

Supplier Code of Conduct

2025

Achmea stands for Sustainable Living Together

An inclusive society in which everyone participates and lives together in a pleasant and healthy way. In a manner that can be sustained over the long term. This is our ideal. That's why we believe it is important to take good care of our living environment and to make sustainable solutions accessible. To everyone.

As a large financial services provider, we support our customers every day during the moments that matter. Rooted in our cooperative identity, we seek solutions and new perspectives that contribute to a healthier, safer, greener, and more inclusive society. Together with our customers, strategic partners, and other stakeholders, we contribute to solve major societal challenges related to healthcare, living & working, mobility, and income. In doing so, we create sustainable value for our customers, our employees, our company, and society at large. Sustainability is therefore a key part of Achmea's strategy and activities. See also our website: www.achmea.nl/en/sustainability.

This Code of Conduct has been drawn up for suppliers and partners (hereinafter collectively referred to as 'suppliers') to support our own internal (upstream) business operations. The Code of Conduct provides clarity about Achmea's

policies and expectations regarding sustainable procurement. We expect the suppliers we work with to comply with this Code of Conduct. This also applies to any subcontractors, in order to ensure compliance throughout the supply chain.

Information for suppliers can be found on our website: www.achmea.nl/procurement.

Sustainable Procurement

Attention to climate & environment, human rights & labour standards, and good governance is inextricably linked to our vision of Sustainable Living Together. Our sustainability approach is based on national and international laws and regulations, as well as standards such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, the International Labour Organization (ILO), and the principles of the UN Global Compact. When carrying out our business activities, we minimise, as far as reasonably possible, (potential) negative impacts on the environment, act with social justice and respect for human rights and labour standards, and base our actions on good governance practices.

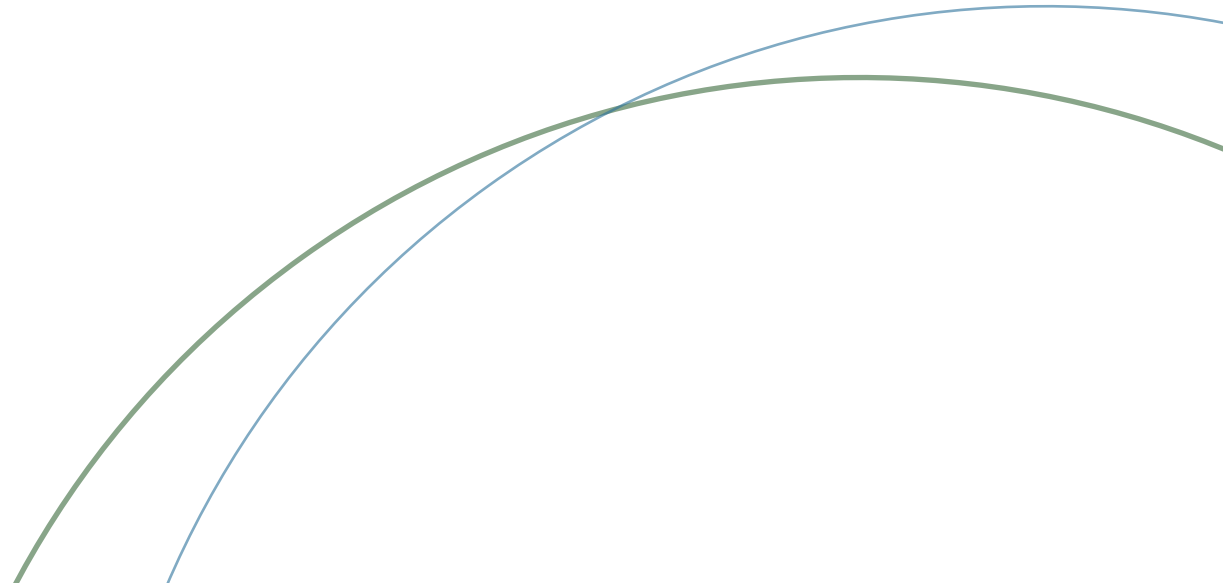
Achmea expects its suppliers to conduct their own operations and business activities in an honest, ethical manner and with respect for people, climate, and the environment. This means, among other things, that suppliers comply with national and international laws and regulations, adhere to the standards mentioned above, and are transparent about this. In addition, we expect suppliers to minimise the (potential) negative impact of their activities on people, the climate, and the environment.

In addition to the expectations outlined in this Code of Conduct, specific requirements or needs for the procurement of certain products and services that contribute to Achmea's sustainability strategy can be included. These may relate, for example, to CO₂ emissions, energy savings, circularity, biodiversity, or social entrepreneurship.

Environmental damage, human rights violations, and the disregard of labour standards can result in financial and reputational harm for both Achmea and the supplier. In cases of structural non-compliance with this Code of Conduct, the supplier is expected to report this to Achmea, after which Achmea engages with the supplier to address possible improvements. We expect suppliers to be willing to share information demonstrating compliance with the Code of Conduct and to report material violations. Non-compliance may ultimately impact the business relationship with Achmea.

Monitoring suppliers' sustainability performance

To gain insight into various sustainability aspects and risks of new and existing suppliers, Achmea uses tools such as [EcoVadis](#). We use EcoVadis to monitor and engage with suppliers about the progress of their sustainability performance. In addition, sustainability is a recurring topic in our regular meetings with suppliers. In some cases, Achmea may ask suppliers to complete an EcoVadis assessment or a comparable sustainability evaluation. We expect suppliers to cooperate with such requests.



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Climate and environment

At Achmea, we take the lead in the climate transition and actively work towards achieving sustainable changes. It is our ambition to align our activities with the goals of the Paris Climate Agreement, aiming to limit global warming as much as possible. We have developed ambitious climate plans, including the goal of achieving a fully sustainable and climate-neutral operation by 2030. Specifically, this means that the CO₂ footprint of our own operations will be net-zero by 2030. We want to achieve this by minimising emissions, generating local and sustainable energy where possible, and procuring products and services in a CO₂-neutral and circular way wherever feasible. Any remaining emissions will be offset through large-scale reforestation projects.

“We expect our suppliers to also take active measures against climate change and biodiversity loss.”





Achmea expects its suppliers to:

- strive to minimise their own CO₂ emissions in line with national and international climate targets and offset any remaining emissions;
- collaborate with their own suppliers and other parties in the supply chain to reduce the environmental impact of their activities where possible;
- measure their environmental impact, report on it where applicable, and set targets.

Specifically regarding circularity and biodiversity, Achmea expects suppliers to:

- take measures to prevent or mitigate the negative impact of their activities on biodiversity and ecosystems wherever possible;
- supply products and materials with minimal environmental impact. This includes applying circular economy principles in the design of products and materials, reducing waste, and promoting reuse and recycling of resources;
- take effective action when significant environmental damage exists or is likely to occur. These actions must prevent or minimise environmental harm and include an emergency plan.



Human rights and labour standards

Achmea strives for a sustainable and inclusive society where we live together in harmony and no one feels excluded. This includes respecting human rights and labour standards. **The Achmea Human Rights and Labour Standards Statement** reflects our commitment. This statement outlines our approach to human rights and labour standards in our various roles: as an employer, financial services provider, business partner, financier and investor, and as a socially responsible company.

Respect for human rights reflects the belief that all people are entitled to fundamental rights and freedoms regardless of nationality, race, ethnicity, gender, language, sexuality, religion, political or other beliefs.

Achmea expects its suppliers to:

- respect fundamental human rights as established in the Universal Declaration of Human Rights;
- take measures to prevent or mitigate (potential) human rights violations;
- recognize the freedom of association and assembly

In terms of labour standards, Achmea expects suppliers to:

- ensure safe working conditions and protect the health of employees, while also encouraging their personal development and education;
- adhere to working hours in compliance with applicable laws and regulations. Where such laws are absent, international ILO standards on working hours apply;
- provide remuneration that enables a living wage;
- base pay on the principle of equal pay for equal work and work toward closing any gender pay gaps;
- recognize the freedom of employees to join a union and the right to collective bargaining;
- refrain from any form of exploitation, forced labour, debt bondage, or child labour.

Privacy and data security

The protection of privacy is a human right. As a financial services provider, Achmea processes large volumes of personal data on a daily basis. The protection of this data through robust data security measures is critically important.

“Achmea expects suppliers to acknowledge the importance of privacy and data security and to embed these principles in their operations.”





Inclusion, diversity, and equality

We aim to be an inclusive employer where everyone feels welcome. Every person is unique. We want to create a working environment where employees can fully develop and apply their talents, where diverse beliefs and values are embraced, and where everyone's contribution is equally valued. Equality means that everyone can participate and has access to the same opportunities.

Achmea expects its suppliers to:

- provide equal opportunities and rights to employees, customers, and others they interact with, and not discriminate based on ethnicity, gender, origin, social status, age, religion, political opinion, sexual orientation, or health status;
- take measures to prevent unwanted behaviour, such as sexual harassment, aggression and violence, discrimination, stalking, bullying, abuse of power, insults, and defamation;
- commit to building an inclusive corporate culture where everyone has a place;
- promote employment opportunities for people with a distance to the labour market.

Ethics and integrity

In line with our vision of “Sustainable Living Together,” we aim to create sustainable value. Trust is essential for the functioning of Achmea and the financial system as a whole. We aim to protect this trust by maintaining an ethical and responsible way of doing business.

“This means we work together based on trust, respect, and integrity.”

Achmea does not tolerate any form of corruption, bribery, money laundering, financing of terrorism, conflicts of interest, abuse of power, tax evasion, or the circumvention of trade and economic sanctions — either within Achmea or its supply chain.

This principle is key to fostering a transparent and ethical corporate culture and ensuring that the customer’s interests always come first. Starting point is that employees perform their duties independently, without any (perceived) conflict of interest or unfair advantage.



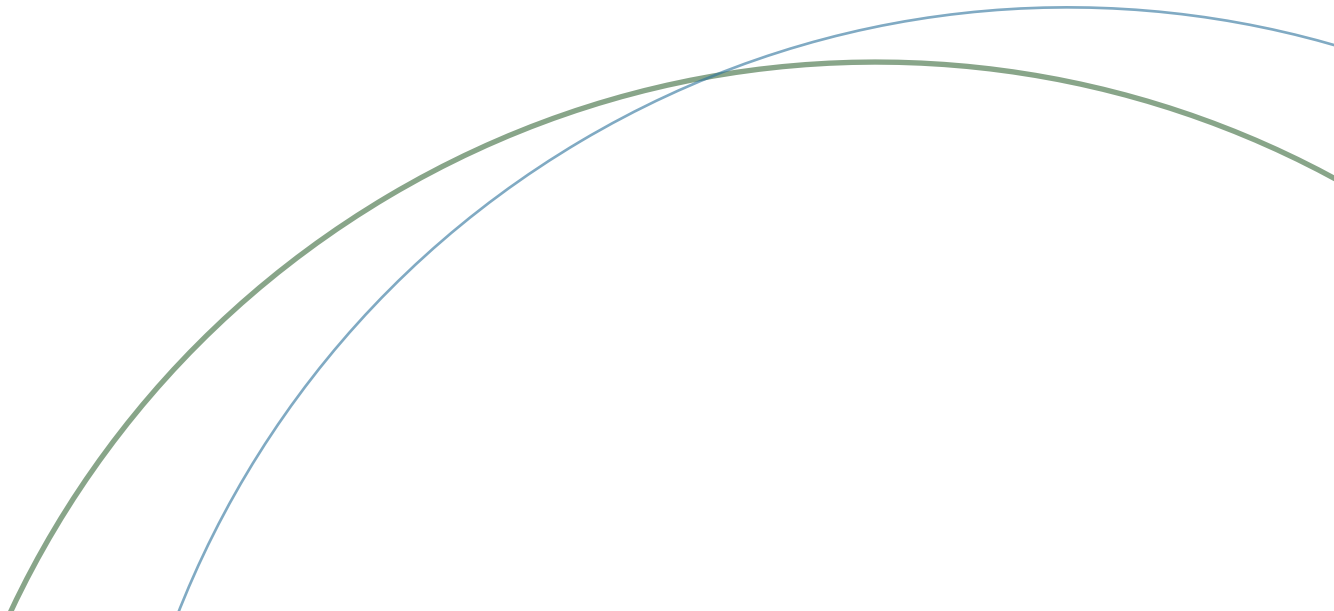
We expect our suppliers to adhere to the same standards and comply with applicable laws and regulations — not just in letter, but in spirit. By working together and committing to transparency and integrity, we can jointly foster an ethical business culture.

Achmea expects its suppliers to:

- comply with all relevant national and international laws and regulations regarding competition, sanctions, and export control;
- take action against unethical conduct in their operations and supply chains;
- refrain from transactions or other actions that could be considered market manipulation or give the appearance of it.

Regarding conflicts of interest, Achmea expects suppliers to:

- avoid situations and refrain from activities that could create a conflict of interest between the supplier and Achmea (or its employees);
- exercise restraint in giving and receiving gifts;
- report any actual or potential conflicts of interest to their Achmea contact person.

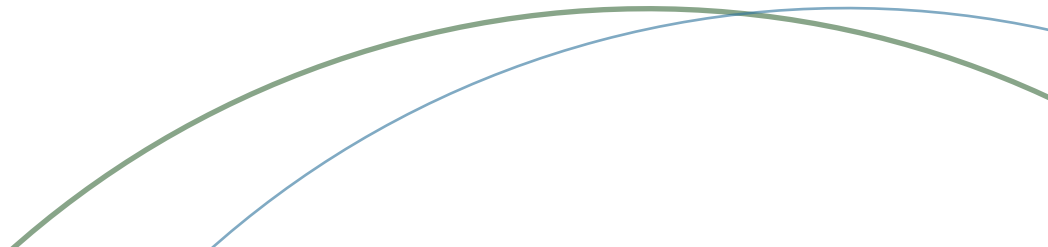




Grievance Mechanisms

Achmea takes responsibility for addressing environmental damage and human rights or labour standard violations where Achmea is directly or indirectly involved in causing harm. To support this, we have a complaint system in place, including a **whistleblower policy**. Achmea expects suppliers to have confidential grievance mechanisms for employees, customers, business partners, and other external stakeholders. These mechanisms must ensure anonymity and proper handling of reports.

“Achmea expects safe, confidential,
and serious handling of reports.”



Let us know if you have any questions

For questions about this Code of Conduct, please contact your designated Achmea representative or email: procurement@achmea.nl.

Zeist, August 2025