



achmea 

Code of Conduct

2024

Why do we need a code of conduct?

We are a leading organisation that is relevant to our customers

Our insurance and services help our customers in numerous ways. Together with our partners, we are market leaders. For customers, this means helping them with solutions to feel confident and prevent risks. If a risk proves unavoidable, we help our customers to keep people and organisations going.

The customer's interests always come first. We like to think outside the box. We are moving from "compensating and preventing damage" to "making life more pleasant, safe and healthy"; from "helping people avoid loss" to "helping people maintain or achieve something". That could be a healthy body and a fit mind, but also a safe living, working or travel environment.

It could involve financial planning that accounts for new uncertainties, new opportunities and an entrepreneurial life. The customer's interests always come first. We only provide products and services that fit our customers' needs.

Stronger together

We work together to continuously improve and innovate our insurance and services, customer service and work processes. We actively involve our customers and members in that process through avenues such as our member council, customer councils and customer panels. We empathise. We always look for ways to innovate and then do so. These core values guide our work. Our focus on social and customer interests differentiates us from competitors.

Compliance with the Code of Conduct

Trust forms the foundation of working at Achmea. We expect all employees to adhere well to this Code of Conduct. Failure to comply with this may result in an official warning, reprimand or other further-reaching sanctions. These will be stored in your personnel file. Severe violations may result in summary dismissal or termination of your contract. We may also report incidents to the police and file a registration in the Incidents Register.

We ask the following of our employees:

- You are 100% committed to the customer
- You are good at what you do
- You adapt when necessary
- You work on your development and employability
- You keep Achmea's interests in mind and do not harm them

Furthermore, we expect the following of managers:

- You give direction to our strategy
- You cooperate with others to that end

All Achmea employees learn about the topics in this Code of Conduct in the mandatory Ethical Conduct e-learning module.

We adhere to the Code of Conduct

Trust forms the foundation of working at Achmea, but how does that affect your daily work? What is allowed and what is not? Achmea's Code of Conduct (hereinafter: Code of Conduct) outlines the rules and agreements regarding honest and good behaviour. We expect everyone who works for Achmea - both in-house¹ and external employees - to adhere closely to these agreements. The Code of Conduct is part of your contract with Achmea.

1. Employed by Achmea Internal Services N.V.

Sometimes, employees do the wrong thing, and we want to action that correctly. Rules and agreements can help. Deviating behaviour will not be tolerated from employees or from and to the outside world.

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Please note: Achmea's subsidiaries mostly have their own codes of conduct.² In the absence thereof, their employees are subject to Achmea's Code of Conduct³.

2. Exceptions to this are the specific Achmea regulations referred to in this Code of Conduct, which do not apply to subsidiaries. See Annexe 1 for an overview of these regulations.

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1 We work according to our core values

Our core values and core qualities help us achieve our ambition. For each core value and core quality, we have listed the behaviour we expect from you in your dealings with customers, partners, colleagues and shareholders.

Core values	Core qualities
Empathy <ul style="list-style-type: none">• I empathise with others• I listen to others without prejudice• I act with honesty and integrity, as I want to be treated myself• I talk about people as if they are present	Connection <ul style="list-style-type: none">• I have, and I instil confidence• I am approachable and approach others• I visibly consider wishes and interests• I cooperate and encourage cooperation in others
Innovation <ul style="list-style-type: none">• I show courage and ownership• I see possibilities and opportunities• I develop myself and help others do the same• I take time and space for innovation	Workmanship <ul style="list-style-type: none">• I am open and transparent• I maintain my professional knowledge• I use my knowledge actively• I share my knowledge and experience
Deliver on promises <ul style="list-style-type: none">• I prioritise the customer's interests in my actions• I take responsibility for our joint result• I keep appointments and try to exceed expectations	Improvement <ul style="list-style-type: none">• I try to do my job better every day• I ask for and give feedback• I recognise and acknowledge mistakes and correct them

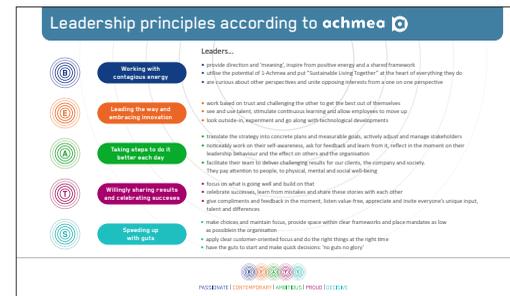
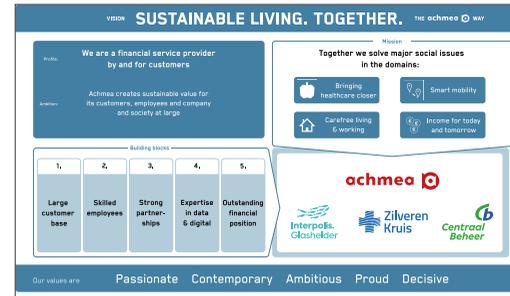
Achmea stands for Living Together Sustainably. We aim for an inclusive society where everyone participates and lives with and alongside each other enjoyably and in good health, in a way that can last for a long time. We work with our clients, strategic partners and associates to solve major societal issues around health, living & working, mobility and income. Our actions are based on five shared values: our BEATS. We are Inspired, Contemporary, Ambitious, Proud and Decisive in everything we do, creating sustainable value for our customers, our employees, our company and society as a whole. See the three pictures for a closer look at BEATS. Click here for the explanation.

BEATS are Achmea values that apply to all of us. They are the foundation of how we work, both for our organisation and for all our employees. They are the key to solving major societal issues together and creating sustainable coexistence. Our brands also have their own brand values that differentiate them in the market and deliver on customer promises.

This also means something for what we expect from our leaders. The core responsibilities of our leaders are giving direction and meaning, leading by example, supporting teams and collaboration, and achieving results: highly results-oriented and highly people-centric.

Leaders focus on providing meaningful work, stimulating autonomy within clear frameworks, challenging, inspiring, coaching, connecting with individual needs and talents, promoting inclusion and having employee's backs. This is how we attract and retain talented and skilled people. This is reflected in Achmea's employer promise.

- All this has been translated into [leadership principles](#).



2 This is how we treat each other, our customers and our suppliers

We trust our employees

You can be yourself with us. Our open corporate culture encourages employees to do their best and to prioritise the customer's interests.

We are open to new ideas

We appreciate how different ideas and views can be. We respect and value everyone's culture, faith, stage of life, sexual orientation and background.

We call each other out for undesirable or inappropriate behaviour

Managers set a good example in this regard. Mutual trust is the basis for a mature working relationship in which everyone takes responsibility.

This is how you treat each other and others.

- **Discuss difficult situations:** Work with your supervisor or colleagues to find a way to talk about difficult situations and come up with solutions together.
- **Address each other's behaviour:** Talk to each other instead of about each other.
- **Lead by example:** You are a role model of "Achmea behaviour", both to your colleagues and to the outside world. We trust that you will take that responsibility. After all, you work at Achmea for a reason!
- **You do not harm Achmea's interests, even outside working hours:** This concerns private behaviour, such as on social media, that leads to a

demonstrable risk for or damage to Achmea. Click [here](#) to read Achmea's social media policy.

2.1 No tolerance for inappropriate behaviour

We do not tolerate inappropriate behaviour, both towards colleagues and to the outside world. Inappropriate behaviour is a broad term which includes sexual harassment, discrimination, aggression and violence or bullying.

The perception of the behaviour by the recipient determines whether it is inappropriate.

- **Sexual harassment:** Sexual harassment is verbal, nonverbal or physical behaviour that is sexual in nature. Sexual harassment affects a person's dignity, especially if it leads to a threatening, hostile, offensive, humiliating or hurtful situation. Examples include staring, ogling, peeking and making unnecessary physical contact, such as accidentally touching you or putting an arm around you.
- **Discrimination:** Discrimination involves treating an employee differently than you would treat someone else in a similar situation. This could be on the basis of appearance, sexual orientation, cultural background, religion or a disability, for example.
- **Aggression and violence:** Aggression and violence relate to psychological or

physical harassment, threats or assault in the workplace. This could also be via email, for example, or colleagues or customers approaching you inappropriately while you are working.

- **Bullying:** All forms of intimidating behaviour from one or more colleagues or managers. This behaviour often carries on for a long time and is directed against an employee or a group of employees who cannot defend themselves from such behaviour.

Speak up, even when in doubt. If you hear, see or experience something that goes against our values or code of conduct, please report it.

Other examples of undesirable behaviour include:

- ignoring, excluding or intimidating someone;
- other forms of psychological pressure;
- invitations or proposals whereby:
 - refusing is to your disadvantage;
 - accepting is to your advantage.

If you are a victim of inappropriate behaviour, talk about it!

Talk about it with your manager or an in-house or external confidential counsellor. A confidential counsellor can support you and tell you where to address your complaint.

See also:

- the section [Dealing with complaints](#);
- the [Confidential Counsellor page on achmeanet](#);
- the [Behaviour and Culture page](#) on achmeanet;
- the [Inappropriate Behaviour Scheme](#).



2.2 How we work together

Our guiding principle is to deliver together. Achmea empowers you and the teams to add value for our customers.

We work together in various ways,

including ...

... at the office

... in scrum teams: working with a team

... virtual: location independent

This way of working is fast, flexible and beneficial

You are given the space to adjust your work-life balance and the confidence and freedom to make your own choices about where, when and how you work. Work still proceeds within frameworks and agreements, but the goal is to enable you to do your job to the best of your ability.

You discuss your work method thoroughly with your colleagues and manager

Freedom of working hours and location is not a right or duty but an opportunity. If your wishes conflict with your team's desire to work together in person more, we expect you to resolve this with the team and your manager, keeping the customer's best interests in mind.

2.3 We protect the privacy of our employees, customers and others

We protect the privacy of our employees

Protecting privacy is an important part of trusting each other. Our [Privacy Scheme](#) explains what personal data we use for which purposes. It also outlines your rights as an employee, such as being allowed to view and amend your data.

We protect the privacy of employees working at customer contact centres

Employees at customer contact centres (KCC) are subject to a special privacy policy: the Achmea Privacy Protocol KCC. The Achmea Privacy Protocol KCC includes rules about recording conversations and listening in on KCC employee conversations for training purposes, among other things.

We protect the privacy of customers and others

We process the personal data of customers and others in accordance with the [Achmea Privacy Policy](#). This could relate to parties who have suffered damages caused by one of our customers. We do not discuss this information with others.

We treat health data with extra care

If you work with Zilveren Kruis customer health data, you must sign a separate "Working with Health Data" confidentiality agreement and complete the

mandatory GDPR Privacy e-learning module. Click [here](#) for more information on working with Zilveren Kruis health data.

If you are unsure about the measures in your business unit, please check with your manager.

2.4 The customer's interests always come first

We expect all of our employees to put the customer's interests first. This goes beyond customer satisfaction. It can also mean not selling a product if it is not in the customer's best interest, even if the customer indicates that they want said product.

An example:

A customer applies for a car insurance policy. This policy includes legal expenses coverage. The customer already has a separate legal expenses insurance policy covering traffic incidents. As such, they do not need the additional legal expenses coverage with the car insurance.

Even if you are not in direct contact with the customer, their interests are paramount

We always actively aim for the customer's best interest:

- We put customer perspective at the heart of Achmea's strategy.
- You must swear the Oath or Promise when you join Achmea; this is a statement

in which you promise the following, among other things:

- In your work, you make a good choice between the interests of everyone involved with Achmea: customers, distribution partners, shareholders and colleagues
- You empathise with those parties
- You show that you are good at your job
- You always put the customer's interests first
- You promise to abide by laws, regulations and codes of conduct (including this Code of Conduct)
- Our remuneration policy supports the interests of our customers and other stakeholders. It aims to ensure that there are no financial incentives that expose customers and other stakeholders to irresponsible risk.

We adhere to the [Code of Conduct for Insurers](#) by the Association of Insurers.

The Code of Conduct for Insurers includes agreements on:

- easy and clear communication with customers;
- reliable service;
- employee quality. If you are in direct contact with customers,

you must meet the requirements under the Financial Supervision Act (Wft).

2.5 How to act when purchasing and outsourcing

You avoid giving preferential treatment to suppliers

We expect you to act professionally, ethically and honestly in procurement and outsourcing processes. You must never disclose quotes submitted by suppliers to other participants in the procurement or outsourcing process.

This includes information about the content of these quotes. This prevents preferential treatment to suppliers.

and you avoid conflicts of interest

You must also never accept a personal benefit offered by suppliers who have submitted a quote. This avoids [conflicts of interest](#) or the appearance thereof. You can read more about this in the section on conflicts of interest and the [Corporate Gifts and Invitations Guidelines](#).

Please note: If you are involved in a “high-risk” procurement process, you must take extra care in this regard and will be asked to sign the [Code of Conduct for Procurement](#).

2.6 We work in a 100% smoke-free environment and contribute to a smoke-free generation

Smoking is not permitted on Achmea’s premises. At Achmea, we work towards a healthy, safe and future-proof society.

We also place great importance on the health and vitality of our employees. Smoking in the work environment does not fit with that.

Our smoking policy means that employees, temporary workers, customers, suppliers and all other visitors are not allowed to smoke in and around Achmea’s premises or grounds. The policy applies to everyone working for and at Achmea and covers all smoking products, including e-cigarettes. 100% smoke-free applies to all activities that colleagues and other employees do as part of their jobs, including visiting customers or suppliers. Smoking privately is a matter of personal preference.

2.7 Alcohol, drugs and medication

Alcohol, drugs or medications can have a narcotic effect and impact health, well-being and safety. They can lead to situations where people are a danger to themselves or others. They can also lead to poor work performance, absenteeism, communication problems and harassment or aggression. Achmea holds employees responsible for incidents arising from the use of alcohol, drugs and medication during the performance of their work.

The following agreements apply at Achmea regarding the use of narcotics in relation to work:

Employees must not be under the influence of narcotics during work. Our caterer does not actively serve alcoholic beverages at receptions and events unless explicitly requested by the employee or organiser. Prescribed medication may affect employee performance. Employees are expected to know whether they can work safely with the prescribed medication; when in doubt, they should consult the company doctor. Employees dealing with substance abuse or addiction should seek help. Achmea will support employees in their recovery and, if necessary, reintegration. Employees who regularly attend business lunches and dinners for their jobs should exercise caution with regard to consuming and offering alcohol.

To find out more,

read the new [Narcotics Policy](#). If you have any questions, please contact supportgezondwerken@achmea.nl.



3 This is how we handle business assets and business information

3.1 Follow the Code of Conduct for Computer Use

You use Achmea resources or private equipment to process information from Achmea and our customers. This is necessary to do your job well. Such equipment could be a phone, tablet or printer, for example. Resources also include such things as your Achmea account, Achmea access pass, Achmea email address and the internet access we provide to you.

Follow the following agreements at a minimum:

- Keep your Achmea account private.
- Use your Achmea email address appropriately and responsibly.
- Use your internet access appropriately and responsibly.
- Treat Achmea equipment properly.
- Treat your own equipment properly if you use it for Achmea.
- Treat software, internet or cloud services properly.
- Handle confidential information and personal data properly.
- Use social media responsibly.
- Share data securely.
- Follow the “clean desk” and “clear screen” principles; for more information on these principles, please see the “Clean Desk Policy” on achmeanet.
- Keep your access card personal.

All guidelines and advice can be found in Achmea’s Code of Conduct for Computer Use. Visit the page on [Working Safely](#) to read this Code of Conduct, the latest news and our advice on how to handle equipment and data properly and safely.

Achmea monitors compliance with Achmea’s Code of Conduct for Computer Use

To ensure security and safeguard our business interests, Achmea monitors the use of computer equipment, software, email and the internet, as well as the underlying data, both manually and automatically. If this monitoring leads to reasonable suspicion that an employee is not complying with the Code of Conduct for Computer Use or is otherwise acting improperly, the employee concerned and, if necessary, their manager will be informed. The relevant rules are included in the Computer Use Monitoring Protocol (included as an annexe to Achmea’s Code of Conduct for Computer Use). If a suspicion of abuse or violation requires a personal investigation (PGO), the Conduct Compliance team will follow the Personal Investigation Guidelines in doing so. The [Personal Investigation Guidelines](#) are available on achmeanet.

Please note: Employees also have a duty of care with regard to other company assets that Achmea provides for business purposes, such as office furniture, Achmea equipment or lease cars. Office supplies should only be used for business

purposes. Depreciated business assets may not be taken for private use. Achmea will take appropriate measures in the event of theft or embezzlement during employment.

3.2 Employees also have a duty of care with regard to other company assets that Achmea provides for business purposes

Consider, for example, office furniture, Achmea equipment or lease cars. Office supplies should only be used for business purposes. Depreciated business assets may not be taken for private use. Achmea will take appropriate measures in the event of theft or embezzlement during employment.

3.3 Adhere to the Achmea Insider Scheme

The [Achmea Insider Scheme](#) outline special rules for employees who work with price-sensitive information. Price-sensitive information is information based on which investors decide whether or not to invest. This could be a decision to buy listed bonds or shares in Achmea, for example. Price-sensitive information is not public. If you have access to such information, you may not distribute it or use it to your advantage.



4 How we handle conflicts of interest

If your job involves contact with other parties, please keep in mind that these parties may have different interests. It is important that you are always able to do your job independently without creating a situation where multiple interests can come into conflict - a conflict of interest. This chapter outlines the agreements to avoid conflicts of interest or the appearance thereof. You can read more about this in the [Integrity & Fraud Policy](#).

4.1 We do not tolerate corruption in any form

Corruption includes, among others, bribery, embezzlement, payments to speed up processes and conflicts of interest. We do not tolerate corruption. Only then can we ensure an open and honest corporate culture. The Sponsorship and Donations Guidelines outline Achmea's [guidelines](#) for this.

4.2 Adhere to the guidelines for corporate gifts and invitations

The [Corporate Gifts and Invitations Guidelines](#) apply to everyone. The guidelines explain what you should do when you give or receive corporate gifts, gratuities and invitations. The key points are:

- Register corporate gifts and invitations you give and receive in HR Online. Your manager will assess whether the business gift or invitation is appropriate and, therefore, permissible or engage in a conversation with you about why it is wise to decline or offer it.
- You must examine the various interests carefully to avoid conflicts of interest or the appearance thereof and avoid jeopardising your independent way of working.

4.3 Working alongside your job at Achmea

We are happy to help you be socially active and work on your sustainable employability. This could involve working for another employer, client or yourself or being active on a board. It doesn't matter whether such activities are paid or not; these are called ancillary activities.

If you perform ancillary activities, please adhere to the following agreements:

- Consult with your manager if the work may conflict with our interests or if you have any doubts about it. Request permission to do the work through HR Online.
- Your work at Achmea should not suffer due to your ancillary activities.
- Ancillary activities must not harm our interests.

The collective bargaining agreement outlines the conditions for working alongside your work for Achmea.

4.4 Never give acquaintances an advantage

You may not give yourself, family, friends or other relations any advantage through your work. This means:

- You handle only business payments, and you provide only business services.
- You do not handle cases of acquaintances yourself. These should be reported to your supervisor. Your supervisor will determine who handles these cases.
- You are open in your way of working. You do not give anyone an advantage. You avoid giving the impression of giving anyone an advantage.
- Report a conflict of interest or the appearance thereof to your supervisor immediately and discuss a good solution together.

4.5 We follow the rules to protect competition

Everyone should be able to rely on companies being trustworthy and operating with integrity. This applies first and foremost to consumers but also to everyone living in the Netherlands. Competition law includes rules to protect competition for the proper operation of Dutch markets. Agreements between competitors are often prohibited, for example, and there are rules about mergers and acquisitions. Companies must comply with these rules. All employees must avoid violating the Competition Act or the appearance thereof.

The Achmea Competition Compliance Regulation contains additional rules for employees who are more likely to be involved in situations relating to competition law. Click [here](#) to view more information about competition law and contacts for answering questions about it in the column on the right.

4.6 If you make commitments or payments

Many employees make commitments on Achmea's behalf, such as accepting quotes or issuing assignments. Such obligations could involve customers, employees or other parties. Making payments involves activities such as approving invoices or payment orders. In such cases, you are considered to hold power of attorney.



5 How we handle mistakes and incidents

Everyone makes mistakes from time to time. We are committed to an “open mistakes culture”. This means that we see mistakes as an opportunity to learn. When you admit a mistake and share it with others, we can resolve the mistake faster, learn from it and improve the process.

Mistakes can lead to incidents. Incidents are events that disrupt normal business operations or jeopardise our business operations or the integrity thereof. This could be because sensitive information is made public, for example. If an incident occurs, we must report, register, process and conclude it. The following agreements apply to dealing with incidents at Achmea.

5.1 Dealing with threats and aggression

The [Manual for Dealing with Threats and Aggression](#) outlines how we deal with aggression and threats against Achmea’s employees or property. Such threats can be physical, over the phone, or in an email or letter. Examples of this include an angry customer on the phone, a bomb threat or a white-powder letter.

5.2 Dealing with incidents

The [Incidents Guidelines](#) explain how we deal with events that pose a risk to our business integrity and topics such as procedural errors, deception, fraud and theft. They also cover personal data leaks (data breaches). It is important to recognise incidents. Incidents should be reported to your supervisor or via this link on Achmeanet. This helps improve the processes within Achmea.

The following two regulations are related to the Achmea Incidents Policy:

- [Whistleblower Scheme](#)

You are aware of an incident that could harm yourself, our company or others. You want to protect yourself, our company or others. If you believe the regular processes for reporting an incident are less appropriate, use the whistleblower

scheme. The whistleblower scheme allows you to report internal incidents to the internal or external confidential advisor. This provides extra protection for you and your rights. If the report is made in good faith, the person responsible for the incident will not find out that you reported the incident. Your management will not find out that you reported the incident.

- [Personal Investigation Guidelines](#)

If we suspect that an employee is guilty of inappropriate or unlawful behaviour, such as fraud, we may initiate a personal investigation. The Personal Investigation Guidelines outline how we are allowed to do that. It also outlines Achmea's, the employees' and the investigators' interests, rights and obligations in this. The Conduct Compliance team coordinates and conducts these investigations.

5.3 What to do in case of emergency

In the event of an emergency, such as a fire, please listen to the emergency response officers. They know exactly what to do. They know the Emergency Procedure, which explains what to do in case of evacuations or accidents. Not everyone has access to the Emergency Procedure, as some of the information is confidential. If you encounter an emergency during your work, such as a threat, you can report it [here](#).



6 How we handle complaints

6.1 Complaints about inappropriate behaviour

Are you a victim of inappropriate behaviour such as sexual harassment, discrimination, aggression, violence or bullying? Talk about it! Talk to your manager or, if that is not possible, with a confidential counsellor. The confidential counsellor is there specifically to help you. You can read all about it in the [Confidential Counsellor Scheme](#). You can also submit a complaint to the Inappropriate Behaviour Committee. For more information, please see the [Inappropriate Behaviour Scheme](#).

6.2 Complaints about the collective bargaining agreement, employment conditions or a staff rule

Always discuss your complaint with your supervisor first. If you are unable to resolve your complaint together, you have the [right to make a complaint](#). You can file your complaint with the General Individual Complaints Committee. A confidential counsellor can assist you with this.

6.3 Complaints about job ranking or job assignment

For more information about this, please read the [Job Ranking Complaints Procedure](#).

6.4 Complaints about our Social Plan

A [Social Plan Guidance Committee](#) has been appointed to handle complaints regarding the application of our Social Plan. The work of the guidance committee is explained in the Social Plan.

6.5 Customer complaints

As a company, we are happy with every signal we receive from our customers. Happy because the customer has made the effort to respond to us. We use these signals to further improve our products and services. If you receive a complaint from a customer, try to resolve it yourself or follow the usual procedure in your department. If you are unable to resolve it, consult with your manager.

Colophon

Please let us know if you have any questions

If you have questions about the Code of Conduct, please contact the HR Info Desk or your business unit's [compliance officer](#).

This Achmea Code of Conduct and associated regulations have been drawn up in close consultation with employees and with the Central Works Council.

We may update these rules if new situations, laws or regulations require it.

Text:

HR, Achmea Compliance

Design:

Achmea Creatieve Diensten

Date of consent by Central Works Council:

2024



Annexe Achmea-specific regulations

Chapter Scheme/Protocol/Guidelines	Specifically for Achmea
2.1 and 6.1 Inappropriate Behaviour Scheme	Yes
2.1 and 6.1 Confidential Counsellor Scheme	
2.3 Privacy Scheme	Yes
2.3 Achmea's Privacy Protocol for Customer Contact Centres	Yes
2.3 Privacy Policy	Yes
2.3 Zilveren Kruis Privacy Manual	Yes
2.4 Oath or promise	No, but only for subsidiaries operating in financial services.
2.4 Code of Conduct for Insurers	No, but only for subsidiaries that are affiliated with the Association of Insurers and/or perform insurance activities.
2.5 and 4.2 Corporate Gifts and Invitations Guidelines	Yes
2.5 Code of Conduct for Procurement	Yes
2.7 Narcotics Policy	
3.1 Code of Conduct for Computer Use	Yes
3.1 Working Safely	Yes
3.2 Clean Desk Policy	Yes
3.3 Achmea Insider Scheme	No, see the description in the insider scheme.
4 Achmea Integrity & Fraud Policy	No, for all Dutch and foreign entities (insofar as not excluded elsewhere) of the Achmea Group's legal structure.
4.1 Sponsorship and Donations Guidelines	Yes
4.5 Achmea Competition Compliance Scheme	NNo. Applies to all Achmea business units in the Netherlands and abroad.
4.6 Power of Attorney Regulations	Yes
5.1 Manual for Dealing with Threats and Aggression	Yes



Annexe Achmea-specific regulations

Chapter Scheme/Protocol/Guidelines	Specifically for Achmea
5.2 Incidents Guidelines	No, it is applicable to all Achmea business units in the Netherlands and abroad (Operating Companies).
5.2 Achmea Whistleblower Scheme	No, Achmea B.V. and its group companies, together or each separately, as appropriate to the context, to the extent located in the Netherlands.
5.2 Achmea Personal Investigations Guidelines	No, Achmea B.V. and/or its business units and subsidiaries, including the organisational units referred to as divisions and staff departments.
5.3 Emergency Procedure	Yes
6.2 Individual Right of Complaint	Yes
6.3 Job Ranking Complaints Scheme	Yes