Conduct | All employees of a.s.r. | 15.1, 15.2, 17.1 | Investigations department, Security Affairs, CEO & MB | UN Guiding Princples on business and human rights. |
| Policy on Responsible Investments | Assets under management of Asset Management | 15.1, 15.3 | Management team of Asset Management | None |
| Supplier Code of Conduct | all suppliers of a.s.r. | 16.1 | Procurement | None |
| Procurement and supplier policy | All suppliers of Robidus & Corins | 16.1 | Management teams of Robidus and Corins | None |
| Procurement Policy of Health | Health (healthcare providers, in particular pharmacists, hospitals and mental health providers) | 16.1 | Management team of Health | None |
| Procurement and Outsourcing policy | TKP | 16.1 | Management team of TKP | None |
| Anti-corruption Policy | all employees of a.s.r. | 17.1 | Compliance | UN Guiding Principles on business and human rights. |
| Incentives Policy | all employees of a.s.r. | 17.1 | Compliance | None |
| Outside business activities Policy | all employees of a.s.r. | 17.1 | Compliance | None |
| Sponsorship and Donation Policy | all employees of a.s.r. | 17.1 | Compliance | None |
| Group Policy on Conflicts of Interest | all employees of a.s.r. | 17.1 | Compliance | None |
| Whistleblower policy | all employees of a.s.r. | 17.1 | Compliance | None |
| Customer Due Diligence policy | a.s.r and its subsidiaries | 17.1 | Management teams of P&C, Income, Health, Pensions, Life Individual and Funeral | None |

### 8.3.2.2 MDR - Actions

Time horizon of below actions are continuous, unless stated otherwise in the description of the action in Section 6.

Affected stakeholder groups, when applicable, are stated in the description of the action in Section 6.

## E1

| Action | Product line, staff function, and/or other | Value chain scope (upstream/own operations/downstream) |
|---|---|---|
| Assess adaptation solutions for highly exposed assets | Mortgages | Downstream |
| Increase climate adaptive thinking for residential homes | Mortgages | Downstream |
| Develop products which incentivise prevention measures | P&C | Downstream |
| Make impact investments | Asset management, Real estate, Mortgages | Upstream, downstream |
| Participate in industry collaborations | Asset management | Upstream, downstream |
| Invest in renewable energy | Real estate | Upstream, downstream |
| Increase on-site renewable energy generation | Real estate | Upstream, downstream |
| Engage through sustainable living platform/partner network | Mortgages | Upstream, downstream |
| Make renewable energy initiatives insurable | P&C | Upstream, downstream |
| Develop products | P&C | Upstream, downstream |
| Engage through various platforms | P&C | Upstream, downstream |
| Use renewable energy | Facilities | Upstream, own operations, downstream |
| Purchase market-based green electricity | Facilities | Upstream, own operations, downstream |
| Promote eco-friendly transportation/hybrid working | Facilities | Upstream, own operations, downstream |
| Extend use of hardware | Facilities | Upstream, own operations, downstream |
| Exclude investments in certain activities/sectors | Asset management | Downstream |
| Carry out active ownership | Asset management | Downstream |
| Minimise energy consumption | Real estate | Downstream |
| Reduce environmental impact | Real estate | Downstream |
| Increase on-site renewable energy generation | Real estate | Downstream |
| Offer specific mortgage products/opt-in mortgage offers. | Mortgages | Downstream |
| Apply underwriting criteria | P&C | Downstream |
| Refer to certified repairers | P&C | Downstream |
| Stimulate to reduce GHG emissions | Health | Downstream |
| Stimulate to provide mobility plan | Health | Downstream |
| Stimulate to design framework for real estate action | Health | Downstream |
| Stimulate to produce GHG roadmaps. | Health | Downstream |
| Develop products | Life individual and Funeral | Downstream |
| engage with network | Life individual and Funeral | Downstream |
| support the development of industry-wide GHG calculation methodology. | Life individual and Funeral | Downstream |

## E2

| Action | Product line, staff function, and/or other | Value chain scope (upstream/own operations/downstream) |
|---|---|---|
| Stimulate healthcare providers to prevent impact. | healthcare providers, specifically pharmacists, | Upstream |
| Raise awareness among insured. | Insured cliënts | Downstream |
| Make sustainability part of the preference policy for medication. | healthcare providers, specifically pharmacists, | Upstream |

## E4

| Action | Product line, staff function, and/or other | Value chain scope (upstream/own operations/downstream) |
|---|---|---|
| Contribute to restoration | Real estate | Downstream |
| broaden knowledge | Real estate | Downstream |
| offer products | Real estate | Downstream |
| Carry out active ownership | Asset management | Upstream, downstream |
| use biodiversity criteria | Asset management | Upstream, downstream |
| Collaborate | Asset management | Upstream, downstream |
| carry out impact investment | Asset management | Upstream, downstream |
| Promote material use. | P&C | Upstream, downstream |
| Apply underwriting criteria | P&C | Upstream, downstream |
| Make renewable energy initiatives insurable | P&C | Upstream, downstream |
| Engage and participate | | Upstream, downstream |
| Identify high-potential assets to enhance the potential ecological value in the portfolio. | Real estate | Downstream |
| Take nature related risks into consideration in Real Estate management. | Real estate | Downstream |

## E5

| Action | Product line, staff function, and/or other | Value chain scope (upstream/own operations/downstream) |
|---|---|---|
| Introduce circular building principles in ESG strategy and policy | Real estate | Upstream |
| Refer customers to have damage repaired by certified companies | P&C | Upstream |
| Encourage healthcare providers to reduce the use of raw materials when purchasing aids | Health | Upstream |
| Promote the use of recycled parts among car repair shops | P&C | Downstream |
| Make recycling activities insurable through Corins | Corins | Downstream |
| Facilitate waste seperation and perform a waste scan of the residual waste | Facilities | Upstrea, own operations, downstream |
| Research criteria for sustainable procurement among health insurers to prevent waste | Health | Upstrea, own operations, downstream |
| Promote the reuse of materials | Real estate | Upstream, downstream |

## S1

| Action | Scope of actions (e.g. product line/staff function/other) | Value chain scope (upstream/own operations/downstream) |
|---|---|---|
| Provide training that contribute to more diversity, equality and inclusion. | HR | Own operations |
| a.s.r. has established a Talent Committee and Recruitment & Selection Committee to promote the advancement of female talent. | HR | Own operations |

## S2

| Action | Scope of actions (e.g. product line/staff function/other) | Value chain scope (upstream/own operations/downstream) |
| --- | --- | --- |
| Asset management conducts human rights risk assessments frequently. | Asset management | Own operations |
| Asset Management screens bi-annually its investment portfolio. | Asset management | Own operations |
| Real estate conducts human rights risk assessments every three years | Real estate | Own operations |

## S4

| Action | Scope of actions (e.g. product line/staff function/other) | Value chain scope (upstream/own operations/downstream) |
| --- | --- | --- |
| Employees are trained in accessibility, which is integrated into design, development, and editorial processes. | HR, Compliance | Own operations, downstream |
| Digital environments are tested, and experts assess accessibility, with user feedback included. | Compliance | Own operations, downstream |
| Conduct tenant satisfaction surveys. | Real estate | Own operations, downstream |
| Health launched Gezond.nl, Thuisfysio, Welshop, and promotes a healthy lifestyle to reduce healthcare burden. | Health | Own operations, downstream |

## 8.3.3 TNFD recommendations

**TNFD recommendations**

| TNFD | Content | Corresponding ESRS paragraphs | a.s.r. CSRD reference |
|---|---|---|---|
| Governance | Disclose the organisation's governance of nature-related dependencies, impacts, risks and opportunities. | | |
| Governance A | Describe the board's oversight of nature related dependencies, impacts, risks and opportunities. | ESRS 2 GOV-1 | 6.1.3.1 |
| Governance B | Describe management's role in assessing and managing nature-related dependencies, impacts, risks and opportunities. | ESRS 2 GOV-1 | 6.1.3.1 |
| Governance C | Describe the organisation's human rights policies and engagement activities, and oversight by the board and management, with respect to Indigenous Peoples, Local Communities, affected and other stakeholders, in the organisation's assessment of, and response to, nature-related dependencies, impacts, risks and opportunities. | ESRS 2 SBM-2 | 6.1.4.2 |
| Strategy | Disclose the effects of nature-related dependencies, impacts, risks and opportunities on the organisation's business model, strategy and financial planning where such information is material. | | |
| Strategy A | Describe the nature-related dependencies, impacts, risks and opportunities the organisation has identified over the short, medium and long term. | ESRS 2 SBM-3 | 6.1.4.4 |
| Strategy B | Describe the effect nature-related dependencies, impacts, risks and opportunities have had on the organisation's business model, value chain, strategy and financial planning, as well as any transition plans or analysis in place. | ESRS E4-1 | 6.2.3.2 |
| Strategy C | Describe the resilience of the organisation's strategy to nature-related risks and opportunities, vtaking into consideration different scenarios. | ESRS E4-1 | 6.2.3.2 |
| Strategy D | Disclose the locations of assets and/or activities in the organisation's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations. | No metrical data available yet | |
| Risk and impact management | Describe the processes used by the organisation to identify, assess, prioritise and monitor nature-related dependencies, impacts, risks and opportunities. | | |
| Risk and impact management A (i) | Describe the organisation's processes for identifying, assessing and prioritising nature-related dependencies, impacts, risks and opportunities in its direct operations. | None | |
| Risk and impact management A (ii) | Describe the organisation's processes for identifying, assessing and prioritising nature-related dependencies, impacts, risks and opportunities in its upstream and downstream value chain(s). | ESRS E4-1 | 6.2.3.1 |
| Risk and impact management B | Describe the organisation's processes for managing nature-related dependencies, impacts, risks and opportunities. | ESRS E4-1<br>ESRS E4-2 and E4-3 | 6.2.3.2<br>6.2.3.3 |
| Risk and impact management C | Describe how processes for identifying, assessing, prioritising and monitoring nature-related risks are integrated into and inform the organisation's overall risk management processes. | ESRS 2 GOV-5 | 6.1.3.4 |
| Metrics and Targets | Disclose the metrics and targets used to assess and manage material nature-related dependencies, impacts, risks and opportunities. | | |
| Metrics and Targets A | Disclose the metrics used by the organisation to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process. | No metrical data available yet | |
| Metrics and Targets B | Disclose the metrics used by the organisation to assess and manage dependencies and impacts on nature. | No metrical data available yet | |
| Metrics and Targets C | Describe the targets and goals used by the organisation to manage nature-related dependencies, impacts, risks and opportunities and its performance against these. | ESRS E4-4 | 6.2.3.4 |

## 8.3.4 Finance for Biodiversity

**Finance for Biodiversity**

| Finance for Biodiversity | Content | Corresponding ESRS paragraphs | a.s.r. CSRD Report reference |
| --- | --- | --- | --- |
| Collaboration | Collaboration and knowledge sharing | | |
| | • Name and format of collaborative initiative(s)<br>• Types of institutions collaborated with<br>• Key activities<br>• Tangible outcomes | E4-3 actions related to biodiversity and ecoystems | 6.2.3.3 |
| Engaging | Integrate biodiversity criteria in ESG reporting and actively engage with companies | | |
| | 1. Identified biodiversity topics and challenges | ESRS 2 SBM-3 (impact, risks and opportunities) | 6.1.4.4 |
| | 2. Goals and objectives | ESRS E4-4 (target related to biodiversity and ecosystems) | 6.2.3.4 |
| | 3. Mode(s) of engagement action<br>4. Engagement outcomes<br>5. Escalation (if applicable) | ESRS E4-3 (actions and resources related to biodiversity and ecosystems) | 6.2.3.3 |
| Impact | Dislose and report | | |
| | Step (1): Disclose the impact assessments conducted on your investments and financing activities<br>Step (2): Report on how decision-making is influenced by the results of the impact assessments | ESRS E4-1 (Consideration of biodiversity and ecosystems in strategy and business model) | 6.2.3.2 |
| Targets | Setting targets | | |
| | • Description of the targets<br>• Scope of the targets<br>• Data and Methodologies<br>• Challenges and Actions<br>• Evolution of the targets | ESRS E4-4 (targets related to biodiversity and ecosystems) | 6.2.3.4 |

# 8.4 Supplementary data points

## 8.4.1 Financial indicators

**Key figures**

| | 2024 | 2023 | 2022 (restated IFRS 17) | 2021 (IFRS4) | 2020 (IFRS4) |
|---|---|---|---|---|---|
| Operating result (€ million) | 1,428 | 973[1] | 805 | 1,009 | 885 |
| IFRS net result (€ million) | 946 | 1,086 | -1,709 | 942 | 657 |
| Operating return on equity (%) | 13.1 | 11.6[1] | 10.6 | 16.3 | 15.3 |
| Solvency II ratio (%)[2] | 198 | 176 | 221 | 196 | 199 |
| Dividend per share (€) | 3.12 | 2.89 | 2.70 | 2.42 | 2.04 |
| Total dividend (€ million) | 654 | 610 | 385 | 329 | 282 |
| Share buyback (€ million) | 100 | - | 75 | 75 | 75 |
| Total equity (€ million) | 9,833 | 9,377 | 6,177 | 7,385 | 6,313 |
| Total equity attributable to shareholders (€ million) | 8,779 | 8,339[1] | 615 | 6,363 | 5,309 |
| Premiums and DC volume (€ million) | 10,376 | 8,825 | 651 | | |
| Contractual Service Margin (€ million) | 5,675 | 5,168 | 1,829 | | |
| Operating expenses (€ million) | 1,413 | 1,107[1] | 702 | 725 | 701 |
| Combined ratio (Non-life segment) (%) | 91.9 | 93.5 | 94.4 | 91.8 | 93.6 |
| Credit rating (S&P) | A | A | A | A | A |
| Organic capital creation (€ million) | 1,193 | 874[1] | 653 | 594 | 500 |
| Interest coverage ratio IFRS based (%) | 8.2 | 8.7 | -22.9 | 13.8 | 9.5 |

1 This 2023 figure has been restated, see section 7.3.2 for more information.
2 The Group Solvency II ratio is based on the existing Partial Internal Model for Aegon Life and Spaarkas. The other insurance entities in the Group calculate their solvency capital requirement in accordance with the Solvency II Standard Formula. The Group Solvency II ratio includes financial institutions.

## 8.4.2 Investor community indicators

### Shares

| (in numbers) | 31 December 2024 | 31 December 2023 | 31 December 2022 | 31 December 2021 | 31 December 2020 |
|---|---|---|---|---|---|
| Authorised capital | 325,000,000 | 325,000,000 | 325,000,000 | 325,000,000 | 350,000,000 |
| Issued share capital | 211,326,978 | 211,326,978 | 149,827,056 | 138,057,204 | 141,000,000 |
| Own shares held by a.s.r. | 2,424,597 | 178,816 | 1,902,772 | 2,263,812 | 3,071,697 |
| Outstanding shares | 208,902,381 | 211,148,162 | 147,924,284 | 135,793,392 | 137,928,303 |

### Dividend history

| (in €) | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|
| Dividend (in millions) | 654 | 610 | 385 | 329 | 282 |
| Dividend per share | 3.12 | 2.89 | 2.70 | 2.42 | 2.04 |

### Dividend per share

| (in €) | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|
| Interim dividend | 1.16 | 1.08 | 0.98 | 0.82 | 0.76 |
| Final dividend | 1.96 | 1.81 | 1.72 | 1.6 | 1.28 |
| **Total dividend** | **3.12** | **2.89** | **2.70** | **2.42** | **2.04** |

### Share price performance

| (in €) | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|
| Starting price as at 1 January | 42.70 | 44.35 | 40.50 | 32.85 | 33.36 |
| Highest closing price | 48.76 | 44.92 | 45.99 | 40.98 | 37.66 |
| Lowest closing price | 41.60 | 34.45 | 34.65 | 31.92 | 18.46 |
| Closing price as at 31 December | 45.78 | 42.70 | 44.35 | 40.50 | 32.85 |
| Market cap as at 31 December (€ million) | 9,675 | 9,016 | 6,560 | 5,500 | 4,531 |
| Average daily volume shares (numbers) | 419,134 | 623,604 | 497,953 | 463,387 | 635,603 |

### Shareholder return

| (in %, including dividend reinvested) | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|
| Shareholder return including dividend reinvested in a.s.r. shares | 14.5 | 3.2 | 16.3 | 30.4 | 5.1 |
| Euronext AMX Index | -7.4 | 2.3 | -11.1 | 18.5 | 5.0 |
| Euronext AEX Index | 14.6 | 17.2 | -11.4 | 30.5 | 5.5 |
| STOXX Europe 600 insurance Index | 24.6 | 14.6 | 5.6 | 21.1 | -8.9 |

## 8.4.3 ESG ratings

a.s.r. is rated by various ESG benchmarks & rating agencies, an explanation on the latest scores is provided in section 3.3.4.

**Scores international ESG ratings and benchmarks**

| | Score low | Score high | 2024 | 2023 | 2022 | 2021 | 2020 |
|---|---|---|---|---|---|---|---|
| S&P Dow Jones Sustainability Index[1] | 0 | 100 | 82 / #9[2] | 79 / #8[2] | 84 / #10 | 86 / #8 | 82 / #10 |
| MSCI | CCC | AAA | AA | AA | A | A | BBB |
| Sustainalytics ESG Risk Rating | 100 | 0 | 11.2 / #4[2] | 9.6 / #2[2] | 9.1 / #1 | 10.0 / #1 | 14.7 / #5 |
| Carbon Disclosure Project | D- | A | B | B | B | B | C |
| ISS ESG | D- | A+ | C+ (prime) | C+ (prime) | C+ (prime) | C (prime) | C (prime) |
| FTSE4Good | 0 | 5 | 5.0 | 5.0 | 3.9 | 4.1 | 4.3 |
| Bloomberg Gender Equality Index | N/A | N/A | included | included | included | included | N/A |
| Euronext Sustainable Europe 120 Index[3] | N/A | N/A | included | included | included | included | included |
| Ethibel Excellence Euro Index | N/A | N/A | included | included | included | included | included |
| Fair Insurance Guide (Eerlijke Verzekeringswijzer) | N/A | N/A | #1 | #1 | #1 | #1 | #1 |
| VBDO (once every two years) | N/A | N/A | N/A | #2 | N/A | #3 | N/A |
| VBDO Tax Transparency Benchmark | 0 | 35 | 31 / #14 | 31 / #11-14 | 31 / #5 | 28 / #6 | 27 / #4 |

1 DJSI Europe Index: #5, DJSI World Index: #8
2 Ranking amongst the insurance leaders in ESG worldwide
3 Previously: Euronext Vigeo Eiris (Eurozone 120)

## 8.4.4 EU Taxonomy templates

**Investment activities within insurance undertakings**
The following templates relate to the additional complementary disclosures relating to the EU Taxonomy in regards to the insurance KPI, see section 6.2.5.

**Additional, complementary disclosures: breakdown of denominator of the KPI current year**

| | | | |
|---|---|---|---|
| The percentage of derivatives relative to total assets covered by the KPI. | | The value in monetary amounts of derivatives. | |
| in % | 12% | in € millions | 11,557 |
| The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings in % | 22% | For non-financial undertakings in € millions | 21,637 |
| For financial undertakings in % | 4% | For financial undertakings in € millions | 4,008 |
| The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings in % | 19% | For non-financial undertakings in € millions | 18,953 |
| For financial undertakings in % | 4% | For financial undertakings in € millions | 3,507 |
| The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings in % | 9% | For non-financial undertakings in € millions | 9,089 |
| For financial undertakings in % | 5% | For financial undertakings in € millions | 5,075 |
| The proportion of exposures to other counterparties and assets over total assets covered by the KPI: | | Value of exposures to other counterparties and assets: | |
| in % | 48% | in € millions | 47,975 |
| The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities: | | Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities: | |
| Turnover-based in % | 9% | Turnover-based in € millions | 9,228 |
| Capital expenditures-based in % | 10% | Capital expenditures-based in € millions | 9,555 |
| The value of all the investments that are funding economic activities that are not Taxonomy-eligible relative to the value of total assets covered by the KPI: | | Value of all the investments that are funding economic activities that are not Taxonomy-eligible: | |
| Turnover-based in % | 59% | Turnover-based in € millions | 58,707 |
| Capital expenditures-based in % | 59% | Capital expenditures-based in € millions | 58,145 |
| The value of all the investments that are funding Taxonomy- eligible economic activities, but not Taxonomy-aligned relative to the value of total assets covered by the KPI: | | Value of all the investments that are funding Taxonomy- eligible economic activities, but not Taxonomy- aligned: | |
| Turnover-based in % | 31% | Turnover-based in € millions | 30,763 |
| Capital expenditures-based in % | 31% | Capital expenditures-based in € millions | 30,775 |

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## Additional, complementary disclosures: breakdown of numerator of the KPI current year

| | | | |
|---|---|---|---|
| The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: | | Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU: | |
| For non-financial undertakings: | | For non-financial undertakings: | |
| Turnover-based in % | 1% | Turnover-based in € millions | 848 |
| Capital expenditures-based in % | 1% | Capital expenditures-based in € millions | 1,361 |
| For financial undertakings: | | For financial undertakings: | |
| Turnover-based in % | 0% | Turnover-based in € millions | 129 |
| Capital expenditures-based in % | 0% | Capital expenditures-based in € millions | 156 |
| The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned: | | Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned: | |
| Turnover-based in % | 9% | Turnover-based in € millions | 9,228 |
| Capital expenditures-based in % | 10% | Capital expenditures-based in € millions | 9,555 |
| The proportion of Taxonomy-aligned exposures to other counterparties and assets in over total assets covered by the KPI: | | Value of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI: | |
| Turnover-based in % | 9% | Turnover-based in € millions | 8,896 |
| Capital expenditures-based in % | 9% | Capital expenditures-based in € millions | 8,904 |

## Breakdown of the numerator of the KPI per environmental objective current year

| | | | | |
|---|---|---|---|---|
| (1) Climate change mitigation | Turnover-based | 10% | Transitional activities Turover-based | 0% |
| | | | Enabling activities Turnover-based | 1% |
| | Capital expenditures-based | 10% | Transitional activities Capital expenditure-based | 0% |
| | | | Enabling activities Capital expenditure-based | 1% |
| (2) Climate change adaptation | Turnover-based | 0% | Enabling activities Turnover-based | 0% |
| | Capital expenditures-based | 0% | Enabling activities Capital expenditure-based | 0% |
| (3) The sustainable use and protection of water and marine resources | Turnover-based | | Enabling activities Turnover-based | |
| | Capital expenditures-based | | Enabling activities Capital expenditure-based | |
| (4) The transition to a circular economy | Turnover-based | | Enabling activities Turnover-based | |
| | Capital expenditures-based | | Enabling activities Capital expenditure-based | |
| (5) Pollution prevention and control | Turnover-based | | Enabling activities Turnover-based | |
| | Capital expenditures-based | | Enabling activities Capital expenditure-based | |
| (6) The protection and restoration of biodiversity and ecosystems | Turnover-based | | Enabling activities Turnover-based | |
| | Capital expenditures-based | | Enabling activities Capital expenditure-based | |

### Nuclear energy and fossil gas related activities

The following templates indicate whether a.s.r. has made investments in activities related to gas and nuclear sectors.

### Template 1: Nuclear and fossil gas related activities

| | 2024 |
|---|---|
| **Nuclear energy related activities** | |
| The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle. | YES |
| The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies. | YES |
| The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades. | YES |
| **Fossil gas related activities** | |
| The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. | YES |
| The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. | YES |
| The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels. | YES |

The following templates provide more Taxonomy information on the amount of investments in specific activities for climate change mitigation and climate change adaptation, both turnover-based and capital expenditures-based. The information, presented in total investment amounts and percentages, constitute the mandatory reporting basis and excludes any voluntary reporting.

The template below shows the exposures in Taxonomy-aligned economic activities in the denominator for nuclear energy and fossil gas related activities. This means that the percentages represent the amount of investments divided by the total assets covered by the KPI.

## Template 2: Gas and nuclear taxonomy-aligned economic activities (denominator) current year

| Economic activity | Turnover based | | | | | | CapEx based | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | - | 0% | - | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 3 | 0% | 3 | 0% | - | 0% | 1 | 0% | 1 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% | - | 0% | 5 | 0% | 5 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 3 | 0% | 3 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 0 | 0% | 0 | 0% | - | 0% |
| Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI. | 9,868 | 10% | 9,633 | 10% | 236 | 0% | 10,412 | 10% | 10,167 | 10% | 245 | 0% |
| **Total applicable KPI** | **9,872** | **10%** | **9,636** | **10%** | **236** | **0%** | **10,421** | **10%** | **10,176** | **10%** | **245** | **0%** |

### Template 3: Gas and nuclear taxonomy-aligned economic activities (numerator) current year

| Economic activity | Turnover based | | | | | | CapEx based | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | - | 0% | - | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 3 | 0% | 3 | 0% | - | 0% | 1 | 0% | 1 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | - | 0% | - | 0% | - | 0% | 5 | 0% | 5 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 3 | 0% | 3 | 0% | - | 0% |
| Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 0 | 0% | 0 | 0% | - | 0% |
| Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI. | 9,868 | 100% | 9,633 | 100% | 236 | 100% | 10,412 | 100% | 10,167 | 100% | 245 | 100% |
| **Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI** | **9,872** | **100%** | **9,636** | **100%** | **236** | **100%** | **10,421** | **100%** | **10,176** | **100%** | **245** | **100%** |

## Template 4: Gas and nuclear taxonomy-eligible but not taxonomy-aligned economic activities current year

| | Turnover based | | | | | | CapEx based | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Economic activity | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | | CMM + CCA | | Climate change mitigation (CCM) | | Climate change adaptation (CCA) | |
| | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % | € millions | % |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% | - | 0% |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 0 | 0% | 0 | 0% | - | 0% |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 0 | 0% | 0 | 0% | - | 0% |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 25 | 0% | 25 | 0% | - | 0% | 9 | 0% | 9 | 0% | - | 0% |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 5 | 0% | 5 | 0% | - | 0% | 1 | 0% | 1 | 0% | - | 0% |
| Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | 0 | 0% | - | 0% | 0 | 0% | 0 | 0% | - | 0% |
| Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI. | 30,732 | 31% | 30,668 | 31% | 63 | 0% | 30,765 | 31% | 30,748 | 31% | 17 | 0% |
| **Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI** | **30,763** | **31%** | **30,700** | **31%** | **63** | **0%** | **30,775** | **31%** | **30,758** | **31%** | **17** | **0%** |

## Template 5: Gas and nuclear taxonomy-non-eligible economic activities current year

| | Turnover based | | CapEx based | |
|---|---|---|---|---|
| Economic activity | € millions | % | € millions | % |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 0 | 0% | - | 0% |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | 10 | 0% | 5 | 0% |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | 0 | 0% |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% |
| Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI | - | 0% | - | 0% |
| Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI. | 58,696 | 59% | 58,140 | 59% |
| **Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI** | **58,707** | **59%** | **58,145** | **59%** |

# 8.5 Stakeholder engagement[1]

The way a.s.r. interacts with stakeholders is described in the Stakeholder Policy. The stakeholders consulted in the stakeholder dialogue in April 2023 were (representatives of) customers, peers, suppliers, brokers, educational and research institutes, NGOs, media and branch organisations. A summary of the outcome of the stakeholder dialogue was shared with the Management Board and the stakeholders that participated. The outcomes of the stakeholder survey on impact and financial materiality are included in the figure on the last page of this section.

**Stakeholder engagement**

| Stakeholder group | Type of interaction | Frequency |
|---|---|---|
| Customers | • Telephone and email support<br>• Surveys (e.g. NPS)<br>• Webinars<br>• Social media<br>• Stakeholder dialogue | Daily |
| Intermediary, distribution partners and advisors | • Telephone and email support<br>• Surveys (e.g. NPS)<br>• Webinars<br>• Social media<br>• Stakeholder dialogue | Daily |
| Employees | • Via telephone, email and Teams<br>• Performance appraisals<br>• Works Council<br>• Social media<br>• SAM(intranet)<br>• Staff meetings<br>• Employee panel<br>• Information and inspiration sessions<br>• Stakeholder dialogue | Daily |
| Prospects (consumers and companies) | • Social media<br>• Commercials<br>• Contract webpage | Daily |

1 Section 8.5 is in scope of CSRD and limited assurance (ESRS 2 SBM-2).

| Stakeholder group | Type of interaction | Frequency |
|---|---|---|
| Financial market players: shareholders, analysts, banks and rating agency S&P | • Meetings with team Investor Relations and Board members<br>• Conference calls with analysts and (potential) investors<br>• Webinars<br>• Road shows<br>• Corporate presentations<br>• Stakeholder dialogue | Almost daily |
| Peers and Business partners | • Meetings<br>• Telephone and email<br>• Stakeholder dialogue | Regularly |
| Regulators and tax authorities | • Meetings with Board members and departments Compliance and Tax<br>• Telephone and email<br>• Stakeholder dialogue | Regularly |
| Government | • Meetings with Board members, senior management and team Public Affairs<br>• Telephone and email<br>• Stakeholder dialogue | Regularly |
| Suppliers | • Consultation at strategic (2-4 times per year), tactical (monthly) and operational (daily) level<br>• Stakeholder dialogue | Regularly |
| Media | • Meetings<br>• Telephone and email<br>• Stakeholder dialogue | Almost daily |
| Trade unions | • Meetings<br>• Telephone and email<br>• Stakeholder dialogue | Quarterly |
| Social partners and organisations | • Meetings<br>• Telephone and email<br>• Stakeholder dialogue | Regularly |
| Civil society organisations & interest groups | • Events<br>• Partnerships & memberships<br>• Meetings<br>• Telephone and email<br>• Interviews<br>• Stakeholder dialogue | Regularly |

## Outcomes of stakeholder engagement

### Sustainable living and climate

**a) Sustainable Real Estate**
- Encourage innovative, sustainable (re)construction methods
- Play a key role in making existing homes more sustainable by sharing knowledge and bringing parties together
- Speak up about the affordability of sustainable housing and public debate

**b) Nature-Inclusive Landscape Management**
- Support farmers in the transition to a sustainable and nature-inclusive business

**c) Sustainable Damage Repair**
- Increase your impact by involving the entire damage repair chain
- Ensure that sustainable damage repair becomes the norm
- Utilize innovations such as Product As A Service instead of replacement

### Financial self-reliance and inclusion

**a) Making Insurance More Accessible for Low Incomes**
- Investigate how certain insurances, which form an important financial safety net for low incomes, can be made more accessible.
- Facilitate and support financial solidarity in society
- Seek collaboration to insure vulnerable groups

**b) Financial Problems**
- Contribute to preventing the poverty trap for middle incomes through prevention
- Consider customers with low literacy and those with limited digital skills
- Collaborate with parties trusted by people with low incomes
- Also focus on hard-to-reach target groups

**c) Financial Skills and Financial Insight**
- Advocate for financial skills in the school curriculum
- Offer financial assistance through employers

**d) Public debate**
- Use the term ‘financial SELF-sufficiency’
- Help by taking a leading role in the sector

### Vitality and sustainable employability

**a) Providing People with Insight into Their Health and Well-being**
- a.s.r. has a clear role in raising people’s awareness of (the importance of) their health and well-being
- Taking on a role model position is a crucial condition to be credible in this and to motivate people

**b) Improving Health & Well-being**
- As an insurer, we have insight into risks, but we can also offer possible solutions.
- a.s.r. can make a significant health impact by focusing on ‘seniors’
- Introduce a Vitality Index
- Collaboration with ‘respected’ partners makes it possible to scale up
- Highlight the local character of a.s.r. to increase solidarity among customers

**c) Influencing the Public Debate on Vitality**
- Create more awareness about current behavior and its effects for the future
- Clearly explain why a.s.r. has an important voice in the public debate
- Provide insights into developments to then spark the debate

# 8.6 Glossary

**Amortised cost**
The amount at which a financial asset or financial liability is measured on initial recognition net of principal repayments, plus or minus accumulated amortisation using the effective interest method or any difference between that initial amount and the amount at maturity, and minus any reduction for impairments or collectability.

**Associate**
An entity over which a.s.r. has significant influence and which is neither a subsidiary nor an interest in a joint venture.

**Basis point**
One-hundredth of one percent (0.01%).

**Claims ratio**
The cost of claims, net of reinsurance in Non-life, excluding the internal costs and exclusively commissions paid of handling non-life claims, less interest accrual on reserves, and a margin of prudence for health, expressed as a percentage of net earned premiums.

**Clean fair value**
The fair value of an asset or liability, excluding related accrued interest.

**Climate adaptation**
The process of adjusting to actual or expected climate change and its effects. The goal is to reduce vulnerability and enhance resilience to the impacts of climate change.

**Climate mitigation**
The efforts and actions taken to reduce or prevent the emission of greenhouse gases into the atmosphere.

**Closed books**
Closed books are policies that are no longer sold but are still on the books of a life insurance carrier as insurance coverage is still given and insurance policy contract services and/or cashflows are expected.

**Contractual service margin (CSM)**
CSM represents the unearned profit a.s.r. will recognise as it provides insurance contract services in the future and is determined at recognition as the equal and opposite amount of the estimates of the future cash flows including acquisition cash flows, an adjustment for the time value of money and a risk adjustment.

**Derivative**
A financial instrument with all three of the following characteristics: (a) Its value changes in response to the change in a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided, where a non-financial variable is concerned, the variable is not specific to a party to the contract (sometimes referred to as the underlying); (b) It requires no initial net investment or else an initial net investment which is lower than would be required for other types of contracts that would be expected to have a similar response to changes in market factors and (c) It is settled at a future date.

**Developing and promoting sustainable products/ services**
a.s.r. offers various sustainable products and services in all its business segments, such as sustainable repair and the 'Verduurzamingshypotheek'. Offering sustainable products and services enables a.s.r. to contribute towards a sustainable, future-proof society. Furthermore, sustainable products and services increase the appeal of a.s.r. for the growing group of customers that regard sustainability as important. The Policy on Sustainable Insurance states that sustainability considerations (such as potential impact on ESG topics) are integrated into the different phases of the product policy.

**Dirty fair value**
The fair value of an asset or liability, including related accrued interest.

**Discounted cash flow method**
A valuation technique whereby expected future cash flows are discounted at a rate that expresses the time value of money and a risk premium that reflects the extra return that investors demand as compensation for the risk that the cash flows may not materialise.

**Discretionary Participation Feature**
A contractual right to receive, as a supplement to guaranteed benefits, additional benefits that are likely to be a significant portion of the total contractual benefits, the amount or timing of which is contractually at the discretion of the issuer, which are contractually based on the performance of a specified pool of contracts or type of contract, realised and/or unrealised investment returns on a specified pool of assets held by the issuer, or the profit or loss of the company, fund or other entity that issues the contract.

**Diversity, equity and inclusion**
*Diversity*
All aspects in which people differ from each other. These visible aspects such as age and skin colour and the less visible aspects such as cultural, social and ethnic backgrounds, sexual and gender identities, competences,

work styles, education levels, perspectives and views make us authentic and unique as human beings. a.s.r. believes that these differences make the organisation stronger together.

*Equity*
Every person is unique, but everyone's contribution is of equal or comparable value. Equity means that everyone can participate fully and has access to equal opportunities.

*Inclusion*
With inclusion, a.s.r. sees a culture in which differences are recognised, valued and made use of. An environment in which everyone has their place and experiences the freedom and safety to be their authentic and unique selves.

**Double Materiality**
The concept that considers both financial materiality (how sustainability issues affect the company) and impact materiality (how the company impacts the environment and society).

**Embedded derivative**
A component of a hybrid instrument that also includes a non-derivative host. The host contract may be a bond or equity, a lease, an insurance contract or a contract of purchase and sale.

**Emission own activities**
Scope 1 emissions are direct emissions from company-owned and controlled resources.
Scope 2 emissions are indirect emissions from the generation of purchased energy, from a utility provider.
Scope 3 emissions are all indirect emissions - not included in scope 2 - that occur in the value chain of the reporting company, including both upstream and downstream emissions.

**Employee benefits**
All forms of consideration given by an entity in exchange for service rendered by employees.

**Employee contribution**
a.s.r.'s employee contribution to local society is measured by the volunteering hours of both a.s.r. employees as well as external employees working on behalf of a.s.r. These hours are non-profit and might include activities of the Doenkracht programme. This contribution can be done in a team or on an individual basis. For some activities the time is estimated based on a standardised table. Activities include improving financial literacy, being a financial buddy, reading aloud to children, etc., as well as team activities for societal organisations. Employees that are involved in an activity within a domain (Financial self-reliance and Helping by doing) more than once per calendar year are considered a double count. And as such only included once in the figure reported for number of employees involved. Volunteering hours also include training hours, travel time and the actual execution of the employee contribution.

**Environmental, Social and Governance (ESG)**
ESG refers to the three main areas of concern that have developed as central factors in measuring the sustainability and societal impact of an investment in a company. These areas cover a broad set of concerns increasingly included in the non-financial factors that feature in the valuation of investments in equities, property, and corporate and fixed-income bonds. ESG is the catch-all term for the criteria used in what has become known as socially responsible investment.

**EU Taxonomy**
EU Taxonomy Regulation establishes an EU classification system – or taxonomy – that provides investors, including financial sector entities and corporates, with uniform criteria specifying which economic activities are considered to contribute to the sustainable objectives of the EU.
This should provide non-financial and financial actors with clarity on which of their activities are considered sustainable in order to scale up sustainable investments and thereby contribute to the overall objectives of the EU's 2018 Sustainable Finance Action Plan and 2020 renewed Sustainable Finance Strategy.

*EU Taxonomy eligibility*
Eligibility used under the EU Taxonomy Regulation means that the economic activity is mentioned in the technical screening criteria and have therefore the potential to be considered or become sustainable, so-called 'taxonomy aligned'.

*EU Taxonomy alignment*
Alignment used under the EU Taxonomy Regulation means that the economic activity meets the technical screening criteria for alignment, including the criteria that the activity cause no significant harm to one or more of the other EU Taxonomy Regulation environmental objectives, while at the same time respecting minimum safeguards. These minimum safeguards are set out in particular in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**Expense ratio**
Expenses, including the internal costs of handling non-life claims, minus internal investment expenses and restructuring provision expenses, expressed as a percentage of net earned premiums.

**Fair value**
The price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

**Full Time Equivalent (FTE)**
Full Time Equivalent is a unit of account for the size of a job or total workforce. One FTE is equal to an employee working a full working week (being at least 38 hours) during the entire reporting year.

**Global Real Estate Survey Benchmark (GRESB)**
The GRESB is a benchmark that looks at the sustainability performance of more than 700 institutional investment funds worldwide.

**Goodwill**
An asset representing the future economic benefits arising from other assets acquired in a business combination which are not individually identified and separately recognised.

**General Measurement Model (GMM)**
The default model for the measurement of insurance contracts, except for direct participating contracts. The model comprises of four building blocks to determine the insurance liability, being future cash flows, discounting, risk adjustment and contractual service margin.

**Green House Gas (GHG)**
These are gases in the Earth's atmosphere that trap heat, contributing to the greenhouse effect and global warming. The main greenhouse gases include carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and fluorinated gases. Each of these gases has different sources and varying impacts on the climate.

**Gross written premiums**
Total revenues (earned or otherwise) expected to be received for insurance contracts over the life of the contract, including reinsurance premiums.

**Hedge accounting**
Hedge accounting (IFRS 9/IAS 39), is an accounting method used to align the financial reporting of hedging instruments (such as derivatives) and the underlying hedged items (such as mortgage loans) to better reflect the company's risk management activities. The goal is to reduce the volatility in the profit and loss account caused by changes in the value of the hedging instruments and the associated hedged items.

**HR indicators**
The definitions of the HR indicators mentioned in section 3.2 are included below. The scope of the HR indicators is a.s.r. employees excluding subsidiaries, redundant employees, incapacitated employees and employees employed through the Participation desk (*Participatiedesk*), unless specified otherwise. Some HR indicators are only covered in the Sustainability statements, and explained in section 6.5.

*Absenteeism rate*
Percentage of working hours that employees called in sick compared to the total number of workable hours according to contact in the reporting period. Maternity leave and pregnancy-related sickness are excluded.

*Employee Mood Monitor (eMood®)*
The eMood® score measures how employees feel in terms of happiness at work, vitality and productivity. The average of these scores is called the mood of a.s.r. All weekly scores are consolidated in the average score per year. Contractors are in scope.

*Employee engagement (Denison Culture Scan)*
Employee engagement is measured through the annually performed Denison Culture Scan. Employees are asked to fill in a questionnaire on the basis of four drivers of engagement: vision, core values, empowerment and knowledge development. The results are compared with a global benchmark of more than 1,200 large organisations that use the Denison scan. Contractors are in scope.

*Employees followed training courses (%)*
The percentage of employees who have completed at least one training course during the reporting period.

*Employee turnover*
The employee turnover is measured through a percentage which is the total outflow of employees divided by the average number of employees. Redundant employees and employees employed through the Participation desk are in scope.

*Employees employed through the Participation desk*
Employees that are employed through the participation desk and qualify for the Dutch Participation Act (*Participatiewet*). Contractors are out of scope, employees employed through the Participation desk are in scope.

*eNPS*
The eNPS is the extent to which employees would actively recommend a.s.r. as an employer. This is also measured via the Employee Mood Monitor. The eNPS provides a.s.r. an insight in the loyalty and perceived attraction of a.s.r. as an employer. Contractors are in scope.

*FTE*
Total number of internal FTE that have an employment contract with a.s.r. or one of its subsidiaries. Contractors are out of scope.

*Gender diversity (%)*
The proportion (in %) of female / male employed at a.s.r.

*Gross average hourly wages split by gender*
Gross average wage per hour in €, split by gender and per management layer.

*Nil absenteeism*
Nil absenteeism is the proportion (in %) of employees who have not reported sick during the reporting period.

*Parttime and fulltime employees*
Fulltime employees are the number of employees that have contract hours of at least 38 hours per week. Parttime employees are the number of employees that have contract hours of less than 38 hours per week.

*Pay gap*
The pay gap refers to the adjusted pay gap. The pay gap is calculated as follows: (average gross hourly wage for women - average gross hourly wage for men) / average gross hourly wage for men. The calculation is based on the full-time gross annual salary, including allowances. In the unadjusted pay gap, a.s.r. does not correct for type of work, age and work experience, but looks at all men and woman as a whole. In the adjusted pay gap all factors above are included as correction factor in the calculation.

*Pay ratio (incl. highest paid and average)*
a.s.r. is transparent concerning the remuneration of the EB. Not only in terms of actual amounts, but also in accordance with the Dutch Corporate Governance Code as compared with the average of the remuneration of the employees at a.s.r. The average pay ratio calculation is the difference expressed in a ratio between the average of the remuneration of the employees at a.s.r. and the highest paid individual at a.s.r.

*Pay ratio (incl. highest paid and median)*
a.s.r. is transparent concerning the remuneration of the EB. Not only in terms of actual amounts, but also in accordance with the Global Reporting Initiative as compared with the median of the remuneration of the employees at a.s.r. The median pay ratio is the difference expressed in a ratio between the median of the remuneration of the employees

at a.s.r. and the highest paid individual at a.s.r. Part-time employees are excluded from the calculation of the ratio because accurate extrapolation to full time employees is not possible through certain loan components.

*Total spending on training and development*
Total a.s.r. investment in € on training and development programmes.

*Vacancies filled internally and externally*
Internally filled vacancies are the number of vacancies filled by internal candidates, in absolute numbers and in percentage by dividing by total filled vacancies. Externally filled vacancies are the number of vacancies filled by external candidates, in absolute numbers and in percentage by dividing by total filled vacancies. Redundant employees, incapacitated employees and employees employed through the Participation desk are in scope.

**Impairment**
The amount by which the carrying amount of an asset or a cash-generating unit exceeds its recoverable amount. The asset's carrying amount is reduced to its fair value and the impairment loss is recognised through the income statement.

**Institution for Occupational Retirement Provision (IORP)**
IORP is a pension vehicle in the form of a separate legal entity which can operate a pension DC scheme on a separate account basis during the pension accrual phase. When an employee reaches his or her retirement age, the IORP transfers the accrued capital to a pension insurer of the employee's choice to pay the pension benefits. Employers wishing to insure any additional risks (such as survivors' pensions) can do so through an IORP.

**Insurance contracts**
A contract under which one party (a.s.r.) accepts significant insurance risk from another party (the policyholder) by agreeing to compensate the policyholder if a specified uncertain future event adversely affects the policyholder.

**Insurance contract revenue**
Insurance contract revenue under the general measurement model and Variable fee approach consists mainly of the sum of the changes in the liability for remaining coverage due to the insurance service expenses incurred in the period measured at the amounts expected at the beginning of the period, the change in the risk adjustment for non-financial risk, and the amount of contractual service margin for the services provided in the period. Insurance contract revenue under the premium allocation approach is based on the expected premium receipts for providing coverage in the period, based on the passage of time.

**Intangible asset**
An identifiable, non-monetary asset without physical substance.

**Intermediary**
A person or organization that acts as a middleman or mediator between two or more parties to facilitate communication or transactions. In the context of insurance, an intermediary is often responsible for advising clients on various insurance products, helping with policy purchases, and assisting with claims.

**International Financial Reporting Standards (IFRS)**
As of 1 January 2005, these standards have been the generally accepted international accounting policies that apply to all listed companies in the EU. They make annual results easier to compare and offer a better understanding of a company's financial position and performance.

**International Integrated Reporting Council (IIRC)**
The IIRC is a global coalition of regulators, investors, companies, standard setters, the accounting profession, academia and NGOs. The coalition promotes communication about value creation as the next step in the evolution of corporate reporting.

**Investment contract**
A life insurance contract that transfers FR with no significant insurance risk.

**Investment property**
Property held to earn rentals or for capital appreciation or both.

**Joint venture**
A contractual arrangement under which two or more parties undertake an economic activity that is subject to joint control.

**Mandated broker**
An intermediary in the insurance industry who has the authority to sell insurance, issue policies, collect premiums, and handle claims on behalf of an insurance company. This broker acts as an extension of the insurance company and has specific powers outlined in a power of attorney.

**Materiality**
An aspect is considered material if it is relevant to the stakeholders, has a reasonably estimable economic, environmental, and/or social impact and can have a major impact on the development of a.s.r. The greater the impact of the aspect on both society and a.s.r.'s business operations, results and strategy, the greater its materiality.

**Net Promoter Score (NPS)**
The NPS is a management tool that can be used to gauge the customer satisfaction of an organisation's customers. a.s.r. uses several NPS indicators, namely the:

- NPS-c: measures customer satisfaction after contact with an a.s.r. employee;
- NPS-d: measures customer satisfaction after interactions via digital channels;
- NPS-r: evaluates overall customer satisfaction, independent of specific customer interactions;
- NPS-i: combines NPS-c and NPS-d to assess satisfaction across both online and offline channels.

**Non-participating life insurance contracts**
In non-participating life insurance contracts, all values relating to the policy (death benefits, cash surrender values, premiums) are usually determined at policy issue, for the life of the contract, and cannot usually be altered after issue.

**Notional amount**
An amount of currency, number of shares, number of units of weight or volume or other units specified in a derivatives contract.

**Nu, later en altijd**
*'Nu, later en altijd'* is the brand asset developed for the in 2023 launched marketing campaign of a.s.r. It translates to 'Now, later and always'. With its financial services and role as responsible investor, a.s.r. aims for an improved financial situation for its customers and a sustainable society for today, tomorrow and for future generations to come.

**Operating lease**
A lease that does not transfer substantially all the risk and rewards incidental to ownership of an asset.

**Operating Return on Equity**
A measure of financial performance calculated by dividing the operating result (after hybrid costs and net of taxes) by the average adjusted equity attributable to shareholders for the reporting period.

**Option**
A financial instrument that conveys the right to buy (call option) or sell (put option) a security at a reference price during a specified time frame.

**Organic capital creation (OCC)**
The sustainable creation of capital from both the change in the Eligible own funds (EOF) and the change in the Solvency Capital Requirement (SCR) on Solvency II basis. To express the change in SCR in EOF-equivalent terms, the change in SCR is multiplied by the Solvency II target ratio. The OCC consists of three elements: (1) Business Capital Generation, (2) Finance Capital Generation and (3) Net SCR impact. In this definition, sustainable means: generated by the company on its own account, net of external and one-off effects. This results in a view on the Solvency II figures that is comparable with the definition of the operational result on IFRS basis.

**Order in Council**
An Order in Council is a decision taken by the Dutch government with respect to statutory provisions.

**Pension DB**
Defined benefit pension plan is a type of pension plan in which an employer/sponsor promises a specified pension payment, lump-sum, or combination thereof on retirement that depends on an employee's earnings history, tenure of service and age, rather than depending directly on individual investment returns.

**Pension DC**
A defined contribution plan is a type of retirement plan in which the employer, employee or both make contributions on a regular basis. Individual accounts are set up for participants and benefits are based on the amounts credited to these accounts plus any investment earnings on the money in the account.

**Photovoltaics**
Photovoltaics is the conversion of light into electricity using semiconducting materials that exhibit the photovoltaic effect.

**Partial internal model (PIM)**
Partial internal model - The Solvency II framework allows an insurance company to calculate the SCR using either the standard formula or, subject to supervisory approval, their own internal model (either full or partial). Partial internal models can be used to model one or more of the standard formula risk modules or sub-modules, the capital requirements for operational risk or for the loss-absorbing capacity of technical provision for either the whole business or one or more business units.

**Premium allocation approach (PAA)**
PAA is an optional simplification of the GMM. The PAA simplifies the measurement of the liability for remaining coverage. The measurement of the liability for incurred claims does not change and is measured conform the GMM. Revenue recognised is based on the expected premium receipts allocated to the period, based on the passage of time.

**Private equity**
An asset class consisting of equity securities of companies that are not publicly traded on a stock exchange. The transfer of private equity is strictly regulated. In the absence of a marketplace, any investor looking to sell their stake in a private company personally has to find a buyer.

**Provision**
A liability of uncertain timing or amount. Provisions are recognised as liabilities if it is probable that an outflow of resources embodying economic benefits will be required to settle the obligations (assuming that a reliable estimate can be made).

**Recoverable amount**
The recoverable amount of an asset or a cash-generating unit is its fair value less costs to sell or its value in use, whichever is higher.

**Return on Equity (ROE)**
A measure of financial performance calculated by dividing the net result attributable to holders of equity instruments by the average equity attributable to shareholders for the reporting period.

**Science Based Targets**
a.s.r. considers a target to be science-based if it is based on, the best available or latest, scientific data, as can be derived from the references in the ESRS and the definitions in voluntary frameworks such as the SBTi and SBTN frameworks. In general, to qualify as a target, also in line with ESRS 2 MDR-T, a target needs to be measurable, outcome-orientated and time-bound.

Although one can have its targets validated by, for example, SBTi, this is not a condition for a target to be science-based; a target can be science-based without being validated by SBTi or another validating body.

**Science Based Targets initiative (SBTi)**
SBTi is a corporate climate action organisation that enables companies and financial institutions worldwide to play their part in combating the climate crisis. They develop standards, tools and guidance which allow companies to set GHG emissions reductions targets in line with what is needed to keep global heating below catastrophic levels and reach net-zero by 2050 at the latest. Its subsidiary provides target validation services.

**Securities lending**
This refers to the lending of securities by one party to another, with the latter agreeing to return the securities on a specified future date. The borrower usually provides the lender with collateral. Securities lending allows the owner of the securities to generate extra income.

**Socially Responsible Investment (SRI)**
Investing with due regard for ethical standards, policies and procedures, in line with the interests of a.s.r. stakeholders, where the integration of ESG criteria is key. To achieve this a.s.r. uses multiple ESG approaches such as the exclusion of controversial activities, exclusion of companies and countries due to their ethical performance, the engagement dialogue, the integration of ESG assessments in the portfolio construction and impact investments.

**Solvency II**
Solvency II is an EU regulatory regime that has been in force in all member states since 1 January 2016. It has introduced a new, harmonised Europe-wide regime for insurance companies and sets regulatory requirements for solvency and risk governance.

**Stakeholders**
Stakeholders are individuals or organisations that have an interest, of whatever nature, in an organisation. They have a link with its activities, share in its earnings, influence its performance and assess its ESG effects. a.s.r.'s main stakeholder groups are customers, employees, investors and the society as a whole.

**Stakeholder Engagement**
The process of involving key stakeholders in the decision-making process regarding sustainability issues with the aim to strengthen the relationship to create mutual insight and understanding and opportunities for collaboration.

**Subsidiary**
An entity that is controlled by ASR Nederland N.V. (the parent company) or a subsidiary of ASR Nederland N.V.

**Sustainable repair**
The Sustainable repair indicator presents claims for P&C that were repaired as a share of total repairable claims. Research by CE Delft shows that the climate impact of repair is three to six times lower than that of replacement. The definition of sustainable repair was adapted as of reporting year 2023, in line with most recent research of CE Delft, a Dutch research centre specialised in (climate impact related to) energy, raw materials, and transport. Please refer to the research paper here (in Dutch).

**Sustainable reputation**
Sustainable reputation reflects the brand reputation of a.s.r. in the Netherlands in the areas of sustainability, transparency, and reliability. The score is calculated by determining how much % of the respondents give a top 2 score on a 5-point-scale. E.g. a score of 40 means 40% of the respondents give a top 2 score.

**Transaction date**
The date at which a.s.r. enters into the contractual terms of an instrument.

**Value creation model**
In section 2.2, a.s.r.'s value creation model is disclosed. This model illustrates how a.s.r. perceives the process of achieving sustainable value for its customers, employees, investors, and society. Different types of resources serve as inputs into the business model of a.s.r. The different business activities of a.s.r. use these inputs to create intended outputs and outcomes and hence added value to a.s.r.'s different key stakeholders.

**Value chain model**
The value chain outlines the relationship between the business activities of a.s.r. and the preceding and underlying links.

**Value in use**
Value in use is the present value of the future cash flows expected to be derived from an asset or cash-generating unit.

**Variable fee approach (VFA)**
VFA is required for insurance contracts that meet specific requirements whereby a link between payments to the policyholder and the returns on underlying items, such as some ‘participating’, ‘with profits’ and ‘unit linked’ contracts, is key. The interest on the CSM for such contracts is accreted implicitly through adjusting the CSM for the change in the variable fee. The variable fee represents a.s.r.’s share of the fair value of the underlying items less amounts that do not vary based on the return of the underlying items. The CSM is also adjusted for the time value of money and the effect of changes in financial risks not arising from underlying items such as options and guarantees.

# 8.7 Abbreviations

| Abbreviation | Definition |
|---|---|
| €STR | Euro Short-Term Rate |
| A&RC | Audit & Risk Committee |
| ACM | Authority for Consumers and Markets (*Autoriteit Consument & Markt)* |
| AEX | Amsterdam Exchange Index |
| AF | Actuarial Function |
| AFM | Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten)* |
| AGM | Annual General Meeting |
| AI | Artificial Intelligence |
| AI Act | European Artificial Intelligence Act |
| AIFM | Alternative Investment Fund Managers |
| AIVD | General Intelligence and Security Service (*Algemene Inlichtingen- en Veiligheidsdienst*) |
| ALM | Asset Liability Management |
| AML | Anti-Money Laundering |
| Amvest RCF | Amvest Residential Core Fund |
| Amvest LCF | Amvest Living & Care Fund |
| Amvest DF | Amvest Development Fund |
| AMX | Amsterdam Midcap Index |
| AP | Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*) |
| APE | Annual Premium Equivalent |
| APFS | ASR Pensioenfondsen Services |
| ASR DCRF | ASR Dutch Core Residential Fund |
| ASR DFLF | ASR Dutch Farmland Fund |
| ASR DMOF | ASR Dutch Mobility Office Fund |
| ASR DPRF | ASR Dutch Prime Retail Fund |
| ASR DSPF | ASR Dutch Science Park Fund |
| ASR MF | ASR Mortgage Fund |
| ASR PDF | ASR Private Debt Fund |
| ASR SAM | ASR Separate Account Mortgage Fund |
| AUD | Australian Dollar |
| AuM | Assets under Management |
| BMR | Benchmark Regulation |
| BPO | Business process outsourcing |
| bps | Basis points |
| BRC | Business Risk Committee |
| BSCR | Basic Solvency Capital Requirement |
| BVPA | Dutch Association for Public Affairs (*Beroepsvereniging voor Public Affairs*) |
| CAD | Canadian Dollar |
| CAPM | Capital Asset Pricing Model |
| CBS | Statistics Netherlands (*Centraal Bureau voor de Statistiek)* |
| CCA | Climate change adaptation |
| CCM | Climate change mitigation |
| CCR | Counterparty Credit Rating (Standard & Poor's) |
| CCT | Central Crisis Team |
| CDD | Customer Due Diligence |
| CDP | Carbon Disclosure Project |
| CEO | Chief Executive Officer |
| CFO | Chief Financial Officer |
| CGU | Cash Generating Unit |
| CHRO | Chief Human Resources Officer |
| CIC | Central Investment Committee |
| CISO | Chief Information Security Officer |
| CLA | Collective Labour Agreement |
| CMD | Capital Markets Day |
| $CO_2$ | Carbon dioxide |
| $CO_2$e | $CO_2$ equivalent |
| CoC | Cost of Capital |
| COO | Chief Operating Officer |
| COR | Combined Ratio |
| COR a.s.r. | Central Works Council a.s.r. (*Centrale Ondernemingsraad a.s.r.)* |
| COR Aegon | Central Works Council (*Centrale Ondernemingsraad Aegon*) |
| COSO | Committee of Sponsoring Organizations of the Treadway Commission |
| CRO | Chief Risk Officer |
| CRREM | Carbon Risk Real Estate Monitor |
| CSA | Credit Support Annex |
| CSDDD | Corporate Sustainability Due Diligence Directive |
| CSM | Contractual service margin |
| CSP | Concentrated solar power |
| CSR | Corporate Social Responsibility |
| CSRD | Corporate Sustainability Reporting Directive |
| CTO | Chief Technology Officer |
| DB | Defined benefit |
| DBA | Employment Relationships Deregulation Act (*Wet Deregulering Beoordeling Arbeidsrelaties*) |
| DC | Defined contribution |
| DCF | Discounted Cash Flow |
| DEI | Diversity, equity and inclusion |
| DGBC | Dutch Green Building Council |
| DJSI | S&P Global Dow Jones Sustainability Index |
| DKK | Danish crown |
| DNB | Dutch Central Bank (*De Nederlandsche Bank*) |
| DORA | Digital Operational Resilience Act |
| DUFAS | Dutch Fund and Asset Management Association |
| DVA | Dynamic volatility Adjustment |
| EB | Executive Board |
| EC | European Commission |
| ECB | European Central Bank |
| EEA | European Economic Area |
| EFRAG | European Financial Reporting Advisory Group |
| EGM | Extraordinary General Meeting |

| Abbreviation | Definition |
|---|---|
| EIOPA | European Insurance and Occupational Pensions Authority |
| eMood® | Employee Mood Monitor |
| eNPS | Employee Net Promoter Score |
| EOF | Eligible own funds |
| EONIA | Euro OverNight Index Average |
| ERC | First line Risk & Control (*Eerste lijn Risk & Control*) |
| ERM | Enterprise Risk Management |
| ESG | Environmental, Social and Governance |
| ESPP | Employee share purchase plan |
| EU | European Union |
| EU SFAP | European Sustainable Finance Action Plan |
| Euribor | Euro Interbank Offered Rate |
| FCAB | Framework for Climate Adaptive Buildings |
| FMA | Future Management Action |
| FR | Financial risks |
| FRC | Financial Risk Committee |
| FRM | Financial Risk Management |
| FSCB | Financial Services Complaints Board |
| FTE | Full-Time Equivalent |
| GBP | Pound Sterling |
| GDDZ | Green Deal Sustainable Healthcare |
| GDP | Gross Domestic Product |
| GDPR | General Data Protection Regulation |
| GHG | Greenhouse gas |
| GIIN | Global Impact Investing Network |
| GMM | General Measurement Model |
| GRC | Governance, Risk and Compliance |
| GRESB | Global Real Estate Survey Benchmark |
| GRI | Global Reporting Initiative |
| GRM | Group Risk Management |
| GWP | Gross Written Premiums |
| HKD | Hong Kong Dollar |
| HR | Human Resources |
| IAS | International Accounting Standards |
| IBNR | Incurred but not reported |
| IBOR | Interbank offered rate |
| ICT | Information and Communications Technology |
| IDD | Insurance Distribution Directive |
| IFRS | International Financial Reporting Standards |
| IFSR | Insurer Financial Strength Rating (Standard & Poor's) |
| IIRC | International Integrated Reporting Council |
| ILO | International Labour Organisation |
| IMP | Individual Monitoring Plan |
| IORP | Institution for Occupational Retirement Provision (*Premiepensioeninstelling)* |
| IRRD | Insurance recovery and resolution directive |
| ISDA | International Swaps and Derivatives Association |
| ISIN | International Securities Identification Number |
| IT | Information Technology |
| ITSA | IT Transitional Service Agreement |
| IVBN | Dutch Association of Institutional Investors in Real Estate (*Vereniging van Institutionele Beleggers in Vastgoed)* |
| KNMI | Royal Netherlands Meteorological Institute *(Koninklijk Nederlands Meteorologisch Instituut)* |
| KPI | key performance indicator |
| kWh | kilowatt-hour |
| KYC | Know Your Customer |
| LAC DT | Loss Absorbing Capacity Deferred Tax |
| LAC TP | Loss-Absorbing Capacity of Technical Provisions |
| LAT | Liability Adequacy Test |
| LDI | Liability-Driven Investing |
| LEAP | Locate, Evaluate, Assess and Prepare approach of TNFD |
| LoC | Level of Concern |
| LTO | Netherlands Agricultural and Horticultural Association (*Land- en Tuinbouw Organisatie Nederland*) |
| LULUCF | Land Use, Land-Use Change and Forestry |
| M&A | Mergers and Acquisitions |
| MB | Management Board |
| MiFID | Markets in Financial Instruments Directive |
| MSCI | Morgan Stanley Capital International |
| MT | Management Team |
| MTA | Social team activity (*Maatschappelijke Team Activiteit*) |
| MtM | Mark-to-Market |
| MV | Model Validation |
| N&ESGC | Nomination & Environmental, Social and Governance Committee |
| N/A | Not applicable |
| NAB | Netherlands Advisory Board on impact investing |
| NCSC | National Cyber Security Centre |
| NFR | Non-financial risks |
| NFRC | Non-Financial Risk Committee |
| NGOs | Non-governmental and non-profit organisations |
| NHG | National Mortgage Guarantee (*Nationale Hypotheek Garantie*) |
| Nibud | National Institute for Family Finance Information (*Nationaal Instituut voor Budgetvoorlichting*) |
| NPS | Net Promoter Score |
| NPS-c | Net Promoter Score for contact moments |
| NPS-d | Net Promoter Score for digital channels |
| NPS-i | Net Promoter Score for interactions |
| NPS-r | Net Promoter Score for customer relationship |
| NSLT | Not Similar to Non-life Techniques |
| NSR | Dutch Debt Assistance Route (*Nederlandse Schuldhulproute*) |
| NZIA | Net-Zero Insurance Alliance |
| OCs | Subcommittees (*Onderdeelcommissies*) |
| OCC | Organic capital creation |
| OECD | Organisation for Economic Co-operation and Development |
| OIFR | Operating Investment and Finance Result |
| OISR | Operating Insurance Service Result |
| OR a.s.r. | Works Council a.s.r. (*Ondernemingsraad a.s.r.)* |
| ORs | Works Councils (*Ondernemingsraden*) |
| ORM | Operational Risk Management |
| ORSA | Own Risk and Solvency Assessment |
| OTC | Over the Counter |
| OTSO | Supervised entity (*Onder toezicht staande onderneming*) |
| P&C | Property & Casualty |
| p.a. | per annum |
| PAA | Premium allocation approach |
| PARP | Product Approval & Review Process |
| PBAF | Partnership for Biodiversity Accounting Financials |
| PCAF | Partnership for Carbon Accounting Financials |
| PQC | Post-quantum cryptography |

| Abbreviation | Definition |
|---|---|
| PfZW | Dutch pension fund for the care and welfare sector (*Pensioenfonds Zorg en Welzijn*) |
| PII | Personal Identifiable Information |
| PIM | Partial internal model |
| PMO | Preventive Medical Examination (*Preventief Medisch Onderzoek*) |
| PRI | Policy on Responsible Investments |
| PV | Photovoltaics |
| PVFCF | Present Value of Future Cash Flows |
| RA | Risk adjustment |
| RAS | Risk Appetite Statements |
| RC | Remuneration Committee |
| RG | Review Group |
| RI&E | Risk Inventory and Evaluation |
| RICS | Royal Institution of Chartered Surveyors |
| RIVM | National Institute for Public Health and the Environment (*Rijksinstituut voor Volksgezondheid en Milieu*) |
| RM | Risk Management |
| RMF | Risk Management Framework |
| ROE | Return on Equity |
| RPA | Robotic Process Automation |
| RT1 | Restricted Tier 1 |
| RVO | Netherlands Enterprise Agency (*Rijksdienst voor Ondernemend Nederland)* |
| RVU | Early Retirement Regulation (*Regeling voor vervroegde uittreding*) |
| S&P | Standard & Poor's |
| SAA | Strategic Asset Allocation |
| SB | Supervisory Board |
| SBB | Share buyback |
| SBTi | Science-Based Targets initiative |
| SCR | Solvency Capital Requirement |
| SDGs | Sustainable Development Goals |
| SEK | Swedish Krone |
| SER | Dutch Social and Economic Council (*Sociaal-Economische Raad*) |
| SF | Standard formula |
| SFCR | Solvency and Financial Condition Report |
| SFDR | Sustainable Finance Disclosure Regulation |
| SG | Steering Group |
| SIRA | Systematic integrity risk analysis |
| SLT | Similar to Life Techniques |

| Abbreviation | Definition |
|---|---|
| SME | Small and medium-sized Enterprises |
| SOFR | Secured Overnight Financing Rate |
| SONIA | Sterling Overnight Index Average |
| SPPI | Solely Payment of Principle and Interest |
| SPT | Pension fund for Dentists and Dental-specialists (*Pensioenfonds Tandartsen en Tandarts-specialisten*) |
| SPV | Special purpose vehicle |
| SRA | Strategic risk analysis |
| TCFD | Task Force on Climate-related Financial Disclosures |
| TNFD | Task Force on Nature-related Financial Disclosures |
| TIBER-NL | Threat Intelligence-Based Ethical Red team |
| TSA | Transitional Service Agreement |
| TVOG | Time value of financial options and guarantees |
| UFR | Ultimate Forward Rate |
| UK | United Kingdom |
| UN PRI | United Nations Principles for Responsible Investments |
| UNGC | United Nations Global Compact |
| UNGPs | The United Nations Guiding Principles on Business and Human Rights |
| US | United States |
| USD | United States Dollar |
| UWV | Employee Insurance Agency (*Uitvoeringsinstituut Werknemersverzekeringen*) |
| VA | Volatility Adjustment |
| VAT | Value Added Tax |
| VBDO | Dutch Association of Investors for Sustainable Development (*Vereniging van Beleggers voor Duurzame Ontwikkeling*) |
| VFA | Variable fee approach |
| VKG | Van Kampen Groep |
| VNO-NCW | Confederation of Netherlands Industry and Employers |
| VOBA | Value of Business Acquired |
| VPL | Act Early retirement and life-course savings scheme (*Wet aanpassing fiscale behandeling VUT/prepensioen en introductie levensloopregeling*) |
| WCAG | Web Content Accessibility Guidelines |

| Abbreviation | Definition |
|---|---|
| WEF | World Economic Forum |
| Wft | Financial Supervision Act *(Wet Financieel Toezicht)* |
| WG | Working Group |
| WIA | Work and Income according to Labour Capacity Act (*Wet Werk en Inkomen naar Arbeidsvermogen)* |
| WTP | Future Pensions Act (*Wet toekomst pensioenen*) |
| Wwft | Anti-Money Laundering and Anti-Terrorist Financing Act (*Wet ter voorkoming van witwassen en financieren van terrorisme*) |
| ZVW | Health Insurance Act (*Zorgverzekeringswet*) |
| ZAR | South African Rand |

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a.s.r. likes to receive feedback or questions from stakeholders on the Annual Report. If you want to give a.s.r. feedback, please feel free to contact us.

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