ANNUAL REPORT 2024

In this document the English translation of the official Dutch annual report is presented. In case of differences between the Dutch and English version, the Dutch version is leading.

Annual Report 2024 Achmea B.V.

This report sets out our company's vision, strategy and objectives, the manner in which we create value for our stakeholders and the trends and challenges we face. We also provide insight into our results and the most important developments in 2024. This annual report also contains the consolidated and company financial statements of Achmea B.V. for 2024 and other information. The supplements belonging to the Executive Board Report contain additional information, including in relation to sustainability.

The external auditor has audited the 2024 consolidated financial statements as included on pages 241 to 394 and the company financial statements as included on pages 395 to 407. The auditor's report can be found on pages 411 to 422.

The external auditor has also assessed the sustainability information as included in the Executive Board report. The assurance report with the auditor's opinion can be found on pages 423 to 426.

CONTENT ANNUAL REPORT

EXECUTIVE BOARD REPORT

GOVERNANCE

FINANCIAL STATEMENTS

OTHER INFORMATION

ABOUT ACHMEA

This section of the annual report serves as an introduction to our organisation and our role in society. In addition to an introduction by our Chair of the Executive Board, we provide an overview of our key activities, illustrated by key figures and our main brands. We also outline the most significant events of 2024. The final part of this section describes our vision.

A WORD FROM OUR CHAIR

Building a sustainable future together

In 2024, we were successful with our growth strategy and achieved strong financial results. In addition, we are taking important steps in the further development of our digital operating model, which is highly appreciated by our customers. The customer satisfaction and reputation scores of our brands remain as high as ever, as does the engagement of our employees.

The economic and social environment in which we find ourselves remains dynamic. Geopolitical tensions and international conflicts are an ongoing concern. The associated uncertainty also increases the risk of volatility in financial markets. However, these markets developed favourably last year, which was positive for investment returns. The ECB cut interest rates several times in 2024. In the Netherlands, however, inflation remained relatively high last year. This resulted, among other things, in higher costs for health care and damage repair. The labour market is becoming tighter due to demographic developments in the Netherlands. Nevertheless, we still fill our vacancies quickly. People like to work at our beautiful company.

Good financial results

Our strategy translates into good results. In the Non-Life segment, the operational result was approximately the same as last year at € 300 million. At Achmea Pension & Life, the operating result increased to € 354 million (+70%), thanks to an improved insurance service result and higher investment results. At € 241 million, the result at Health was also better than last year (+29%). In the Retirement Services segment, the operational result amounted to € 32 million, € 15 million lower than last year. This was partly caused by investments related to the pension transition. At International, the result was higher than last year and amounted to € 47 million.

The net result also increased, partly due to higher investment returns. Finally, our solvency ratio remained solid at 182%. We are therefore on track to achieve our financial goals for 2025. We are also making good progress with our carbon reduction targets.

A WORD FROM OUR CHAIR

Growth accros the board

Customers appreciate our services. With relational NPS scores between +15 and +27, customer satisfaction at Centraal Beheer, Interpolis and Zilveren Kruis remains as high as ever. As a result, we know how to reach and retain large groups of customers. The premium volume in the insurance business increased by 12% to € 25 billion, mainly due to Health, Non-Life and International.
Assets under management at Achmea Investment Management rose to € 265 billion (+22%), thanks to the acquisition of BSG Asset Management, share price developments and organic growth. As part of this, mortgage assets under management amounted to € 33 billion (+10%).
At Achmea Bank, the number of customers purchasing private financial services through Centraal Beheer grew to 600,000. The volume of savings increased to more than € 10 billion (+17%).

Acceleration of strategy through acquisitions and investments

Growth and profitability are essential to continue to invest in our strategic agenda. We are pleased that costs (+6%) increased less rapidly than revenues (+12%). We continue to focus on growth and digitisation. And we are alert to acquisition opportunities. In 2024, we announced two major transactions. Thanks to the announced partnership with Sixth Street and Lifetri, we will welcome more than 500,000 new private customers to Centraal Beheer after closing. In addition, we are creating growth opportunities in the pension buy-out market, where smaller pension funds are switching to insured schemes under the Future Pensions Act (Wtp). Achmea Pension & Life's capital generation is also expected to improve annually from 2028 onwards by € 100 million.
With the acquisition of BSG Asset Management, we welcomed KLM's pension funds as clients and our assets under management increased by more than € 27 billion. As a result of the acquisition and our continued focus on impact investing, Achmea Investment Management strengthens its leading position in the Netherlands in the field of asset management.

We also continue to grow internationally. Premium volume increased by 18% And we are entering new markets. We recently announced that we will start offering online non-life insurance in both Spain and Romania in 2025. We do this with our Inshared and Anytime platforms. Customers can easily and completely digitally insure themselves here. These platforms are excellent for use in various European markets. We are already successfully active in Germany with InShared.

Strengthened positions as market leader in non-life and health insurance

Achmea is the market leader in the Netherlands in the field of non-life and health insurance. We have further strengthened these positions over the past year. The premium volume at Non-Life rose by 9%. Rabobank is an important distribution partner for non-life insurance. Together, we have ambitious goals to serve even more customers. In addition, we work closely with private and business customers, especially through Interpolis, to improve road safety. With the national campaign 'BewustBestuurd' we increase awareness of this theme. At the same time, we emphasise personal responsibility by no longer compensating damage caused using the mobile phone in traffic from 2025. The premium volume at Non-Life increased by 9%.

Our health insurer Zilveren Kruis celebrated its 75th anniversary in 2024. To mark the occasion, there was a conference where employers and healthcare providers exchanged ideas about how we can bring health closer to working people in the Netherlands. In addition to more exercise and healthy eating, this is also about inclusiveness, a safe working environment and mental well-being, for example.

In addition, last year, in the context of the Integral Care Agreement (IZA), agreements were made with many parties from the healthcare field and the social domain (care providers, umbrella organisations, municipalities) about the most appropriate care per region. The total number of insured persons of Achmea's health insurers increased by about 450,000 in 2024 and remained about the same at the beginning of 2025.

More focused management on social value

Based on our cooperative identity and our vision 'Sustainable Living. Together', we contribute to solutions for important social issues. We do this with 18,000 colleagues for more than 10 million customers and for society. We do this in the areas of health, living and working, mobility and income.

As of this year, the Corporate Sustainability Reporting Directive (CSRD) will make the social added value of large companies even more visible in annual reports. In this annual report, we report on this for the first time. This is a positive development, as it provides greater transparency into how large companies create value, both financially and socially. And it enables us and other companies to steer even more specifically on social value.

A WORD FROM OUR CHAIR

Investing in homes for the elderly and sustainability

Strategically, we are well on track. We are growing across the board, are successful in digital customer service and, together with our partners and the Achmea association, create value for both customers and society. We do this based on our vision 'Sustainable Living. Together'. Last year, we also made agreements with parties in the healthcare sector to organise the health care provision per region as well as possible. Within our Non-Life business, we gain experience in insuring new technologies, such as large-scale energy storage systems. In the interest of the energy transition, we want to learn from this and stimulate innovation.

Last year, we achieved great results from our housing agenda with investments in homes for the elderly and making rental homes more sustainable. Together with clients, we invested € 100 million in senior housing from Buurtzorg, which is important in view of the ageing population. And we recently announced that we will invest € 50 million in making rental housing more sustainable. This is done through an investment fund that can grow to € 1 billion with external investors. With this Achmea fund, we are helping to shape the enormous sustainability challenge of rental housing in the Netherlands.

Climate plan update

In August, we published an update of our climate plan. We are on track to deliver on our interim corporate and real estate investment targets. Our goal is to allocate at least 10% of Achmea's own investments to Impact investments by the end of 2025 (approximately € 4 billion). This goal is within reach. For example, we invest in companies and projects that generate sustainable energy, such as wind and solar energy, and in sustainable healthcare real estate. Impact investing is an integral part of our investment mix. Especially now that sustainable investing is receiving international criticism, we are pointing out to our clients the opportunities we create with Achmea Investment Management and Achmea Real Estate to combine financial and social returns.

Investing in innovation and digitalisation

As part of our innovation strategy, we continuously invest in new technologies and initiatives that enable us to better respond to the needs of our customers and meet the challenges of the future. For example, through the Achmea Innovation Fund, we invested in the German agricultural start-up Klim, a company that supports the agriculture and food industry in the transition to regenerative agriculture. In addition, we have invested in Laka, an embedded bicycle insurer.

Customers expect an increasingly digital and personal service. In 2024, we further optimised the application process for private non-life policies. Meanwhile, 93% of these applications are submitted online, and more than 90% of them are handled entirely digitally. At Health, we processed about half a billion claims completely digitally last year. Customers received the payment of their claims in their account quickly. In addition, we invested in AI. We are taking great steps to embed this technology in a good and responsible way in our working method. We set up a secure Achmea ChatGPT environment and developed new AI applications to further improve customer satisfaction. A good example of this is the Deep Desk tool, which was launched at FBTO and is now used in all our customer contact centres.

Based on incoming customer questions, employees receive real-time answer options that allow them to help customers faster and more effectively during chat contact.

Transition to the new pension system

The ageing population presents the Netherlands with various challenges. In the labour market, in healthcare and also in the field of pensions. It is an important reason for the reform of our pension system. From the start, Achmea has actively contributed to this reform. The Wtp was approved in 2023. Together with our pension fund clients, we have been busy preparing for the transition to the new pension system ever since. The transition must be completed by 2028 at the latest. This is an extensive and challenging task for the coming years.

Another important project in 2025 is the implementation of the compensation that we agreed in February 2024 for unit-linked insurance. We are also preparing the start of the strategic partnership with Sixth Street and Lifetri.

Relocation of head office

In 2028, our head office will move from Zeist to Apeldoorn. Zeist has been our home base since the nineties, but this step offers several advantages. We currently have more office space than is needed and with this we are focusing on investments in five sustainable and inspiring work locations: Amsterdam, Apeldoorn, Leeuwarden, Leiden and Tilburg.

I look back on a successful year with excellent result. I would like to thank all colleagues for their commitment and dedication over the past year. Many thanks also to our customers and partners for their trust in Achmea. I look forward to working together to continue to build a sustainable and successful future for our customers, society and Achmea.

Kind regards,

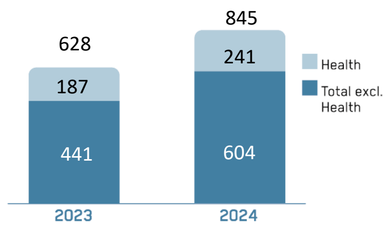
Bianca Tetteroo

Chair of the Executive Board

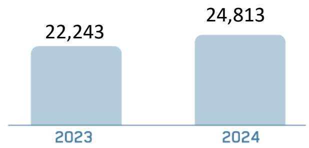
ACHMEA AT A GLANCE

Group key figures

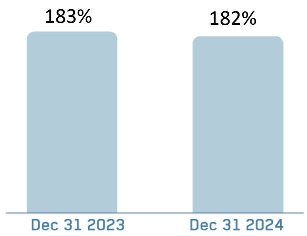
Operational result
(€ million)



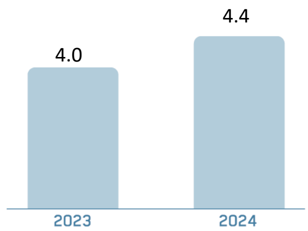
Gross written premiums
(€ million)



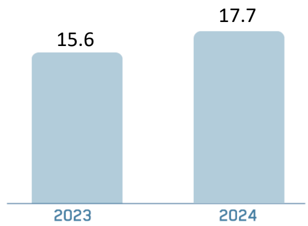
Solvency II (SII)
(%)



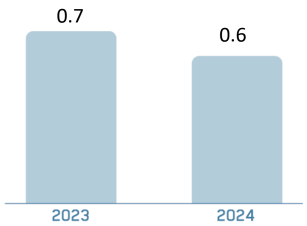
Non-Life Netherlands
Gross written premiums in €bn



Health Netherlands
Gross written premiums in €bn



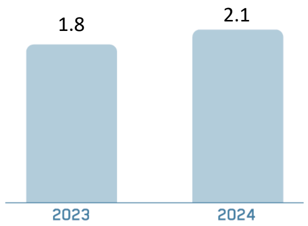
Pension & Life Netherlands
Gross written premiums in €bn



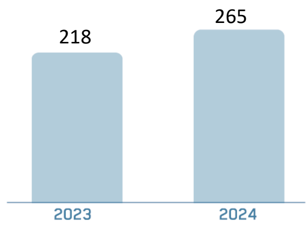
Large client base in the Netherlands and abroad[1]

#1	#1	#4	#4
Non-Life Netherlands	Health Netherlands	Pension & Life Netherlands	Achmea Investment Management

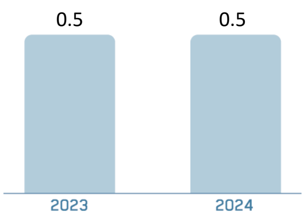
International
Gross written premiums in €bn



Retirement Services Netherland
Assets under Management in €bn



Retirement Services Netherlands
Total revenue in €bn



Credit rating and ESG rating

Credit rating ‘core’ insurance business

S&P Global: A

Fitch Ratings: A+

ESG rating

MSCI ESG RATINGS: AA (CCC | B | BB | BBB | A | AA | AAA)

SUSTAINALYTICS a Morningstar company: LOW RISK, Score 14,3

Corporate ESG Performance, RATED BY ISS ESG: C PRIME

ACHMEA AT A GLANCE

Achmea offers solutions in the area of healthcare, housing, mobility and income and is active with various brands. With the Achmea brand, we offer products and services through amongst others Achmea Investment Management, Achmea Real Estate, Achmea Bank and Achmea Mortgages. In addition to the Achmea brand, Interpolis, Zilveren Kruis and Centraal Beheer are our major brands. These brands are aimed at all Dutch people. There are also brands that focus on a specific target group, product range, or distribution channel.

In the Netherlands

International brands

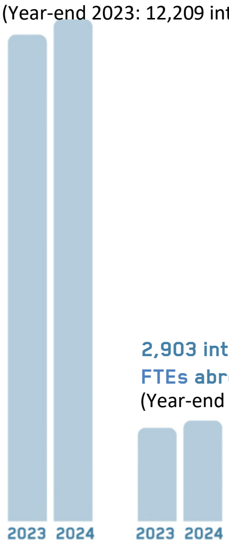
Locations and employees

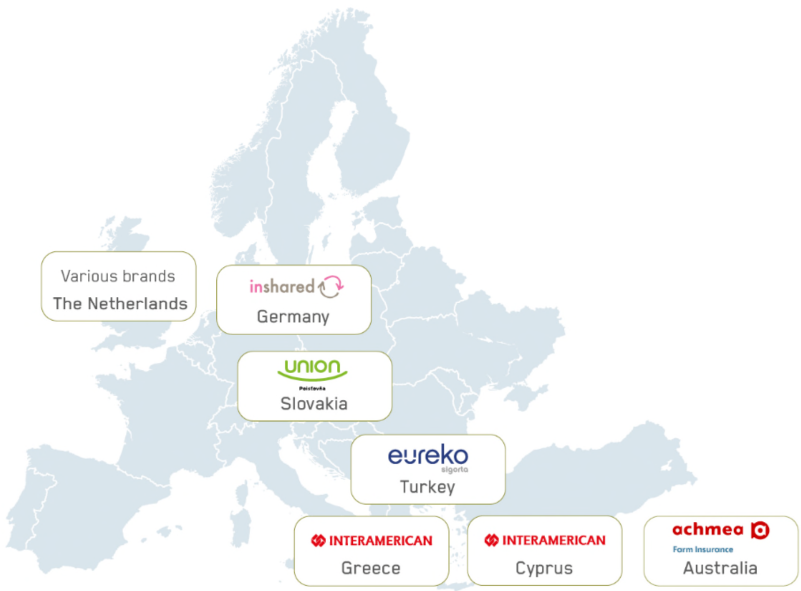
12,415 internal FTEs in the Netherlands*

(Year-end 2023: 12,209 internal FTEs)

2,903 internal FTEs abroad*

(Year-end 2023: 2,800 internal FTE's)





* FTE calculated on the basis of a standard working week (for CAO staff in the Netherlands and employees abroad: 34 hours, for Management and Senior Management: 40 hours).

2024 IN BRIEF

January

Achmea Investment Management has been rated by the British ShareAction as the best Dutch asset manager in terms of voting behaviour in favour of sustainability resolutions at shareholders' meetings.

Number of policyholders with basic health insurance increased by approximately 450,000 to 5.3 million insured persons.

February

Achmea enters into a final agreement with interest groups on unit-linked insurance policies for which € 85 million has been reserved.

March

Sale of Onlia Canada.

After a careful selection process, Achmea Investment Management has decided to choose State Street Alpha as i partner for the investment administration.

April

Achmea issues Tier 2 bond of € 750 million. The transaction has been well received on the capital market. The book has been overwritten 4 times.

Achmea joins the Forum for Insurance Transition to Net-Zero.

Achmea will pay a dividend of € 267 million in shares and cash.

May

Zilveren Kruis's relational NPS has risen sharply from 8 to 17.

June

Introduction of 'Deepdesk' after successful pilot Centraal Beheer, a tool that supports employees in answering customer questions, creating more room for personal customer contact.

July

Achmea Investment Management (Achmea IM) and Blue Sky Group (BSG) have reached an agreement on the acquisition of BSG Vermogensbeheer by Achmea IM. As a result, Achmea IM's assets under management will increase by €27 billion.

2024 IN BRIEF

August

Achmea publishes an update of the Climate Transition Plan including a tightening of our investment policy for fossil companies and a new target to invest 10% of our own investments in impact by the end of 2025.

September

Centraal Beheer once again ranked as the best in the Consumentenbond test for its Home Contents Insurance. Centraal Beheer is also innovative by being the first in the market to insure a 'workation' in the Continuous Travel Insurance.

October

As of 1 October 2024, Achmea will split the mortgage and real estate activities of Syntrus Achmea Real Estate & Finance B.V. The management of mortgage funds will be taken over by Achmea Mortgage Funds; the real estate company will continue as Achmea Real Estate.

Achmea Real Estate's Achmea Dutch Health Care Property Fund (ADHCPF) can once again call itself the most sustainable healthcare real estate fund in the world, according to the leading Global Real Estate Sustainability Benchmark (GRESB).

Achmea received the “World-class Workplace” label following good scores in the annual employee engagement survey.

November

Achmea, Lifetri and Sixth Street have reached agreement on a strategic partnership in the field of pension and life insurance. Achmea Pension & Life Insurance, in which Sixth Street will retain around 20% of the shares, will be a top-3 player in the Netherlands based on its more than 2.1 million customers and is well positioned for growth opportunities in the pension buy-out market.

SIXTH STREET™

November

With an average score of 8.3, Achmea is the leader in the Fair Insurance Guide. Every two years, the Fair Insurance Guide assesses the sustainability of the investment policy of 16 insurers in the Netherlands.

Over the next five years, Achmea Real Estate will invest more than €100 million in 25 small-scale residential locations for residents with an incipient need for care. These homes, social housing and mid-market rentals, are largely built with wood and other biobased materials.

Achmea reaches agreement on transition to a new pension scheme.

December

Interamerican, the Greek subsidiary of Achmea, strengthens its position with the acquisition of Europ Assistance Greece. This reputable company specializes in roadside assistance services in Greece.

Centraal Beheer and Interpolis announced new conditions to make customers aware of how dangerous the use of a phone while driving is and what the financial consequences can be. If an insured driver causes damage or injury due to non-hands-free phone use after December 1, 2024, they are not insured. This means that the damage to your own vehicle, but also the damage (or injury) to the other party must be paid for itself.

OUR VISION

'SUSTAINABLE LIVING. TOGETHER' THE ACHMEA WAY

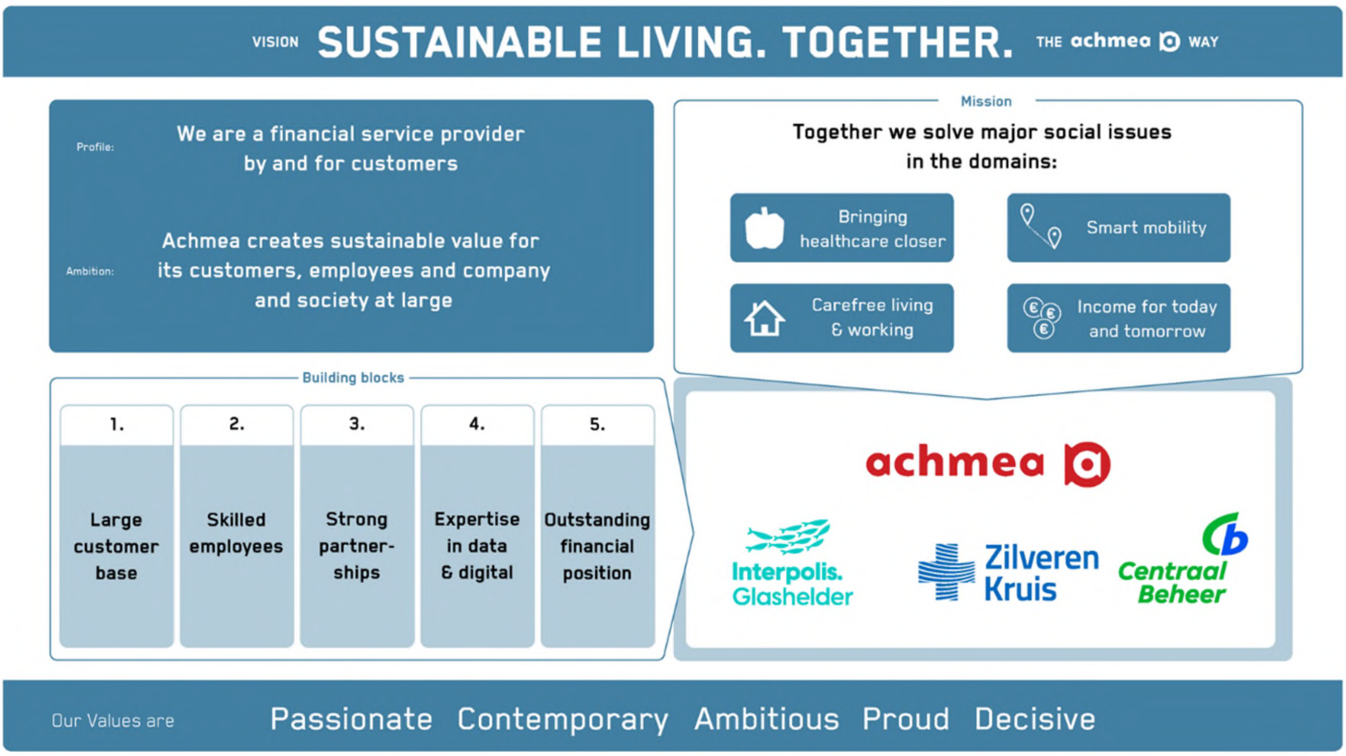
Achmea was founded more than 210 years ago when farmers joined forces to be resilient together in the event of disaster. Today, we are still from and for our customers. We are developing from an insurer into a broad financial service provider. This is our way of responding to today's needs within society.

As a financial services provider, we serve our customers with a wide range of solutions. Our offering includes insurance products in the non-life, health, life and income insurance segments, while our expertise and offerings also extend to financing and asset management. Each area contributes to addressing the pressing challenges of our time. With our healthcare activities, we focus on making care more accessible, affordable and of better quality for everyone. Our non-life, life and income insurance policies focus on carefree living and working, financial security and sustainable mobility. With our financing, life insurance, pensions and asset management activities, we contribute to securing income for today and tomorrow.

From our cooperative identity, we strive for a society where everyone can participate. We believe this leads to greater happiness for individuals and for all of us. Unfortunately, this is still far from reality in many places. Too many groups are left behind for various reasons. We believe this can change and are committed to making a difference.

Although we quite literally live together in our densely populated country, we seem to be growing further apart. In the traditionally tolerant Netherlands, polarization is increasing. Differences are magnified, while common ground becomes invisible. This leads to more conflicts and less social well-being.

We want to bring people back together and ensure that everyone can participate in our society. This makes life more enjoyable, healthier, and safer. This is what Sustainable Living. Together means to Achmea. And this role suits us. As an insurer, we have always played a role in uniting shared interests. With us, individuals and businesses from diverse backgrounds can come together to share their risks.



OUR VISION

SUSTAINABILITY

Sustainability is an integral part of our vision and strategy. We embed environmental and social aspects in our business activities and processes. Climate change is leading to major social, economic and financial challenges. We are seeing the effects of climate change and extreme weather conditions worldwide, and they are becoming increasingly frequent.

Sustainable value creation means, among other things, that we want to contribute to achieving the global climate goals. Limiting the global temperature increase to 1.5°C - 2°C compared to 1990 is necessary to prevent risks from becoming potentially uncontrollable. As a broad-based financial service provider, we contribute to resilience to the risks of climate change and are committed to further supporting the energy transition. We do this, among other efforts, through impact investing for both our own-risk investments and institutional clients.

Sustainable Living. Together also means: working on diversity and inclusion. Everyone has the right to equal opportunities and treatment. As an employer, we want to be a good reflection of society and strive for an inclusive culture, in which we embrace diversity. This also applies to our dealings with customers and suppliers.

More information is available in the Sustainability Report.

SOCIAL ISSUES IN FOUR DOMAINS

We have the ambition to create sustainable value for our customers, our employees, our company and society. We do this based on our mission to solve major social issues together. We focus on four domains:

- Bringing healthcare closer
- Smart mobility
- Carefree living & working
- Income for today and tomorrow

These domains fit in with our activities and competences. Within these domains, we periodically select a number of concrete social issues on which we put extra focus. We focus on issues that concern many people and have a major impact.

From our four strong brands Interpolis, Zilveren Kruis, Centraal Beheer and Achmea, we take a visible position on the chosen social issues. We engage with our customers and partners and challenge ourselves to come up with solutions together.

SUSTAINABLE DEVELOPMENT GOALS

With our commitment to social issues and through our sustainability strategy, we contribute to the realisation of the Sustainable Development Goals (SDGs). These 17 United Nations Sustainable Development Goals, together with the Paris Climate Agreement, form the world's 'sustainability agenda' for 2030. We support the SDGs and contribute to them. Both in our daily activities and through our ambitions in the field of climate and social impact.

Based on our Sustainable Living. Together vision, we focus on five SDGs that closely align with our four key domains, are at the core of our company, and have the potential to drive innovation and growth. These are SDG 3 (Good health and well-being), SDG 8 (Decent work and economic growth), SDG 10 (Reduce inequalities), SDG 11 (Sustainable cities and communities) and SDG 13 (Climate action). We do not directly focus on the (sub-)objectives in SDGs. But by helping to solve social issues in the four domains and through our sustainability strategy, we contribute to the realisation of the SDGs.

OUR BUILDING BLOCKS

We have the ambition to create sustainable value and solve major social issues. Based on five building blocks (see figure on the previous page), we work on realising our mission and exploiting the group's synergy.

We have a large customer base with customers who rate us highly in general. We serve them from our brands. We have enthusiastic and expert employees who are committed to our customers. We believe that this benefits the service provided to our customers. Together you achieve more than alone; That's why we like to work together and build strong partner relationships. Expertise in data and digital is necessary to be able to continue to serve customers well in the future. We also use this expertise for a secure and trusted digital way of working. An excellent financial position is needed to be able to realize the long-term ambitions of Sustainable Living. Together. We want to have the financial space to invest in growth and innovation and to contribute to the transition to a sustainable economy and society.

OUR ACHMEA VALUES

Sustainable Living. Together includes a number of values that form the foundation for our actions: Passionate, Contemporary, Ambitious, Proud and Decisive. These values indicate how we work as Achmea, how we treat each other, what we want to be and what we hold each other accountable for.

We are moving from working together to limit risks to working together to achieve concrete results for customers and society. By being enthusiastic and contemporary, but also decisive. By showing ambition and being proud of our company. We stand for Sustainable Living. Together.
This is what we are, this is Achmea.

ENVIRONMENT AND STRATEGY

This section of the annual report outlines the environment in which we operate, the key developments and trends. We also elaborate on our strategy and the related objectives and ambitions. Additionally, we explain how we create value for various stakeholders and contribute to global sustainability goals

TRENDS AND DEVELOPMENTS

In our environmental analysis, we outline our perspective on changes in our surroundings based on eight major developments. These developments impact the economy, as well as our customers and Achmea. In this chapter, we describe how we respond to these changes.

EIGHT MAJOR DEVELOPMENTS

1 It's a VUCA (volatility, uncertainty, complexity and ambiguity) world! We live in turbulent times that bring with them complex problems and a great deal of uncertainty. The world is becoming less predictable and it sometimes seems as if we move from one crisis to the next. There are no easy solutions to many of the problems facing us as a society.

2 House of cards Many people in the Netherlands think the government is powerless to solve problems. Yet at the same time they increasingly look to the government for solutions. On the one hand there is little trust in the government, but on the other the government seems to play an ever bigger role. Not just during the coronavirus pandemic and when compensating higher energy bills, but also for example in the call for more controls on the construction of affordable housing.

3 Slowbalisation Globalisation and international cooperation were a given for many years. The war in Ukraine and conflict in Israel and the Palestinian territories seem to be aggravating conflicts of interest and driving geoeconomic fragmentation.

4 Climate is hot! Although there is a greater focus on sustainability and ESG policy, climate change is causing a growing amount of damage and we are in danger of losing sight of the 1.5°C target for 2050. According to the World Economic Forum, the biggest risks to society in the coming 10 years are environmental, ranging from extreme weather to the collapse of ecosystems and loss of biodiversity.

5 Together alone Today's technology enables us to share an increasing amount with others online while it is steadily becoming embedded in society. We gain in efficiency, but the growing shift to the digital world raises the question of whether we are not also losing something thanks to the reduced human contact. Many young people felt miserable during the coronavirus pandemic and there are worries about the digital mental resilience of children.

6 The world ~~goes~~ is digital Technology, including Generative Artificial Intelligence (Gen AI), is shifting our boundaries and making more and more possible. This raises the question of whether we in fact want everything that is possible and how we as a society can safeguard public values, all the more so as these can differ between countries and cultures.

7 Fifty shades of grey The composition of the population is changing. The Netherlands has a growing group of senior citizens as advances in healthcare mean that people are living longer and inflow in the lower part of the population pyramid is declining because we are having fewer children. Europe is witnessing increasing (labour) migration and the arrival of asylum seekers in search of refuge. This affects all parts of our society: from the job market to demand for healthcare, from the housing market to the pension system.

8 Inequality and division There are concerns about division and inequality in the Netherlands. Old divisions seem to be hardening and new ones arising. The question is whether what binds us together is stronger than what is driving us apart.

IMPACT ON THE ECONOMY

The above trends and developments have a major impact on society and the economy. Households and businesses need to become more sustainable and adapt to climate change. The tightness in the labour market seems to be continuing and will increase further under the pressure of an ageing population. The results of the political discussions on nitrogen emissions can have a major impact on the prospects for farmers in the Netherlands and on the possibilities of building more homes in the short term and investing in making the energy supply more sustainable. Many companies are exploring the possibilities of new techniques such as Generative AI and how they can use them in a controlled way for their customers.

The financial markets have been turbulent in recent years. Inflation in 2024 was at a lower level than in previous years, but is still relatively high. Central banks have started lowering interest rates. However, inflation expectations for the coming years are uncertain: it cannot be ruled out that an ageing population, sustainability, geopolitical fragmentation and domestic tightness in the housing market will put upward pressure on inflation for a long time to come. The risk of financial market volatility remains present.

IMPACT ON OUR CUSTOMERS AND ON ACHMEA

As an insurer and financial service provider of and for customers, we are at the heart of society. The trends and developments described have an impact on our customers and on the risks to which they are exposed, on our employees and our business operations, and of course also on our financial results.

The risks our customers face are changing; For example, cybersecurity and risks associated with climate change are becoming increasingly relevant. This leads to new needs from customers, which we respond to with new propositions. In this way, we choose to help customers become more sustainable. In the face of inflation and cost increases, we are

TRENDS AND DEVELOPMENTS

committed to helping customers who are unable or unable to pay their bills. We do this by identifying problems for customers at an early stage and solving them where possible.

Technological changes and the use of data are accelerating. In 2024 there has been the breakthrough of Generative AI technology; major tech players are investing massively in this and adding it to their platforms, such as Microsoft Copilot and ChatGPT. We see this as a first step and we expect to see many more opportunities in the coming years.

Customer expectations about products and the use of technology are increasing, and prevention and service are gaining importance in the sector. We continue to invest in further digitization and customer service. Collaboration in partnerships offers opportunities to meet new customer demands and the challenges in society. But new technology such as Generative AI also requires being keen on ethical dilemmas and only using technology if it can be done in a safe and controlled way.

In the Netherlands, even after the new cabinet takes office, uncertainty remains about the design of social security systems. This not only brings uncertainty to our customers, but also to us and the markets in which we operate: from healthcare systems to pension discussions and the income insurance market.

We see that increasing laws and regulations lead to cost increases. The implementation of legislation in the field of sustainability (CSRD), privacy, digital resilience (DORA), access to data (FIDA), and customer due diligence, for example, has a major impact on the organization. This means that we have to hire extra people and incur extra costs.

We are also seeing cost increases due to inflation and the tight labour market. Suppliers are implementing cost increases and we also want to compensate our own employees for the higher costs due to inflation. This affects our operational costs and puts pressure on the premium we can charge.

Developments in the financial markets are also reflected in our financial results. The financial markets affect our investment results, the valuation of our real estate investments and the interest margins we can achieve.

Dilemma: Exclusion versus Engagement

At Achmea, we aim to make an impact in the real economy and do not exclude companies outright. While selling shares in carbon-intensive companies reduces our carbon footprint, it does not foster real change in the sector. Instead, our focus is on lowering the carbon emissions of the companies we invest in through active dialogue and the utilisation of shareholder rights. When these discussions do not yield results, exclusion may become an option.

Last year, we excluded several fossil companies due to insufficient change. For companies we continue to engage with, we provide a deadline to demonstrably invest in renewable energy; otherwise, exclusion will follow.

This dilemma calls for careful consideration: how can we remain engaged with companies while simultaneously achieving our sustainability goals? It is a balance between encouraging positive change and taking necessary actions when efforts do not have the desired effect.

OUR STRATEGY

THE SUM OF US

The Sum of Us is the strategy with which we pursue our vision of Sustainable Living. Together. Part of our strategy is that we invest in technology, customer service and services, in proposition development and innovations, in the core business and in our growth centres. In addition, we focus on reuse and synergy within the group. In this way, we can continue to serve our customers optimally and create sustainable value for our stakeholders. We do this based on five building blocks that we have further strengthened in 2024. The Results section includes more information about the progress on our building blocks since 2023.

Large client base

Achmea has a strong position in the market. With our brands and our broad product portfolio, we know how to reach and retain a very large customer group. We do this through a wide mix of distribution channels. We are proud that our customers generally rate our services highly, which is reflected in the NPS scores of our brands. It is precisely because of our size that we can achieve synergy and efficiency and free up space to invest in the further development of products and services. In this way, we remain customer-relevant and strive for more customers who consciously choose one or more of our brands, purchase more from us and are even more satisfied. The platforms of Centraal Beheer and FBTO are powerful examples with which we continue to exploit the cross-sell opportunities and increase our customer base.

In 2024, we achieved premium growth in Non-Life, the open book of Pension & Life, Health and International, and increased revenue and assets under management in the Retirement Services segment.

Skilled employees

The engagement and expertise of all our employees are crucial to realizing our strategy. We fulfill our employer promise and want to remain an attractive employer with contemporary employment conditions. The current collective labour agreement that took effect in 2024 includes, in addition to a wage increase due to inflation, also more extensive secondary employment benefits, a continuation of the personal climate budget aimed at new employees, and more opportunities throughout the year to work more or fewer hours. In December, a large majority of Achmea employees agreed to the new pension scheme and the transition to this new pension scheme. This enables Pension Fund Achmea to start the transition to the new pension scheme in line with the Future Pensions Act (Wtp).

In a tight labour market, engaging and retaining employees is of great importance, especially with the new balance in which we work more in hybrid form and from home than before. In 2024, we improved the recruitment process and onboarding of new employees within Achmea. Candidate information is shared from one place among business units. Information necessary for onboarding new employees has been adjusted to ensure a smooth start at Achmea. The Employee Engagement Survey (MBO) scores are at a good level, and we see a decrease in absenteeism. The policy regarding inclusivity, diversity, and equality has been implemented and is being applied.

Strong partnerships

We collaborate with partners to better assist customers and strengthen our distribution. Rabobank is and remains an important partner for us to strengthen our market position in the personal and business segments with Interpolis. Avéro Achmea collaborates with independent intermediaries for tailored advice. We also work with partners to provide solutions for societal issues. For example, Zilveren Kruis closely collaborates with local parties in the regions under the Integral Care Agreement to keep healthcare accessible and affordable. In an international context, we also work in partnerships, such as the collaboration between Eureko Sigorta and Garanti Bank in Türkiye. We work closely with pension funds on the implementation of the Future Pensions Act. In the field of pension and life insurance, we are entering into a collaboration with Sixth Street.

Expertise in data & digital

Utilising data and technology is crucial for serving our customers well, now and in the future. Therefore, we are expanding our expertise in data and digitalisation by implementing one way of working throughout our organisation.

We are digitising our processing processes, for instance, by increasing the Straight Through Processing (STP) rate of processing personal damage claims. We develop knowledge and skills to utilise data, for example, in personalising customer service for Centraal Beheer customers. In 2024, we introduced Generative AI tools in a safe and controlled manner to support our employees. This allows all employees to use AchmeaGPT as a safe internal variant of ChatGPT, and we implement tools for summarising chat conversations in contact centres.

The principle is that we handle the data entrusted to us carefully and transparently. We want to use data and technology in an ethically responsible manner so that customers can manage their affairs safely and reliably. For this reason, Achmea has an Ethics Committee that discusses ethical issues. Our expertise in data and digital will be further developed over the coming years with the safe and controlled application of the new generation of Generative AI.

Excellent financial position

With excellent results in 2024, we have a strong financial foundation to expand our core business, finance our growth,

OUR STRATEGY

and realise our societal ambitions. Customers, employees, shareholders, regulators, and credit rating agencies expect us to maintain a healthy financial position so that they can be assured that we can meet our obligations in the event of claims. Therefore, we strive to further improve our operational results, generate more capital, and free up additional capital supported by balance sheet optimisations.

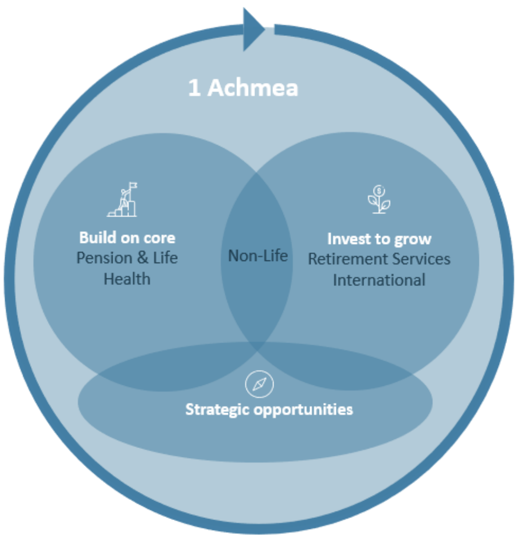
MANAGEMENT AGENDA

The management agenda through which we steer our strategy is built around four components. We optimise from one Achmea, further develop our core business, invest in growth, and leverage strategic options.

Optimisation based on ʻoneʼ Achmea

As a group, we have a shared mission and common ambition. By joining forces across brands and business units, we achieve synergy and economies of scale. We have initiated a number of group-wide initiatives, aimed at collaboration on IT, finance, digitalisation, commercial excellence, sourcing, asset management and sustainability, among others. The cost savings we achieve in this way offer the financial space to invest in growth and our social ambitions ('Save to invest to grow').

We are increasing our commercial strength into the future by organising distribution, innovation and brand management differently within the new organisational unit 'Distribution, Innovation & Brand'. This division provides Achmea-wide strategic and policy-related support to the Achmea brands. This organisational unit implemented the first startup ideas and partnerships in 2024, for example Coachmagnet, a platform that links people with a request for help to a coach. We use the power of our digital platforms to increase cross-sell. We are also increasing our commercial strength internationally by reusing our digital skills in direct distribution in new countries.



We are executing a multi-year plan to migrate our applications to Microsoft Azure cloud by 2025. In 2024, we will have taken steps in this direction and we will be on track. We are working on increasing our maturity in the field of data. We are expanding the possibilities for digital customer contact. The digitalization of the customer service of the brands is developing steadily. In 2024, we conducted the first pilots with the new generation of AI technology (Generative AI) to support customer contact employees.

The centralised 'Know Your Customer' competence center is working on a future-proof way of working with IT support in the field of 'customer due diligence (CDD)'.

Based on our sourcing policy, we make targeted use of outsourcing in our business operations. For IT activities, we are working with nine IT partners in fourteen different countries in 2024. This provides us with access to capacity and knowledge in the field of information technology.

Sustainability is an integral part of our vision ʻSustainable Living. Together' and strategy. Our approach is based on the environmental, social and governance (ESG) pillars. Environmental considerations such as climate change and biodiversity loss require continuous innovation and responsibility. Social issues, such as health and well-being, have been an integral part of our identity and strategic vision since the inception of our company. Governance is the foundation of our operations, ensuring transparency, ethics and safety in everything we do. Our commitment is to limit negative effects on people and planet and to promote positive social impact.

Our sustainability strategy includes ambitious goals, including making our own operations carbon neutral by 2030 and achieving carbon neutrality through our investment portfolio by 2040/2050. We also aim to reduce carbon emissions from non-life insurance and want to encourage sustainable initiatives in our corporate insurance portfolio. In addition, we believe it is important to address social issues by promoting diversity, inclusivity and equal access. We are committed to diversity in top management and the well-being of our employees. In our insurance services, we focus on strengthening the resilience of our customers by providing solutions that improve sustainable employability, provide accessible and affordable healthcare, and provide support to people with payment problems or debts. In our investments, we actively exclude companies that violate international standards.

In our sustainability report, which we have prepared in accordance with the CSRD, we account for how we translate our vision into concrete actions, reflecting our commitment to embedding sustainability at the core of our operations. We provide an overview of our results on material themes and describe the steps we take to make a positive contribution to the world. Think of themes such as climate change and good employment practices. We also see the need to make progress on other material themes, such as biodiversity, water and soil pollution, and the position of workers in the value chain. We are currently in the early stages in these areas. Given our dependence on different stakeholders, not all data or methodologies are readily available; These are likely to become available over time. This applies both to our activities in the Netherlands and to the collection of data on the value chain of our foreign business units, where our market shares are smaller than in the Netherlands.

The ongoing developments will further strengthen our sustainability strategy, allowing us to achieve our overarching goal more effectively.

Expanding the core business

Part of our strategy is also to further expand our core business. At Pension & Life, we are committed to growing the open portfolio, partly through the Centraal Beheer Financial Services platform, and we are freeing up capital through the extension of the service book.

With the proposed strategic partnership with Lifetri and Sixth Street in the field of pension and life insurance, we are giving a boost to our growth ambitions, both in the field of insurance and in the Retirement Services segment. Lifetri's more than 500,000 customers will be integrated into Pension & Life and served from the Centraal Beheer brand. Together we will enter the market for pension buy-outs in which we want to acquire the pension obligations of pension funds. The aim is to achieve a market share of 20% in this market. We will also be working together in the field of investments, which offers additional opportunities for growth. As a result of the collaboration, Achmea Pension & Life Insurance's capital generation is expected to increase by €100 million from 2028. Furthermore, the collaboration provides economies of scale and synergy for the service books.

We have the long-term ambition to maintain a 30% market share in the health insurance market. We assist our health policyholders in paying for and arranging care and improving their health. From a broad view of health, we encourage and help our customers to live and work healthier. As a market leader, Zilveren Kruis is committed to the necessary transformation of the healthcare landscape and we encourage accessible care digitally and at home.

In Non-Life, the strategy is to maintain our market leadership and to expand and grow our position in both P&C (Private and SME) and Income Protection. With Centraal Beheer and FBTO in the direct market, from Interpolis together with Rabobank and with Avéro Achmea in close cooperation with the independent intermediary. We want to combine growth with sharp claims management and we are committed to digital, data-driven customer journeys and processing chains.

Investing in growth

In addition to the growth ambitions in the core business in Non-Life, Health and Pension & Life, part of our strategy is also to invest in new growth, especially in Retirement Services (ODV) and in our international activities.

With ODV, we want to give millions of Dutch people a carefree day, today and tomorrow. We help our customers, consumers, employers and institutional parties, to make well-considered financial choices by offering insight, overview and smart solutions. As a broad-based financial service provider, Retirement Services contributes to Achmea's Sustainable Living. Together vision. Especially within the domains: Income for today and tomorrow and Carefree living and working.

From the Centraal Beheer platform, we strive to offer integrated solutions in the 2nd, 3rd and 4th pillars for wealth accumulation at the times when it matters to our client. With a growing number of customers and a growing NPS score, Centraal Beheer shows its position as a forerunner and its important role in wealth accumulation in the Netherlands.

Within the Retirement Services segment, we clustered our activities to intensify cooperation between divisions, increase execution power and increase commercial strength. The four clusters are Mortgages and Financial Services, Pensions, Institutional Investment and Real Estate.

In Mortgages and Financial Services, we leverage our market positions in mortgages by increasing investments for our own balance sheet and by attracting external investors. The focus is on Centraal Beheer as a mortgage brand with one streamlined process for processing mortgage applications. In the long term, we aim for one million Centraal Beheer customers who purchase financial services, such as term life insurance, immediate pension, annuity, savings, investments or a mortgage.

From the Pensions cluster, we want to offer employees and employers a complete range of pensions. We carry out the pension administration for pension funds and offer clients solutions from Centraal Beheer APF and Centraal Beheer PPI. In 2024, we worked with our clients to implement the transition from their existing pension plans to the new pension system.

OUR STRATEGY

In the Institutional Investment cluster, we bundle the sales and marketing activities for the institutional market to further optimise our commercial strength. Achmea Investment Management has the ambition to create more capital for and with institutional investors for the future in a better world. We do this by focusing on ESG integration, active ownership and impact investing, among other things. Over the past year, we strengthened our position with the acquisition of the asset management activities of the Blue Sky Group (approximately €27 bn in assets under management).

With the real estate company Achmea Real Estate, we have built up a solid portfolio. We are committed to growth in invested assets with a focus on social returns. This is evident from our residential care portfolio and the attention paid to timber construction and sustainability. To increase efficiency and achieve future growth, we are implementing a new IT platform.

In line with previous years, we continue to invest in growth abroad. Achmea focuses internationally on non-life and health insurance, distributed through the online (direct) and banking channels. Achmea pursues an international growth strategy by leveraging knowledge and digital expertise gained in the Netherlands, with a focus on growth in existing and new markets. We are further expanding our international activities with a focus on organic growth in the direct distribution channels, with acquisitions and the roll-out of the centrally managed model of InShared and Anytime. In addition, Achmea has the ambition to grow in other countries in Europe as well, for example in Spain and Romania, where we will start to offer insurance with our online P&C insurance platforms in 2025.

Taking advantage of strategic options

We use strategic options when they help to bring our vision closer and achieve our ambitions faster. Examples include the proposed strategic partnership with Lifetri and Sixth Street in the field of pension and life insurance and the acquisition of BSG Asset Management.

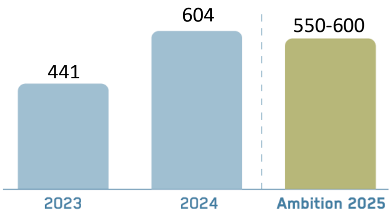
Dilemma: Sustainability versus Inclusivity

At Achmea, we want to play an active role in the sustainability of society, among other things by making our insurance portfolio more sustainable. This can be achieved by engaging in conversations with customers or, for example, offering discounts for more sustainable choices, such as electric cars or energy-efficient homes.
However, greening can have unintended consequences, such as the exclusion of customers who are financially unable to make sustainable choices. It is essential for Achmea that we do not exclude anyone, especially those with financial constraints.
This dilemma calls for careful consideration: how do we contribute to the energy transition while simultaneously ensuring the inclusivity and accessibility of our services for all our customers? It requires a balance between sustainability and maintaining affordability for everyone.

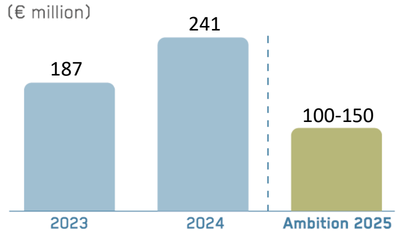
OUR OBJECTIVES

Financial indicators

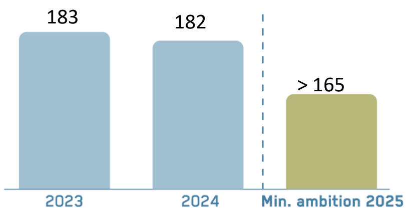
Operational result excl. Health
(€ million)



Operational result Health
(€ million)

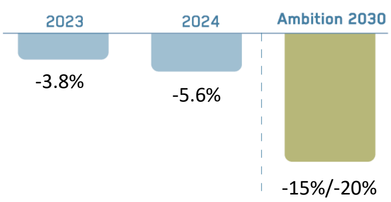


Solvency II (SII)
(%)

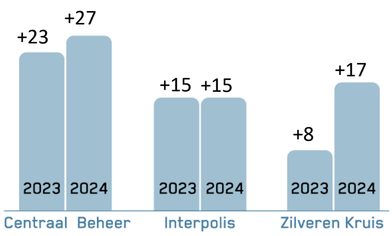


Non-financial indicators

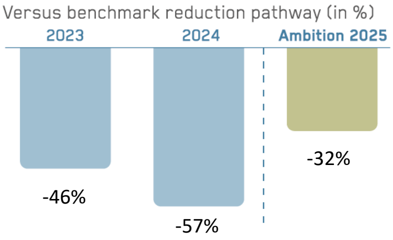
Average insurance-related CO_2 emissions per car[1]



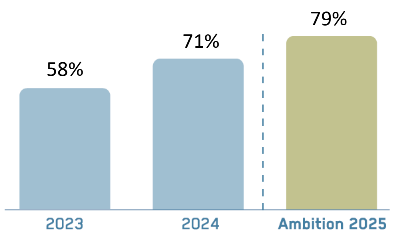
Relational NPS Retail market[2]
Ambition 2025 > market average



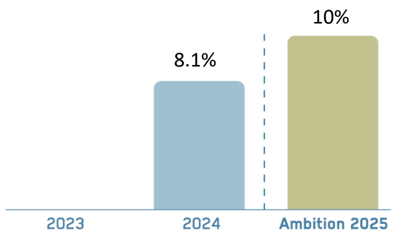
Financed GHG emissions investee companies[3]
Versus benchmark reduction pathway (in %)



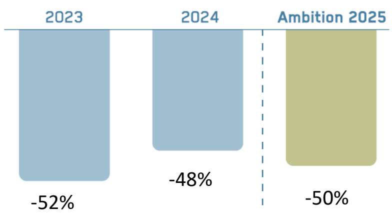
Percentage energy label A or better real estate portfolio[4]



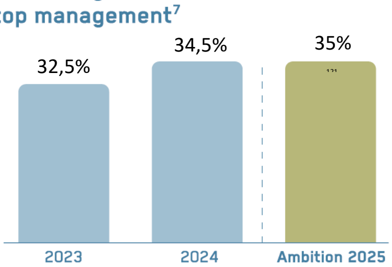
Impact investments[5]
As % own risk portfolio



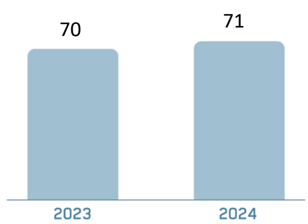
Development carbon footprint business operations[6]



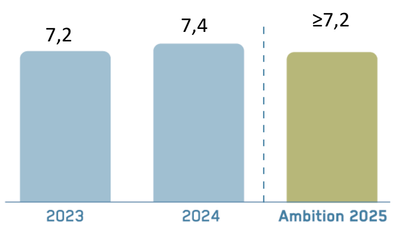
Percentage of women in top management[7]



Reputational score
Total score Achmea



MBO scores: Vitality



1) Reduction percentage compared to the average insurance-related CO_2 emissions per car in 2021 for the private Dutch car insurance portfolio. 2)For Centraal Beheer and Interpolis, average NPS over four quarters based on customer satisfaction research conducted by MetrixLab on behalf of Achmea. For Zilveren Kruis, based on research by MarketResponse, Klantenmonitor Zorgverzekeringen, as of April 2024 and 2023. 3) Reduction percentage of financed greenhouse gas (GHG) emissions compared to the market benchmark as of year-end 2020, determined using the EVIC method. The percentage is based on the GHG performance of the individual equity and corporate bond mandates that Achmea holds at its own risk and not on the economic characteristics of the instrument. When calculating the GHG emissions of these investments, we take Scope 1 and 2 emissions into account; Scope 3 emissions are excluded. Compared to 2023, methodological changes have been implemented to improve the coverage and quality of the reported information. For the categories of listed equities and corporate bonds, we apply sector averages to investments for which no GHG data is available to ensure full coverage of the investments in scope. Additionally, green bonds are no longer reported as zero greenhouse gases, but instead, the emissions of the issuing entity are applied. As a result, the reduction percentage reported as of 31 December 2023 has decreased from -70% to -46%. 4) Determined by aggregating the nominal value of the underlying real estate assets per energy label and expressing it as a percentage of the total portfolio value. 5) The percentage of impact investing refers to investments aimed at generating positive, measurable social or environmental effects alongside financial returns. This includes own-risk investments in green bonds, social housing, healthcare real estate, and renewable energy infrastructure. The weighting is determined relative to the own-risk investment portfolio of Achmea's Dutch insurance entities and Achmea B.V. 6) CO_2 emissions from buildings, mobility, waste, paper, data centres, and cloud services in the Netherlands compared to 2019. 7) Top management defined as the Executive Board, Management Board, and Senior Management.

OUR VALUE CREATION MODEL

Our Capital

Strategic capital allocation essential to create value

Social and relationship Capital

Our corporate, institutional and individual clients and stakeholders

- Number of clients > 10 million
- Intermediary
- Vereniging Achmea Ledenraad
- Partnerships such as suppliers and business partners

Human Capital

Our group of employees and distributors

- Number of employees > 15.318 FTE
- Corporate Culture

Financial Capital

Our capital and funding invested in our business model

- Total equity: € 9.4 billion
- Borrowings Achmea B.V. and Achmea Bank N.V. respectively: €2.5bn and €6.9bn
- Savings deposits in banking operations: € 10.1 billion

Intellectual Capital

Our knowledge of data and technology

Digital, data-drive customers journeys and processing chains.

- Digital claims processing
- Digital care services

Natural Capital

Among which:

- Solar energy
- Heat-cold storage
- Green energy

Business Model

SUSTAINABLE LIVING, TOGETHER
THE achmea WAY

Activities

Insurance and services

Non-life, Pension & Life, Healthcare, Investing and financing

Product development

- Insurance products that are widely accessible and affordable based on high-quality information and responsible marketing practices
- Products that promote environmental and social choices and resilience

Distribution

- Own brands and external distribution partners
- Modern channels with digital and personal interaction
- Protection of personal data privacy at all times

Services

- Seamless customer journey with our rigorous claims management process
- Experienced and innovative pension administrator

Investment

- We invest the premiums and other funds that our clients have entrusted to us
- A combination of financial and social return
- Commitment to the important themes of climate, biodiversity, human rights, health and rights at work

Carefree living and working •
Income for today and tomorrow •
Bringing healthcare closer • Smart mobility

Four domains

Our Value Creation | Our Contribution

Prioritizing the environment and social initiatives creates long-term value and a positive contribution.

Customers

Relational NPS retail

+27	Centraal beheer	Accessible and affordable products put our customers' mind at ease to protect their health, income, assets, and business. Responsible investments ensure long-term capital growth
+15	Interpolis	
+17	Zilveren kruis	
€24.8 billion	Claims paid and other costs of insurance-related services	

Employees

7.4	Employee engagement score	Through training and leadership, we stimulate the growth of our employees' competencies, which increases their employability and contributes to a valuable and ethical corporate culture.
34.5%	Women in management positions	
€ 1,796 mln	Personnel costs (incl. training)	

Company

€ 335 million	Proposed dividend	Sustainable growth benefits shareholders and other stakeholders.
€ 24.8 billion	Premium income	
€ 265 billion	Assets under management	
€ 1,303 million	Net result	
182%	Solvency Achmea Group	

Society

-57%	Financed greenhouse gas emissions investments in companies	Through our product design, services and commitment, we strive to create an inclusive society where we support the well-being of both nature and humanity.
8.1%	Allocated impact	
€ 4 mln	Contribution to Achmea Foundation	

We contribute tot he following SDG's

3 GOOD HEALTH AND WELL-BEING
8 DECENT WORK AND ECONOMIC GROWTH
10 REDUCED INEQUALITIES
11 SUSTAINABLE CITIES AND COMMUNITIES
13 CLIMATE ACTION

OUR CONTRIBUTION TO THE SUSTAINABLE DEVELOPMENT GOALS

3 GOOD HEALTH AND WELL-BEING

Accessible healthcare
- **571,957 customers** used digital care remotely
- **€18.3 billion** paid out in healthcare claims
- Almost **2 million days** less waiting time through care mediation

Better health through prevention
- We supported **115 employers** with health solutions
- **828,722** customers engaged with their health through Zilveren Kruis
- We distributed about **1 million free** sunscreen products

Increasing road safety
- Car mode app users drove **3 million** mobile-free kilometres
- **2000 bicycle lights** handed out at stations in the Netherlands
- **250,000 views** video series on safe traffic behaviour

8 DECENT WORK AND ECONOMIC GROWTH

Access to financial services
- **5.3 million** health insurance policy holders in basic healthcare
- **Approximately 600,000 customers** on the financial services platform Centraal Beheer (savings, investments and mortgages)

Providing employment
- **15,672 employees** in 6 countries
- **34-hour** workweek in the Netherlands
- **274,327** training hours via unlimited training budget

Decent work, equal pay
- Employees give us an **8.2** for employership, **7.8** for work-life balance and an **8** for safe working environment
- Equal pay for equal work for all employees

10 REDUCED INEQUALITIES

Promoting social inclusion
- **12%** of employees in the Netherlands have a non-Western background
- **35%** women in top management
- Employees give us a **7.8** for social inclusion

Reducing inequality
We paid **out 0.5% of the net profit** to the Achmea Foundation. This is used to finance projects in the Netherlands and Africa that reduce inequality. In 2024, this amounted to over **€4 million**

Policies that promote social equality
- We have policies in place to prevent discrimination and exclusion
- We gave **31 guest lectures** on finances at primary schools
- **100** employees volunteer for JINC and LEF
- We write everything in **language level B1**

11 SUSTAINABLE CITIES AND COMMUNITIES

Affordable housing
- **60%** of newly purchased homes are affordable rent
- **99 people** with a key profession were given a home in The Hague, Utrecht, Rotterdam or Amsterdam

Inclusive and sustainable urbanization
- **3,133** customers purchased a sustainable service from Centraal Beheer
- **47%** of new homes purchased are life-cycle proof
- Achmea Real Estate made **1,862 homes more sustainable**
- **€78 million** invested in sustainable healthcare real estate
- **€716 million** lent to housing corporations for social housing

13 CLIMATE ACTION

Climate change measures
- **100%** of all new lease cars in the Netherlands are electric
- **100%** of our energy in the Netherlands is sourced green
- We planted more than **1 million** trees through Landlife Company

- **82%** of employees have spent the climate budget of **€ 2,500** on, among other things, making their own home or mobility more sustainable
- **€2.6 billion** invested in green bonds
- **€56 million** invested in sustainable infrastructure
- We engaged in a dialogue with **31** large **companies** about their climate plans
- We exclude **565 fossil fuel companies** from investments

RESULTS

In this section of the annual report, we provide an explanation of Achmea's results for 2024. We do this for both our financial performance and our other strategic results. Our vision, "Sustainable Living. Together," means that we aim to conduct our business activities in a sustainable manner. As a result, strategic and sustainability outcomes are often closely linked. Therefore, we have chosen to integrate these results under Other Results.

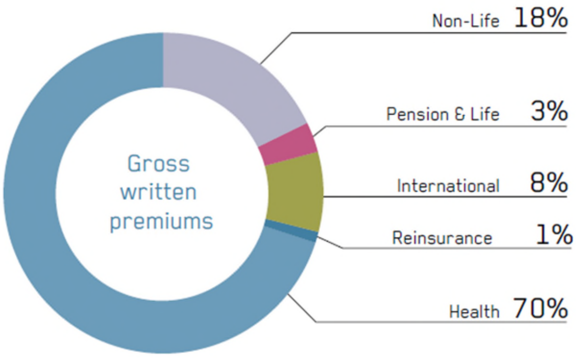
In addition, we highlight key developments in the progress of our strategy. We also demonstrate how, in 2024, we are fulfilling our ambition to contribute to the domains and societal challenges on which we focus.

FINANCIAL PERFORMANCE GROUP

Results and developments in 2024

GROUP RESULTS

GROSS WRITTEN PREMIUMS	NET RESULT	TOTAL EQUITY	SOLVENCY SII
€24.813 MILLION	€1.303 MILLION	€9.415 MILLION	182%



(€ MILLION)

RESULTS	2024	2023	Δ
Operational result excluding Health Netherlands	**604**	**441**	**37%**
Operational result Health Netherlands	241	187	29%
of which Basic Health Insurance	125	79	58%
of which Supplementary Health Insurance and other	116	108	7%
Operational result including Health Netherlands	**845**	**628**	**35%**
Non-operational result	796	326	144%
Result before tax	**1,641**	**954**	**72%**
Corporate income tax expenses	338	140	141%
Net result	**1,303**	**814**	**60%**
Gross written premiums	**24,813**	**22,243**	**12%**
Total revenue segment Retirement Services	**538**	**490**	**10%**
Gross operating expenses	**2,525**	**2,375**	**6%**
Of which related to non-insurance activities	657	611	8%
BALANCE SHEET			
Total assets	82,238	77,718	6%
Total equity	9,415	8,980	5%
ASSETS UNDER MANAGEMENT (in € billion)			
Total Assets under Management*	**265**	**218**	**22%**

FINANCIAL PERFORMANCE GROUP

SOLVENCY AND OPERATIONAL FREE CAPITAL GENERATION			
Solvency ratio Achmea Group after dividend	182%	183%	-1 pp
Solvency ratio insurance entities and holding company	194%	196%	-2 pp
Total capital ratio Achmea Bank	19.1%	16.9%	+ 2.2 pp
Operational Free Capital Generation (€ million)	450	n.a.	

RATINGS INSURANCE ENTITIES	31-12-2024	31-12-2023	
S&P (Financial Strength Rating)	A (Stable)	A (Stable)	Unchanged
Fitch (Insurer Financial Strength)	A+ (Stable)	A+ (Stable)	Unchanged

NON-FINANCIAL RESULTS	FY 2024	FY 2023	Targets 2025
rNPS Centraal Beheer (Consumer market)	+27	+23	Above market average
rNPS Interpolis (Consumer market)	+15	+15	
rNPS Zilveren Kruis (Consumer market)	+17	+8	
Reputational score Achmea	71	70	n.a.
Financed carbon emissions mortgages (Footprint (kg carbon/M[2])	-8%	-3%	-12%
Financed carbon emissions investee businesses versus benchmark reduction pathway	-57%	-46%	-32%
% of women in top management	35%	33%	35%
Employee Engagement Survey scores: Vitality	7.4	7.2	≥7.2

n.m.: not meaningful

n.a.: not available

** Total Assets under Management after eliminations*

FINANCIAL PERFORMANCE GROUP

OVERVIEW OF GROUP RESULTS

Operational result

The operational result increased in 2024 to € 845 million (2023: € 628 million) driven by improved results in Pension & Life Netherlands, International and Health Netherlands. Non-Life Netherlands contributes significantly to the result.

OPERATIONAL RESULT (€ MILLION)

	2024	2023	Δ
Non-Life Netherlands	300	309	-9
Pension & Life Netherlands	354	208	146
Retirement Services	32	47	-15
International activities	47	6	41
Other activities	-129	-129	0
Operational result excluding Health Netherlands	604	441	163
Health Netherlands	**241**	**187**	**54**
Operational result[1] including Health Netherlands	**845**	**628**	**217**
Of which			
Operational insurance service result	447	319	128
Net operational financial result from (re)insurance activities	590	425	165
Other results	-192	-116	-76

Non-Life Netherlands achieved an operational result of € 300 million, in line with 2023 (2023: € 309 million). Adjusted for investments in InShared's international expansion and an inflation result in 2023 (due to lower inflation expectations), the underlying result improved. In P&C, premium indexations compensated for the impact of the overall increase in claims costs as a result of persistent inflation. In addition, there were fewer major claims in 2024 than in 2023. At Income Protection, the result is under pressure due to increasing absenteeism and higher claims inflow into the WIA disability portfolio.

In 2024, the operational result for Health Netherlands increased to € 241 million (2023: € 187 million) driven by a higher operational financial result. The insurance service result was stable despite the capital deployment in 2024 for loss making premiums 2025, partly due to increased economies of scale driven by the increase in policyholders in 2024.

At Pension & Life Netherlands, the operational result increased to € 354 million (2023: € 208 million) due to an increase in the operational financial result driven by higher investment returns. The insurance service result increased as 2023 included an addition to the provision for the final agreement on unit-linked policies.

CFO'S INTRODUCTION TO GROUP RESULTS

Michel Lamie, CFO

Vice-chairman and
Member of the Executive Board

Overall, we realised strong financial results in 2024. Achmea's operational result increased to € 845 million (+35%). Our net result of € 1.3 billion is at an all-time high level.

Premium income in the insurance business increased by 12% to € 25 billion supported by growth across almost all of our business segments. Revenue from Retirement Services grew by 10% to € 538 million and assets under management rose by 22% to € 265 billion. Costs (+6%) grew less rapidly than our topline.
With a solvency ratio of 182%, our capital position remained solid and stable compared to last year, partly due to our OFCG of € 450 million (8% points solvency). Also, our successful Tier 2 and RT1 issuance (in the beginning of 2025) demonstrated our continued good access to capital markets.

Financial markets are expected to remain volatile in 2025 due to geopolitical tensions and macroeconomic developments. While monitoring this challenging environment we continue to focus on growth and underlying improvement of operational result and OFCG aimed at the realization of our 2025 financial targets.

The recently announced strategic partnership between Achmea, Lifetri and Sixth Street in Pension & Life is expected to support our financial strategy in 2025 and beyond by the contribution to growth and the expected increase to OFCG by approximately € 100 million starting 2028.

At Retirement Services, the result decreased to € 32 million in 2024 (2023: € 47 million), mainly due to investments related to the new pension system at Achmea Pension Services and investment in future growth at CB PPI. Adjusted for these one-offs the underlying development is positive. The result of Achmea Bank increased driven by growth in the mortgage portfolio. The result at Achmea Investment Management increased driven by the growth in Assets under Management onboarding of new clients and expansion of services for existing clients.

FINANCIAL PERFORMANCE GROUP

Operational result of International activities increased strongly to € 47 million (2023: € 6 million) due to portfolio growth, increased premiums, lower cost of weather-related claims and a higher net operational financial result.

The operational result for Other activities was stable at € 129 million negative (2023: € 129 million negative).
At Achmea Reinsurance, the operational result increased by € 30 million to € 51 million due to lower net claim expenses given the absence of large natural catastrophe claims and a higher operational financial result.

The result in Other activities includes the expenses of the holding and shared service activities, as well as the financing costs for bonds issued by Achmea. The operational result of the holding company decreased due to higher interest expenses due to the early refinancing of Tier 2 notes in April 2024.

Result before tax

(€ MILLION)

	2024	2023	Δ
Operational result	**845**	**628**	**217**
Non-operational result	**796**	**326**	**470**
Non-operational financial result	892	344	548
Reorganisation expenses	-26	-14	-12
Transaction results (mergers and acquisitions)	-44	0	-44
Goodwill impairment	-26	-4	-22
Result before tax	**1,641**	**954**	**687**

The non-operational result, the difference between the result before tax and the operational result increased to € 796 million in 2024 (2023: € 326 million).

The non-operational financial result of 2024 was € 892 million and € 548 million higher than last year. This is partly driven by more favourable developments on the financial markets than expected and a continuous focus on optimisation of our investment portfolio. The main drivers of the positive result in the (matching) portfolio in 2024 are the interest rate and spread developments. Returns on equities and real estate were also higher compared to 2023. Whereas 2023 recorded a negative result of € 199 million, real estate in 2024 showed a positive return of € 38 million on the back of a more favourable development of the residential housing market. In addition, in 2024, the return on equities was € 176 million higher than expected (2023: € 133 million higher than expected) and the return on commodities was € 37 million higher than expected (2023: € 11 million lower than expected), due to increases in emerging market equity indices and commodity prices (especially gold).

Reorganisation expenses increased from € 14 million to € 26 million, partly related to the announced closing of the head office in Zeist. The transaction result from mergers and acquisitions were € 44 million negative in 2024 (2023: € 0 million). This includes the result on the sale of the Canadian operation (Onlia) and M&A related project costs, including the strategic partnership with Sixth Street.

The goodwill impairment of € 26 million is related to CB PPI due to increased future costs and an increased discount rate.

Net result

The net result amounted to € 1,303 million in 2024 (2023: € 814 million). The effective tax expenses were € 338 million (20.6%). The effective tax rate is lower than the nominal tax rate, mainly as a result of the deduction of the interest payments on perpetual bonds of which the interest expenses are recognised through equity and the tax exempt results of our Health business.

Revenues

(€ MILLION)

	2024	2023	Δ
Gross written premiums Fout! B ladwijzer niet gedefinieerd.	**24,813**	**22,243**	**12%**
Non-Life Netherlands	4,397	4,044	9%
Health Netherlands	17,663	15,571	13%
Pension & Life Netherlands	648	729	-11%
International activities	2,062	1,756	17%

Gross written premiums increased by 12% to € 24,813 million in 2024 (2023: € 22,243 million).

Premiums at Non-Life Netherlands grew by 9% to € 4,397 million (2023: € 4,044 million) due to indexations related to inflation and growth in customer numbers.

Premiums at Health Netherlands increased by 13% to € 17,663 million (2023: € 15,571 million) due to an increase in the number of insured with about 450,000 in 2024 and higher policyholder premiums caused by healthcare costs inflation and a higher contribution from the Health Insurance Equalisation Fund.

Gross written premiums from pension and life insurance policies in the Netherlands decreased by 11% to € 648 million (2023: € 729 million) due to lower indexations and the run-off of the service book, partly compensated by growth in the term life insurance open-book portfolio.

FINANCIAL PERFORMANCE GROUP

At Retirement Services, revenues grew by 10% to € 538 million in 2024 (2023: € 490 million) as a result of the higher interest margin and higher fee income driven by portfolio growth at Achmea Bank and higher Assets under Management at Achmea Investment Management.

Assets under management at Achmea Investment Management increased to € 233 billion (year-end 2023: € 190 billion) driven by positive developments in the financial markets, the acquisition of Blue Sky Group Vermogensbeheer (€ 27 billion) on 31 December 2024 and as a result of organic growth. Assets under management at Achmea Real Estate were stable at € 12 billion. Asset under Management in mortgages increased to € 33 billion (year-end 2023: € 29 billion).

Premiums in our International activities increased in both the non-life and health business. Premiums from our international non-life business increased by 24% to € 1,056 million (2023: € 849 million), driven by growth in the number of customers and premium adjustments. Premiums from our international health business grew by 11% to € 956 million (2023: € 862 million), largely owing to growth in Slovakia.

Gross operating expenses

The gross operating expenses that are allocated to the insurance activities are recognised under the expenses from insurance-related services. The part of operating expenses that is not allocated to the insurance activities and the operating expenses from other activities are recognised under Operating expenses in the income statement.

TOTAL GROSS OPERATING EXPENSES (€ MILLION)

	2024	2023	Δ
Related to insurance activities	1,868	1,764	6%
Related to non-insurance activities	865	790	9%
Gross operating expenses	2,525	2,375	6%

Gross operating expenses increased by 6% to € 2,525 million in 2024 (2023: € 2,375 million) due to higher staff expenses as a result of the collective labour agreement increase, more FTEs due to growth, and project related expenses.

The total number of employees grew to 17,360 FTEs (year-end 2023: 16,690 FTEs). In the Netherlands, the number of FTEs increased to 14,258 (year-end 2023: 13,991 FTEs) due to portfolio growth and investments in amongst others additional CDD (“Customer Due Diligence”) activities and the new pension system. The total number of employees outside the Netherlands grew to 3,102 FTEs (year-end 2023: 2,999 FTEs).

CAPITAL MANAGEMENT

Total equity

Total equity increased by € 435 million to € 9,415 million (year-end 2023: € 8,980 million). This increase is due to the addition of the net result in 2024. The dividend payment of € 267 million over the 2023 result was paid both in cash (€ 64 million) and shares (€ 203 million). Coupon payments on other equity instruments amounted to € 74 million. In April 2024, Achmea B.V. successfully issued € 750 million dated Tier 2 notes. Following this issue, Achmea executed a tender offer on € 357 million perpetual Tier 2 notes that were accounted for as equity under IFRS. The remaining € 393 million of these notes were transferred to Other obligations as a result of the redemption in February 2025.

DEVELOPMENT OF TOTAL EQUITY (€ MILLION)

Total equity 31.12.2023	**8,980**
Net result	1,303
Revaluation of net defined benefit liability	5
Unrealised gains and losses on property for own use	8
Movement in exchange difference reserve	7
Dividends and coupon payments to holders of equity instruments	-341
Issue, sale and buyback of equity instruments	-750
Change in own shares as a result of stock dividend	203
Total equity 31.12.2024	**9,415**

Solvency II

The solvency ratio of Achmea Group is solid at 182% at the end of 2024 and was stable compared to 2023 (year-end 2023: 183%).

SOLVENCY II RATIO FOR ACHMEA GROUP (€ MILLION)

	31.12.2024	31.12.2023	Δ
Eligible Own Funds under Solvency II	10,039	8,848	1,191
Solvency Capital Requirement	5,526	4,840	686
Surplus	4,513	4,008	505
Solvency II Ratio	**182%**	**183%**	**-1 pp**

The increase in required capital is mainly due to an increase in market risk, health risk and other developments. The increase in market risk is related to interest rate and spread developments, as well as an increase in our exposure to equities, both due to the increase in equity markets and additional purchases. In addition, Achmea Bank's capital requirements are higher due to the sector-wide increase in the Counter Cyclical Buffer. Health risk increased due to an increase in expected premiums resulting from an increasing number of customers and health care cost inflation.

FINANCIAL PERFORMANCE GROUP

The eligible own funds increased as a result of, amongst others, the positive contribution from the Operational Free Capital Generation (OFCG) from our activities and higher investment results from, among others, market value development of equities and interest and spread developments. Due to the increase in required capital, eligible Tier 3 capital increased. The issuance of € 750 million dated Tier 2 notes in April 2024 compensated for the partial buy-back and announced call of € 750 million outstanding Tier 2 notes. Achmea Bank issued € 125 million Tier 2 notes in July 2024 which are included in the group eligible own funds.

In January 2025 Achmea B.V. issued € 300 million Restricted Tier 1 notes which will have a pro-forma impact on the Solvency II ratio of approximately 5%-point from 2025.

From the end of 2024, the minimum ambition for the Solvency II ratio of 165% will apply to the consolidated insurance entities including the holding company. The solvency of the companies which comply with the Capital Requirement Directive IV (CRD IV), including Achmea Bank, are reported separately.

The Solvency II ratio takes into account the proposal to be presented to the General Meeting on 15 April 2025 to pay dividends on shares totalling € 335 million. The shareholders have a choice between a dividend (partial or full) in cash or in the form of Achmea ordinary shares. Given the choice for the dividend over 2023 we expect that the majority of the dividend will be paid out in the form of shares.

The solvency ratio of the insurance entities, including the holding company, is 194% (year-end 2023: 196%) and is robust. Achmea Bank has a strong capital position with a total capital ratio that increased to 19.1%, partly due to the issuance of € 125 million Tier 2 notes in July 2024 (Year-end 2023: 16.9%).

NON-FINANCIAL RESULTS

Under Non-financial results we present an overview of our accomplishments and targets on our sustainability goals (Environmental), together with an update on our (social) and reputational scores (commercial performance) and the progress on our expertise in Data and Digital (Data & Digital).

Environmental

MAKING OUR INSURANCE PORTFOLIO MORE SUSTAINABLE

	FY 2024	FY 2023	Ambition 2030
Reduction in average insurance-related carbon emissions per vehicle (versus 2021)	-5.6%	-3.8%	-15/-20%

The reduction in average insurance-related carbon emissions per vehicle improved to -5.6% in 2024. The main drivers of this improvement are the relative growth in the number of electric and hybrid cars in the portfolio and an adjustment of the 2024 emission factor for electric cars.

MAKING OUR INVESTMENT PORTFOLIO MORE SUSTAINABLE

	FY 2024	FY 2023	Ambition 2025
Financed GHG emissions investee companies versus benchmark reduction pathway	-57%	-46%	-32%
% of energy label A or higher for real estate portfolio	71%	58%	79%
Financed carbon emissions mortgages (Footprint (kg carbon/M^2)[2])	-8%	-3%	-12%
% impact investments own risk portfolio	8.1%	-	10%

Based on our purpose ‘Sustainable living. Together’ and as a market leader, we actively contribute to the transition to a sustainable economy and inclusive society via both our own investments and asset management activities for our institutional clients.

For both own risk and policyholder investments, the financed emissions of investments in companies are well below the intended transition path. In 2024, we tightened our policy on fossil investments. This is expected to further reduce the financed emissions.

Increasing the sustainability of the real estate portfolio is on schedule. The share of properties with at least energy label A has increased to 71% (58% as of 31 December 2023). For the mortgage portfolio, the energy label target has been replaced by a carbon reduction target in 2024. Compared to our real estate portfolio, we have less influence on making the homes for which we provide the mortgage more sustainable. In addition, there is no incentive for a current owner to apply for a new energy label. The reduction in the average number of kg of carbon per square metre of living space is decreased 8% compared to 2022.

We have formulated a new target for impact investing. By 2025, we want to invest at least 10% of our own risk portfolio in impact investments, including investments in green bonds and sustainable infrastructure. At the end of 2024, this was 8.2%. Because green bonds are part of the impact objective, we no longer report this as a separate objective. In our updated version of our Climate Transition Plan (version August 2024), we provide more detail about our goals, actions we are taking and the progress we are making.

FINANCIAL PERFORMANCE GROUP

MAKING OUR BUSINESS OPERATIONS MORE SUSTAINABLE

	FY 2024	FY 2023	Ambition 2025
% reduction of carbon emissions (net zero in 2030)	-48%	-52%	-50%

The gross carbon emissions of our Dutch business operations increased by 8% to 26.8 kiloton compared to 2023 (2023: 24.9 kiloton). This increase is mainly due to the first time inclusion of the carbon emissions related to our employees working from home. In addition, the carbon emission factors used for the Dutch energy mix increased. The target for 2025 is a 50% reduction compared to 2019. In 2024 this reduction was 48% (2023: 52% reduction). With the expansion of the Heat and Cold Storage installation in our offices in Tilburg and Apeldoorn, expansion of LED lighting and a tightening of our policy on commuting as of 1 July 2024, which will be in force for the whole of 2025 we expect further reduction.

Social

SUSTAINABLE EMPLOYMENT PRACTICES

	FY2024	FY 2023	Ambition 2025
% women in top management	34,5%	32,5%	35%
Employee Engagement Survey score: Vitality	7.4	7.2	≥7.2

We like to strengthen the relationship with our employees and retain them, for example by creating a place where you can make a difference and develop. In order to keep our own employees employable in the long term, we offer all colleagues in the Netherlands an unlimited training budget ('All You Can Learn'). More than half of the colleagues actively use it. The share of women in top management increased to 34,5% in 2024.

Customers

IMPROVING CUSTOMER SATISFACTION

	FY 2024	FY 2023	Ambition 2025
rNPS Centraal Beheer (Consumer market)	+27	+23	Above market average
rNPS Interpolis (Consumer market)	+15	+15	
rNPS Zilveren Kruis (Consumer market)	+17	+8	

Centraal Beheer's relational NPS (rNPS) for the consumer market for the last four quarters increased strongly to +27 (FY 2023: +23). Customers are particularly satisfied with the experienced service.

Interpolis' relational NPS for the consumer market for the last four quarters is +15 (FY 2023: +15) and stable compared to last year.

Zilveren Kruis's relational NPS has risen from +8 in 2023 to +17. The increase in rNPS at Zilveren Kruis is partly due to an improved customer experience for declarations. More and more customers experience that their claims are paid out in 1 working day. In addition, we see that the appreciation of customer contact via telephone and chat, among others, has improved compared to last year. Customers are most enthusiastic about the service to them through our employees.

REPUTATIONAL SCORE

	FY 2024	FY 2023	Ambition 2025
Score Achmea B.V.	71	70	n.a.

n.a.: not available

Various public campaigns give Achmea a stronger profile, that the general public also recognises and appreciates. Achmea's reputation, as measured by its sentiment score among the general public, increased by 1 point in 2024, to 71. The measurement of the general public takes place via the real-time monitor of StakeholderWatch.

Data & digital

PROGRESS ON OUR EXPERTISE IN DATA & DIGITAL

	FY 2024	FY 2023	Ambition 2025
Digital sales Centraal Beheer	84%	73%	n.a.
Online claims notification Centraal Beheer and Interpolis	50%	54%	>60%
Digital submission of healthcare claims by Zilveren Kruis customers	92%	92%	>95%
STP% of claims settled in claims handling process Centraal Beheer en Interpolis	19%	18%	>35%
STP% healthcare declarations Zilveren Kruis customers	95%	96%	>95%
STP% healthcare declarations Zilveren Kruis healthcare provider	99%	98%	>95%
% functioning on the cloud within Achmea	74%	45%	>90%

n.a.: not available

Leveraging data and technology is crucial to serve our customers well. In 2024, we have further expanded our expertise in data and digitization. The Azure data analysis platform forms the basis for the management and sharing of data, allowing us to organise our processes more efficiently by using data in digital applications. By the end of 2024, approximately 74% of our systems run on Microsoft Azure cloud, with the ambition to reach >90% by 2025.

WhatsApp has been successfully introduced as a fully-fledged channel at FBTO. This is a great application of conversational AI. This supports the management of customer volume to digital channels and digital interaction within FBTO. Centraal Beheer has added its chatbot CeeBee to more digital channels. At Zilveren Kruis, our healthcare customers have been able to use these types of applications for some time. We make sure that we develop in 1 place and then scale up further to other brands.

FINANCIAL PERFORMANCE GROUP

An important result of our digitalisation is the increase in the Straight Through Processing (STP) rate, which means, among other things, that a greater number of claims, healthcare invoices and pension applications are handled digitally. This leads to faster processing times and an improved customer experience.

We have also introduced innovative solutions, such as a virtual assistant on WhatsApp, which supports customers during their interactions with us. This has led to a significant improvement in the Customer Effort Score (CES), indicating that customers have to put less effort into getting their questions answered.

With the introduction of the digital conversion module, we have increased the percentage of customers who can take out their pension digitally via self-service from 36% to 51% in our pension services. This makes it easier and more accessible for customers to arrange their pension matters. In addition, with an increase of 43%, there is a strong increase in the number of fully STP-settled windscreen damages. Which significantly improves the efficiency of our claims handling..

With chatbot Ziv, Zilveren Kruis has achieved a 58% growth in customer conversations compared to 2023, increasing both customer satisfaction and effectiveness. The claim robot Robin currently automatically recognises 70% of the types of health care in the submitted claims and we pay-out 92% directly.

In addition, we have reached an all-time high of 72.9% in online damage claims at FBTO, with 2 million online reports recorded since the introduction of this service.

Furthermore, Achmea has incorporated its application framework for data sharing into its policy. Finally, with the successful rollout of Achmea GPT to all employees, we are strengthening our digital strategy, training our employees in the responsible application of AI and further improving the customer experience.

With a focus on data and technology, we are well positioned to respond to the changing needs of our customers and serve them better. 2024 marks an important year in our journey towards a more digital and customer-centric future.

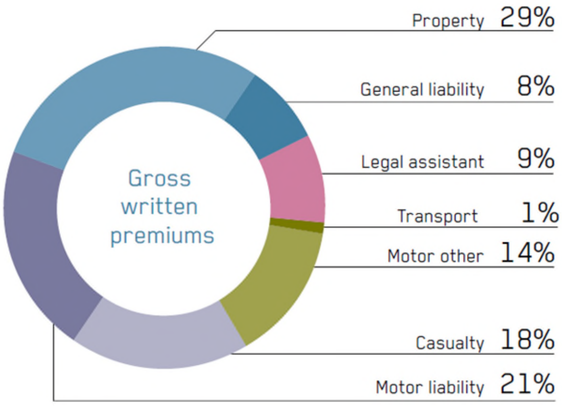
UNCERTAINTIES

Our activities involve inherent uncertainties, as do the related investments. The risks related to the development of the financial markets are managed via the investment and ALM policy and the restrictions it contains. We aim to manage the volatility of the Solvency II ratio based on the set limits for the individual investments and interest rate sensitivities. The application of IFRS 9/17 causes greater volatility in the results because of the integral recognition of market value developments for both our investments and the liabilities in the income statement. Given the nature of our activities, there is an inherent risk of calamities. For non-life insurance, this risk is limited to the own retention of the reinsurance policies taken out for these risks. The results on our health insurance are subject to inherent volatility of healthcare costs compared to the costs included in the premium and equalisation contribution.

FINANCIAL PERFORMANCE SEGMENTS

Non-Life Netherlands

GROSS WRITTEN PREMIUMS	OPERATIONAL RESULT	CLAIMS RATIO	EXPENSE RATIO
€4.397 MILLION	€300 MILLION	71,1%	23.7%



RESULTS

(€ MILLION)

	2024	2023	Δ
Operational insurance service result	**223**	**247**	**-10%**
Revenue from insurance-related services	4,321	4,034	7%
Expenses from insurance-related services	-4,070	-3,620	-12%
Insurance service result from reinsurance contracts	-28	-167	n.m.
Net operational financial result from (re)insurance activities	94	74	27%
Other results	-17	-12	42%
Operational result	**300**	**309**	**-3%**
Gross written premiums	4,397	4,044	9%

NON-LIFE NETHERLANDS	2024	2023	Δ
Claims ratio	71.1%	69.6%	1.5%-pt
Expense ratio	23.7%	24.3%	-0.6%-pt
Combined ratio	**94.8%**	**93.9%**	**0.9%-pt**

SOLVENCY II	31.12.2024	31.12.2023	Δ
Solvency ratio Achmea Schadeverzekeringen N.V.	157%	143%	+14 pp

n.m.: not meaningful

Operational result

At € 300 million, the operating result for Non-Life Netherlands is in line with last year (2023: € 309 million). The combined ratio was 94.8% (2023: 93.9%), within range of our long-term return target of a combined ratio of 94-95% in 2025. Adjusted for investments in InShared's international expansion and an inflation result in 2023, the underlying result improved and the combined ratio is in line with 2023.

The operational insurance service result decreased to € 223 million in 2024 (2023: € 247 million). This is partly driven by investments in Inshared's international expansion in Germany and Spain and an inflation result in 2023 (due to lower inflation expectations). Excluding these, the result has improved. In P&C, premium indexations compensated for the impact of the overall increase in claims costs as a result of persistent inflation. In addition, there were fewer major claims in 2024 than in 2023. At Income Protection, the result is under pressure due to increasing absenteeism and higher inflow into the WIA disability portfolio.

The net operational financial result for 2024 increased to € 94 million (2023: € 74 million) due to more favourable interest rate developments.

FINANCIAL PERFORMANCE SEGMENTS

Operating expenses
Operational expenses increased to € 1,033 million (2023: € 986 million) while the expense ratio improved from 24.3% in 2023 to 23.7% in 2024. In absolute terms, the effects of the collective labour agreement and the relatively high inflation have largely been compensated by efficiency improvements.

Gross written premiums
Gross written premiums increased by 9% to € 4,397 million (2023: € 4,044 million). Partly due to indexations, partly due to growth in customer numbers.

Non-Life Netherlands segment

Lidwien Suur
Member of the Executive Board and responsible for Non-Life and Distribution

Keeping the sustainability transition insurable is an important theme for Achmea. Together with our clients, we are gaining experience with relatively new technologies and their insurance aspects. Consider, for example, large Energy Storage Systems that help address the issues of grid congestion, or applications in the field of bio-based construction. In this way, we not only manage risks but also create opportunities and stimulate innovation.

The costs for vehicle damage repairs have risen significantly over the past year due to a combination of various factors. Cars increasingly contain advanced technology, making repairs more complex and expensive. Additionally, relatively high inflation has led to increased labour costs and more expensive parts. Longer repair times caused by staff shortages also contribute to rising costs, which in turn have increased expenses for replacement transportation. Together, these developments create increasing pressure on the profitability of our auto portfolio.

In the area of Income Protection, we are working hard to raise awareness about the consequences of absenteeism. Entrepreneurs often underestimate the costs of paying (long-term) sick employees and do not adequately consider costs for occupational health services, productivity loss, and potential replacement staff. Especially now that absenteeism is increasing in the Netherlands, it is essential to pay attention to this, and that is exactly what we are doing.

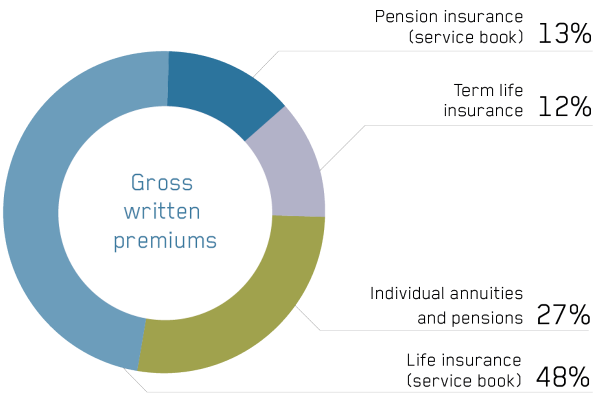
In the P&C department, we have strengthened our leading position in both the business and consumer markets, achieving high customer satisfaction ratings with our brands. For income protection insurance, however, the increasing absenteeism has impacted the result.
Overall, the results in Non-life, aided by favourable developments in the financial markets, are excellent, with an operational result of €300 million.

FINANCIAL PERFORMANCE SEGMENTS

Pension & Life Netherlands

GROSS WRITTEN PREMIUMS
€648 MILJOEN

OPERATIONAL RESULT
€354 MILJOEN



RESULTS

(€ MILLION)

	2024	2023	Δ
Operational insurance service result	**126**	**14**	**n.m.**
Revenue from insurance-related services	1,534	1,679	-9%
Expenses from insurance-related services	-1,408	-1,665	-15%
Insurance service result from reinsurance contracts	0	0	n.m.
Net operational financial result from (re)insurance activities	245	201	22%
Other results	-17	-7	n.m.
Operational result	**354**	**208**	**70%**
Gross written premiums	648	729	-11%

	31.12.2024	31.12.2023	Δ
Contractual Service Margin (CSM)	980	1,030	-5%
Risk adjustment	679	700	-3%

SOLVENCY II	31.12.2024	31.12.2023	Δ
Solvency ratio Achmea Pensioen- en Levensverzekeringen N.V.	175%	177%	-2 pp

n.m.: not meaningful

Operational result

In 2024 the operational result for Pension & Life Netherlands (AP&L) increased to € 354 million (2023: € 208 million) due to an increase in investment income driven by continuous focus on optimisation of our investment portfolio, the developments of interest rates and spreads, as well as higher yields on equities and real estate. The insurance service result increased substantially as 2023 included an addition to the technical provision for the final agreement on unit-linked policies.

Gross written premiums

In 2024 the gross written premiums decreased to € 648 million (2023: € 729 million). The premiums consist of € 252 million (2023: € 221 million) from the open book and € 396 million from the service book (2023: € 508 million).

In the open-book portfolio premiums from term life insurance increased to € 78 million (2023: € 70 million). Our market share increased to 17% at the end of the year. In 2024, the

FINANCIAL PERFORMANCE SEGMENTS

single-premiums for immediate annuities and pensions business increased to € 174 million (2023: € 151 million), mainly due to new business via the Centraal Beheer platform.

In 2024, the total premiums of the service-book pension portfolio decreased to € 88 million (2023: € 146 million) due to lower indexations. The total premiums of our service book life portfolio decreased to € 308 million (2023: € 362 million). No insurance contracts are concluded with new customers on these portfolios, in line with our service-book strategy.

Development of CSM and Risk Adjustment

Both the CSM and the Risk Adjustment decreased in 2024 and amounted to € 980 million (2023: € 1,030 million) and € 679 million (2023: € 700 million), respectively. Both the CSM and the Risk Adjustment declined due the regular release in 2024.

Strategic partnership with Lifetri and Sixth Street

On November 28 Achmea, Lifetri and Sixth Street have reached an agreement on a strategic partnership in the field of pension and life insurance. Achmea and Lifetri are merging their pension and life portfolios into AP&L to create a top three player, serving over 2.1 million customers. Sixth Street, the principal shareholder of Lifetri, will acquire 20% of the shares of AP&L by contributing Lifetri and paying € 445 million to Achmea. Achmea will hold 80% of the shares. The partnership will be well positioned to seize growth opportunities in the pension buy-out market in which a volume of € 20- € 30 billion is expected to become available over the next few years. The partnership targets a 20% share of this market. Thanks to the partnership, AP&L expects to increase its capital generation by approximately € 100 million starting from 2028.

Pension & Life Netherlands segment

Daphne de Kluis
Member of the Executive Board and responsible for Pension & Life.

In December, we announced a strategic partnership with Lifetri and Sixth Street. This strengthens our position in the pension and life insurance market. We create economies of scale and growth opportunities, particularly in the pension buy-out market. In addition, we welcome more than 500,000 new customers and sixty skilled new colleagues. A very nice deal.

Our open book showed good growth in 2024, especially in term life insurance (ORV) and immediate annuities. Our market share in ORV grew to 17%. Together with Centraal Beheer PPI, we continue to offer innovative solutions for both employers and employees.

At the beginning of 2024, we reached a settlement with five interest groups for customers with an investment insurance policy. An important milestone. It is great that there is now a solution for the affected customers and that clarity has been established.

Financially, Achmea Pension & Life again made a significant contribution to the overall results, with an operational result of €354 million. I look forward to building on this successful year!

FINANCIAL PERFORMANCE SEGMENTS

Retirement Services Netherlands

NET INTEREST MARGIN	OPERATIONAL RESULT	ASSET UNDER MANAGEMENT	COMMON EQUITY TIER 1 RATIO ACHMEA BANK
€227 MILLION	€32 MILLION	€265 MILLION	19.1%

RESULTS

(€ MILLION)

RETIREMENT SERVICES	2024	2023	Δ
Total income	**538**	**490**	**10%**
Administrative and management fees	315	292	8%
Net interest margin	227	206	10%
Fair value results	-4	-8	n.m.
Operating expenses	-493	-441	11%
Other results	-13	-2	n.m.
Operational result	**32**	**47**	**-32%**

SOLVENCY RATIOS	31.12.2024	31.12.2023	Δ
Total Capital ratio Achmea Bank	19.1%	16.9%	+2.2 pp
ICARAP ratio Achmea Investment Management	162%	163%	-1 pp
ICARAP ratio Achmea Real Estate	198%	221%	-23 pp
ICARAP ratio Achmea Mortgage Fund	148%		

ASSETS UNDER MANAGEMENT (in € billion)	31.12.2024	31.12.2023	Δ
Achmea Investment Management	233	190	43
Of which BSG Vermogensbeheer	27	0	27
Achmea Real Estate	12	41	-29
Of which real estate	*12*	*12*	0
Of which mortgages	*0*	*29*	-29
Total mortgages*	**33**	**0**	**33**
Total Assets under Management**	**265**	**218**	**47**

MORTGAGE	31.12.2024	31.12.2023	Δ
Banking mortgage portfolio	17.4	14.4	+3.0

	2024	2023***	Δ
Mortgage production Retirement Services	**5.1**	**4.1**	**+1.0**
Of which on behalf of Achmea Bank	2.2	2.0	+0.2
Of which on behalf of Achmea's insurance entities	0.6	0.7	-0.1
Of which on behalf of third parties	2.3	1.4	+0.9

SAVINGS (in € billion)	31.12.2024	31.12.2023	Δ
Banking customer accounts	10.1	8.7	+1.4

** Managed by Achmea Mortgage Funds and/or Syntrus Achmea Hypotheekdiensten*

*** Total assets under management after eliminations*

**** Adjusted so that only the gross inflow is included*

FINANCIAL PERFORMANCE SEGMENTS

General

As of 1 October 2024, Achmea has split the mortgage and real estate activities of Syntrus Achmea Real Estate & Finance (Syntrus Achmea). This organisational change is important for the further growth of Achmea in mortgages and real estate and impacts the reporting in this segment as follows:

Achmea Bank acquired Syntrus Achmea Hypotheekdiensten B.V. (SAH) including its activities (origination and management of mortgages) from Syntrus Achmea. Therefore, the results of SAH are part of the results of Achmea Bank from October 1st. Achmea Mortgage Funds B.V. (trade name: Achmea Mortgages) has taken over the management of mortgage funds and investment portfolios from Syntrus Achmea and is reported separately.

Syntrus Achmea has been renamed Achmea Real Estate and is responsible for asset management of real estate funds and separate accounts. The reported results of Achmea Real Estate include the full result of Syntrus Achmea for the first nine months of 2024.

Operational result

The operational result decreased to € 32 million (2023: € 47 million), mainly due to one-off items. These one-offs concern a loss provision related to the investments in the transition to the new pension legislation and further improvements in portals and investment propositions. Corrected for the one-offs, the result increased due to growth and favourable market conditions. There is a substantial increase in the total assets under management in 2024. Additionally, the mortgage and savings portfolio of Achmea Bank grew strongly in 2024.

Achmea Bank

Achmea Bank's operational result improved to € 87 million in 2024 (2023: € 75 million).

The interest result increased by € 21 million to € 227 million due to strong growth of the mortgage portfolios. The on-balance mortgage portfolio grew to € 17.4 billion (2023: € 14.4 billion). This strong growth was realised with origination of Centraal Beheer mortgages, acquisition of mortgage portfolios and mandates for the external mortgage platforms of a.s.r. and Munt mortgages. The retail savings portfolio increased to € 10.1 billion (2023: € 8.7 billion). The growth of mortgages, retail savings and retail investments also increased the customer base of Centraal Beheer, and therefore, supported and strengthened the growth ambition of Achmea Bank and Centraal Beheer.

RETIREMENT SERVICES NETHERLANDS SEGMENT

Daphne de Kluis

Member of the Executive Board and responsible for Retirement Services

The operational result of ODV declined to €32 million in 2024, primarily due to one-off items.

With the acquisition of BSG Vermogensbeheer, we have further strengthened our position in asset management. We not only welcome skilled new colleagues but also valuable new clients, including the pension funds of KLM. Our assets under management have grown by €27 billion due to this transaction.

Another important step in Retirement Services' growth strategy was the separation of our mortgage and real estate activities on 1 October. This allows us to focus more sharply on each activity, enabling us to better respond to the needs of our clients and achieve our growth ambitions.

In the pension sector, we are actively preparing our pension fund clients for the transition to the new system. Additionally, we have developed new solutions for our individual clients, such as the 'Variable Pension' ('Variabel Pensioen') from Centraal Beheer.

Sustainability is a top priority for us. By 2025, Achmea aims to invest at least 10% of its investments (approximately €4 billion) in impact investments. This includes investments in companies and projects that generate sustainable energy, such as wind and solar energy, as well as in sustainable healthcare real estate. Achmea Investment Management and Achmea Real Estate, specialists in investment solutions with both financial and social returns, facilitate this.

Following the transfer of SAH, Achmea Bank services a growing mortgage portfolio of € 33 billion (of which € 11 billion Achmea Bank on balance mortgages), resulting in an increase in fee income by € 12 million), which is partly offset by increased operational expenses.

The capital position improved with a Total Capital ratio of 19.1% (year-end 2023: 16.9%).

FINANCIAL PERFORMANCE SEGMENTS

Achmea Mortgages Funds

Achmea Mortgage Funds strategy is focused on being a full-service mortgage asset manager, dedicated to provide a broad range of investment solutions through strongly positioned mortgage brands. By the end of 2024, it manages € 24 billion in assets under management (at the end of 2023, the corresponding mortgage portfolio amounted to € 22 billion) and achieved an operational result of € 1 million for the year 2024.

Achmea Investment Management

In 2024, Achmea Investment Management (Achmea IM)'s operational result increased to € 9 million (2023: € 0 million).

Assets under management increased by € 43 billion to € 233 billion in 2024 (31 December 2023: € 190 billion), driven by the acquisition of BSG Vermogensbeheer, positive developments in the financial markets and as a result of the onboarding of new customers in 2024.

Driven by the increase of assets under management for existing clients, onboarding of new clients, the expansion of services for existing customers and the higher one-off fees for the transition to the new pension legislation (offset by higher one-off costs), total revenue increased to € 134 million (2023: € 114 million).

Expenses increased by € 11 million to € 125 million (2023: € 114 million) due to higher personnel costs and the increase of the cost related to the transition to the new pension legislation.

As part of the transformation of Achmea IM's operating model, an agreement was signed with State Street Alpha in March 2024 for the outsourcing of the investment administration. With the start of the outsourcing program, we are working towards an organisation to be able to respond more quickly to the changing landscape and the resulting needs of our customers.

Achmea IM's solvency remains strong. The Internal Capital Adequacy and Risk Assessment Process (ICARAP) ratio as at 31 December 2024 is 162% (year-end 2023: 163%).

The relative performance of almost all portfolios was good in 2024, continuing our long-term track records. For the majority of our clients and the majority of our asset classes, Achmea IM managed to outperform.

On 25 July Achmea announced that it had reached an agreement with Blue Sky Group (BSG) on the acquisition of BSG Vermogensbeheer. The transaction was settled at 31 December 2024. The integration of the activities will take place in 2025. This acquisition reinforces the position of Achmea IM in the asset management industry and further expands the company’s expertise and customer base. BSG currently manages approximately € 27 billion AuM.

Achmea Real Estate

The operational result in 2024 was stable at € 9 million (2023: € 9 million). As of 1 October 2024 the results of the mortgage activities are no longer included. Additionally, the indirect international real estate activities were transferred to Achmea Investment Management by mid-2024. Due to these transformations revenue declined to € 113 million (2023: € 135 million). Assets under management in real estate were stable at € 12 billion as at 31 December 2024 (2023: € 12 billion, € 41 billion including Mortgages).

The result of the mortgage activities increased due to higher revenues of the mortgage activities as a result of portfolio growth, while the successful migration to a single mortgage chain in 2023 resulted in a cost reduction.

This increase was not sufficient to compensate for the decline in the result of the real estate activities. The real estate market was challenging in 2024, especially for transactions & developments, although this effect was partly compensated by a recovery in the residential housing market. The expenses increased due to additional investments in customer due diligence activities and the new operational real estate system. This new integrated IT solution will support a more efficient operational process and enables the growth strategy of Achmea Real Estate.

With an ICARAP ratio of 198%, the capital position is solid (year-end 2023: 221%).

Achmea Pension Services

The operational result of Achmea Pension Services in 2024 was € 63 million negative (2023: € 35 million negative).

Revenue increased by € 7 million due to indexations and additional revenue from the transition to the new pension system, resulting in a total revenue in 2024 of € 63 million (2023: € 56 million).

Expenses increased by € 35 million to € 125 million (2023: € 90 million) due to higher investments for the implementation of the new pension legislation together with the first customer migration to the new Allvida platform. The expenses also increased due to loss provision related to the cost of the migration to the new pension legislation.

As of 2024, Achmea Pension Services performs the pension administration of the first pension fund on the new AllVida platform.

FINANCIAL PERFORMANCE SEGMENTS

Centraal Beheer PPI

Centraal Beheer PPI (CB PPI), through pension and financial advisors, offers sustainable and contemporary pension solutions for employers and administers the pension plan for their employees.

The operational result decreased to € 11 million negative (2023 € 2 million negative) mainly due to one offs such as additional investments and implementing improvements to the proposition in order to position for further commercial growth in the coming years. This includes improvements to portals and investment propositions.

Assets under management increased by € 0.7 billion to € 4.5 billion at the end of 2024 (year-end 2023: € 3.8 billion) due to premiums received and a positive investment return.

FINANCIAL PERFORMANCE SEGMENTS

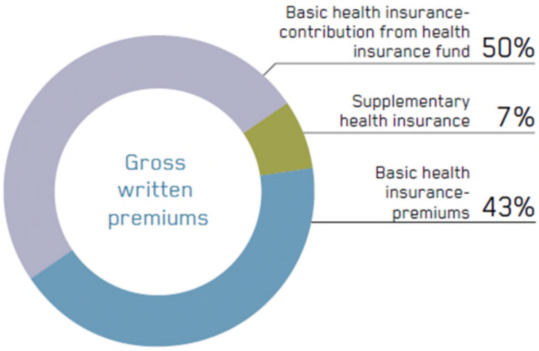
Health Netherlands

GROSS WRITTEN PREMIUMS
€17.663 MILLION

OPERATIONAL RESULT
€241 MILLION

COMBINED RATIO BASIC HEALTH INSURANCE
100.2%

COMBINED RATIO SUPPLEMENTARY HEALTH INSURANCE
94.3%



RESULTS

(€ MILLION)

	2024	2023	Δ
Operational insurance service result	**28**	**32**	**-13%**
Revenue from insurance-related services	17,649	15,553	13%
Expenses from insurance-related services	-17,620	-15,520	14%
Insurance service result from reinsurance contracts	-1	-1	0%
Net operational financial result from (re)insurance activities	203	147	38%
Other results	10	8	25%
Operational result	**241**	**187**	**29%**
Gross written premiums	17,663	15,571	13%

BASIC HEALTH	2024	2023	Δ
Claims ratio	98.7%	98.7%	0.0 pp
Expense ratio	1.5%	1.6%	-0.1 pp
Combined ratio	**100.2%**	**100.3%**	**-0.1 pp**

SUPPLEMENTARY HEALTH	2024	2023	Δ
Claims ratio	84.5%	83.0%	1.5 pp
Expense ratio	9.8%	9.8%	0.0 pp
Combined ratio	**94.3%**	**92.8%**	**1.5 pp**

SOLVENCY II	31.12.2024	31.12.2023	Δ
Solvency ratio Achmea Zorgverzekeringen N.V.	160%	162%	-2 pp

FINANCIAL PERFORMANCE SEGMENTS

Operational result

The operational result in 2024 for Health Netherlands amounted to € 241 million (2023: € 187 million), consisting of € 125 million (2023: € 79 million) on basic health insurance, € 109 million (2023: € 103 million) on supplementary health insurance and € 7 million (2023: € 5 million) on other.

The operational result of our basic health insurance increased by € 46 million due to higher investment results. The operational insurance service result decreased as a loss component and risk adjustment were formed for a loss-making 2025 premium. In addition, higher health care costs due to the higher number of insured and health care cost inflation had a negative impact on the result. This was largely offset by higher premiums as a result of the higher number of insured, higher policyholder premiums and a higher contribution from the Health Insurance Equalisation Fund.

The combined ratio on the basic health insurance slightly improved to 100.2% as a result of a lower cost ratio due to the increased number of policyholders and a focus on efficiency.

The operational result on supplementary health insurance increased slightly due to higher investment income and higher premium income as a result of the higher number of insured, partly offset by higher healthcare costs. The percentage of basic health insurance policyholders with supplementary coverage (supplementary and/or dental insurance) slightly decreased to 76% in 2024 (2023: 79%). The FBTO brand in particular has attracted many new policyholders who opted for a lower supplementary and/or dental insurance coverage.

The combined ratio of supplementary health insurance came in at 94.3% (2023: 92.8%). This increase is mainly caused by higher health care consumption and health care cost inflation.
The other category relates to healthcare offices that implement the Long-term Care Act (Wlz) and the healthcare service companies. The healthcare service companies, particularly the Eurocross Assistance Company, aim to assist customers if they urgently require healthcare when abroad, travelling in the Netherlands or at home, and to help people to improve their vitality at work and in everyday life.

The operational result in 2024 improved largely thanks to higher revenue at the Eurocross Assistance Company and higher reimbursements from the government under the Long-term Care Act.

Gross written premiums

Gross written premiums from basic and supplementary health insurance totalled € 17,663 million, 13% higher than last year (2023: € 15,571 million). Gross written premiums from basic health insurance amounted to € 16,395 million (2023: € 14,373 million). The increase of 14% is the result of the increase in the number of policyholders, higher policyholder premiums and a higher contribution from the Health Insurance Equalisation Fund.

Gross written premiums from supplementary health insurance increased by 6% to € 1,268 million (2023: € 1,198 million). The increase in premiums is primarily due to the increased number of policyholders.

Health Netherlands segment

Robert Otto

Member of the Executive Board and responsible for Health

We are committed to keeping healthcare accessible and affordable, now and in the future. However, we face significant challenges. Healthcare costs continue to rise, the demand for care is increasing, and at the same time, the sector is struggling with a shortage of healthcare personnel, while the population is aging. Nevertheless, we continue to make an impact for our insured customers and society. For instance, we use reserves to keep premiums as low as possible. As a result, we succeed in being the market leader in the Netherlands with over 5 million insured individuals. This creates economies of scale and cost advantages and provides a solid foundation for delivering excellent service to our customers. Additionally, we are successfully focusing on prevention. In the past summers, we have made free sunscreen available throughout the Netherlands. The use of sunscreen reduces the risk of skin cancer.

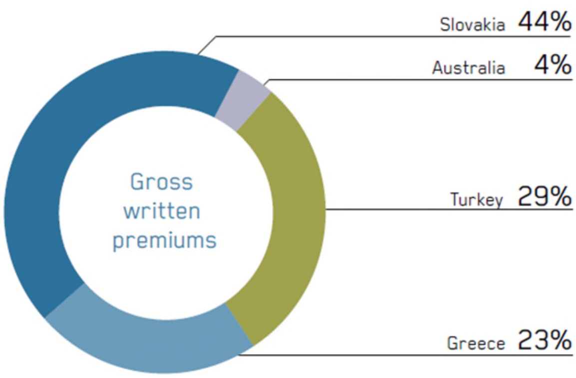
Together with healthcare providers and other stakeholders, we are also working to keep healthcare affordable and accessible. We do this by developing and implementing transformation plans based on the Integral Care Agreement (IZA). For example, by developing housing/care concepts that enable people to live at home in good conditions for as long as possible.

We remain unwavering in our commitment to providing the best possible care in the Netherlands. We do this from a solid position. Our customer base is stable, and we achieved a solid operating result of €241 million.

FINANCIAL PERFORMANCE SEGMENTS

International activities

GROSS WRITTEN PREMIUMS	OPERATIONAL RESULT	ACTIVE FOREIGN ESTABLISHMENTS
€2.062 MILLION	€47 MILLION	5



RESULTS (€ MILLION)

	2024	2023	Δ
Operational insurance service result	**31**	**-7**	**n.m.**
Revenue from insurance-related services	1,864	1,564	19%
Expenses from insurance-related services	-1,641	-2,153	n.m.
Insurance service result from reinsurance contracts	-192	582	n.m.
Net operational financial result from (re)insurance activities	66	52	27%
Other results	-50	-39	28%
Operational result	**47**	**6**	**n.m.**
Gross written premiums	2,062	1,756	17%

GROSS WRITTEN PREMIUMS PER COUNTRY	2024	2023	Δ
Slovakia	910	824	10%
Greece	473	422	12%
Türkiye	600	441	36%
Australia	79	69	14%

n.m.: not meaningful

Operational result

The operational result in 2024 amounted to € 47 million (2023: € 6 million).

Slovakia's operational result decreased to € 16 million negative (2023: € 14 million). The result was lower due to higher health care cost which were not fully compensated by the government contribution. Additionally, the motor and property portfolio showed higher claims ratio compared to last year.

Australia's operational result increased by € 15 million to € 10 million in 2024 (2023: € 5 million negative) due to portfolio growth, premium adjustments and lower claims expenses, partly due to the absence of major weather-related calamities.

Greece's operational result increased to € 21 million (2023: € 2 million) due to an increase in the number of insured, premium adjustments and a lower frequency of claims. The results of 2023 included the effects of storm Daniel.

Türkiye’s operational result increased to € 36 million (2023: € 4 million). In 2023, the operational result was adversely affected by the earthquake in February 2023. The insurance result improved in 2024 due to increased sales and a decrease in claims ratio. Additionally, the net financial result benefited from higher financial income compared to last year.

FINANCIAL PERFORMANCE SEGMENTS

Canada's operational result was in line with last year. The sale of online insurer Onlia to Southampton Financial Inc. was completed in the first half of 2024.

Gross written premiums

Gross written premiums increased by 17% to € 2.1 billion in 2024 (2023: € 1.8 billion).

In Slovakia, gross written premiums increased by 10% due to an increase in health insurance premiums and portfolio growth.

In Greece, premium income increased by 12% due to customer growth and premium adjustments in the life, health and non-life segments.

In Türkiye premium income increased by 36%, mainly driven by portfolio growth in Fire, Engineering and MTPL segments.

In Australia premium income increased by 14%, driven by premium adjustments.

International segment

Robert Otto

Member of the Executive Board and responsible for International

Internationally, we have once again demonstrated double-digit growth figures. The premium volume grew by 17%. This growth is driven by the increasing number of Achmea customers abroad.
Our operational result improved compared to 2023, reaching €47 million, thanks to strong performances in Greece, Türkiye, Slovakia, and Australia.
We are proud of that! We are also proud of the customer satisfaction scores. In all these countries, we consistently rank in the top 3 for customer satisfaction. This is all due to the Achmea way of working: excellent digital processes, skilled employees, and a heart for the customer.

We have the ambition to continue this growth, both organically and by seizing strategic opportunities as they arise. In Greece, we strengthened our position as the market leader in P&C by acquiring Europ Assistance Greece, a company specializing in roadside assistance. Furthermore, we aim to achieve growth with our online claims platforms Inshared and Anytime. Customers can easily and fully digitally insure themselves through these platforms, which can be used in multiple markets. We are already active in Germany and will start in Spain and Romania in 2025.

FINANCIAL PERFORMANCE SEGMENTS

Other activities

OPERATIONAL RESULT OTHER ACTIVITIES	OPERATIONAL RESULT ACHMEA REINSURANCE	GROSS WRITTEN PREMIUMS ACHMEA REINSURANCE
€-129 MILLION	€51 MILLION	€349 MILLION

RESULTS (€ MILLION)

	2024	2023	Δ
HOLDING COMPANY			
Operational result Achmea Reinsurance Company	**51**	**21**	**143%**
Gross other income	84	85	-1%
Operating expenses	-96	-130	-26%
Interest and similar expenses	-106	-76	39%
Other expenses	-62	-29	114%
Operational result Holding company	**-180**	**-150**	**20%**
Operational result Other activities	**-129**	**-129**	**0%**
ACHMEA REINSURANCE COMPANY	2024	2023	Δ
Insurance service result	**36**	**15**	**140%**
Revenue from insurance-related services	309	321	-4%
Expenses from insurance-related services	-254	-221	15%
Insurance service result from reinsurance contracts	-19	-85	-78%
Net operational financial result from (re)insurance activities	19	13	46%
Other results	-4	-7	-43%
Operational result Achmea Reinsurance	**51**	**21**	**143%**
Gross written premiums	349	403	-13%

Operational result

The operational result amounted to € 129 million negative and was in line with 2023 (2023: € 129 million negative).

The operational result of the Holding company decreased with € 30 million to € 180 million negative (2023: € 150 million negative) mainly due to higher interest expenses due to the issuance of Tier 2 notes in April 2024. The proceeds were partly used for the early redemption of part of the outstanding Tier 2 notes with a first call date in February 2025 (€ 357 million of the € 750 million outstanding).

The operational result of Achmea Reinsurance increased to € 51 million in 2024 (2023: € 21 million) due to both a higher insurance service result and a higher net operating financial result from (re)insurance activities.

The operational insurance service result increased to € 36 million in 2024 (2023: € 15 million). This is mainly explained by a lower net cost of claims due to the absence of large natural catastrophe claims and higher net premium income on the group programme due to the renewal and the growth of the underlying group portfolio. These effects are partially offset by the lower premium income as a result of the decision to stop taking third-party P&C reinsurance.

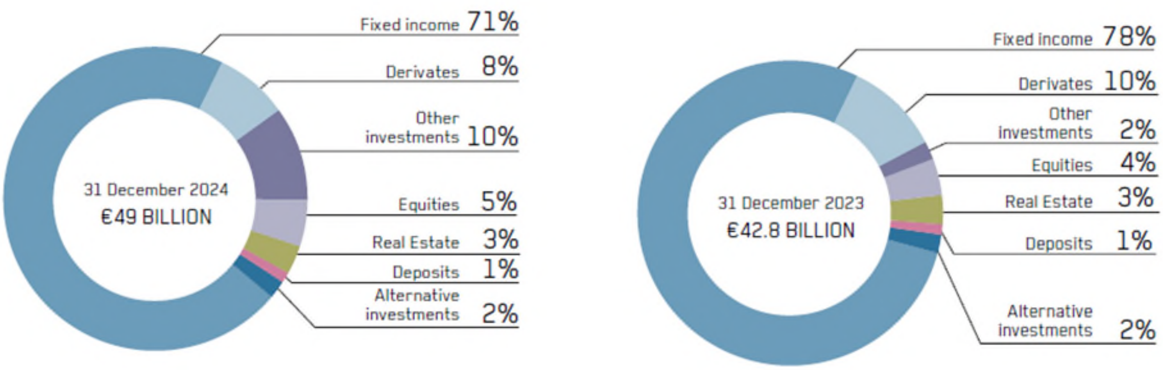
In addition, the net operational financial result from (re)insurance activities increased to € 19 million in 2024 (2023: € 13 million) as a result of a higher interest result.

Gross written premiums amounted to € 349 million in 2024 and are down compared to last year (2023: € 403 million). The decrease is mainly due to the decision to stop taking on third-party P&C reinsurance.

FINANCIAL PERFORMANCE SEGMENTS

Investments

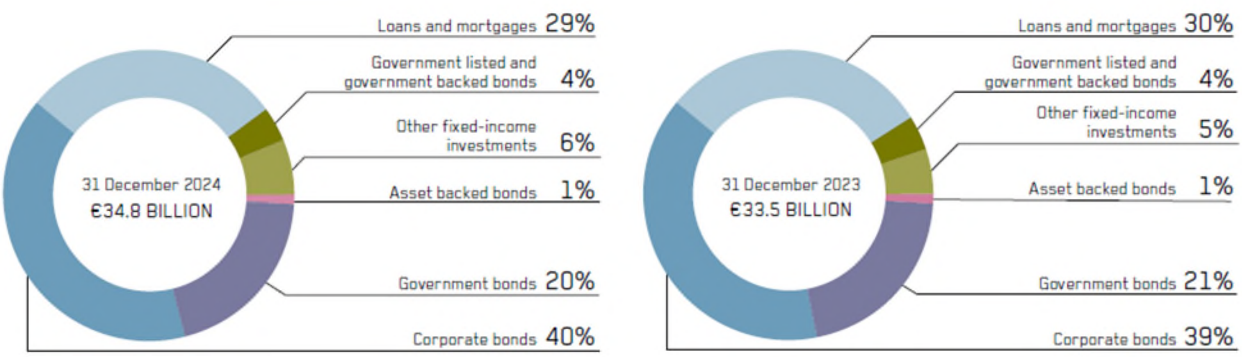
TOTAL INVESTMENT PORTFOLIO[1,2]



[1] The year report shows fixed-income funds as part of the fixed-interest portfolio and real estate funds as part of real estate. In the financial statements, these investment categories are shown as part of equities and similar investments.

[2] The total investments portfolio contains Investment property and Investments own risk (part of investments from insurance and other activities) as included in the consolidated financial statements 2024.

RELATIVE ALLOCATION FIXED-INCOME PORTFOLIO



Fixed income portfolio

The value of our fixed income portfolio increased by 4% in 2024 to € 34.8 billion (2023: € 33.5 billion). The increase is mainly due to purchasing and increases in fair value as a result of lower interest rates (short term) and incoming credit spreads in 2024.

The share of government bonds, government-related bonds and state-guaranteed loans within the fixed income portfolio decreased by 1%-point to 24% (2023: 25%) and stood at € 8.0 billion at the end of 2024 (2023: € 8.5 billion). By far the largest part of the portfolio is invested in Dutch government bonds. In addition, we have large allocations to French and Italian government bonds and we invest in Spanish and German government bonds, among others.

In 2024, the residential mortgage portfolio increased to € 8.5 billion (2023: € 8.3 billion). The decreased spread and lower interest rates resulted in a positive value development of € 321 million.

Our fixed income portfolio is prudently invested. The majority, 69% of the portfolio, has an Investment Grade rating (BBB or higher) (2023: also 69%). The unrated fixed income securities of 29% mainly relate to direct mortgages (2023: 30%).

FINANCIAL PERFORMANCE SEGMENTS

Equity & Alternative investments

At the end of 2024, our listed equities amounted to € 2.6 billion (2023: € 1.6 billion), a share of approximately 5.3% of our total investment portfolio. Purchases (re-risking) and increased equity indices over 2024 add up to € 1.1 billion. In addition to the listed equity portfolio, we also manage a portfolio of alternative investments such as private equity, hedge funds, infrastructure and commodities. This portfolio increased slightly, mainly due to an expansion in hedge funds (€ 136 million), to a size of € 0.9 billion at the end of 2024 (2023: € 0.8 billion)..

Real estate portfolio

Our real estate portfolio increased slightly in 2024 compared to 2023 levels and at the end of 2024 (volume € 1.6 billion) it amounted to approximately 3.3% of our total investment portfolio. At the end of 2024, our real estate portfolio consisted of direct real estate investments of € 0.72 billion (2023: € 0.73 billion), of which 97% were residential, 1% retail and 2% offices. Our real estate portfolio also includes € 880 million (2023: € 740 million) in indirect real estate investments. The direct real estate portfolio shows a positive revaluation of € 52 million for 2024. In addition, approximately € 60 million was sold (mainly offices).

TOP 5 INVESTMENTS IN GOVERNMENT BONDS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023	RATING
The Netherlands	1,468	2,012	AAA
France	783	1,030	AA-
Italy	771	397	BBB
Spain	767	880	A-
Germany	343	704	AAA

DISTRIBUTION OF FIXED-INCOME PORTFOLIO BY RATING

	31 DECEMBER 2024	31 DECEMBER 2023
AAA	17%	18%
AA	10%	12%
A	21%	21%
BBB	21%	18%
<BBB	2%	1%
No rating	29%	30%
Total	**100%**	**100%**

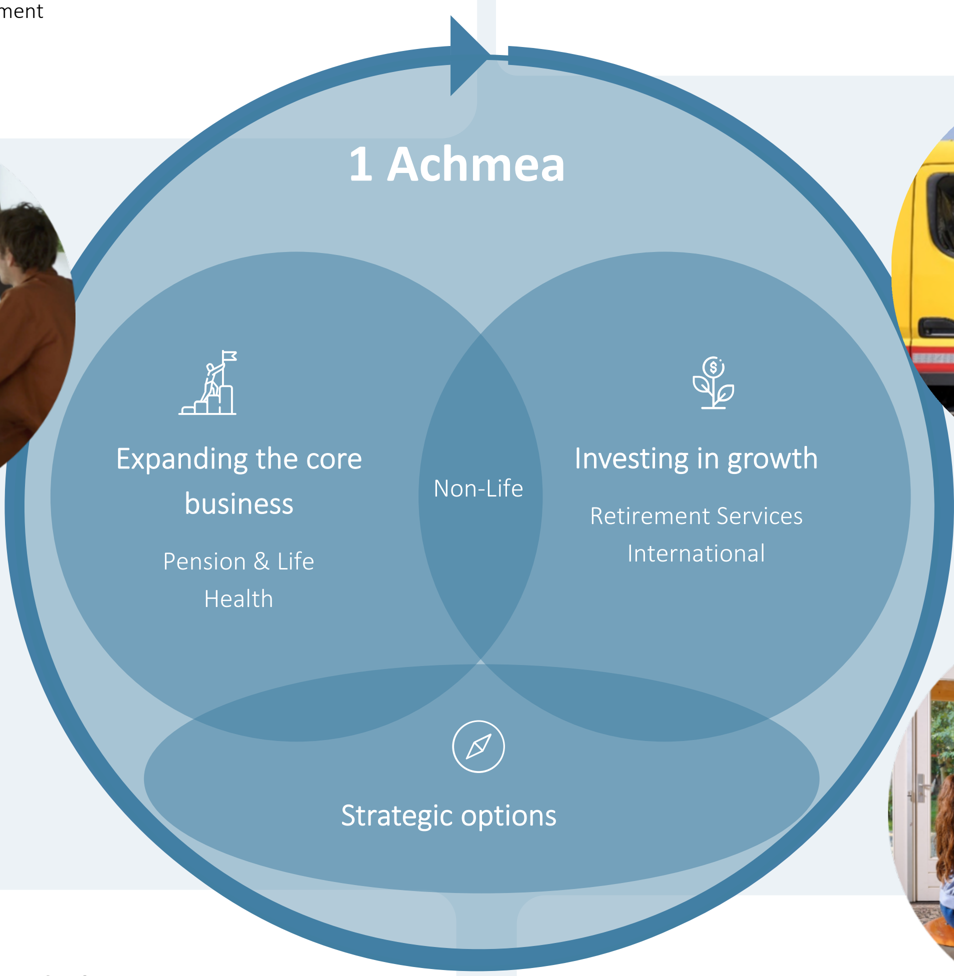
SPOTLIGHT: MAIN DEVELOPMENTS IN PROGRESS ON STRATEGY

Optimising from 1 Achmea

* Achmea delivers strong revenue and profit growth with an operating result of 845 million.
* On track with climate goals, climate transition plan updated, implementation of CSRD reporting
* Social campaign 'Go for something' ('Ga ergens voor')
* Renewal of IT platform for customer contact centres, further digitisation of customer service by the brands
* Know Your Customer competence centre operational
* On track with cloud migration
* First broad deployment of generative AI for Achmea employees and customer contact centers
* Innovation Hub up and running with first startups live
* Investments in leadership, culture, performance management

Invest in growth

* More customers through Centraal Beheer Financial Services platform, high customer satisfaction
* Splitting of Syntrus mortgage and real estate activities Achmea Real Estate & Finance supports further growth of Achmea in mortgages and real estate.
* Growth in institutional assets under management
* Outsourcing back office and renewal of IT platform Institutional Investment
* Started with the implementation of the new IT platform for Real Estate
* Launch of the Wtp transition with pension fund clients
* Strong premium growth in international activities (17% in 2024), preparation for further European growth.



Expanding the core business

* Broad-based commercial growth
* Grow Healthcare Customers through our digital channels such as FBTO
* Approach to regional care transformation in the context of Integral Care Agreement and in particular Zilveren Kruis
* Further digitisation of the healthcare company, which means that almost all insured persons are paid in 1 day
* Proposed partnership between Lifetri and Sixth Street in pension and life insurance
* Digitisation of claims service P&C Retail
* Renewal of Commercial propositions and rationalisation of IT
* High customer satisfaction with our brands

Strategic options

* Proposed partnership between Lifetri and Sixth Street in pension and life insurance
* Acquisition of BSG Asset Management with € 27 billion in assets under management
* Acquisition of roadside assistance provider Europ Assistance Greece by Interamerican in Greece
* Sale of Onlia Canada

OUR SOLUTION IN THIS DOMAIN

From a broad perspective on health we encourage and help our customers to live and work more healthily. If policyholders require healthcare, wherever possible we want them to be able to receive it in familiar surroundings. Digitisation can offer support in this regard.

AFFORDABLE HEALTHCARE, ORGANISED CLOSE TO HOME

As the largest health insurer in the Netherlands, Achmea is naturally committed to social sustainability. An ageing population, rising costs and shortages in the labour market are putting more pressure on healthcare staff and informal care: healthcare is facing major challenges. For a transformation of healthcare, we as a health insurer, together with the government, healthcare providers and customers, must keep healthcare affordable, staffable and accessible. To bring health closer to everyone, we focus not only on keeping healthcare affordable, but also on arranging care and improving health by focusing on the issues below.

Social issue	Ambition
Healthier living and working environment	We create a healthy working environment for employees by supporting employers in this. This helps to ensure that workers can participate longer and make a meaningful contribution to society.
Organising healthcare close to home and digitally	We contribute to accelerating digital care by helping patients to choose this: of all care provided that can take place digitally, 25% takes place digitally when this has added value for the customer.

As the market leader in healthcare, Zilveren Kruis is committed to paying for and arranging care and strengthening health from a broad perspective. Together with social partners and care providers, we are working on the implementation of agreements in the Integral Care Agreement (IZA), the Healthy and Active Living Agreement (GALA), Housing and Care for the Elderly (WoZo) and the Green Deal Sustainable Care. In 2024, Zilveren Kruis will have further fleshed out the agreements in the IZA by giving more shape to the regional plans in the eleven core regions and implementing them with healthcare providers and municipalities.

Zilveren Kruis contributes to a healthy living and working environment for employees by looking at solutions in the field of health management together with employers. We do this, among other things, by offering various solutions through collectivities in the field of prevention and vitality. In 2024, more than 2.3 million customers were served through a collective scheme. In 2024, Zilveren Kruis actively ran a campaign to prevent skin cancer, the so-called "sun cream campaign". This has led to almost 1 million applications at 120 sunscreen poles, including on terraces, the Zwarte Cross, F1 in Zandvoort, Pride Amsterdam and the Nijmegen Four Days Marches.

Digitisation is indispensable to meet the challenges in healthcare. Digital care and health are not always accessible to everyone, while it can provide better care, reduce pressure on the healthcare field and save costs. Zilveren Kruis works closely with healthcare insurers in the Netherlands and with healthcare providers to organise and transform towards digital care pathways and data exchange. With apps such as the Zilveren Kruis Wijzer and Dokter Appke, we help customers with health questions, while we can reduce the burden on the healthcare field. We use Eurocross for personal alarms and other remote care. We monitor the appreciation of customers when using this digital care and see that customers feel helped.

SMART MOBILITY

OUR SOLUTION IN THIS DOMAIN

In the enormous mobility transition from ownership to use and from fossil to green, via our services and solutions we want to offer consumers and businesses ever greater convenience, reliability, personalised service and speed. We do so with the aid of data and new technology.

SAFE TRAVEL FROM A TO B

With our insurance products and services, we aim to provide consumers and businesses with convenience, reliability, personalisation, and speed during the transition "from ownership to usage" and from fossil to green. Road safety remains a key focus. Sustainable behavioural change is necessary to prevent material, injury, and emotional damage. Therefore, we focus on safe driving behaviour, with the goal of reducing the number of traffic casualties.

Social issue	Ambition
Road safety	Interpolis contributes to road safety by increasing awareness, offering options for action and by helping, together with partners, to reduce the frequency of claims. Our goal is for 25% of our retail customers to use our prevention services and advice.

To reduce the number of traffic casualties, Achmea is working on behavioural change through various initiatives. As a major insurer of (motor) vehicles, Achmea can create significant impact. Since 2016, Interpolis has focused on reducing distractions on the road and promoting safe behaviour. This includes raising awareness among young people about the dangers of using mobile phones while cycling. For drivers, Interpolis has developed the AutoModus app, which helps them avoid distractions. In 2024, this app reached over 15,000 downloads, and drivers have logged 3 million mobile-free kilometres.

Additionally, FBTO offers customers the opportunity to receive feedback on their driving behaviour through the driving style app, allowing them to earn discounts. In early 2024, the RijCoach feature was also added to the AutoModus app to further encourage safe driving behaviour and reduce the number of traffic accidents.

Interpolis has also turned to the media to raise awareness about the rising number of accidents involving fatbikes and young people. We advocate for road safety to become a national priority, with the government investing in road safety and ensuring adequate legislation and enforcement. In this context, it is also important to encourage the use of bicycle helmets. Bicycle helmets prevent severe brain injuries. The societal costs of traffic accidents are rising, which also affects the insurer's costs and leads to higher premiums for our customers. Interpolis continually draws attention to road safety awareness and helps people behave more safely on the road so that together we can create a safer traffic environment for everyone.

OUR SOLUTION IN THIS DOMAIN

The Dutch National Climate Agreement involves an enormous sustainability transition for both existing and new residential and commercial properties. People want to be able to live and work in a comfortable and safe environment. Via innovative services, partly together with partners, and financial support, we stimulate making living and working environments more sustainable.

CAREFREE LIVING & WORKING: COMFORTABLE, SAFE AND CLIMATE-NEUTRAL

Via our brands we are focusing on long-term employability, making homes more sustainable and society more resilient in order to create a safer home environment. As an asset manager, as an investor and as an insurer, we are in a position to contribute to these issues.

Social issues	Ambition
Long-term employability and job satisfaction	Centraal Beheer is contributing to increasing job satisfaction by enabling employees to invest in themselves, for example via the Lekker Bezig (keep busy) platform.
Making homes more sustainable	Centraal Beheer and Interpolis, together with partners, are making it easier for residents of the Netherlands to make their homes more sustainable.
Safety in the home and safe living habits	Interpolis contributes to increasing resilience in society by using smart insights and affordable and accessible propositions to improve safety in the home and in doing so reduce damage and loss.

The tightness in the labour market calls for attention to work pressure, job mobility, agility, and good physical and mental health. Centraal Beheer has therefore established the Lekker Bezig platform to help employers enhance the sustainable employability of their employees. Through this platform, employees gain access to training, courses, and interventions in areas such as health and work-life balance. Over the past year, there has been a 100% increase in usage among employees of the affiliated organisations and companies.

With our sustainable housing services and financial solutions, we contribute to the societal issue of making homes more sustainable. Through the ‘Sustain Your Home’ scan from Centraal Beheer, individuals can explore options for greening their homes. Centraal Beheer collaborates with partners to offer solutions for the sustainability of homes. In 2023, the Climate Shop of Centraal Beheer was opened, where Achmea employees can utilise the climate budget that is part of the collective labour agreement. The Climate Shop is now also open to other customers.

Additionally, we assist homeowners' associations (VvE’s) in making apartments more sustainable, for example, by developing a sustainability plan. Over the past year, Centraal Beheer introduced a sustainability proposition for VvE’s and we saw an increase in the number of clients for comprehensive sustainability efforts. Centraal Beheer also worked on activating (mortgage) customers in 2024, by making sustainability affordable through attractive mortgage options.

A safer society creates a community where people can Living Sustainable. Together. Through the Burglary Barometer, Interpolis provides insights into burglary risks in neighbourhoods and offers tips to prevent break-ins. With the Safety Meter, Interpolis customers can understand how safe their living environment is and receive advice on improving safety. If a customer already lives safely, they earn a prevention discount on their home insurance. Online safety is becoming increasingly important. Together with partners, we raise awareness of this societal issue and develop tools. The CyberCheck helps individuals gain insight into their online safety.

Achmea is lobbying the government for the construction of age-friendly homes in the Netherlands. Achmea has initiated the corresponding campaign and has created a Living Test. This allows conversations to begin about how and where one wants to live in the future. This Living Test has been opened 10,000 times and completed 1,600 times.

OUR SOLUTION IN THIS DOMAIN

With insight, oversight and comprehensible products, as a coach we help people make prudent financial decisions throughout their lives so that they have the financial resources to overcome setbacks, not just now but in the future as well.

INCOME FOR TODAY AND TOMORROW: EVERYONE IN THE NETHERLANDS FINANCIALLY FIT AND EMPOWERED

We contribute to this domain in our role as an insurer, asset manager and provider of pension administration services. We want to help people make prudent financial choices with insight, oversight and comprehensible products.

Social issue	Ambition
Informed pension decisions	We help employers and employees to make informed decisions about the new pension system and their own pensions by providing them with detailed information and offering them inspiration.

We aim to contribute to the practical implementation of the new pension system in the Netherlands. We do this, among other ways, by providing as comprehensive an array of pension solutions as possible. In 2023, we introduced a new investment service, which enables customers of Centraal Beheer to not only save tax-efficiently but also to invest tax-efficiently in order to build wealth for the future. In 2024, the inflow of funds significantly increased, resulting in a total tax-efficient capital growth of 10%, amounting to €2.6 billion.

We are now taking steps towards further integrating the CB PPI with the propositions of Centraal Beheer. In this context, we aim to offer PPI customers a comprehensive proposition, allowing them to save and/or invest in the third and fourth pillars in addition to the second pillar.

Furthermore, we wish to assist customers in gaining insight into their future financial situation. With the Mortgage Check, customers can assess the future affordability of their mortgage within 10 minutes. This Mortgage Check has been completed 833 times by customers in 2024.

In 2024, Centraal Beheer launched a new campaign highlighting the importance of saving and investing for the future. After two campaign phases, over 75% of the Dutch population aged 18 and older has been reached.

We have policies in place to prevent and resolve payment arrears. For instance, we offer our customers access to a budget coach to assist them in gaining an overview of their finances. Achmea is actively involved in societal initiatives such as SchuldenlabNL and the Dutch Debt Relief Route (NSR). We are also one of the initiators of Geldfit. These initiatives contribute to resolving and preventing debt.

Additionally, we strive to help future generations manage their finances responsibly. We achieve this through initiatives such as ‘Bank voor de Klas’ and Stichting LEF. By providing guest lectures delivered by our employees, we contribute to the financial education of students and young people. These lessons occur at a time when they are beginning to assume greater financial responsibility and awareness becomes increasingly important.

RISK MANAGEMENT

Effective risk management is essential for the continuity of Achmea and for maintaining a sustainable relationship with our customers and other stakeholders. Risk management involves identifying risks, taking appropriate measures, monitoring risks, and reporting on them. It is not so much about avoiding risks but rather about making informed decisions regarding the risks to be taken in achieving business objectives.

We approach risk management and capital management as a single integrated whole. Principles regarding capital and solvency are important for determining Achmea's risk appetite, which is reflected in the annual Own Risk & Solvency Assessment (ORSA), where Achmea's risk and capital position is assessed in conjunction.

In the notes to the consolidated financial statements of Achmea B.V. (Note 2. Capital and Risk Management), we provide a more detailed explanation of our capital management and risk management system. Here, we discuss our capital position, risk profile, and the key risk themes for 2024. Additionally, we provide a detailed explanation of our main risks, namely: insurance risk, market risk, counterparty risk, liquidity risk, operational risk, and compliance risk.

RISK MANAGEMENT

Michiel Delfos

Member of the Executive Board and Risk Management

We observe that uncertainty in the world has increased over the past year. The updated environmental analysis for 2024 reaffirms trends in areas such as climate change and sustainability, geopolitical unrest, structural labour market shortages, technology, cyber risk, and risks arising from increasing legislation and regulation.

These developments impact Achmea, our customers, the economy, and financial markets, and they put pressure on existing systems and the role of the government. This necessitates continuous monitoring of the environment. We do this, among other ways, through the Emerging Risks Monitor, including in-depth analyses where necessary. Additionally, it requires vigilance and, if necessary, adjustments.

The higher level of global uncertainty is also a significant reason for us to develop scenarios based on different worldviews, which we apply in our Own Risk & Solvency Assessment (ORSA) reporting.

WE VALUE YOUR FEEDBACK
This is the first time we have prepared our sustainability statements using the CSRD framework, as detailed in the ESRS. We welcome your feedback to understand how we can improve our approach. You can find our contact details on the last page of this annual report.

Sustainability statements

STRATEGY AND BUSINESS MODEL – DESCRIPTION OF OUR BUSINESS

SUSTAINABILITY

Michiel Delfos

Member of the Executive Board and Chair of Achmea's 'Sustainable Living. Together' programme

With great pride, we present our first sustainability statements, which have been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) framework. The journey to this point has been an exciting one, marked by meaningful achievements and valuable lessons we have learned. As we navigate through an era of increasing environmental and social developments, we aim to provide transparent insight into our progress, challenges, and ambitions in this report.

These statements are more than just reporting; it also reflects our vision 'Sustainable Living. Together' into concrete action. It demonstrates our commitment to embedding sustainability at the core of our activities. The report aims to provide a clear overview of our performance on material topics, demonstrates accountability to our stakeholders, and outlines the concrete steps we are taking to make a positive contribution to the world around us. By doing so, we hope to engage in meaningful dialogue with our partners, inspiring collective action towards a more sustainable future.

Reflecting on our performance, I am proud to highlight areas where we are already making a tangible impact. In various material topics our initiatives have begun to yield measurable results, underscoring the strength of our strategy and the dedication of our colleagues.

However, we recognise that there are still significant steps to be taken. In certain areas, we are still in the early stages of our journey. We recognise these as critical priorities and are determined to take action so that we can make a tangible impact in these areas and achieve our objectives.

This report reflects our belief that sustainability is a journey, not a destination. Together with our stakeholders, we will continue to learn, adapt, and innovate as we strive for a future that balances economic growth with responsibility for the environment and social justice.

INTRODUCTION

With our vision 'Sustainable Living. Together', we shape our approach to sustainability. A society in which everyone participates and lives a happy and healthy life together. That is our dream.

As a financial service provider, we offer insurance products in the segments of property, health, life, and income insurance. Additionally, our offerings include financing and asset management. We serve both private and business customers, with our business clients coming from various sectors, such as agriculture, real estate, construction, and professional services. We also provide pension services and collective healthcare services to large companies, as well as pension services and asset management services, primarily focused on Dutch pension funds.

The majority of our revenue comes from the financial services and insurance activities sector. In addition to our home market in the Netherlands, we are also active in other countries, including Greece, Türkiye, Slovakia, Germany, Spain and Australia. A breakdown of revenues by IFRS 8 segment can be found in the Consolidated Financial Statements, note 3, Segment Information. For sustainability reporting, we include all investment activities (including banking activities) as part of Investing & financing. The remaining revenues in the segments with insurance activities are included under Insurance & services. In Appendix A Approach to sustainability reporting, paragraph Reporting structure, we clarify how the IFRS 8 segments align with sustainability reporting. We have almost 16,000 internal employees, of which over 12,500 in the Netherlands.

STRATEGY

To realise our vision of 'Sustainable Living. Together', we have aligned our strategy with the environmental, social, and governance (ESG) pillars. These pillars form the foundation of our approach, shaping our actions, and help us address today's challenges while creating opportunities for a sustainable future. Environmental considerations, such as climate change and biodiversity loss, challenge us to continuously innovate and take responsibility in a changing world. Social issues, including health and well-being, have been an integral part of our identity and strategic vision from the very beginning. Governance serves as the backbone of our operations and contributes to maintaining transparency, ethics, and safety in our work. Together, these ESG pillars reflect our commitment to sustainability and guide us to minimise negative impacts while promoting positive effects in our activities.

As a financial service provider with a cooperative background, we see it as our responsibility to address sustainability issues on which we have a direct or indirect impact. Although most of our products and services do not have a direct impact on environmental issues, we do play a role in areas such as healthcare and damage repair, thereby indirectly influencing the environment. Additionally, by insuring or investing in companies, we can exert influence on environmental issues.

We want to improve our impact on both the environment and society. This also applies to potential violations of human rights. Additionally, through our activities and product portfolio, we can have a direct impact on social issues, such as promoting diversity, inclusivity, and equal access to services. In our approach, we strive to be as inclusive as possible. We favour engagement over exclusion. In some cases, exclusion is the appropriate response to an ESG issue, and we will utilise this option when deemed necessary and when no alternatives exist. By implementing our strategy 'The Sum of Us', we aim to take our responsibility in terms of sustainability.

We are committed to accelerate the transition to a sustainable society, wherever possible, and realise change in the real economy. To turn this commitment into action, we have developed a sustainability strategy with clear goals for our activities: Own operations, Insurance & services, and Investments & financing. To guide our business units, we have developed a group-wide Sustainability Policy Framework in 2024. This framework outlines Achmea's overarching approach to sustainability and how we address environmental, social, and governance matters across our entire organisation.

In addressing climate change across our organisation, we have the ambition to make our Own operations CO_2 neutral by 2030. We aim to achieve this by setting targets for reducing energy consumption, minimising waste, procuring green electricity, reducing carbon emission related to commuting and travel, and compensating for any remaining emissions through reforestation projects.

In our investment portfolio, we plan to achieve CO_2 neutral for investments in companies by 2040 and by the end of 2050 for other asset classes. Additionally, we strive to invest 10% of our own investments in impact investments by the end of 2025. In our insurance activities, we aim to be CO_2 neutral by 2050, with interim targets for non-life insurance by 2030, including a reduction of greenhouse gas emissions by 15% to 20% for our retail motor portfolio. Furthermore, we aim to engage 50% of our non-life commercial portfolio in sustainability initiatives by 2030. We are also committed to achieving the objectives of the Green Deal Sustainable Healthcare 3.0, which includes reducing greenhouse gas emissions, promoting circularity, and minimising the environmental impact of medications. For more information, refer to chapter Climate change.

Regarding our own employees, we are committed to diversity, inclusion, and equality. By the end of 2025, we aim for women to make up at least 35% of top management positions, increasing to 40% by 2030. Additionally, we want to promote a healthy workplace and ensure high employee engagement. In our investments, we focus on social bonds and healthcare real estate, among other areas. We actively exclude companies and countries that violate international standards. In our insurance activities, we focus on enhancing the resilience of our customers by providing solutions that improve sustainable employability, offer accessible and affordable healthcare, and support those facing payment challenges or debt.

THE WAY FORWARD

This report illustrates the translation of our vision 'Sustainable Living. Together' into actions and reflects our commitment to embedding sustainability at the core of our operations. We provide an overview of our results on material themes and outline the steps we are taking to make a positive contribution to the world around us.

The report provides an overview of the areas where our initiatives on key topics, such as climate change and responsible employer practices, are already delivering measurable results. This indicates the effectiveness of our strategy. At the same time, we recognise the need to make progress on other material topics, such as biodiversity, water and soil pollution, and the position of workers in the value chain. We are still in the early stages of our development in these areas.

In this report, we disclose our ambitions and outline the steps we are taking to comply with the European Sustainability Reporting Standards (ESRS), particularly regarding upstream and downstream topics.

Given our reliance on multiple stakeholders, not all data or methodologies are readily available; these will only become accessible over time. As our activities primarily take place in the Netherlands, this challenge is often reflected in disclosures related to our foreign operations.

BUSINESS MODEL

Achmea's business model combines diversified financial services with a multi-distribution and brand strategy, emphasising digitalisation and social impact. Our business model can be described through the core elements outlined below.

Product and services development

Our business model focuses on generating revenue through the collection of premiums, which is determined by assessing the risks that our policyholders wish to insure. We aim to provide insurance products and services that are widely accessible and affordable, based on quality information and responsible advertising. Our product range is diverse and includes life, health, and non-life insurance. This allows us to spread risks and cater to a wide range of customer needs.

Through Achmea Bank, we attract savings that we lend out as mortgages. This generates interest income and helps retail customers save or invest, for example, for their retirement. Strict risk management measures and compliance with regulations are of great importance to us, enabling us to maintain financial stability and protect the interests of our customers. We place great emphasis on strong customer relationship management, enhancing the overall customer experience, and promoting customer loyalty. This also includes the development of new products and services aimed at encouraging green choices and the resilience of our customers, as well as supporting new environmentally friendly business models and sustainable technologies.

Through our asset management services, we advise institutional clients on sustainable investments, and we offer impact investment propositions.

Distribution

We operate under multiple brands, such as Zilveren Kruis, Centraal Beheer, and Interpolis, and focus on different market segments and customer needs. This approach allows us to tailor our products and services to specific demographic groups, contributing to greater brand reach and customer loyalty.

Additionally, we utilise various distribution channels to make our offerings more accessible. Brands such as FBTO focus on online insurance that is managed by the customer themselves, while we also collaborate with brokers and other intermediary distribution channels. Brands like Interpolis maintain close relationships with local brokers and banks, particularly Rabobank, which collaborates with Achmea to offer financial services through its network.

Ensuring the privacy of personal data at all times is an important principle.

Investing and financing

The premiums we collect are invested in various financial instruments to generate investment income, which contributes to our overall profitability.

We believe that responsible investing reduces risks and lead to long-term value creation. Our socially responsible investment policy ensures that the premiums and other funds entrusted to us by our customers are invested in a responsible manner, with consideration for the world around us and future generations. In our investments and financing, we seek for both financial and social returns.

Claims and benefits

When our customers experience a loss or an insured event occurs, we aim to manage the claims process as efficiently as possible. This is essential to maintain our customers' trust and satisfaction. We want to provide a positive customer experience and further improve customer satisfaction by creating efficient digital, data-driven processes. Additionally, we are working on the sustainability of repairs for cars and homes.

VALUE CHAIN

On the next page, we describe Achmea's value chain. In accordance with the requirements of the ESRS, we define our value chain as the full range of activities, resources, and relationships related to our business model and the external environment. The value chain is an important input for our Double Materiality Analysis, as it delineates our sphere of influence for determining sustainability themes. Our value chain ends at the point where we can no longer influence the sustainability decisions of our business relationships. In practice. This means that the value chain is limited to direct business relationships of Achmea, also referred to as 'Tier 1' relationships. Based on a risk assessment of the sector and Achmea's Human Rights and Labour Rights Statement, we conduct due diligence in the value chain where necessary. In the chapters on material topics, a more detailed explanation of the value chain related to that material topic is included.

In determining the boundary of our value chain, we consider several factors. We assess the potential causal relationship between our financing, insurance, and facility activities and the relevant sustainability topics. Additionally, our due diligence principles are an important consideration, along with our obligations and responsibilities as a member of international initiatives and organisations. Finally, we consider the applicable laws and regulations.

Based on these principles and definitions, we have created a (simplified) graphical representation of our value chain, as shown on the next page.

VALUE CHAIN 'OWN OPERATIONS'

'Own operations' encompasses all activities necessary to provide and support our services and products to customers, policyholders, institutional investors, and account holders. For internal activities, this includes our own workforce and office premises, as well as the resources and (internal) assets used to provide services in asset management, insurance, banking, and other services. This also includes activities aimed at attracting financing.

STRATEGY AND BUSINESS MODEL – DESCRIPTION OF OUR BUSINESS

Upstream business relationships

Our upstream business relationships involve suppliers, contractors, and service providers with whom we have (contractual) agreements to support our operations. This includes, for example, accountants, consultants, office supply suppliers, energy providers, and recruitment agencies.

Downstream business relationships

Our downstream business relationships include the organisations and customers to whom our employees provide services.

Additionally, this encompasses organisations for which Achmea employees are committed, such as industry associations like the Dutch Association of Insurers and the CRO Forum. Professional associations and international organisations are also part of these relationships. Institutional investors who hold shares or other financing instruments issued by Achmea are also part of our downstream business relationships as they are not part of the supply chain of Achmea.

VALUE CHAIN INSURANCE & SERVICES

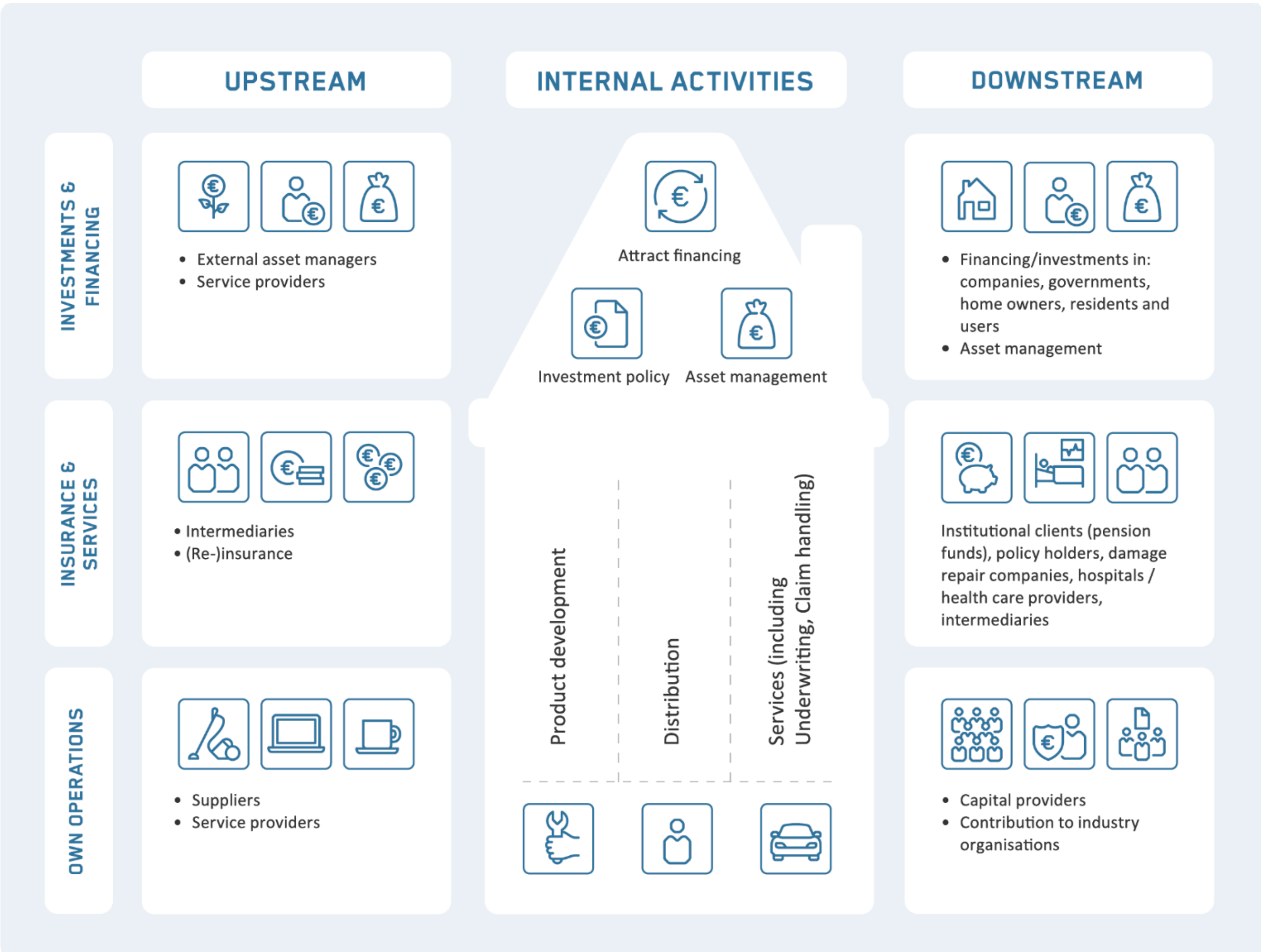
This part of the value chain encompasses all activities related to insurance and reinsurance activities.

Within these activities, we differentiate between non-life, health, and life insurance, as well as reinsurance. For healthcare providers, the value chain can extend to 'Tier 3', to include workers in the healthcare sector, depending on the definition of the material topic. Additionally, we extend the value chain to 'Tier 2' for distribution partners who sell insurance products on behalf of Achmea. The reinsurance activities are primarily managed by Achmea Reinsurance Company N.V., which reinsures risks from the insurance entities within Achmea and from several external life (re)insurance companies.

Upstream business relationships

Our key upstream relationships include external reinsurance parties and other risk pooling structures, such as the national terrorism pool and guarantee funds. Additionally, we

GRAPHICAL REPRESENTATION VALUE CHAIN - BOUNDARIES OF ACHMEA'S SPHERE OF INFLUENCE



collaborate with brokers who facilitate the purchase of reinsurance arrangements. We also work with organisations that provide detailed sustainability information and data on natural catastrophes, as well as those that conduct calculations and valuations for us. Our relationships include insurance pools in which we participate and insurance organisations where we exert meaningful influence, particularly De Vereende N.V. and Garanti Emeklilik ve Hayat A.S.

Downstream business relationships

The downstream business relationships in our non-life and health insurance activities include both individual and corporate policyholders. We collaborate with organisations that handle claims reported by policyholders.

Additionally, we engage with healthcare providers whose services are covered by health insurance and with health administration offices (‘Zorgkantoren’) of other Dutch health insurers. Our distribution partners and agents sell insurance on behalf of Achmea, including 'white label' products branded by the distribution partner.

Our downstream business relationships for life insurance activities include both individual and corporate policyholders. We offer various insurance solutions through multiple distribution channels, including the direct channel of Centraal Beheer and external partnerships with Rabobank and Garanti Bank.

VALUE CHAIN INVESTING & FINANCING

This part of the value chain encompasses activities related to asset management, investment management, and banking activities.

Investment management and -service activities and Asset management

The management of the following investments falls within the value chain: (1) investments for own risk, (2) investments for risk of policyholders, and (3) investment funds managed or established by our own asset management companies. So-called 'Assets under advice', which fall within our fiduciary activities (where we cannot determine the size and composition of the investments), are not included in the direct scope of the value chain. In our asset management activities, we form strategic partnerships to implement engagement activities with our business relationships.

Upstream business relationships

Our key upstream relationships include third-party asset managers who carry out activities on our behalf, as well as rating agencies and other organisations that provide detailed sustainability and rating information. We also collaborate with organisations that conduct calculations and valuations for us. Additionally, suppliers involved in real estate development are also part of our upstream relationships.

Downstream business relationships

Our main downstream business relationships include both institutional investors, such as pension funds, and individual customers who invest in Achmea investment funds. Additionally, our relationships extend to tenants of residential properties owned or managed operationally by Achmea.

Banking activities

The banking activities are carried out within Achmea Bank N.V., which primarily focuses on providing residential mortgages to households and offering investment services.

Upstream business relationships

Our key upstream business relationships include, among others, rating agencies, organisations that provide detailed sustainability information, as well as parties that conduct calculations and valuations on our behalf. Additionally, we maintain contacts with parties from whom we acquire mortgage portfolios and with data providers.

Downstream business relationships

Our main downstream business relationships include, among others, individual customers and holders of savings accounts at Achmea Bank N.V. The bank uses various distribution channels within Achmea, such as Woonfonds (intermediary) and Centraal Beheer (both intermediary and execution). Additionally, we use external channels for our banking activities, including the Munt Hypotheek brand.

STRATEGY AND BUSINESS MODEL – INTERESTS AND VIEWS OF STAKEHOLDERS

We believe stakeholder engagement is an important part of our vision 'Sustainable Living. Together'. By involving our stakeholders, we aim to achieve our mission, which focuses on addressing major social issues related to health, living and working, mobility, and income.

We engage in discussions with various groups of stakeholders, including customers, employees, shareholders, and business partners. Additionally, we collaborate with stakeholders outside our value chain, as we believe their interests and perspectives can influence the sector in which we operate. Therefore, we also engage with societal organisations, interest groups, and regulators. In the coming years, we aim to explore how we can involve our stakeholders in the further development of policies for our material topics. In addition to our ongoing engagement with stakeholders, we specifically engaged with them this year for the purpose of the Double Materiality Assessment (DMA).

ENGAGEMENT WITH STAKEHOLDERS

Customers

Our customers have direct contact with employees through call centres, as well as through customer councils, customer panels, and policyholder councils. Additionally, we organise roundtable discussions and conduct online surveys. Customers also have a voice through the Members' council of Vereniging Achmea. A detailed description is included in the text box on the next page. The aim of engagement with customers is to understand their needs and build trust and proximity.

With our Corporate Relations, we support our services across the various products and brands. Additionally, we implement an Executive Involved model, whereby the Executive Board is responsible for ensuring that the senior management or the Executive Board meets with the management of our business relationships annually. During these meetings, current customer issues and broader societal themes are discussed.

Employees

We are engaging with our employees to support their involvement and development within Achmea. Our focus is on improving communication, promoting collaboration, and encouraging employee feedback. Employees are consulted during team meetings and through their managers. The results of these discussions are used to improve working conditions where necessary. Additionally, there are regular consultations with Achmea's Central Works Council and the works councils for the individual segments in the Netherlands. The Dutch collective labour agreement (Collectieve Arbeidsovereenkomst, CAO) is discussed with the trade unions. An Employee Engagement Survey (Medewerkersbetrokkenheidsonderzoek (MBO)) is conducted annually in the Netherlands and in our foreign operating companies in Australia, Greece, Slovakia, and Türkiye. The findings are shared with senior management. Team reports and results are then discussed in team meetings. The team report also includes the results of questions about undesirable behaviour. Furthermore, insights are discussed at the level of senior management and the Executive Board. Based on these insights, we seek ways to improve and innovate. The findings are also used by an external expert from the Occupational Health and Safety Service to advise Achmea on Risk Inventory & Evaluation. For more information on employee engagement, see the chapter Responsible employer practices.

Shareholders

Contacts with our shareholders, including Vereniging Achmea and Rabobank, are embedded in our formal governance process. For more information about our governance, please refer to the Governance-section, chapter Corporate Governance.

Vereniging Achmea represents the collective interests of its customer members and provides the members with a unified voice in Achmea. Vereniging Achmea, as a major shareholder, ensures the continuity of the company by overseeing that Achmea remains financially sound and adds value.

Business relations

We engage in discussions with our business relations during bilateral meetings. During these meetings, current issues and broader societal themes are addressed. These conversations provide Achmea with valuable insights into what our business relations observe and what they need. The dialogue serves as a breeding ground for new ideas. In line with our cooperative roots, we initiated the establishment of 'De Kamer' in 2013 to bring together the strengths of executives. In De Kamer, they exchange their visions, challenges, and perspectives, enhancing each other's knowledge and experiences through collaboration. In small groups, they discuss social and environmental themes, such as the evolving labour market, increasing inequality, and challenges related to climate and sustainability. These conversations provide Achmea with valuable input for making sustainable long-term decisions. Additionally, Achmea organises an annual 'Grote Kamer', where executives from major Dutch companies and societal institutions are present.

Social organisations, interest groups, and supervisory authorities

In 2024, societal themes were discussed with regulators, industry organisations, and external experts. These conversations included topics such as the new Dutch pension legislation and the affordability of healthcare. Additionally, we engaged with NGOs on sustainability themes to share knowledge and insights. For instance, we held discussions with the World Wildlife Fund (Wereld Natuur Fonds) regarding nature and biodiversity.

STRATEGY AND BUSINESS MODEL – INTERESTS AND VIEWS OF STAKEHOLDERS

Spotlight: Vereniging Achmea strengthens the cooperative foundation of Achmea.

Vereniging Achmea plays an important role in representing the interests of Achmea customers. All customers of Achmea are automatically members of the association, which focuses on advocating for collective customer interests, ensuring the continuity of Achmea Group, and creating value. Vereniging Achmea is a not-for-profit association and the largest shareholder of Achmea.

The Members' council of Vereniging Achmea, consisting of various groups of customers, meets three times a year with the board of the association and the Executive Board of Achmea. During these meetings, current customer issues and broader societal themes are discussed. The input from the Members' council is of great importance and is translated into recommendations for Achmea.

To effectively address societal issues, thematic working groups have been established. These groups consist of members of the Members' council, board members of Vereniging Achmea, and employees of Achmea. The working groups examine social developments and translate signals and needs into recommendations for new or improved services. This allows customers to have a voice in Achmea's policies. In 2024, there were thematic working groups on Claims and sustainability, New pension system, and Entitlement to care. Recommendations from the working groups were presented to the Members' council. This approach aligns with Achmea's strategy to collaborate with partners to solve societal issues.

Additionally, there are expert sessions where members with specific expertise are invited to participate. These sessions provide an opportunity to form well-founded opinions on certain themes. The results of these expert sessions are documented in position papers and presented to Achmea.

Through Vereniging Achmea, which ensures the voice of customers in corporate policy, we strengthen our cooperative identity as a financial service provider. We attach importance to values such as solidarity, collaboration, participation, and the influence of customers.

ENGAGEMENT FOR THE PURPOSE OF THE DOUBLE MATERIALITY ASSESSEMT (DMA)

As part of our DMA, we engaged with relevant external stakeholders this year to gather their perspectives on sustainability topics. This helped us gain insight into how stakeholder interests and viewpoints influence our strategy and business model. We used a shortlist of 14 material sustainability topics as a basis. Through various questions, we collected feedback with the aim of assessing the materiality of the proposed sustainability topics, determining which subjects are most relevant to Achmea, and identifying whether there are any important sustainability topics that have been overlooked.

Participants in the stakeholder survey

We invited over 140 external stakeholders to participate in Achmea's DMA research, resulting in 38 responses. The involved stakeholders included customers, investors, suppliers, peers, experts, NGOs, regulators, and industry associations. They represent a reflection of Achmea's key stakeholders. The largest groups of respondents were experts, followed by customers, while investors and peers formed the smallest groups.

The input from stakeholders was also analysed to rank topics based on their relevance to stakeholders. Overall, our stakeholders largely agreed with the topics we identified. Their analysis confirmed that our four most material topics are also their top priorities.

Stakeholders' validation

We asked external stakeholders which topics they felt were missing. Some of the topics they mentioned are already included in our current material topics, while we consider other topics, such as animal welfare and weapons, to be less relevant to our primary activities.

During the discussion of the outcomes of the DMA, the Programme board of the 'Achmea Together Sustainable' programme, the Executive Board, and the Supervisory Board were informed about the viewpoints and interests of the stakeholders concerning Achmea's sustainability impact.

Through the validation of the DMA results, the Executive Board is informed about the outcomes of the discussions with stakeholders and decided not to change the strategy in light of the DMA results.

STRATEGY AND BUSINESS MODEL – PROCESS TO IDENTIFY MATERIAL TOPICS

As part of the annual evaluation of the material topics, a reassessment of the material topics has taken place for the 2024 annual report. Building on the analysis from 2023, we have reassessed the relevance of the sustainability topics from two perspectives. First, we examined the impact of Achmea on people and the environment, known as 'impact materiality' or the 'inside-out' view. We then assessed how these topics present risks and opportunities for Achmea, also referred to as 'financial materiality' or the 'outside-in' view.

CHANGES IN THE DMA PROCESS

The DMA and the associated process are evaluated annually and updated as necessary. This is the first year that we are conducting the DMA in accordance with the requirements of the CSRD, which has resulted in changes to the process compared to 2023. Below, the adjusted process steps are explained. As a result, the earlier analyses, although based on similar premises, are not fully comparable to those of this year.

We have also included the activities of our foreign operations in our assessment within their unique context. No new topics were identified in this process.

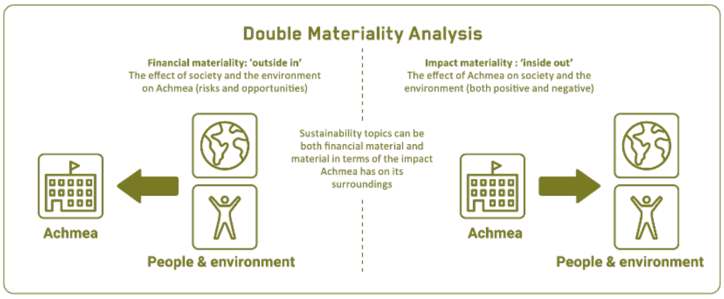
THE SIX STEPS OF OUR DMA PROCESS

Our DMA process consists of six steps:

1 We started the DMA process with a reassessment of the DMA process note and the material topics from the DMA 2023, which resulted from the evaluation of a list of 110 potential topics. This led to an initial list of possible material topics that we used for further assessment. This list included both topics based on sustainability regulations (ESRS) and topics specific to Achmea. Our goal was to identify relevant topics related to material Impacts, Risks and Opportunities (IROs) in our own operations and our value chain (refer to chapter Description of our business - Our value chain).

Based on this initial list, we compiled a longlist of relevant topics. To do this, we conducted 'peer' studies and held discussions with internal stakeholders to refine the material topics. It was confirmed that our initial approach was comprehensive and thorough. This step resulted in a longlist of 20 potential material topics.

2 Next, we assessed the value chain and identified stakeholders. To map the stakeholders effectively, we determined which stakeholders are most important to Achmea. This included both a group of internal and external stakeholders. To ensure a thorough assessment, relevant internal stakeholders were selected based on their expertise and experience. For more information about (external) stakeholders, refer to chapter Interests and views of stakeholders.



The next step was to refine the longlist of potentially relevant topics into a shortlist of potentially material topics and their related IROs.

To achieve this, we examined the potentially material topics from the longlist for overlap and clustered them based on overarching policies. This resulted in a shortlist of 14 potentially material topics.

The defined IROs from the 2023 DMA have also been clustered according to these potentially material topics. We then asked each relevant business unit and department to adjust and specify the corresponding IROs. Relevant internal stakeholders within each business unit and department were selected based on their expertise and experience to ensure a thorough assessment.

3 We assessed whether each impact (the 'inside out' view) is positive or negative and whether it is actual or potential. This impact can occur in the short, medium, or long term and relates to impacts caused by us or to which we have contributed in our value chain. We also evaluated how effects related to potentially material topics can create financial risks or opportunities (the 'outside in' view).

The assessment scale for evaluating impacts/effects was defined by internal stakeholders, including experts in risk management and sustainability reporting. We have integrated sustainability risks into our regular periodic risk analyses, such as the strategic risk analysis, where risks are evaluated based on their likelihood and impact.

For the 'outside-in' view, given the substantial value of our investment portfolio, we established specific threshold values for our investment and financing activities. Based on these threshold values, we found no significant differences compared to the related topics from other business units. Additionally, we did not identify any specific activities, business relationships, or other factors that have increased the risk of negative actual and/or potential impacts related to the 14 potential material topics.

This year, unlike last year, we mapped the time horizon for the IROs to better support strategic planning, with the aim of providing insight into potentially material topics that may gain importance over time.

STRATEGY AND BUSINESS MODEL – PROCESS TO IDENTIFY MATERIAL TOPICS

4 Next, the relevant internal stakeholders assessed the IROs to determine materiality, using factors such as scale, scope, remediability, and likelihood of the impact, with a 5-point scale to ensure consistency. For risks and opportunities, we assessed the potential magnitude and likelihood of financial effects on us. This assessment resulted in a ranking of IROs based on their scores.

5 To determine materiality, we applied thresholds to the scores aligned with our risk appetite. An impact that achieved at least 1.8 out of 5 points was deemed material. For financial materiality, a score of at least 2.2 out of 5 points was required. All 14 assessed topics scored above these thresholds and are therefore considered material.

Finally, we validated the results with the Programme board of the 'Achmea Together Sustainable' programme and the Executive Board. The shortlist of material topics was discussed, and based on the feedback received, the DMA was further refined. This ultimately led to a final list of 14 material topics, one of which is specific to Achmea: Data and Cybersecurity. External stakeholders were consulted on the relevance of the identified material topics. The outcome of this external validation resulted in the final list of material topics, which was approved by the Programme board of the

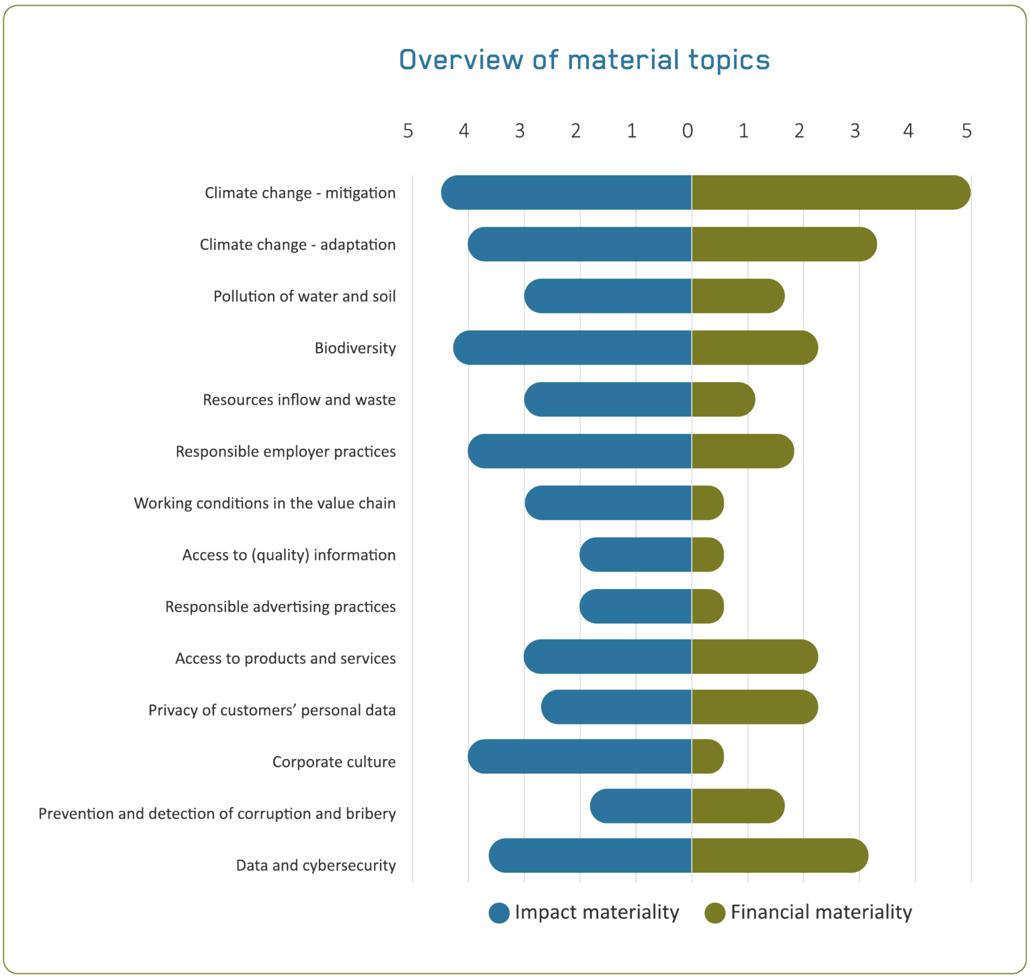
6 'Achmea Together Sustainable' programme and validated by the Executive Board and discussed by the Supervisory Board.

OVERVIEW OF MATERIAL TOPICS

Below, we have visualised the 14 material topics, also showing their interrelated relevance. The figure displays impact materiality on a scale of 1 to 5 on the left side and financial materiality on a scale of 1 to 5 on the right side.

PROCESS TO IDENTIFY MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

As a major financial service provider, we engage with our clients, employees, regulators, and other stakeholders. In these discussions, our various roles as an employer, insurer, investor, and bank are addressed. This ongoing dialogue provides us with valuable insights into the impact we have as a company. We have leveraged this knowledge in the DMA process to assess the materiality of different topics. Although we have taken the input from stakeholders into account, it may be the case that certain IROs that an individual stakeholder group considers important for their specific assessment have not been classified by us as being material.



STRATEGY AND BUSINESS MODEL – PROCESS TO IDENTIFY MATERIAL TOPICS

Additionally, we consulted experts from our business units to evaluate the material impact of each topic for both our Dutch and international entities. We also considered topics arising from our covenants and other commitments, including the Dutch Climate Commitments and the Dutch Green Deal for Healthcare, and identified them as potentially material.

We aim to align our risk analyses, such as the climate risk analysis for the Own Risk & Solvency Assessment (ORSA) and the ESG risk analysis, with the outcomes of the DMA and the related IROs. Conversely, the ESG risk analysis and the climate change risk analysis for the ORSA also contribute to the IROs and our overall risk profile assessment. For more information about the methodologies and assumptions used to determine the impact of climate-related risks, refer to the chapter Climate change.

The DMA process continues to evolve. Through further embedding of stakeholder engagement and ongoing due diligence, new topics may emerge or existing topics may become obsolete. Future risk analyses may also provide new insights. Additionally, the regulations regarding the execution of a DMA under the ESRS are new, which may lead to changes in our current interpretation of the regulations. This, in turn, could result in changes to future material topics.

A description of the material topics and their associated IROs can be found in the chapter Interaction between material topics and strategy. More information on why we have determined the impacts, risks, and opportunities to be material is included in the relevant topical chapter.

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

As outlined in the chapter Process to identify material topics, we have identified 14 material topics. In this chapter, we provide a description of the impacts, risks, and opportunities, as well as how the material topics align with our strategy and business model.

STRATEGIC CONNECTION TO MATERIAL TOPICS

Sustainability is at the core of our vision 'Sustainable Living. Together' and is fundamental to our strategy. It is important for defining our overall direction and it encompasses more than just climate. We aim to support customers in managing climate change, facilitate a circular economy, address environmental challenges, and promote a positive social impact. Furthermore, governance is essential in supporting our business model. Transparent, ethical, and safe business operations are key factors in our strategic direction.

In determining where material impacts, risks, and opportunities exist within our upstream and/or downstream value chain, we have considered geographical areas, facilities, types of assets, inputs, outputs, and distribution channels.

Our 14 material sustainability topics align with our commitment to creating sustainable value for our customers, employees, and our company, as well as for society. As sustainability is integrated into our strategy, our strategic and sustainability outcomes are often interconnected.

The table below illustrates how the material topics are integrated into our vision and strategy (see also the chapters Our vision and Our strategy). The following chapters on the material topics provide more information on where within our business model the material impacts, risks, and opportunities (IROs) arise, how we manage those material IROs, and the impact on our business model, value chain, strategy, and decision-making. The table below includes only the material IROs. We differentiate between actual effects (effects that are currently occurring) and potential effects (effects that could occur).

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Environmental	1. Climate change mitigation (ESRS E1): Involves the reduction of greenhouse gas emissions and limiting the global temperature increase to an average of 1.5 °C above pre-industrial levels by 2050. 2. Climate change adaptation (ESRS E1): Refers to the process of adjusting to climate-related risks arising from climate change, in order to reduce negative effects and capitalize on potential benefits.	**Negative impact** *Insurance and services:* In the healthcare value chain, energy consumption is significant, particularly due to the use of energy in hospitals, medical supplies, and the production of medicines and personal protective equipment. Additionally, greenhouse gases are emitted during the transportation of people and the production and distribution of healthcare products. This also applies to the damage repair value chain, where greenhouse gases are released for instance in cases of roadside assistance, and property damage. By insuring goods and companies responsible for these emissions, we contribute to climate change. Greenhouse gas emissions also arise from healthcare and repair activities related to insurance policies. *Investments and financing:* Investments in high-emission sectors, real estate, and mortgages contribute to greenhouse gas emissions through energy consumption and construction activities. **Positive impact** *Insurance and services:* Insurance activities support the transition to sustainability by insuring assets or activities that contribute to it. Customers and business partners are encouraged to reduce and prevent greenhouse gas emissions. In the event of damages, sustainable solutions are pursued, such as repair instead of replacement. *Investments and financing:* Through investment and financing activities in sustainable energy, sustainable real estate, and green bonds, we contribute to the energy transition and the reduction of greenhouse gas emissions.	**Material negative impact** Actual in less than 1 year. **Material positive impact** Actual and potential in less than 1 year.	Sustainable Living. Together Large customer base Strong partnerships Carefree living & working	Environmental – Climate change: For each investment/ insurance: all paragraphs with the exception of Management of climate-related risks Environmental – EU Taxonomy information Annex C. Annex D.

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Environmental	-Continuation- 1. Climate change mitigation (ESRS E1): Involves the reduction of greenhouse gas emissions and limiting the global temperature increase to an average of 1.5 °C above pre-industrial levels by 2050. 2. Climate change adaptation (ESRS E1): Refers to the process of adjusting to climate-related risks arising from climate change, in order to reduce negative effects and capitalize on potential benefits.	**Risks** *Insurance and services*: For non-life and income insurance activities, climate change poses a risk due to the increasing frequency and severity of extreme weather conditions, such as thunderstorms, heavy rainfall, hail, and strong winds. These changes can lead to higher damage claims, rising repair and maintenance costs, and the necessity for larger financial reserves to cover future damages. *Investments and financing*: Risks arise from environmental legislation aimed at taxing carbon emissions, leading to stricter regulations that increase operational and compliance costs, higher real estate costs, and reduced profitability. Non-compliance with these regulations can result in reputational damage and loss of competitive advantage. Additionally, increasing drought, temperature extremes, heavier rainfall, and rising sea levels create potential losses in rental income, and heighten the risk of uninhabitability and property impairments. **Opportunities** *Insurance and services:* Developing new insurance products and services for energy transition and climate change. *Investments and financing:* Improving energy labels of real estate leads to a reduction in greenhouse gas emissions, making buildings more attractive with lower operational costs. This results in higher occupancy rates, rental income, and property values, thereby strengthening our market position.	**Material risks** *Insurance and Services*: minor impact period until 10 years, > 10 years, uncertainty increases. *Investments and Financing*: minor impact next 1-5 years, > 10 years, uncertainty increases. **Material opportunities** *Insurance and Services*: minor impact period until 10 years, > 10 years insurance of new products *Investments and Financing:* minor impact next 1-10 years, > 10 years possible impact on investment value.	Outstanding financial position	Environmental – Climate change: - Paragraph: Resilience to climate change - For each investment/insurance: Climate transition plan - For each investment/insurance: Management of climate-related risks
Environmental	3. Pollution of Water and Soil (ESRS E2): Refers to the presence of harmful substances in various environments, that significantly could affect living organisms and ecosystems. Water pollution involves the contamination of water by chemicals, microorganisms, and waste materials. Soil pollution refers to the contamination of soil by harmful substances. These substances can harm human health, the environment, or affect the proper use of land.	**Negative impact** *Insurance and services:* In healthcare, pharmaceutical residues from production and their use at home and in healthcare institutions end up in surface water and soil, leading to negative effects on water and soil quality.	**Material negative impact** Actual in less than 1 year.	Sustainable Living. Together Strong partnerships Carefree living & working	Environmental – Pollution of water and soil Environmental – EU Taxonomy information Annex D.
		Risks/Opportunities Based on current insights, not material.			

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Environmental	4. Biodiversity (ESRS E4): Refers to the variability of living organisms from all sources: land, ocean, freshwater, and the atmosphere. It is an essential and indispensable characteristic of nature that ensures that ecosystems are productive, resilient, and adaptive. The direct impact factors of biodiversity loss include the various ways in which the diversity of life, such as animals, plants, fungi, and microorganisms, is declining. Specifically, pollution (including nitrogen) and the impacts and dependencies of ecosystems are considered as key factors.	**Negative impact** *Insurances and services:* Insurance activities can contribute to biodiversity loss by insuring companies and individuals whose activities are harmful to ecosystems. *Investments and financing:* Financing activities can cause biodiversity loss when investing in companies that harm ecosystems. This can result in the overexploitation of natural resources. **Positive impact** *Insurances and services:* Insurance activities can positively contribute to biodiversity by insuring companies and individuals who are committed to the protection and restoration of biodiversity, or by encouraging them to do so.	**Material negative impact** Actual in less than 1 year. **Material positive impact** Actual in less than 1 year.	Sustainable Living. Together Large customer base Strong partnerships	Environmental - Biodiversity: - How we manage our impacts, risks and opportunities - Metrics and targets Environmental – EU Taxonomy information Annex E.
		Risks *Investments and financing:* Loss of biodiversity can lead to operational challenges, higher costs, and reduced profitability for the companies in which we investment, negatively impacting financial performance due to lower investment returns. **Opportunities** Based on current insights, not material.	**Material risks** Potential.	Outstanding financial position	
	5. Resource inflows and waste (ESRS E5): Material usage refers to the input of resources, such as raw materials, used in a company's operations or value chain. In our health insurance, this pertains to the resources used within the health insurance value chain. In non-life insurance, it relates to the materials used in the damage repair process (claims handling). Waste is any material that the owner no longer considers useful and therefore discards. In our health insurance activities, this definition applies to the waste generated during medical procedures. In non-life insurance, it refers to the waste produced during the damage repair process.	**Negative impact** *Insurance and services:* Resource inflows in the healthcare insurance value chain is significant due to the high consumption of materials such as pharmaceuticals, medical equipment, and personal protective equipment, placing pressure on the environment. Scarce resources, such as minerals needed for chips in medical devices, require careful management measures to minimise their inflow. Additionally, waste is generated through the use of medical supplies such as incontinence products.	**Material negative impact** Actual in less than 1 year.	Sustainable Living. Together Strong partnerships	Environmental – Resource inflows and waste Environmental – EU Taxonomy information Annex D.
		Risks/Opportunities Based on current insights, not material.			

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Social	6. Responsible employer practices (ESRS S1): The following topics are material: *Inclusion, diversity and equity (ID&E):* The inclusion of individuals from diverse demographic backgrounds and the fair treatment of employees in the workplace regarding pay, benefits, and promotions. *Training and skills development:* Providing education and resources to employees to improve their knowledge, skills, abilities, and job performance. *Work-life balance:* Demands of both work and personal roles can coexist without conflict. *Measures against violence and harassment in the workplace:* Preventing actions that are unwelcome to the person towards whom they are directed.	**Positive impact** Internal activities *ID&E:* By focusing on ID&E, we can create an environment where employees feel connected, which strengthens innovation and improves our reputation, making it easier to attract and retain talent. *Training and development*: Investing in training and development enhances career opportunities, job security, productivity, and innovation. *Work-life balance:* A good work-life balance promotes employee wellbeing, increases job satisfaction, reduces stress, and contributes to greater engagement. *Measures against violence and harassment in the workplace:* Taking measures against violence and harassment creates a workplace where employees feel safe and valued, improves wellbeing and job satisfaction, reduces stress, and promotes engagement.	**Material positive impact** - *ID&E*: Actual in less than 1 year. - *Training and skills development*: Actual in less than 1 year. - *Work-life balance*: Actual in less than 1 year. - *Measures against violence and harassment in the workplace*: Actual in less than 1 year.	Sustainable Living. Together Skilled employees	Social – Responsible employer practices: - How we manage our impacts, risks and opportunities - Metrics and targets Annex B.
		Risks/Opportunities Based on current insights, not material.			
	7. Working conditions in the value chain (ESRS S2): The collective aspects that shape the professional environment of employees within the value chain. It includes regulated working hours and overtime, a balanced division between professional and personal life, the assurance of physical and mental health and safety at work, the respect for workers' rights such as freedom of association, the prohibition of discriminatory and unfair labour practices, and the provision of a living wage that ensures a decent standard of living for workers and their families based on the normal working hours and country-specific economic conditions.	**Negative impact** *Insurance and services:* High workloads along with more than average mandatory overtime among healthcare professionals in the value chain contribute to elevated stress levels, reduced productivity, and adverse effects on mental health. This can impact the quality of care delivered to patients. *Investments and financing:* Companies invested in may violate labour rights, which can result in unsafe working conditions and unfair compensation.	**Material negative impact** Actual in less than 1 year.	Sustainable Living. Together Bringing healthcare closer	Social – Working conditions in the value chain: *Insurance and services:* - How we manage our impacts, risks and opportunities - Metrics and targets *Investments and financing:* - How we manage our impacts, risks and opportunities - Metrics and targets
		Risks/Opportunities Based on current insights, not material.			

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Social	*Responsible relationships with consumers and customers* *8. Access to (quality) information (ESRS S4):* Clear, accurate, and complete information is essential for informed decision-making. *9. Responsible advertising practices (ESRS S4):* Presenting information truthfully and transparently, avoiding misleading claims and greenwashing, and refraining from harmful advertising practices aimed at vulnerable populations. *10. Access to products and services (ESRS S4):* Availability and affordability of products and services. Ensuring equal access promotes social inclusion. This includes non-discrimination, where everyone is treated equally. *11. Privacy of customers' personal data (ESRS S4):* Collection, use, and processing of personal data and how customers' rights regarding data and privacy are respected. This includes customers' right to privacy, protection against unauthorised use of personal information, and protection against unsolicited communication.	**Negative impact** Internal activities *Access to products and services:* Exclusion through unequal treatment and the failure to ensure the availability and affordability of products and services can harm (financial) well-being. Without accessible and affordable products and services, individuals cannot insure themselves against certain risks, leading them to seek costly alternatives and potentially ending up in vulnerable financial situations. *Privacy of customers' personal data:* Privacy violations due to inadequate protection of privacy and data can result in reputational damage, fraud, sanctions, and a loss of trust in the financial sector. Due to sensitive personal data, such violations can have significant consequences for customers. **Positive impact** Internal activities *Access to (quality) information:* By providing clear, accurate, and complete information, decision-making is improved. This leads to better-informed choices and allows for responses and actions based on this information. *Responsible advertising practices:* The use of ethical and socially responsible methods for advertising and promoting products and services, while avoiding harmful advertising targeted at vulnerable populations. *Access to products and services:* By increasing the availability and affordability of insurance with a wide range of policies at different price levels, individuals can protect themselves against risks and obtain financial protection. Additionally, equal access to insurance products is ensured, creating an inclusive environment by treating everyone fairly and equally.	**Material negative impact** *Access to products and services* and *Privacy of customers' personal data:* Potential in less than 1 year. **Material positive impact** *Access to (quality) information* and *Responsible advertising practices*: Actual in less than 1 year. *Access to products and services*: Actual and potential in less than 1 year.	Sustainable Living. Together Large customer base Skilled employees	Social – Responsible relationships with consumers and customers (paragraph (A) *Access to (quality) information*; (B) *Responsible advertising practices*; (C) *Access to products and services*; and (D) *Privacy of customers' personal data)*: - How we manage our impacts, risks and opportunities - Metrics and targets
		Risks *Access to (quality) information* and *Responsible advertising practices:* Based on current insights, not material. *Access to products and services:* Failing to meet the duty of care regarding access to products and services can lead to compliance and reputational risks. This may undermine the trust of customers and society and pose a risk to our reputation. *Privacy of customers' personal data:* Data breaches, misuse of customer data, and non-compliance with data protection regulations can lead to financial losses, reputational damage, legal liability, and loss of trust. **Opportunities** Based on current insights, not material.	**Material risks** *Access to products and services* and *Privacy of customers' personal data:* Potential	Outstanding financial position	

STRATEGY AND BUSINESS MODEL – INTERACTION MATERIAL TOPICS AND STRATEGY

	MATERIAL TOPIC	DESCRIPTION MATERIAL IMPACT, RISK AND OPPORTUNITY	EFFECT ACTUAL/ POTENTIAL	CONNECTION TO STRATEGY AND/OR VISION	MORE INFORMATION IN ANNUAL REPORT
Governance	12. Corporate culture (ESRS G1-1 Corporate culture and business conduct policies and corporate culture): Formulates objectives based on values and beliefs. The culture serves as a guideline for the organisation's activities, supported by shared assumptions and group norms, such as value or mission statements and a code of conduct. 13. Prevention of corruption and bribery (ESRS G1-3 Prevention and detection of corruption and bribery): Involves managing the risks of unethical practices. This concerns the abuse of entrusted power for personal gain and includes practices such as fraud, extortion, collusion, and money laundering. It may also involve offering or accepting gifts or other benefits, both cash and in-kind, to influence someone towards dishonest or illegal behaviour.	**Negative impact** Internal activities *Prevention of corruption and bribery:* Inadequate prevention and detection of corruption and bribery can undermine trust, disrupt fair competition, and hinder economic growth. **Positive impact** Internal activities *Corporate culture:* Clear ethical guidelines promote ethical business practices and behaviour, leading to improved morale, productivity, employee engagement, and psychosocial safety. This creates a work environment where employees feel valued and motivated, and enhances the reputation of the financial sector.	**Material negative impact** *Prevention of corruption and bribery:* Potential in less than 1 year. **Material positive impact** *Corporate culture:* Actual in less than 1 year.	Sustainable Living. Together Skilled employees Expertise in data & digital	Governance – Ethical corporate culture: - How we manage our impacts, risks and opportunities - Metrics and targets
		Risks/Opportunities Based on current insights, not material.			
	14. Data and cybersecurity (company specific material topic): Protecting digital information from unauthorised access, corruption, or theft throughout its lifecycle. It relates to all aspects of information security, including the physical security of hardware and storage devices, administrative and access controls, as well as the logical security of software applications. This theme also includes the organisation's policies and procedures.	**Negative impact** Internal activities Inadequate security measures can lead to significant data breaches of confidential (customer) information, which can damage customer trust and also affect trust in the financial sector as a whole .	**Material negative impact** Potential in less than 1 year.	Sustainable Living. Together Expertise in data & digital	Governance - Data and cybersecurity: - How we manage our impacts, risks and opportunities - Metrics and targets
		Risks Violations of data and cybersecurity can cause direct and indirect financial losses and reputational damage, undermining stakeholder trust and negatively impacting financial performance. **Opportunities** Based on current insights, not material.	**Material risks** Potential.	Outstanding financial position	Governance - Data and cybersecurity: - How we manage our impacts, risks and opportunities - Metrics and targets

THE RESILIENCE OF OUR STRATEGY REGARDING MATERIAL TOPICS

At this moment, we are not aware of any risks that could lead to a material adjustment in the financial reporting for the upcoming reporting period concerning the current financial effects of the material risks and opportunities. For detailed information on the resilience of our strategy and business model regarding climate-related risks, we refer to the chapter Climate change, which includes sections on resilience. Regarding the other topics related to our own operations (Access to products and services, Privacy of customers' personal data, and Data and cybersecurity), we believe our strategy is resilient to the related risks, partly due to our current compliance activities and risk management policies.

We do not have a complete picture of the expected financial effects of the material topics on Achmea. For the topics related to our value chain, we are in the process of gathering data on this. In general, we have developed policies and action plans for the material topics related to our own operations and, in the case of climate change, also for part of our downstream activities (e.g., carbon emissions). We will gather information and conduct our analysis related to resilience during the phase-in period for value chain information.

GOVERNANCE OF SUSTAINABILITY – ROLES, RESPONSIBILITIES AND EXPERTISE

At Achmea, sustainability is embedded in our governance. The Executive Board holds ultimate responsibility for our strategy, including sustainability. Members of the Executive Board are collectively accountable, while each member is individually responsible for the implementation of sustainability within the business units for which they are responsible.

The Supervisory Board oversees and advises the Executive Board. The Supervisory Board has engaged in discussions regarding sustainability as part of the strategy. Furthermore, discussions on responsible investments and ESG in underwriting were conducted.

In the implementation of Achmea's overall strategy, the Programme board of the 'Achmea Sustainable Together' programme has been mandated by the Executive Board to implement the sustainability strategy along with its associated plans and activities. The Programme board translates the sustainability strategy into actionable steps and converts these into relevant programme workstreams that have been established (own operations, insurance and services, investments and financing, laws and regulation, skills development, CSRD implementation, and foreign operating companies). The 'Achmea Sustainable Together' Programme board is chaired by a member of the Executive Board. Additionally, various division chairs and group directors are part of the Programme board. The workstreams are led by the chairs of the respective business units and departments. The members of the workstream include representatives from the business units with knowledge of sustainability, who work closely with various business units and departments, such as Risk Management, Finance, Legal, Compliance, HR, Facility Management, and Procurement. Alongside the programme, Achmea has a Sustainability department at the group level and ESG officers in various (foreign) operating companies.

Achmea's ESG due diligence process

In providing financial services, contracting suppliers, or investing, we are committed to accurately identifying both actual and potential negative impacts on human rights and the environment. Various business units and departments conduct due diligence in the areas of human rights and the environment by undertaking the following actions:

1. Integrating due diligence into our policies.
2. Identifying actual or potential negative impacts on human rights and the environment.
3. Preventing and mitigating potential negative impacts.
4. Addressing actual negative impacts and minimising their extent.
5. Establishing and maintaining a complaints procedure.
6. Monitoring the effectiveness of our due diligence policies and measures.
7. Communicating publicly about due diligence.

Our due diligence approach varies depending on the different roles we fulfil as a financial service provider.

Due diligence approach in underwriting process

Our due diligence in providing financial services is primarily focused on preventing financial crime. To mitigate risks related to sanctions violations, money laundering, and terrorist financing, we conduct customer due diligence before offering financial services. Our due diligence is in accordance with (inter)national laws, regulations, and industry standards. The approach is outlined in Achmea's Integrity & fraud policy and Customer due diligence policy, which describe roles, responsibilities, and governance structures for combating financial economic crime. We aim to implement environmental and human rights due diligence in the underwriting process for large corporate clients in the Netherlands by 2025. A shortened version of the policy is available on our website.

Due diligence approach in procurement process (supplier due diligence)

Our procurement function facilitates a procedure for new tenders and contracts with suppliers, incorporating sustainability criteria as standard. In the Netherlands, we use EcoVadis to assess the ESG performance of impactful suppliers, where 'impactful' relates to the contract size and contribution to Achmea's sustainability objectives. If a supplier's score falls below the minimum threshold, we will engage in discussions with the supplier. If the score has not significantly improved or remains below the threshold after two years, we consider terminating the contract, taking into account the continuity of business operations and the availability of suitable alternatives.

Due diligence approach in investment process

We conduct assessments of the risks associated with the companies in which we invest, including their compliance with socially responsible business conduct standards. We evaluate investments of our Dutch insurance activities in companies that repeatedly violate the principles of the UN Global Compact regarding human rights, labour standards, environmental protection, and anti-corruption. More information about our due diligence process for investments can be found on our website.

GOVERNANCE OF SUSTAINABILITY – ROLES, RESPONSIBILITIES AND EXPERTISE

Each quarter, the progress towards achieving the goals, as outlined in the annual plans and the objectives of the Stakeholder Value Management (SVM), is reported to the Programme board. For an explanation of SVM, refer to Governance of sustainability - Integration in remuneration policy. During periodic performance dialogues, the effects of the actions taken, as well as the associated risks and opportunities, are discussed and adjusted as necessary. The Programme board subsequently reports to the Executive Board on the results and key points of attention.

The composition of the various governing bodies is explained in the chapter Responsible employer practices, paragraph Inclusion, Diversity & Equality. More information on corporate governance can be found in the section Corporate Governance.

SUSTAINABILITY EXPERTISE WITHIN OUR GOVERNANCE

For both the members of the Supervisory Board and the Executive Board, ongoing education sessions have been organised, focusing on various sustainability themes. In 2024, (upcoming) changes in sustainability legislation, the implementation of the CSRD, the results of the DMA, and Achmea's sustainability objectives were discussed. Additionally, discussions were held regarding the ESG underwriting policy for non-life insurance and responsible investing.

Sustainability is also part of the permanent education sessions for the Directors Council. In 2024, these sessions covered topics such as our approach to sustainability, responsible investing, the implementation of the CSRD, and Achmea's social impact strategy.

Through various permanent education sessions, the members of the Supervisory Board, the Executive Board, and the Directors Council have been able to acquire relevant knowledge and expertise that supports them in addressing material impacts, risks, and opportunities.

Additionally, Achmea has developed an e-learning course titled Sustainability according to Achmea, which is mandatory for all Dutch employees of Achmea, including the Executive Board and the Supervisory Board. Training sessions are also offered on various sustainability topics, such as CSRD, climate, biodiversity, and sustainable impact.

GOVERNANCE OF SUSTAINABILITY – INTEGRATION IN REMUNERATION POLICY

At Achmea, we adopt a straightforward, controlled, and sustainable remuneration policy aimed at preventing undesirable incentives. This includes clear and transparent remuneration systems. We utilise variable remuneration to enhance performance management in line with our goal of long-term value creation. Our remuneration policy also incorporates sustainability principles with a combination of material and non-material rewards that align with our vision of 'Sustainable Living. Together'. A detailed description of our remuneration policy can be found in the Remuneration Report on our website.

Our overall remuneration policy supports the management of our organisation based on stakeholder value management (SVM). This approach ensures that creating value for customers, employees, business partners, shareholders, and society is a fundamental aspect of it. The remuneration policy is structured in such a way that elements that may encourage taking irresponsible risks are minimised as much as possible. Sustainability is integrated into our SVM and performance management. Where relevant, teams have specific sustainability objectives. When variable remuneration is applicable, it is partially linked to these sustainability objectives.

In 2024, the following sustainability targets were relevant for assessing the performance of the Executive Board and the related variable remuneration:

- *Environmental:* Reducing greenhouse gas emissions from our own corporate buildings and decreasing greenhouse gas emissions from our investments and retail motor vehicle portfolio.
- *Social:* Realising progress on the Impact programmes developed to achieve the 'Sustainable Living. Together' objectives. These Impact programmes are 1) Digital healthcare, 2) Sustainable employability and job satisfaction, 3) Healthy living and working environment, 4) Safe living, 5) A suitable home for all elderly people, 6) Safe mobility, 7) Income for now, later, and beyond, and 8) Sustainability of homes.
- *Governance:* Increasing gender diversity in top and senior management.

The targets for Environmental and Governance are directly linked to our sustainability topics that arise from the DMA (where greenhouse gas emissions from our own operations are classified as non-material).

In 2023, the environmental targets were focused on reducing greenhouse gas emissions from our own buildings and decreasing greenhouse gas emissions from our investments. The percentage of the remuneration paid out in 2024 that is related to climate-related objectives pertains to the targets set for 2023 and amounted to a maximum of 5.6%.

INTEGRATION OF SUSTAINABILITY IN FIXED AND VARIABLE REMUNERATION

Fixed remuneration is based on the relevant work experience and the organisational responsibilities of the employee as described in the job profile. Pursuing sustainability objectives and managing sustainability risks are integral parts of the role and are included in the standard remuneration system.

Variable remuneration represents a sustainable and risk-adjusted compensation based on the employee's performance. For all employees eligible for variable remuneration, it is capped at the Dutch legal maximum of 20% of the total fixed annual salary, or 100% for employees working abroad.

Variable remuneration consists of a monetary reward. We impose stricter requirements on the payment of variable remuneration for risk-takers, identified staff, and senior management than the legally prescribed period: 50% of the variable remuneration is deferred for a period of 5 years. The deferred variable compensation is only paid out after an assessment has been conducted and it has been demonstrated that the achieved results have been consistently realised. Part of this assessment includes whether any incidents have occurred in a given year that have resulted in breaches of the risk appetite and/or are in violation of Achmea's General code of conduct.

REMUNERATION POLICY: DETERMINATION, APPROVAL AND UPDATES

The Executive Board is responsible for the establishment and implementation of the remuneration policy for Achmea Group. In the development of this policy, it is advised by the Central Coordination Committee for Controlled Remuneration Policy (CCBB), which includes representatives from all (internal) control functions.

As the highest governing body, the Supervisory Board oversees the remuneration policy of Achmea Group. The Supervisory Board evaluates whether the remuneration policy is in line with the principles of a controlled remuneration policy. This includes assessing whether the policy supports our vision, strategy, and ambitions for long-term value creation, as well as ensuring that the variable remuneration does not contain undesirable or unintended risks or incentives.

The Remuneration Committee of the Supervisory Board assists and advises the Supervisory Board in carrying out its supervisory responsibilities. The Remuneration Committee oversees the implementation and compliance of the (group) remuneration policy across all business units and for different groups of employees within Achmea, including directors and risk-takers.

GOVERNANCE OF SUSTAINABILITY – INTEGRATION IN REMUNERATION POLICY

PERFORMANCE MANAGEMENT PROCESS

Performance management follows an annual cycle that begins with translating objectives into a top-down SVM card. At group level, this is done by developing an annual SVM group card that applies to the entire organisation, both in the Netherlands and abroad. At the business level, these goals are translated into an SVM card for each specific division, business unit, or foreign operating company. At the individual level, specific objectives are established in collaboration with managers and employees, with a focus on talent, development, and performance.

Sustainability is treated as a separate topic, with specific sustainability KPIs (Key Performance Indicators) added to the SVM card. Objectives are established as KPIs at all levels.

KRIs (Key Risk Indicators) are included in the SVM cards from a risk management perspective. Failure to meet a KRI impacts the achievement of the SVM card. KRIs help to prevent inappropriate incentives and provide a counterbalance to the results of performance management.

When managers and employees are eligible for a variable remuneration scheme based on performance objectives, these variable rewards and the agreed objectives are integrated into the SVM and performance management. This also applies to the Executive Board, directors, and senior managers, who have a variable remuneration scheme of up to 20% as a standard component of their employment conditions.

GOVERNANCE OF SUSTAINABILITY – SUSTAINABILITY MATTERS ADDRESSED IN 2024

In 2024, the Executive Board and/or the Supervisory Board (and its committees) discussed several sustainability topics, including:

- Sustainability reporting, including the updated Climate Transition Plan, concepts of the sustainability statements, and our ESG presentation.
- Updated Double Materiality Assessment (DMA) and material topics.
- Remuneration policy, including the part of remuneration related to sustainability topics.
- Commitments in the field of sustainability.
- Sustainability risks.
- Liability risks associated with ESG legislation.
- Systematic Integrity Risk Analysis (SIRA).
- Climate change responsible investing, including investment policy for fossil fuels.
- Sustainable insurance: ESG integration in the underwriting process (S&I).
- Responsible employer practices: Diversity and inclusion.

More information is included in the Supervisory Board report, which is part of the Governance section.

Every quarter, the business units report to the Executive Board on the progress of financial and non-financial performance indicators, followed by performance dialogues with the responsible members of the Executive Board. These discussions enable us to monitor and evaluate the entire range of our strategic agenda.

For the progress on key sustainability topics, performance dialogues take place within the Programme board of 'Achmea Sustainable Together'. These discussions focus on both achieving sustainability ambitions and ensuring compliance with relevant laws and regulations (such as sustainability legislation). During these regular dialogues, the impact of actions taken is assessed and adjusted as necessary. The Programme board then reports to the Executive Board on the outcomes and most important points of attention.

Spotlight: Policy on commitments

In our ESG policy, established in 2024, we have included agreements regarding the entering into commitments and their compliance. Before entering into a new ESG commitment, business units must consult the sustainability department of the relevant entity or the group. Internal legal advice is also sought. Depending on the scope of the commitment (entity-specific or group-wide), approval is granted by the management of the business unit or the Executive Board, respectively. ESG commitments are documented in the (contract) management system and are monitored for compliance by the (local) sustainability department or officer.

The revised DMA outcome forms the basis for the strategic sustainability priorities of the Executive Board. The key strategic priorities addressed in 2024 include:

- Developing our sustainability report in accordance with the requirements of the CSRD and our sustainability ambitions.
- Establishing an ESG Policy framework.
- Formulating a social impact strategy.
- Developing and implementing the Inclusion, diversity, and equality (ID&G) policy.
- Tightening our fossil investment policy and setting a target to allocate 10% of our own investments to impact investments.

SUSTAINABILITY RISK MANAGEMENT

SUSTAINABILITY IN ACHMEA'S RISK MANAGEMENT SYSTEM

Sustainability risks are integrated into our Integrated Governance, Risk Management, and Compliance system (IGRC). The IGRC system consists of the following elements: Governance, Policy, Risk Appetite, Tools & Techniques, Systems & Data, and People, culture and awareness. For more details, including a more detailed description of our risk management process, we refer to the Consolidated Financial Statements, Note 2 Capital and Risk Management. In this chapter, we outline how sustainability topics are incorporated into our IGRC system.

GOVERNANCE

Sustainability is an integral part of the regular governance of risk management. This includes the 'Three Lines model', the organisational structure of the risk committees, and key functions such as risk management, compliance, actuarial services, and internal audit.

POLICY

The IGRC system serves as Achmea's primary risk management policy and acts as a framework for other risk management policies focused on specific types of risk or topics. Where relevant, the principles of sustainability risks are incorporated into the underlying policies and reports on risk management. Achmea's risk classification includes the types of risks and definitions that we apply. We use the following definitions for sustainability risks:

Sustainability risk	The risk of a negative effect on financial results, capital, or reputation (including risks associated with lawsuits) as a result of current or future consequences of environmental (E), social (S), or governance (G) events or circumstances related to Achmea, its counterparties, assets, investments, liabilities, and activities.
Environ-mental (E)	The risk of a negative effect on financial results, capital, or reputation as a result of current or future consequences of environmental factors on the assets, insurance activities, and operations of Achmea.
Social risk (S)	The risk of a negative effect on financial results, capital, or reputation as a result of negative social implications in the way Achmea, directly or indirectly, interacts with various stakeholder groups (society as a whole, communities, and its employees). This can occur due to social capital loss, product liability, or by failing to achieve Achmea's social sustainability ambitions.
Governance risk (G)	The risk of a negative effect on financial results, capital, or reputation as a result of how Achmea and its value chain govern themselves through policies, processes, and control measures. Negative governance effects can occur through corporate governance and business conduct.

RISK APPETITE

Risk appetite refers to the maximum risk that Achmea is willing to accept in pursuing its strategy and achieving its objectives. The regular statement on risk appetite, which pertains to legislation, reputation, and natural disasters, also applies to sustainability risks. Additionally, there is a specific statement on risk appetite at the Achmea group level. Several legal entities have established their own entity-specific Key Risk Indicators (KRIs).

Statement on risk appetite	KRI's
Achmea aims for an ESG policy that focuses on preventing and mitigating material negative (financial and non-financial) impacts in the areas of environment (E), social (S), and governance (G) in relation to its activities for the benefit of its stakeholders.	ESG-rating Achmea B.V. (according to MSCI) ESG-rating Achmea B.V. (according to Sustainalytics)

TOOLS & TECHNIQUES

To understand and mitigate the potential impact of sustainability risks, it is essential to first gain insight into the risks that are most relevant to our business activities. Therefore, we conduct qualitative and quantitative risk analyses. In performing these risk analyses, we utilise the regular risk management assessment framework of the IGRC policy to estimate the likelihood and impact of risks. When risks are approaching the thresholds of our risk appetite, we consider measures to mitigate these risks. Examples of tools and techniques that we use to identify, assess, and mitigate sustainability risks are described below.

RISK ANALYSIS

Sustainability risks are integrated into regular (strategic) risk analyses. In these analyses, we identify, assess, and, if necessary, mitigate risks that may hinder the achievement of our strategic, tactical, and operational objectives.

The key sustainability-related risks identified in the Strategic Risk Analysis at the Achmea group level are: failure to achieve sustainability objectives, natural disasters, and volatility in the financial markets. These are further elaborated below. For more information on these risks and mitigating measures, please see the Consolidated Financial Statements, Note 2 Capital and Risk Management, section A Key Risk Themes in 2024.

Failure to achieve sustainability targets

Sustainability risks relate to all ESG aspects that may impact Achmea as an insurer, investor, and financier, as well as our own operations. Strategic and reputational damage may occur if we do not act swiftly in the transition to sustainable energy sources for the energy transition and if we fail to meet (externally communicated) sustainability targets or commitments. This may also affect future financial performance. Key measures to manage this risk include our Climate transition plan, the central Achmea Sustainable Together programme, the group-wide ESG policy, the ESG acceptance policy for our commercial insurance portfolio (Dutch portfolio), the Socially Responsible Investment policy, the environmental policy for our internal operations, and Achmea Bank's Climate & Environmental Risk Framework.

SUSTAINABILITY RISK MANAGEMENT

Natural disasters

In the non-life portfolio, disasters caused by (extreme) weather conditions can have a significant impact. Climate change can alter the frequency, timing, and intensity of these events. Global climate trends (combined with inflation and exposure growth) are hardening the reinsurance markets, affecting reinsurance premiums, retention, and reinsurance terms. As a result, the required capital increases, and profit volatility may rise. Control measures include adjusting the internal model, reinsurance, and contingency plans. Regarding the non-life portfolio, these risks are taken into account in product development, pricing, and terms and conditions.

Volatility on financial markets

Many factors such as geopolitical instability, economic developments, and decisions by financial authorities can influence the financial markets, with consequences for the valuation of our assets, returns, and solvency. Climate change can add extra volatility, especially when new legislation (e.g. carbon pricing) is implemented to accelerate the pace of the energy transition to 'net zero.' To manage these types of risks, there are control measures as mentioned above, including regular processes for determining the market budget and investment plans.

SPECIFIC ANALYSIS OF SUSTAINABILITY RISKS

In addition, we conduct specific analyses of sustainability risks, such as ESG risk analyses and climate change risk analyses. In 2024, the effect of energy-saving measures on property values in the Dutch housing market was investigated, a follow-up study on flood risks was conducted, and potential long-term climate-related transition risk scenarios for Achmea Bank's corporate financing were examined.

ESG risk analysis

In the ESG risk analysis, we conduct a risk assessment on the CSRD topics with a focus on the 'outside-in' perspective. The results (material topics) of this analysis align with the DMA 2024. More information about the risks related to our material topics can be found in the topical chapters of this sustainability report.

Risk analysis climate change

Each year, we conduct an Own Risk & Solvency Assessment (ORSA). In addition to regular insights into the current and future levels of capital and liquidity position, we evaluate the potential impacts of climate change on the short, medium, and long term on our financial position. We also consider the possible effects on our strategy and policy, reputation, and operational processes. These qualitative assessments are carried out for our (re)insurance portfolios, investment portfolios, and our own operations. Additionally, we have developed long-term climate scenarios for the investment property portfolio and the equity and corporate bond portfolios. More information about these risk analyses can be found in the chapter Climate change.

PARTIAL INTERNAL MODEL

Achmea has developed a partial internal model that incorporates risks such as windstorms, hail, and flooding. This internal model has been approved by the College of supervisors, including De Nederlandsche Bank (DNB). The table below illustrates the climate related risks of the Dutch portfolios that are most relevant and have been quantified by the internal model.

	BUILINGS & CONTENTS	GREEN-HOUSES	HULL INSURANCE FOR MOTOR VEHICLES
Windstorms	√	√	√
Hail and extreme rainfall	√	√	√
Flooding			√

The internal model is used for the determining the required capital (SCR), decisions regarding reinsurance coverage, and the pricing of insurance products. As part of the internal model, we analyse trends in claims development and climate change, and we adjust the internal model as necessary.

INTERNAL FRAMEWORK FOR CONTROL MEASURES

We apply a framework for internal control measures for internal control purposes. As part of this framework, various key sustainability-related risks are monitored based on key control measures. For more information, please refer to the Consolidated Financial Statements, Note 2 Capital and Risk Management, section D Risk Management and Internal Control System.

PEOPLE, CULTURE AND AWARENESS

Risk awareness is an important part of the risk management system. The e-learning course Sustainability according to Achmea is mandatory for all employees. In this way, we increase awareness among all employees about sustainability, ambitions, and goals. Sustainability is also included in the training programme for (statutory) directors. Employees in key positions, such as internal control functions, must meet mandatory requirements regarding sustainability expertise. Product managers receive training in sustainability as part of their product responsibility. We ensure that these employees receive regular training on sustainability and developments in this area.

For specific knowledge about risks, we utilise regular processes to enhance awareness and understanding of specific sustainability-related risks. Climate change is an important topic for our non-life and reinsurance divisions. For our investments, we have appointed specific experts within the Balance Sheet Management and Achmea Investment Management departments who focus on sustainability risks.

ENVIRONMENTAL – INTRODUCTION

Achmea aims to play a facilitating role in the transition to a sustainable economy. We pursue this goal in collaboration with our partners and customers.

In our double materiality analysis, five key environmental topics have been identified: climate change (mitigation and adaptation), biodiversity, pollution of water and soil, and resource inflow and waste. These environmental themes are closely intertwined. For example, the loss of biodiversity is closely linked to climate change, while pollution plays a significant role in biodiversity loss and the degradation of ecosystems. The environmental material themes are illustrated in the figure below. We will address these themes in the following chapters based on the relevant ESRS.

Environmental themes related to our role as an insurer are particularly important for our non-life and health insurance activities. As a large financial service provider, we are also an investor and offer asset management services to institutional clients. Additionally, we have an impact through our banking activities.

OUR APPROACH TO ENVIRONMENTAL TOPICS

We are committed to combating climate change and protecting the environment. We offer products and services that help our customers reduce climate-related damages, adapt to changing climatic conditions, and minimise their ecological footprint.

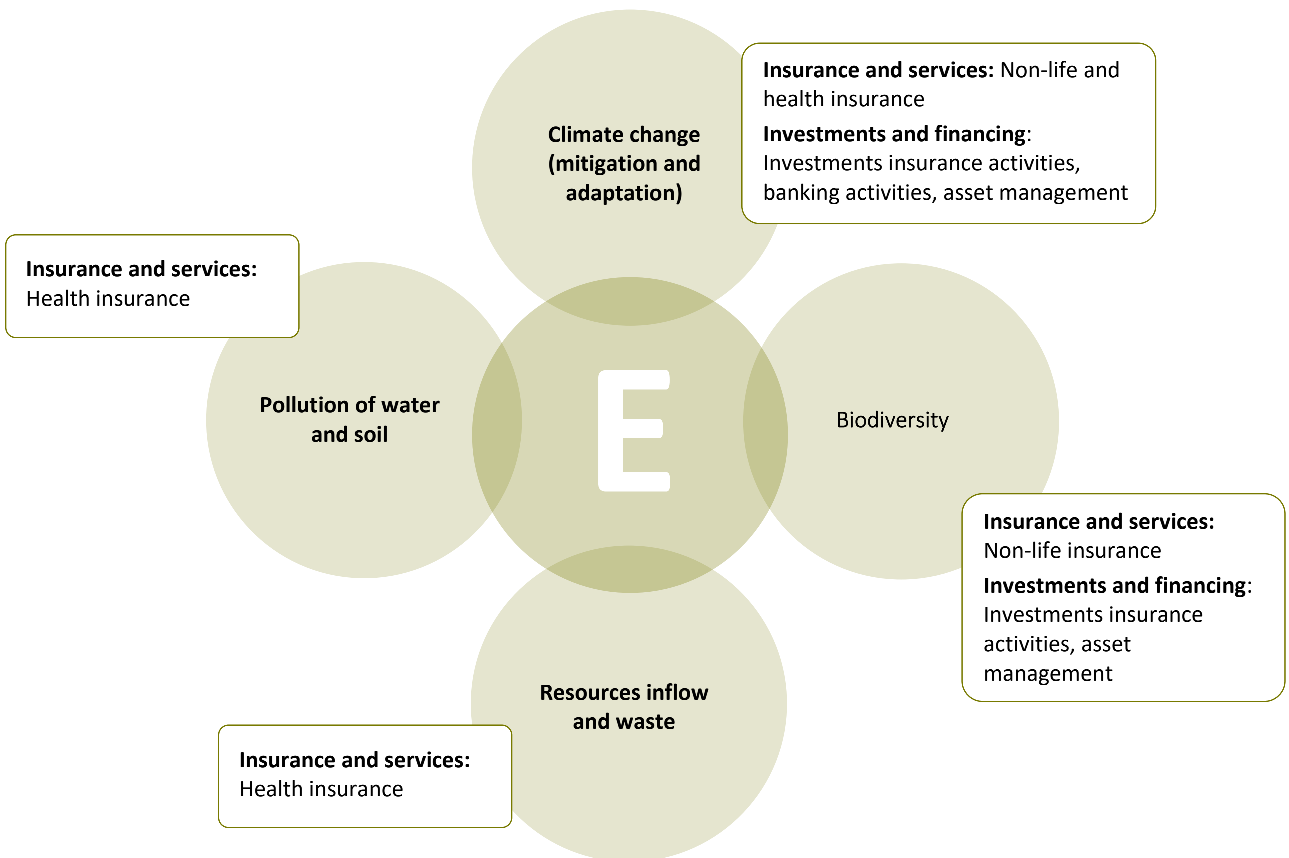
Our ambition is to integrate environmental standards into all our policies and roles, including risk management, claims handling, and procurement.

OUR COMMITMENTS

We have made various commitments regarding sustainability in general and environmental topics specifically. These commitments influence our sustainability strategy, goals, actions, and reporting. We take international guidelines into account, including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. For the environment, the following commitments are considered when developing our overall ESG policy:

1. UN Principles for Responsible Investment (PRI).
2. UNEP FI Principles for Sustainable Insurance (PSI).
3. Climate commitment of the Dutch financial sector.
4. Finance for Biodiversity Pledge.
5. Manifesto for Sustainable repairs (Manifest Duurzaam schadeherstel).
6. Paris Proof Commitment Dutch Green Buildings Council.
7. Dutch Sustainable Mobility Pledge (Coalitie Anders Reizen).
8. Partnership for Carbon Accounting Financials (PCAF).
9. Dutch Green Deal Sustainable healthcare 3.0.

We collaborate with other insurers within the partnership Forum for Insurance Transition to Net Zero (FIT) and the Dutch insurance sector's IMVO covenant.



ENVIRONMENTAL – CLIMATE CHANGE

Risks

Insurance and services: For non-life and income insurance activities, climate change poses a risk due to the increasing frequency and severity of extreme weather conditions, such as thunderstorms, heavy rainfall, hail, and strong winds. These changes can lead to higher damage claims, rising repair and maintenance costs, and the necessity for larger financial reserves to cover future damages.

Investments and financing: Risks arise from environmental legislation aimed at taxing carbon emissions, leading to stricter regulations that increase operational and compliance costs, higher real estate costs, and reduced profitability. Non-compliance with these regulations can result in reputational damage and loss of competitive advantage. Additionally, increasing drought, temperature extremes, heavier rainfall, and rising sea levels create potential losses in rental income, and heighten the risk of uninhabitability and property impairments.

Negative impact

Insurance and services: In the healthcare value chain, energy consumption is significant, particularly due to the use of energy in hospitals, medical supplies, and the production of medicines and personal protective equipment. Additionally, greenhouse gases are emitted during the transportation of people and the production and distribution of healthcare products. This also applies to the damage repair value chain, where greenhouse gases are released for instance in cases of roadside assistance, and property damage. By insuring goods and companies responsible for these emissions, we contribute to climate change. Greenhouse gas emissions also arise from healthcare and repair activities related to insurance policies.

Investments and financing: Investments in high-emission sectors, real estate, and mortgages contribute to greenhouse gas emissions through energy consumption and construction activities.

Climate change

Climate mitigation involves the reduction of greenhouse gas emissions and limiting the global temperature increase to an average of 1.5 °C above pre-industrial levels by 2050. *Climate adaptation* refers to the process of adjusting to climate-related risks arising from climate change, in order to reduce negative effects and capitalize on potential benefits.

Opportunities

Insurance and services: Developing new insurance products and services for energy transition and climate change.

Investments and financing: Improving energy labels of real estate leads to a reduction in greenhouse gas emissions, making buildings more attractive with lower operational costs. This results in higher occupancy rates, rental income, and property values, thereby strengthening our market position.

Positive impact

Insurance and services: Insurance activities support the transition to sustainability by insuring assets or activities that contribute to it. Customers and business partners are encouraged to reduce and prevent greenhouse gas emissions. In the event of damages, sustainable solutions are pursued, such as repair instead of replacement.

Investments and financing: Through investment and financing activities in sustainable energy, sustainable real estate, and green bonds, we contribute to the energy transition and the reduction of greenhouse gas emissions.

Material item

Relevant activities

Insurance and services: Non-life and health insurance, specifically through procurement (damage repair, healthcare).

Investments and financing: Corporate investments, government bonds, mortgages, investment property. Asset management.

Most significant stakeholders

- Policyholders and customers
- Mortgage and investment clients
- Tenants
- Business partners (including healthcare providers and property managers)
- Companies in which we invest
- Intermediaries
- Governments

Boundary of the value chain

Internal activities

Downstream: Insurance clients, companies in which we invest on our own account, on behalf of policyholders and institutional clients, mortgage and investment clients, intermediaries, damage repair companies, healthcare providers*.

*We consider payments to healthcare providers and damage repair companies as payments that would otherwise have been made directly to the policyholders (downstream).

ENVIRONMENTAL – CLIMATE CHANGE

INTRODUCTION TO CLIMATE CHANGE

Climate change poses significant social, economic, and financial challenges. We believe it is crucial to limit global temperature rise in order to prevent uncontrollable risks. We believe it is crucial to limit global temperature rise in order to prevent uncontrollable risks. Financial institutions play a crucial role in the transition to a CO_2-neutral society that is resilient to the impacts of climate change. We are committed to the Paris Agreement and aim to align our activities with a climate scenario that limits global warming to 1.5°C above pre-industrial levels. Additionally, we support our clients in taking both climate adaptation and mitigation measures. This requires ambitious climate plans, which we will elaborate on further in this chapter.

We participate in the Climate Commitment of the Dutch financial sector and are a member of the Forum for Insurance Transition to Net Zero (FIT), an UN-led initiative aimed at accelerating voluntary climate action in the insurance sector. In 2021, we established our climate ambitions and transition strategy based on the principles of the Paris Agreement.

The climate transition plan, as required by the Climate Commitment of the Dutch financial sector, is an action plan in which we outline our goals, plans, and actions to achieve climate objectives. This plan focuses on reducing the CO_2e emissions of our investments and financing, promoting sustainable projects, and investing in green technologies. Through this plan, we account for the progress and impact of the actions taken. In 2022, we published our first Climate Transition Plan, with updates in 2023 and 2024. These documents have been approved by the Executive Board, and the current version is available on our website.

As a financial service provider, our own CO_2e footprint is relatively limited; most emissions come from the investment and insurance activities that are part of our value chain (the so-called Scope 3 CO_2e emissions). In our Double Materiality Analysis (DMA), climate change has been identified as a material topic for our activities in 'Insurance and services' and 'Investments and financing', but not for our 'Own operations'. Emissions related to our Own operations are included in Annex C: Detailed Environmental Information'. Our Climate Transition Plan outlines our actions in more detail to achieve our ambition of reaching 'net zero' emissions in our operations by 2030.

Banks, insurers, and investors face financial risks as a result of climate change. We aim to gain greater insight into the impact of climate-related risks on our insurance, mortgage, and investment portfolios, and we strive to contribute to climate adaptation by enhancing the resilience of our customers and society. We lead the Working Group on Climate Adaptation of the Dutch Platform for Sustainable Finance, which brings together banks, insurers, real estate investors, and the government to explore how we can adapt our economy through financial and insurance solutions. Together with the Dutch Association of Insurers and the government, we are actively addressing the insurability of flood risks. The financial resources needed for the implementation of the measures outlined in this chapter are part of our regular expenditures. Future (additional) financial resources for these initiatives have yet to be determined, except for the budgeted amount for renovations for the period 2024-2029, which contribute to the sustainability of our investment property.

In this chapter, we outline our resilience, strategy, policy, actions, objectives, and metrics related to climate change for our material activities: 'Insurance and services' and 'Investments and financing'. To enhance the readability of this chapter, some of the required explanations under ESRS E1 Climate change are included in Annex C. This includes our total CO_2e footprint (E1-6, Table 1), energy consumption

What we do to reduce the CO_2e emissions of our own operations: leading by example

The CO_2e emissions from our own operations have not been considered material in our double materiality analysis. However, we believe it is important to reduce our own CO_2e emissions, as we also ask this of our relationships in the value chain.

We aim to achieve a sustainable and net-zero operation by 2030, with the ambition of having a net CO_2e footprint of zero. We measure the emissions from our buildings, travel, commuting, paper usage, waste, and outsourced servers/cloud services, and starting in 2024, we will also include emissions from remote work in the Netherlands as part of our scope 3 emissions. To achieve this, we focus on energy efficiency, local renewable energy generation, and the procurement of green energy, while also aiming to reduce and make employee travel more sustainable.

By the end of 2024, we aim to achieve a 48% reduction in gross CO_2e emissions for our Dutch operations compared to 2019. Since 2011, we have been compensating for the remaining emissions by purchasing certificates, and since 2020, we have been doing this with Gold Standard certificates. From 2027, we intend to compensate for the remaining emissions through large-scale reforestation.

Our environmental policy has been updated and published on our website. We are launching a program to make our three own locations in the Netherlands nearly energy-neutral by 2030, with Apeldoorn aiming for energy neutrality by 2025. Our car leasing policy in the Netherlands has been fully electric since May 2023. By the end of 2024, 68% of our leasing fleet consists of electric vehicles.

ENVIRONMENTAL – CLIMATE CHANGE

and -mix (E1-5, Table 2), as well as information on physical and transition risks related to corporate investments, mortgages, and investment property (E1-9, Tables 15 to 20). As a financial institution, we must comply with the EU benchmarks aligned with the Paris Agreement.

It is important to note that a single strategy, policy, or action often interacts with multiple components of the impacts, risks, and opportunities (IROs) as described on the first page of this chapter and does not solely relate to one specific material IRO. Our strategy for engaging with companies can, for example, contribute to reducing the negative impact of financed greenhouse gas emissions while simultaneously limiting the climate-related transition risks of these investments. This also applies to positive impacts and opportunities. Therefore, in this chapter, we will describe our strategies, policies, and actions focused on the topic of climate change, rather than addressing them separately for each specific material IRO.

Achieving the reduction target is a collective effort involving multiple parties, including governments and other actors in the real economy. The efforts of all these parties jointly influence the emissions in our value chain. We are connected to these emissions through, among other things, the objects we insure, the healthcare we procure, the companies and government bonds in which we invest, and the financing we provide for mortgages and investment property. In this chapter, we describe our policy and the actions we are taking to reduce emissions in the value chain of our investments and insurance. E1.29 requires us to provide an overview of the key measures taken in the reporting year and those planned for the future, as well as the outcomes of these measures for the purpose of climate mitigation, including the achieved and expected greenhouse gas emission reductions. It is important to note that we are unable to distinguish between the effects of our own actions and those of our environment. For this reason, we have not included the required explanations on this point. In 2025, we will explore whether it is possible to develop a method to better determine our contribution to the reduction of greenhouse gas emissions.

CLIMATE CHANGE RESILIENCE ANALYSIS

To effectively understand the current and potential impacts of climate change and to adapt to it, it is important to first identify the risks and opportunities that are most relevant to our activities. Our risk analysis includes both transition and physical risks associated with climate change.

We conduct both qualitative and quantitative analyses to gain insight into the potential impacts of climate change on our strategic, financial, and operational objectives. The analysis is carried out at the level of Achmea Group and includes both our Dutch and international entities. The findings are discussed in Risk Committees at the group level and decentralised within the business units, with the key outcomes reported in the annual Own Risk & Solvency Assessment (ORSA) Report. Please see the chapter on Sustainability Risk Management for more information.

CLIMATE RELATED RISKS

PHYSICAL RISKS

These are the risks associated with the physical effects of climate change. These risks can be event-driven (acute), such as an increase in extreme weather events (e.g., droughts and floods). Additionally, they can relate to long-term adjustments (chronic) to factors such as temperature, precipitation, rising sea levels, and greater variability in weather patterns.

TRANSITIONAL RISKS

These are the risks associated with the transition to a low-carbon economy. These risks are linked to policy changes by governments and legislative measures, technological changes, market responses, and reputational damage.

QUALITATIVE RISK ANALYSIS CLIMATE CHANGE

We assess the financial impact that climate change may have on our balance sheet, income statement, and solvency position over short (0-1 year), medium (1-10 years), and long-term (>10 years) horizons. The short-term impact aligns with our annual decision-making process for securing reinsurance coverage, the investment plan, and the pricing of non-life and health insurance. In our strategic planning and budgeting process, we have a horizon of three years, which partially aligns with the medium-term. The long-term horizon is particularly important for addressing climate change.

In this analysis, we also examine the effects on our strategy, policy, reputation, and the continuity of our operational services to customers. We conduct the analysis for our (re)insurance portfolios, investment portfolios, and own operations for all insurance entities of Achmea. Insights from the reports of the Intergovernmental Panel on Climate Change (IPCC) and the Royal Netherlands Meteorological Institute (KNMI) serve as a foundation for our climate change risk analysis, in addition to our strategy and sustainability objectives. The risk analysis is also based on the Application Guide on Running Climate Change Materiality Assessment and Using Climate Change Scenarios in ORSA from the European Insurance and Occupational Pensions Authority (EIOPA) and the Guide for Managing Climate and Environmental Risks from De Nederlandsche Bank (DNB). The uncertainties in the analysis include, among others, the pace and extent of climate change.

In 2024, we updated our qualitative risk analysis. The insights gained are comparable to those of previous years. The most climate-sensitive risks for Achmea from a financial perspective are presented in the table on the next page for

ENVIRONMENTAL – CLIMATE CHANGE

both our insurance and service activities as well as our investment and financing activities. The results of the analysis for those activities for which we consider climate-related risks to be materially significant will be further elaborated in the following paragraphs.

Some activities are less sensitive to climate-related risks. Regarding our insurance activities, we expect limited financial impacts for our healthcare, pension, and life insurance operations. Given the terms of health insurance and the ability to adjust premiums annually to gradual developments, the relative effect on the short and medium term for health insurance does not appear to be significant. Climate change may impact our pension and life insurance portfolios due to mortality risk, as mortality rates can increase during heatwaves and severe winters. This could lead to an increase in heat-related excess mortality and a decrease in cold-related excess mortality, as heatwaves are expected to occur more frequently, and winters are likely to become milder. However, considering the geographical location, healthcare system, and infrastructure of the Netherlands, we expect these effects to have only a limited impact.

Climate change and the energy transition can disrupt our *ability to serve our customers,* for example, through incidents such as prolonged power outages. Our business continuity plans include measures for weather-related risks and power interruptions. Our IT systems, processes, and policies enable employees to work anytime and anywhere, and strategic choices in IT and infrastructure outsourcing take these risks into account. Therefore, this risk is considered low.

Regarding *strategic risks*, our analysis indicates that we will likely need to gradually adjust our strategy and policies, such as underwriting and investment strategies, to serve our customers in a socially responsible manner, in order to seize opportunities and achieve our climate transition goals. In extreme scenarios, we may, like other insurers, be forced to make difficult choices to reduce exposure to climate-related risks and thereby secure our future resilience. This raises the question of whether our position relative to other insurers will change. Overall, the strategic impact of climate change is currently assessed as a low risk.

We face *reputational risks* if we fail to achieve our climate transition goals or if our policies deviate negatively from industry standards. Additionally, activities by climate activist groups may present challenges. Our sustainability strategy, Climate Transition Plan, and the integration of climate change mitigation into our governance and risk management highlight our commitment to this issue. This enables us to comply with relevant legislation and reduces the likelihood of negative media attention or lawsuits. We consider this risk to be low.

POTENTIAL FINANCIAL IMPACT ON THE MOST CLIMATE-SENSITIVE ACTIVITIES OF ACHMEA

	Potential financial impact		Short term (0-1 year)	Medium term (1-10 year)	Long term (> 10 year)
Insurance and Services	Non-life insurance (including greenhouses)	Physical risks	The impact of natural disasters is limited by own retention and other conditions in the reinsurance program.	The financial results may become increasingly volatile due to more frequent and severe climate-related events and a higher own retention. Uncertainty and potential volatility may increase in the long term. Reinsurance contracts are renewed annually, taking into account the latest developments in climate change. This may lead to premium adjustments in response to trends in the reinsurance market and claims development.	
		Transition risks	Insuring objects that support the transition is still limited. Controlled growth in underwriting. Impact is limited.	The potential impact on and volatility of the financial results may temporarily increase due to new risks associated with new products that have not yet been fully priced. Controlled growth in underwriting is based on ESG policy. This is limited by the annual adjustment of (reinsurance) contracts and premiums.	
Investments and financing	Corporate investments	Physical risks	Limited impact due to diversification. Also limited by emphasizing climate policy at the companies in which we invest through engagement and voting at shareholder meetings.	Uncertainty and volatility of the financial results are expected to increase in the long term. The impact is mitigated by diversification and a liquid portfolio, which allows for quick adjustments to new developments. The impact is also limited through engagement and voting at shareholder meetings	
		Transition risks	Limited impact due to a lack of global political consensus on climate-related policy. Broad diversification and a liquid portfolio allow for quick responses to new developments. Use of ESG monitoring, engagement, and exclusion.	Minor impact, but uncertainty and volatility are increasing. Broad diversification and a liquid portfolio allow for quick adjustments to new developments. Use of ESG monitoring, engagement, and exclusion.	Uncertainty and volatility of the financial results are increasing due to efforts to accelerate the transition to 'net zero.' 'Stranded assets' are a point of concern. Broad diversification and a liquid portfolio allow for quick adjustments to new developments. Use of ESG monitoring, engagement, and exclusion.
	Investment property and mortgages	Physical risks	Limited impact because only a small portion of the portfolio recognizes a stacked risk of foundation issues (such as pile rot and subsidence) and water-related problems.	Limited impact, but the uncertainty regarding the potential effects of climate change is increasing. The long-term impact may rise due to flooding risks, where 'stranded assets' are a concern for specific locations.	
		Transition risks	Limited impact due to efforts to improve energy labels in accordance with the Climate Transition Plan. (Balanced) distribution of the mortgage portfolio across energy labels.	Limited impact due to efforts to improve energy labels and make the portfolio more sustainable. However, the uncertainty regarding value development is increasing, also due to possible (new) legislation.	

ENVIRONMENTAL – CLIMATE CHANGE

QUANTITATIVE RISK ANALYSIS CLIMATE CHANGE

We are developing long-term scenarios for climate change focused on the most climate-sensitive risks. This process is still in the development phase, with gradual progress being made each year. The first preliminary calculations for investments and financing are included in Annex C (Tables 15 to 20).

INSURANCE AND SERVICES

As an insurer, we can support the mitigation of and adaptation to climate change. Our insurance activities contribute to greenhouse gas emissions by insuring companies and assets that cause these emissions. At the same time, we also see opportunities to create a positive impact. By insuring new technologies, we can facilitate the energy transition, for example. Additionally, we can advise customers on managing climate-related risks.

We have an impact with our insurance activities, particularly in non-life and health insurance, through the greenhouse gas emissions of our customers and business partners, such as damage repair companies and healthcare providers. In the Netherlands, we have a large portfolio of retail car and home insurance, a portfolio of property insurance for businesses, and a significant market share in agricultural insurance. In Türkiye, we are active in insurance within the energy sector. We also insure renewable energy projects such as solar parks and wind farms. Additionally, we are a major health insurer in the Netherlands and Greece, where the healthcare sector has a significant share in CO_2 emissions.

The transition to a CO_2 neutral society poses a challenge to our vision of inclusivity and solidarity and may potentially conflict with our cooperative values. Nevertheless, we are committed to facilitating a just transition to a sustainable future that is fair and inclusive. The negative environmental impacts in the value chain of non-life and health insurance are an integral part of our business model and are expected to persist unless we actively promote energy efficiency and support the transition to renewable energy sources.

By insuring activities that make a positive contribution to climate mitigation, we can help our customers and partners reduce their CO_2 emissions. Through active engagement, we support our customers in making sustainable choices and offer services to mitigate risks. For example, we encourage repairs instead of replacements to minimise environmental impact. In healthcare, we have joined the Dutch Green Deal Sustainable Healthcare , creating opportunities to influence the sector toward sustainability. We expect that the positive effects of our initiatives to reduce CO_2 emissions will gradually become visible in the coming years.

Climate change also poses risks to our insurance portfolio, particularly our non-life portfolio. Climate change can lead to more claims due to more frequent and severe weather events. Additionally, the phase-out of high-emission assets by our customers may result in a decline in revenue, as these assets will no longer need to be insured. Reinsurance may also become more difficult and expensive. Insuring new sustainable solutions, such as wooden construction and energy storage, carries risks that could lead to inadequate pricing. Furthermore, insuring activities with high CO_2 emissions may become part of societal debate, which brings reputational risks.

Additionally, we see opportunities related to climate change. We can develop new products and services aimed at the energy transition and climate resilience, thereby strengthening our reputation and brand value to attract new customers. Furthermore, we can create insurance coverage focused on mitigating the impacts of climate change.

A. NON-LIFE INSURANCE

Our non-life insurance portfolio consists of insurance for individuals and businesses (commercial portfolio).

CLIMATE TRANSITION PLAN

Our strategy focuses on supporting a just transition to a resilient economy with 'net zero' emissions. We offer insurance products and services that help customers reduce their CO_2 footprint and protect themselves against damages resulting from climate-related events. Our climate mitigation strategy aims to promote a sustainable society in collaboration with customers, distribution partners, and policymakers.

Our ambition is to achieve a 'net zero' insurance portfolio for all our insurance activities by 2050. To this end, we have started measuring the emissions of a portion of our insurance portfolios to establish a baseline for setting goals and developing action plans. We insure renewable energy projects, such as solar parks and wind farms. Union participates in the Slovak Nuclear Risk Pool, which provides coverage for nuclear-related risks, especially in electricity generation, which now dominates the energy supply following the closure of thermal power plants. Additionally, Union participates in an insurance agreement for the risks of Vodohospodárska výstavba, an entity that operates hydropower plants in Slovakia, including coverage for the Gabčíkovo Hydropower Plant, one of the largest in the country.

In Türkiye, Eureko Sigorta aims to increase its share in the renewable energy sector. Although the capacity for renewable energy, particularly in solar and wind energy, is growing rapidly, the country is still significantly dependent on coal-fired power plants for its energy supply. In 2023, we decided not to insure any new coal plants and to gradually reduce our exposure to this sector, committing to fully phase it out by 2040 at the latest. For existing customers, an annual assessment is conducted for new insured objects based on

ENVIRONMENTAL – CLIMATE CHANGE

sustainability criteria for underwriting. In the meantime, we strive to expand our portfolio in renewable energy. We do not insure coal production or coal plants in other countries.

By providing insurance, we aim to help customers adapt to the social and environmental impacts of climate change while simultaneously protecting them from the financial consequences of climate-related damage. We support our customers in this adaptation by promoting and offering adaptive products and services. Examples include the use of tempered glass in greenhouse horticulture and the installation of green roofs.

Safety and prevention are also crucial for new technologies in the energy transition, including wooden construction, solar panels, hydrogen, biogas, charging stations, and electricity storage. We aim to make these new technologies insurable. Our solutions include insuring electric vehicles and sustainable home improvements, such as solar panels and heat pumps. In the Netherlands, we also provide information and advice to help customers make their homes and commercial properties more sustainable. Additionally, we support Homeowners' Associations (VvE's) in improving the sustainability of their apartment complexes through advisory and execution services.

As climate change increases the likelihood of extreme rainfall and flooding, the insurability of flood risks is a key component of our approach. Since 2021, we have offered insurance coverage in the Netherlands for damage caused by flooding due to the failure of non-primary water defences for retail customers, and since 2022, also for business customers. Additionally, we advise customers on implementing adaptation measures.

To be classified as a sustainable insurance contract under the EU Taxonomy, we must meet specific technical screening criteria and adhere to the principles of 'Do No Significant Harm' and minimum safeguards. In 2025, we aim to conduct an analysis of the portion of our non-life insurance portfolio that qualifies for alignment with the EU Taxonomy, to assess whether it is feasible to demonstrably meet these criteria. The analysis will focus on the product itself, the proposition, and the underlying process. Currently, we cannot demonstrate compliance with the aforementioned criteria. Therefore, the portion of the insurance premium that complies with the EU Taxonomy is currently set at zero. For more information, please refer to the chapter Environment - Taxonomy Information.

Senior management of the responsible division or subsidiary oversees the implementation of the policies and actions for our strategy.

MANAGEMENT OF CLIMATE-RELATED RISKS

In our non-life insurance portfolio, we identify both physical risks and climate-related transition risks. To gain insight into the impact of long-term trends in climate change on our products, we have performed a qualitative analysis, the results of which are shown in the table on the next page. The conclusion is that, among the trends in weather-related risks, the expected increase in hail risk will have the greatest impact on the Dutch non-life insurance portfolio.

Physical risks

For our non-life insurance activities, we distinguish between the volatility of weather-related risks and emerging trends. Climate change is expected to increase the frequency and severity of extreme weather events, although we cannot predict the extent and timing of these changes. In the long term, rising sea levels may increase flooding risks. Based on our assessment, we anticipate heavier thunderstorms, extreme rainfall, hail, and prolonged droughts in the Netherlands. A global slowdown of low-pressure systems may also lead to local flooding. Although we have not observed a clear trend in Achmea's claims data over the past 25 years, we expect an upward trend in claims related to extreme summer weather, particularly for both residential and commercial insurance, as well as greenhouse horticulture (buildings and crops).

In the Netherlands, the flooding risks from primary water defences (dikes or dunes that provide protection against the sea, large inland waterways or major rivers) are excluded from building and contents insurance but are covered under hull insurance for motor vehicles. The adaptive measures taken by the Dutch government as part of the Delta Program reduce the flooding risk. Overall, this means that climate change is not expected to severely impact flooding risks in the coming decades, but it is more challenging to estimate the impact in the second half of this century. The consequences of drought, such as a decline in groundwater levels or land subsidence, are not covered under property and contents insurance, and at the same time, it is difficult for owners to mitigate these issues.

Longer periods of drought in Greece, Türkiye, and Australia are increasing the risk of wildfires. The flooding risk in these areas, as well as in Slovakia, is expected to rise due to the anticipated increase in extreme rainfall. The impact of climate

ENVIRONMENTAL – CLIMATE CHANGE

QUALITATIVE ASSESSMENT OF THE PHYSICAL RISKS OF NON-LIFE INSURANCE (BASED ON A COMBINATION OF EXPECTED CLAIMS AND EXTREME SCENARIOS)

RISKS	LONG TERM TREND	VULNERABILITY								
		Home	Vehicle	Recreational crafts	Business building/contest	Business interruption	Greenhouse industry	Greenhouse industry crops	Outdoor crops	Transport
Winter storms	=	***	**	*	***	**	**	**	*	**
Summer storms	⇧	**	*	*	**	*	**	**	*	*
Lightning	⇧/=	*	*	0	**	**	*	*	-	*
Hail	⇧/=	**	***	*	**	*	***	***	***	*
Precipitation	⇧	**	*	0	*	*	0	0	-	*
Flooding: primary	⇧/=	-	**	*	-	-	-	-	-	*
Flooding: non-primary	⇧/=	**	*	*	**	-	**	-	-	*
Snow/Frost	⇩	*	*	*	**	**	***	***	-	*
Drought	⇧	-	-	-	-	-	-	-	-	*
Wildfire	⇧	*	*	0	*	*	*	*	*	0

⇧ Increase of risk
⇩ Decrease of risk
= equal risk of neutral

*** Highly sensitive
** Moderately sensitive
* Lightly sensitive

0 Not sensitive
- Not covered

OUTCOMES OF THE QUANTITATIVE ASSESSMENT OF PHYSICAL RISKS IN NON-LIFE INSURANCE

For our Dutch non-life portfolio, we conduct quantitative long-term scenario analyses to gain insight into the potential effects of climate change. This is reported in our annual ORSA. The ORSA also provides insight into the short-term impact of natural disasters on the non-life insurance activities within our group. Various scenarios have been calculated for extreme weather conditions. Among the expected developments in weather risk as forecasted by the KNMI, the anticipated increase in hail risk is likely to have the greatest impact on the Dutch non-life insurance portfolio. Based on an analysis of the current claims data in the internal model, we conclude that a large portion of the current claims costs arises from non-weather-related causes rather than weather-related causes such as windstorms, hail, and flooding. For example, approximately 70% of the total claims for buildings and contents come from non-weather-related causes such as fire and burglary. About 20% of the claims are related to winter storms, which, according to the KNMI, are largely insensitive to climate change. Our historical portfolio data shows that only about 10% of the claims are sensitive to other weather-related causes that are often associated with thunderstorms (extreme precipitation, hail, strong wind gusts). These weather-related causes may be sensitive to climate change. Moreover, the proportion of weather-related damage is greater in greenhouse horticulture. For weather-related causes such as storms, rain, and hail, the most likely scenario is the Representative Concentration Pathways (RCP) 4.5 scenario (an increase of nearly 3°C by 2100), and the worst-case scenario is the RCP 8.5 scenario (an increase of nearly 5°C by 2100). An indicative calculation of the higher damage under these scenarios has been made, based on insights from a scientific publication on storm and hail scenarios in the 21st century. We use the midpoint of the range where claims are projected to be 30% higher for the RCP 4.5 scenario and 60% higher for the RCP 8.5 scenario. The results suggest that the increase in damage for fire insurance and motor vehicle comprehensive insurance will remain relatively small (Radler, et al. (2019)). The increase will be significantly larger for hail insurance and insurance for greenhouse horticulture, but in the latter case, laminated glass provides very effective protection against small and medium-sized hailstones. For non-Dutch insurance portfolios, we have not yet analysed the long-term scenarios, but we plan to conduct similar analyses for these portfolios in 2025. For the qualitative assessment, the various vulnerabilities were not evaluated individually but in relation to each other. The portfolios with high scores are more sensitive to the described vulnerabilities.

TABLE 1: PREMIUM INCOME FROM INSURED COMPANIES ACTIVE IN SPECIFIC SECTORS

(€ mln)

REVENUES FROM INSURANCE-RELATED SERVICES	2024
Fossil fuel industry	2
Sectors with a high climate impact	1.006

The amounts in the graph above are based on specific NACE codes. For the fossil fuel industry, these are NACE codes B5.1-B6.2, B8.9.2, B9.1, C19.1-C19.2, C20.1.1, C28.9.2, D35.2, F43.1.3, H49.5. For sectors with high climate impact, the NACE sectors range from A to H and L. The analysis was conducted excluding Greece and includes 79% of the revenue from insurance-related services of the Dutch non-life insurance portfolio for commercial customers. No information at the NACE code level is available for the remaining portion of the portfolio. The revenue from insurance-related services for commercial customers active in the fossil industry primarily comes from Eureko Sigorta customers in Türkiye. The revenue from commercial customers active in sectors with high climate impact is 80% from the Netherlands and 19% from Türkiye. Labelling entire sectors as high climate impact overlooks the fact that a transition may have already taken place within a sector. For example, in greenhouse horticulture (NACE code A), part of the heating supply comes from geothermal energy, and farmers and growers who operate sustainably or extensively are included. Their climate impact is relatively limited.

these storms will become slower and wetter, leading to higher claims. Severe cyclones may become more intense, which could affect the coverage provided by Achmea Farm Insurance in Australia.

Through our regular insurance processes and our Sustainability Program, we manage climate adaptation risks by promoting prevention, adjusting premiums where necessary, and maintaining an effective reinsurance program. We also invest in research and development by conducting studies, partly in collaboration with universities, to gain insight into the physical effects of climate change.

Transition risk
In the transition to a low-carbon economy, fossil fuel-based systems are gradually being replaced by new green energy technologies, leading to changes in the energy market and the nature of the insured assets. This transition may include the adoption of solar panels and heat pumps, but it also introduces new risks, such as the potential fire hazards of electric vehicles, solar panels, and batteries. As a result, the composition of our portfolio may also change, as certain insurance coverages may no longer be necessary in a low-carbon economy. In the short term, we assess the risk as limited, but in the long term, the uncertainty and volatility of claims are expected to increase. We regularly evaluate whether these developments necessitate adjustments to our insurance terms, premiums, and underwriting policies.

Policy

Applicable regulations and commitments
We are signatories of the Principles for Sustainable Insurance (PSI). By signing the PSI, we have committed to integrating ESG topics into our decision-making and collaborating with customers and partners to raise awareness, manage risks, and develop sustainable solutions. Additionally, we work together with governments, regulators, and key stakeholders to promote collective action on ESG issues, including through the Forum for Insurance Transition to Net Zero (FIT) and the Dutch Association of Insurers. Through these commitments, partnerships, and our underwriting and product development policies, we can contribute to both mitigating climate change and adapting to its impacts.

ESG underwriting policy for commercial clients
We strive to facilitate the transition to a sustainable economy through our insurance activities. Our ESG underwriting policy for our Dutch operations is one of the tools we use to achieve our sustainability objectives. This policy, established in 2024, focuses on new contracts, with plans to extend its application to existing customers in the future. The policy specifies the activities that are excluded from coverage and describes our due diligence process regarding ESG. We are committed to supporting our customers' transition to net zero. We do this, for example, by sharing our expertise in research and pilots on innovations, such as applications of green hydrogen, and by analysing the risk factors. However, we explicitly exclude certain activities that we consider incompatible with our values, including new insurance coverage related to coal and oil or gas extraction in vulnerable environments.

Furthermore, we refrain from insuring companies in the oil and gas sector that do not have credible climate transition plans, although we continue to offer insurance products such as health insurance, pension schemes, and disability insurance for the employees of such companies. A shortened version of the policy is available on our website (Achmea ESG underwriting statement).

Product Approval and Review Process-policy (PARP)
The PARP policy includes criteria to assess whether products and services align with environmental and social objectives and comply with relevant legislation such as the EU Taxonomy and the Transparency Directive. Existing products are periodically reviewed under this policy. When classifying products as sustainable, compliance with the PARP policy is required. More information is included in the chapter Access to (quality) information.

Actions

Engagement
Engaging with retail and business customers, along with other stakeholders, is an important part of our strategy. Our goal is to have an engagement strategy in place for 25% of our commercial portfolio by the end of 2025, starting with the agricultural sector. By 2030 at the latest, this strategy will be expanded to cover 50% of our commercial portfolio. In 2024, we initiated a process, together with a working group from Vereniging Achmea, to explore how best to collaborate with our customers to achieve climate ambitions and make the commercial portfolio more sustainable. We have developed a preliminary version of our engagement strategy. This strategy outlines how we can influence our business customers and support them in their transition and strategic objectives. In 2025, we will develop a monitoring method to track progress for each customer. Additionally, we aim to raise awareness among our customers. This is part of the ongoing communication of our brands through newsletters, including sending weather alerts to our customers to prevent damage from climate-related events. In 2024, we included extensive information on climate-conscious living on the Centraal Beheer website in the Netherlands. With this, we aim to make people aware of the impacts that climate change can have on homes and gardens, and we provide solutions and tips for implementing climate adaptation measures.

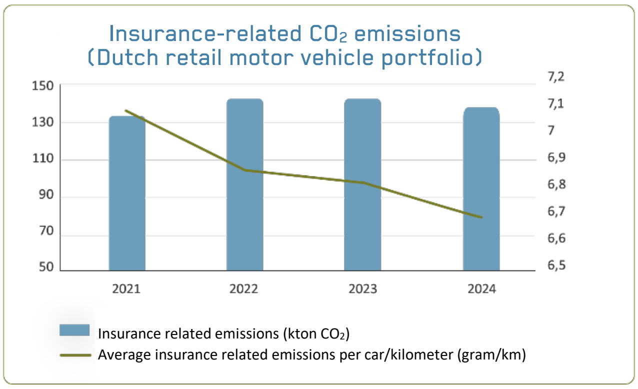
Through the Dutch Association of Insurers, we are actively engaging with the Dutch government regarding the insurability of flood risks. While no public-private insurance solution for flooding from primary water defences is being pursued, the government acknowledges a potential role for insurers in handling damage under the Disaster Compensation Act (Wts). We expect that further explorations with multiple ministries and the Dutch Association of Insurers will yield results in 2025.

As a member of the Forum for Insurance Transition to Net Zero (FIT), we have contributed to the guidelines in a document on transition planning, which was published during COP29, and provided feedback on the draft standard of the Science Based Targets initiative (SBTi) for financial institutions.

Insurance related emissions

In 2023, we began reporting on the insurance-related emissions of our Dutch retail motor vehicle insurance portfolio. This accounts for approximately 24% of insurance-related revenues in 2024. We have also set a target to reduce the average emissions per kilometer of an insured vehicle by 15-20% by the end of 2030 compared to 2021 for our Dutch retail motor insurance portfolio.

In the transition of the mobility sector, we are heavily dependent on government policies and measures. We have aligned our target for our motor vehicle insurance portfolio with the emission reduction targets established by the Netherlands Environmental Assessment Agency (PBL) for 2030, which are based on the established and planned EU and national climate policies. Both EU and Dutch climate policy aim to limit global warming to below 1.5°C, which translates to a 55% reduction in emissions by 2030 compared to 1990 levels, with the goal of achieving net zero by 2050. We believe our target for 2030 is in line with these objectives. Measures such as requiring all new cars to be emission-free by 2035 and increasing the blending ratio of biofuels are expected to make a significant contribution to emission reductions. However, achieving climate goals in the Netherlands for 2030 and beyond faces challenges due to changes in government policy.



As shown in the figure, the absolute insurance-related emissions increased in 2022 and thereafter. This was due to an increase in the number of kilometers driven following the end of the COVID-19 crisis. The average emissions have shown a steady decline since 2021, partly due to the larger share of electric vehicles in our portfolio. This amounts to a reduction of 5.6% compared to the baseline year 2021 for our Dutch operations.

In 2024, our non-Dutch subsidiaries began measuring the emissions associated with the retail motor vehicle insurance portfolio. Although we have not yet established a reduction target for these portfolios, we aim to increase the share of electric vehicles (EVs) in line with the growing market trends for EVs in these countries. For example, Eureko Sigorta has taken several actions to enhance its offering of retail motor insurance. They have launched insurance products specifically for electric vehicles. They also collaborated with Garanti Bank to offer loans and insurance for electric vehicles manufactured by Togg, the market leader in the Turkish EV market. Additionally, a partnership has been established with Vestel, providing a 40% discount on chargers for our customers with electric vehicles. By focusing on these initiatives, we aim to reduce the greenhouse gas emissions associated with our retail motor vehicle insurance portfolios.

In 2024, we conducted a test to measure the insurance-related emissions of our Dutch business portfolios. Together with other Dutch insurers, we worked on a methodology for measuring the emissions associated with home insurance and began testing this methodology. Our goal is to accelerate the development of an international standard for home insurance. We also shared this work with the Partnership for Carbon Accounting Financials (PCAF). Additionally, we participated in PCAF's efforts to develop a standard for reinsurance and project insurance. Once the measurements are established, we can explore the setting of interim targets.

Building knowledge about climate-related risks.

We have established a Sustainability Platform, a centralized knowledge center for sustainability within our non-life insurance sector, to assess new risks and contribute to making the sustainability transition insurable. It is important to gain deeper insights into the risks associated with various non-life insurance products. We have taken various actions to better understand these risks, including collaboration with the Institute for Environmental Studies at Vrije Universiteit Amsterdam on research related to climate-related risks. We also recognize the need to deepen our understanding of the risks associated with greenhouse horticulture insurance. We regularly conduct research to better understand these risks, such as the work of climate experts on vulnerability functions for various disaster scenarios.

ESG due diligence on corporate client acceptance

Based on the ESG underwriting policy established in 2024, we plan to implement an ESG risk assessment in our underwriting process for our Dutch operations in 2025, with a focus on

ENVIRONMENTAL – CLIMATE CHANGE

TABLE 2: INSURANCE RELATED EMISSIONS NON-LIFE INSURANCE

EMISSION CATEGORY	CO_2 EMISSION 2024 (KTON CO_2)	CO_2 EMISSION 2023 (KTON CO_2)	CO_2 EMISSION IN BASE YEAR[1] (KTON CO_2)	YEAR COMPARED TO BASE YEAR %	COMPARED TO LAST YEAR %	TARGET
Retail motor insurance portfolio						
Netherlands	139.9	142.4	136.0	3%	-2%	Net zero in 2050
Greece	93.1	95.8	95.8	-3%	-3%	Net zero in 2050
Slovakia	19.3	21.4	21.4	-10%	-10%	Net zero in 2050
Türkiye	2.8	3.0	3.0	-7%	-7%	Net zero in 2050
Total	**255.1**	**262.6**	**- [1]**	**-**	**-3%**	

For the Netherlands, the baseline year is 2021. For the international subsidiaries, the baseline year is 2023, as it is the first year of calculation. Due to the different years, we have not included a total column.

METHODOLOGY/SCOPE More details about our measurement methodology, sources used, key assumptions, and the scope of the calculation are included in Annex C (explanation for Tables 10, 11, and 12). The definitions of the indicators used are included in Appendix B. Glossary.

The weighted average PCAF data quality score for the above portfolios is 2.1.

commercial insurance. This assessment, based on a list of excluded activities or a company's stance on ESG, may lead to the rejection of insurance applications. We have also established an ESG Underwriting Committee responsible for the ESG underwriting policy in the Netherlands. The ESG Underwriting Committee oversees the application of ESG requirements in the underwriting process and plays a decisive role in the acceptance of companies as part of the ESG due diligence process.

Metrics and targets

The majority of the emissions come from the Dutch portfolio. The CO_2 emissions of this portfolio in 2024 have decreased by 2% compared to 2023. The main reason for this is the growth in the relative number of CO_2-efficient vehicles in the portfolio. This decrease is tempered in the calculation by an increase in the number of insured vehicles.

Similar developments can be observed in the portfolios of the other countries. In Slovakia, these developments are reinforced by a decrease in the number of insured vehicles, while in Türkiye, they are influenced by a reduction in the average number of days a vehicle was insured.

For the Dutch retail motor insurance portfolio, the CO_2 emissions in the base year (2021) have also been calculated. Compared to the base year, emissions have increased by 3% in 2024. The main reason for this is the growth in the size of the portfolio and an increase in the average number of kilometres driven since corona, offset by a more CO_2 efficient portfolio.

B. Health insurance

The healthcare sector in the Netherlands makes a significant contribution to greenhouse gas emissions. Greenhouse gas emissions arise, for example, from energy consumption in healthcare real estate, from the transportation of patients, and from the production and distribution of healthcare products and medications. The Dutch healthcare sector is responsible for approximately 7% of CO_2 emissions in the Netherlands. As part of the Green Deal Sustainable Healthcare 3.0, targets have been set for improving health, reducing greenhouse gas emissions, and minimising the use of resources. For more information, see the text box on the next page.

Climate transition plan

We are the largest healthcare insurer in the Netherlands and also offer health insurance in Greece, Türkiye, and Slovakia. In line with our vision of 'Sustainable Living Together,' we aim to make sustainable solutions accessible to our customers. One of our four main focus areas is Health closer to home. As a health insurer, we are responsible for financing and organizing healthcare and working to improve people's health.

We are committed to sustainable healthcare, and we believe that a healthy planet is essential for healthy aging. In this context, we have signed the Green Deal Sustainable Healthcare 3.0, which is an integral part of our strategy. The Green Deal Sustainable Healthcare 3.0 is a specific agreement that is in effect in the Netherlands. For our international operations, where our market shares in those countries are smaller than in the Netherlands, our overall strategy aligns with the health insurance sector in those countries, taking into account the local context. Based on developments within the healthcare sector and in collaboration with other stakeholders in the value chain in that specific country, we will adjust our policies and measures as necessary.

The emissions associated with our health insurance are primarily linked to the healthcare value chain through the procurement of healthcare services for our insured. Incorporating sustainability criteria into our procurement

ENVIRONMENTAL – CLIMATE CHANGE

Dutch Green Deal Sustainable Healthcare 3.0 (GDDZ 3.0)

Green Deals are agreements between the Dutch government and other partners for the implementation of sustainability plans. The 'Green Deal Working together towards sustainable healthcare' is facilitated by the Ministry of Health, Welfare and Sport and is supported by the healthcare sector. Given the generally perceived urgency and the intrinsic belief that the healthcare sector must and can become more sustainable, several healthcare organisations, including our health insurers in the Netherlands, collaborated in 2022 to create a new Dutch Green Deal (Dutch Green Deal Sustainable Healthcare 3.0, GDDZ 3.0).

The participants in the GDDZ 3.0 commit to the following objectives to achieve sustainable healthcare:

1. A greater focus on the promotion of health among patients/clients, both at home and in and around their own healthcare locations, in terms of environment, food, and lifestyle, as well as a greater focus on the promotion of health among employees in healthcare, to keep them in good health for longer.
2. Raise awareness and understanding of the impact of healthcare on the climate and environment, as well as the impact of climate and environment on health among (prospective) healthcare professionals, patients/clients, and within society.
3. 55% reduction in CO_2 emissions by 2030 compared to 2018 and net zero by 2050.
4. 50% reduction in consumption of primary raw materials by 2030 compared to 2016 and maximum circular healthcare by 2050.
5. Reducing the environmental harm by (the use of) medication.

The GDDZ 3.0, which is in line with the Paris Agreement, has been developed in consultation with stakeholders and is signed by industry associations in healthcare and individual health insurers. Healthcare providers are responsible for making their organisations more sustainable, but health insurers encourage this through their healthcare purchasing practices and by sharing and promoting examples of how improvements can be made. More information about the GDDZ 3.0 is available online.

contracts is therefore a cornerstone of our strategy. We aim to reduce the climate impact of the healthcare sector by contributing to the sustainability of healthcare real estate, including improvements in energy efficiency and the transition to renewable energy sources. One of the focal points of the Green Deal Sustainable Healthcare 3.0 is to raise awareness about the impact of healthcare on the climate and environment, as well as the effects of climate change on the health of healthcare professionals, patients, and society as a whole. By working together with our customers, we can contribute to the reduction of greenhouse gas emissions.

Within Zilveren Kruis, the Sustainability Team collaborates on various initiatives within the ZN framework to make healthcare more sustainable as part of the Green Deal. Senior management of our Dutch healthcare division oversees the implementation of policies and actions related to our strategy for the Netherlands.

MANAGING CLIMATE RELATED RISKS

Our healthcare portfolio is exposed to both physical and transition climate-related risks. For more information, please see the section Resilience analysis climate change.

Policy

Applicable regulations and commitments

We aim to reduce our environmental impact and promote sustainability in healthcare, thereby contributing to combating climate change. To achieve this, we have developed a set of policies in collaboration with other Dutch health insurers that focus on reducing CO_2 emissions. Our three main priorities are the sustainability of healthcare real estate, promoting sustainable mobility, and identifying and addressing other CO_2 hotspots in the healthcare sector.

We will engage with various sectors to determine the most impactful sustainability actions for CO_2 reduction. As part of the Green Deal, a monitoring system will be established by industry stakeholders to track greenhouse gas emissions, which will provide insights into the sustainability outcomes of the healthcare sector and generate input for further actions and improvements. By implementing this policy and collaborating with our stakeholders, we believe we can make a meaningful and positive impact on the environment.

Own policy

We aim to encourage healthcare providers and suppliers to become more sustainable through healthcare purchasing and contracting. In accordance with the agreements in the Green Deal Sustainable Healthcare 3.0 and the sectoral implementation plans, the objectives of the Green Deal Sustainable Healthcare 3.0 related to climate change have been incorporated into the healthcare purchasing policy of our health insurers for 2025.

Actions

In line with our focus on improving the sustainability of healthcare real estate, we have stimulated the development and implementation of CO_2 roadmaps, including strategic real estate plans, for healthcare providers in the Netherlands with more than 250 employees. In the future, we plan to encourage healthcare providers to reduce their CO_2 emissions through our healthcare purchasing policy and to create a framework for future-proof healthcare real estate. These measures will contribute to the sustainability of the healthcare sector and reduce the impact on the environment.

Regarding our focus on sustainable mobility, we have incorporated CO_2 emissions into our contracts for patient transportation. In 2024, Zilveren Kruis signed a new multi-year contract with Zorgvervoercentrale Nederland (ZCN), which includes concrete agreements on the use of emission-free vehicles. More than half of the trips are expected to be electric by 2025. In the future, we will ask healthcare providers with more than 100 employees to develop mobility plans aimed at reducing CO_2 emissions, and we will continue to consider CO_2 emissions when contracting patient transportation services. These measures promote sustainable mobility and reduce our CO_2 footprint.

To strengthen our focus on identifying and addressing other CO_2 hotspots, Stichting Stimular contributed in 2024, on behalf of Zorgverzekeraars Nederland, to estimating the CO_2 emissions in the Dutch healthcare sector. This initial guiding measurement will likely be enriched with additional insights in the future. Based on this, we have a reasonably good understanding of the Scope 1 and 2 emissions of healthcare providers. We will use this information to further refine our measures in 2025. It is expected that our understanding of Scope 3 emissions will also increase in the coming years, potentially revealing additional CO_2 hotspots. As we gain more insights, it is important to evaluate our efforts in mitigating these hotspots to promote sustainability in the healthcare sector.

Metrics and targets

The Green Deal Sustainable Healthcare 3.0 has set a short-term target for the sector to achieve a 30% reduction in CO_2 emissions for real estate and energy by the end of 2026, compared to the baseline year 2018. Achieving this goal will help realize the overall objective of a 55% reduction by 2030 and net zero by 2050 in the Netherlands. This target applies to healthcare institutions with more than 250 employees, which have been asked to develop a CO_2 roadmap, including a real estate management plan, and submit it to the Expertise Center for Sustainability in Healthcare. The target includes emissions from real estate and energy, as well as the mobility of employees, patients, and visitors. Although we currently do not have an established baseline measurement for healthcare activities, our contribution under the Green Deal Sustainable Healthcare 3.0 aligns with the Paris Agreement.

We are currently in discussions with Zorgverzekeraars Nederland to determine the best methods for monitoring the progress and outcomes of our efforts in our Dutch health insurance activities. Until then, we rely on various independent studies to understand the CO_2 footprint of our healthcare procurement.

INVESTMENTS AND FINANCING

Our investment portfolio mainly consists of corporate investments, government bonds, mortgages, and investment property. Please see Note 5. Investment property and Note 6. Investments in the Consolidated Financial Statements for more information on the composition of our investment portfolio.

Description of material impacts, risks, and opportunities

The material environmental impact of our financing and investments is both positive and negative. Additionally, we have determined that climate change can pose significant risks but also offers opportunities. This conclusion has primarily been reached based on the judgment of subject matter experts regarding the impact, while risks have been assessed based on a combination of quantitative analyses and expert judgment. Please also refer to the section Resilience analysis climate change.

TABLE 3: SCOPING INSURANCE-RELATED EMISSIONS IN HEALTH INSURANCE

INCOME FROM INSURANCE RELATED SERVICES (€ MLN)	2024	
Total health	18,556	100%
In scope CO_2 emission calculation (Segment Health Netherlands)	17,649	95%

TABLE 4: INSURANCE RELATED HEALTH EMISSIONS

	CO_2 -EMISSIONS (KTON)	PCAF DATA QUALITY SCORE
Long term care (Wlz)	602	3.0
Basis and supplementary health insurance (Zvw)	1,795	2.6
Total	**2,397**	

METHODOLOGY/SCOPE More details about our measurement methodology, sources used, key assumptions, and the scope of the calculation are included in Annex C (explanation for Tables 13 and 14). The definitions of the indicators used are included in Appendix B. Glossary.

ENVIRONMENTAL – CLIMATE CHANGE

The greenhouse gas emissions from the companies in which we invest contribute to an increase in global temperatures, leading to climate change. Urgent action is needed to address these issues. Through our corporate investments, government bonds, investment property, and mortgages, we finance sectors that cause greenhouse gas emissions. Conversely, through our impact investments, we can contribute to the energy transition. Our international operations, which primarily hold investments in corporate and government bonds, contribute to a negative impact on the environment through these investments.

Additionally, we face financial risks due to environmental legislation, which can have adverse effects on the value of our investments. Stricter regulations may lead to higher operational costs, reduced profitability, and reputational damage. Companies with high emissions are likely to be subject to CO_2 pricing mechanisms that could further increase costs. Moreover, the risk of 'stranded assets' is significant in high-emission sectors, such as fossil fuels. Our investments are also exposed to physical climate-related risks.

Our strategy on this topic

As a major financial service provider, institutional investor, mortgage lender, and asset manager, we aim to support national and international climate goals. In line with our vision of 'Sustainable Living Together,' we seek to reduce our financed emissions and facilitate the energy transition. We have the ambition to achieve 'net zero' for our corporate investments by 2040 and for all other asset classes by 2050. We intend to achieve this through active shareholder engagement and gradually divesting from investments that do not align with our objectives. Another way to decarbonize our portfolio and achieve a positive impact in the real world is through impact investments. Achieving the goals of the Paris Agreement requires a global transition to renewable energy and substantial investments in sustainable infrastructure and real estate. We have the ambition to invest at least 10% of our own risk investments in impact investments by the end of 2025 (8.1% by the end of 2024). These are investments that aim to generate positive, measurable social or environmental effects alongside a financial return. This includes, with a focus on climate effects, investments in green bonds, renewable energy infrastructure, and sustainable real estate, among others.

Investing in the energy transition

Achieving the goals of the Paris Agreement requires significant investments in sustainable infrastructure, particularly in renewable energy. We aim to have at least 35% of our infrastructure investments, amounting to approximately € 60 million as of 31 December 2024, allocated to wind and solar energy projects. Achmea offers institutional clients solutions such as the Achmea Investment Management Climate Infrastructure Fund, which aims to make a positive contribution to the energy transition in Europe through a diversified portfolio, including wind farms, solar energy, and energy storage. In 2024, the fund made three new investments, including solar energy projects in Portugal and Spain, and an energy storage project in Germany. Currently, we do not measure the avoided CO_2 emissions for this portfolio due to a lack of data, but we intend to explore opportunities for this in 2025. In the coming years, we will continue to work on this.

We measure the CO_2 footprint of most of our investments and loans, set reduction targets, and develop action plans. We prioritise the most relevant investments based on the guidelines of the Climate Commitment of the Dutch financial sector. Relevant investments are those through which we can make the greatest contribution to mitigating climate change, as we own and have control over them, such as investment property, corporate bonds, and equities. Additionally, we also consider investments that represent a significant portion of our investment portfolio, such as government bonds and mortgages, to be relevant. In this chapter, we provide a detailed overview of our strategy, policy, and actions for each relevant category.

Our stakeholders do not have a formal role in the process of setting the objectives for our investments. However, our objectives and policies have been developed with consideration of publications from (inter)national regulatory organisations, industry initiatives, and regulators. Peer reviews, climate-related commitments, ESG ratings, and sustainability benchmarks from NGOs also play an important role in this regard. In 2024, we conducted a survey among policyholders regarding our Social Responsible Investment (SRI) policy. We use the results in the evaluation of our SRI policy.

Our strategies, policies, actions, and objectives apply to the majority of our own risk investments, investments on behalf of policyholders, and the funds managed by our asset manager. Any deviations will be explained. For investments managed on behalf of institutional clients through our asset management services, we advise clients on their climate strategies, transition plans, and policies, and implement these plans on their behalf. Additionally, we offer investment solutions that integrate environmental and social criteria. The strategies, objectives, policies, and action plans for these investments (assets under advice) are not detailed here.

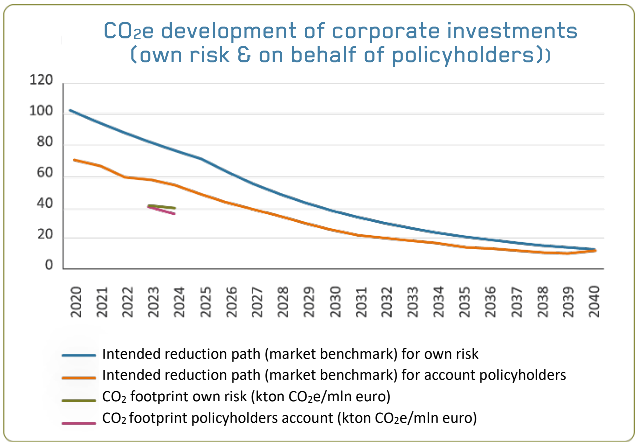
ENVIRONMENTAL – CLIMATE CHANGE

The climate transition plans, policies, and actions of our foreign subsidiaries have not yet been included in this report. In 2023, we included the financed emissions of these investments in our reporting for the first time. In 2025, we will explore whether these investments can become an integral part of our strategies, objectives, and policies.

A. Corporate investments (Listed shares and corporate bonds)

Climate transition plan

We aim to make a real impact in the world. Therefore, we do not immediately exclude companies with high CO_2 emissions. Selling shares or corporate bonds in CO_2 -intensive companies would merely transfer ownership to another investor without affecting the real economy. Instead, we want to achieve our CO_2 reduction targets by encouraging the companies in our portfolio to lower their greenhouse gas emissions through credible transition plans. Through engagement and voting at shareholder meetings, we encourage companies to set scientifically-based reduction targets that align with a 1.5°C transition pathway, incorporate these targets into their remuneration policies, develop action plans, and report on their progress. If the engagement process does not yield sufficient results, we may use our voting rights to exert additional pressure. We are aware that not all of our efforts will lead to the desired outcomes. In this case, we may conclude that our influence as an investor is insufficient. We will then consider divesting from these companies. This way, we can ensure that our portfolio follows the desired CO_2 reduction pathway over time.



Achmea's reduction targets are in line with the Paris Agreement. Various international initiatives have developed methods and transition pathways for formulating CO_2 reduction targets. These methods are generally based on scenarios developed by the Intergovernmental Panel on Climate Change (IPCC). These scenarios indicate that to prevent global warming from exceeding 1.5°C, we must achieve 'net zero' by 2050. We are more ambitious and have set a target to reach 'net zero' for our investments in companies in our own risk portfolio and in the portfolio on behalf of policyholders by 2040. For investment funds managed by Achmea Investment Management, the goal is to achieve 'net zero' by 2050. Achmea adopts a sector-independent approach for corporate investments. In the IPCC's Sixth Assessment Report (AR6), the C1 scenario is one of the most ambitious climate transition pathways. This scenario aims to limit global warming to 1.5°C with no or limited overshoot.

Scope 3-emissions of companies in which we invest and reduction targets

The amount of greenhouse gases associated with a company's activities is expressed in Scope 1, 2, and 3 emissions. Scope 1 emissions relate to the direct emissions of greenhouse gases resulting from an organisation's own activities. Scope 2 emissions are indirect emissions related to the generation of electricity, heat, or steam consumed by the organisation, including emissions from power plants supplying electricity. Scope 3 emissions are also indirect but occur throughout an organisation's entire value chain.

Many of the companies in which Achmea invests have had a clear understanding of their Scope 1 and Scope 2 emissions for years, but they do not yet report or only partially report on their Scope 3 emissions. Generally, it is more challenging to measure Scope 3 emissions because this requires data from other parties in the value chain. As a result, many companies do not yet report on this in full.

In 2023, we started measuring Scope 3 financed emissions, for which we use data from MSCI. MSCI collects data from the annual reports of publicly listed companies and other sources. For companies that only report Scope 1 and Scope 2 emissions, MSCI makes a modelled estimate of their Scope 3 emissions. However, these modelled emissions often deviate from the actual emissions.

Legislation requires an increasing number of companies to report on their Scope 3 emissions in the coming years. Therefore, we expect the availability and quality of data to gradually improve. However, this will also lead to volatility in the reported Scope 3 emissions and complicate comparisons with previous years. Companies are also expected to report on additional categories, which will result in an increase in reported emissions without indicating the actual development of emissions.

Reducing Scope 3 emissions is crucial for achieving global climate targets, but the quality of data on Scope 3 emissions is still insufficient. To establish reduction targets for Scope 3 emissions of the companies in which we invest, the data must be credible, reliable, and consistent. Therefore, Achmea has not yet set reduction targets for the Scope 3 emissions of its investments. Nevertheless, we expect that the companies in which we invest to base their climate strategies on Scope 1, 2, and 3 emissions. This is also part of our engagement strategy. In 2024, we also started reporting on the Scope 3 emissions of the companies in which we invest.

ENVIRONMENTAL – CLIMATE CHANGE

For this scenario, a reduction of CO_2 emissions of approximately 40% by the end of 2030 compared to 2020 is required.

We aim for a reduction of 32% in financed emissions by 2025 and a reduction of 68% by 2030 compared to the market benchmark as of the end of 2020, for both own risk investments and those on behalf of policyholders held by the Dutch insurance entities. This means an annual reduction of at least 7% from 2020 to 2025 and 13% from 2025 to 2030. The target applies to 52% of the corporate investments.

As shown in the graph on previous page, we are well ahead of our target for own risk investments. Compared to the end of 2020, emissions were 57% lower in 2024 compared to the benchmark. For the funds managed by Achmea Investment Management, these targets are a 50% reduction in financed emissions by 2030 compared to 2020.

Our targets are based on the Scope 1 and 2 emissions of the companies in which we invest. Although we have not yet set targets for Scope 3 emissions, we started measuring and reporting them last year. The data quality for Scope 3 emissions is still insufficient. We expect improvements in the availability and quality of data as more companies start reporting on this. More information on the challenges of Scope 3 emissions is included in the text box on the previous page.

We do not expect to be able to achieve 'net zero' through reduction alone. The remaining, difficult-to-reduce CO_2 emissions will need to be offset through some form of negative emissions. We expect the companies in which we invest to take responsibility for offsetting their remaining emissions after all other measures to reduce emissions have been implemented. The premise is that companies should aim to reduce at least 90% of their emissions. Since priority should be given to reduction, we do not take compensation into account in our reporting on the CO_2 emissions of our investments.

Managing climate related risks

Corporate investments are exposed to physical and transition risks. Our investment plan is updated annually, allowing us to adjust our investment strategy as needed when the effects of climate change become visible and pose a risk (see also Consolidated Financial Statements, Note 2. Capital & risk management). Through engagement and voting at shareholder meetings, we aim to influence companies to implement a robust climate policy. This helps them manage and mitigate their physical and transition risks, thereby also reducing our risks. In Annex C (tables 15 and 16), we present the results of a quantitative analysis of the resilience of our equity and corporate bond portfolios. The results are a preliminary exploration of the impact, and we are working to enhance our understanding of the outcomes.

Physical risks
The effects of climate change, such as storms, droughts, and floods, can disrupt the operations and supply chains of the companies in which we invest. This may lead to a lower (market) value or even bankruptcies. Our diversified investment portfolio helps to mitigate the financial impact of these risks in both the short and long term. Additionally, we expect the companies in which we invest to have a solid climate policy. Through our engagement and voting policy, we aim to influence this. Therefore, we anticipate physical risks will have a minor impact on our corporate investments in the short term, although uncertainty and volatility are expected to increase in the long term.

Transition risk
Transition risks are the primary focus within our investment portfolio. Such risks may arise from sudden changes in policy, the introduction of innovative technologies, or shifting societal views on sustainability. Governments and regulatory bodies are also developing laws and regulations to encourage companies and financial institutions in their sustainability efforts, including the European Commission's Action Plan for Sustainable Finance, which encompasses regulations such as the Sustainable Finance Disclosure Regulation (SFDR), the EU taxonomy, and the CSRD. These changes can affect the performance and reputation of companies, potentially leading to temporary declines or 'stranded assets' in the long term. These risks are managed through a diversified and highly liquid investment portfolio, active shareholder engagement, and a strict (exclusion) policy for fossil fuels. We have established CO_2 reduction targets and developed action plans, and therefore we expect minimal financial impact in the short term.

(Own) policies

Our SRI policy includes various types of policies (see also the text box on the next page), with specific guidelines regarding the mitigation of climate change.

Thematic policy Climate change is one of the five focus themes in our SRI policy.

Due diligence policy Climate change and the transition to a low-carbon economy can affect the value of our investments. Therefore, we have integrated environmental criteria, including climate considerations, into our due diligence process for investments. Our due diligence policy aims to identify and analyse significant adverse effects on sustainability factors, including climate change, to prevent and mitigate this impact

Engagement guidelines The Engagement guidelines outline our expectations of the companies in which we invest and form the basis for our engagement objectives and activities. They also serve as a reference for participation in collective

ENVIRONMENTAL – CLIMATE CHANGE

Socially Responsible Investment (SRI) Policy

Achmea is a major financial service provider and thus an important institutional investor. We invest the insurance premiums we receive from our customers and use the investments (and returns) to meet our financial obligations to them. In 2024, the scope of our Socially Responsible Investment (SRI) policy was expanded to include the investment portfolios at Achmea Pension and Life Insurance N.V. on behalf of policyholders. Our goal is to invest in a socially responsible manner, with respect for people and the environment. Our SRI policy outlines how we integrate environmental, social, and governance criteria into our investment processes. This policy includes our Thematic Policy, Exclusion Policy, Due Diligence Policy, and Engagement guidelines.
Our SRI policy is based on international guidelines, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights (UNGPs), ILO conventions, and OECD guidelines. The Balance Sheet Management department oversees the SRI policy in collaboration with the Sustainability department and Achmea Investment Management. Directors of these departments form the SRI table, which evaluates policy proposals. This collaboration ensures diverse expertise and alignment with our Sustainability Program. We conduct an annual evaluation of our policy and participate in external evaluations by organisations such as UN PRI, GRESB, and the Fair Finance Guide to report on our progress. The SRI policy has been approved by Achmea's Asset & Liability Committee and endorsed by the Executive Board. Our policy documents are publicly available on our website.

initiatives and endorsing investor statements, complementing our voting and exclusion policy.

Voting policy An integral part of our active shareholder engagement is the use of our voting rights during shareholder meetings. This includes submitting shareholder proposals, which allow us to clearly communicate our expectations to companies. Our voting policy, which we use to instruct the service provider Institutional Shareholders Services (ISS) to vote on our behalf, is based on international best practices, laws, and corporate governance regulations. It also includes specific guidelines regarding climate-related matters. We critically assess the climate plans presented to shareholders and vote against plans that are not in line with the Paris Agreement. We exercise our voting rights when engagement does not yield sufficient results. We vote against companies' remuneration policies if they are not linked to climate-related risks. Additionally, we support climate resolutions that call for the development of climate plans in accordance with the Paris Agreement, such as the climate resolutions submitted annually by Follow This at the shareholder meetings of various major oil companies. More information on voting and engagements is included in Annex D.

Exclusion policy We have a strict exclusion policy for investments in fossil fuel companies. We do not invest in companies that derive more than 1% of their revenue from coal, oil from tar sands, shale oil and gas, or oil and gas from the Arctic region. Additionally, we exclude companies that generate more than 5% of their revenue from electricity produced using thermal coal. Furthermore, we expect companies that derive more than 1% of their revenue from conventional oil and gas to invest in renewable energy and have credible transition plans. To this end, we have established the following criteria:

1. At least 15% of capital expenditures will be invested in renewable energy by 2025 and 50% by 2030; and/or
2. An Implied Temperature Rise (ITR)-score from MSCI or a Transition Pathway Initiative (TPI) Carbon Performance Alignment score of up to 2°C maximum.

Companies that do not meet these criteria will be excluded. There is one temporary exception. As an engaged investor, we believe in the value of dialogue. Therefore, we are not excluding oil and gas producers with whom we are in engagement currently, including those through the Dutch Climate Coalition. We require these companies to comply with one of the criteria by the end of 2026; otherwise, they will be excluded.

Actions

Our climate mitigation action plan is based on five pillars: 1) encouraging companies to pursue a 'net zero' strategy through engagement, 2) actively exercising our voting rights at shareholder meetings, 3) excluding companies that have inadequate climate policies or make insufficient progress, 4) excluding the most polluting fossil fuel companies, and 5) investing in the energy transition, including green bonds.

In 2023, we launched an engagement program with ten high-emission companies, aiming to secure their commitment to achieve 'net zero' by 2050, preferably by 2040. Additionally, we collaborate with other institutional investors through the Dutch Climate Coalition, where we are engaging in discussions with ten oil and gas companies in 2024. We also participate in collective initiatives such as Climate Action 100+ and the Science Based Targets Campaign by CDP.

An integral part of our active ownership approach is the proactive use of our voting rights during shareholder meetings. Independent benchmark research by ShareAction shows that Achmea Investment Management has been a leader in supporting shareholder resolutions on environmental matters in 2022 and 2023. Data on our voting behaviour can be found on our website through a 'voting disclosure system'. In Annex D, we have included an overview of our voting behaviour regarding shareholder proposals, including climate-related proposals. Among other actions, we supported the climate resolution submitted by Follow This at Shell's shareholder meeting.

Annex D also provides an overview of our normative and thematic engagement, including engagements related to the topic of climate change.

In 2024, we tightened our exclusion policy for fossil fuel production (see Exclusion policy). This resulted in the addition of 199 companies to our exclusion list. We publish a list of excluded companies on our website.

We have increased our investments in green corporate bonds. By the end of 2024, the share of green bonds in our corporate bond portfolio was 13% (end 2023: 11%).

B. Investments in Government bonds

Climate transition plan

A significant portion of our investment portfolio consists of government bonds. We aim to achieve a 'net zero' portfolio for government bonds by 2050 at the latest. We have not yet established interim reduction targets. The opportunities to reduce the CO_2 footprint of the government bond portfolio are limited. This would mean convincing governments to reduce emissions or divesting from countries with a relatively higher CO_2 footprint. Neither of these actions is likely to contribute significantly to actual reductions in global emissions. However, we are taking steps to contribute to the energy transition through our investments in government bonds. First, by increasing the share of this portfolio invested in green government bonds. These are government bonds that finance only environmentally friendly and infrastructure projects. We have set a minimum allocation of 7% for green government bonds within the government bond portfolio. Our second step is to engage with governments and participate in the public debate.

Managing climate related risks

Government bonds are indirectly exposed to physical and transition risks. These risks are managed by maintaining a diversified portfolio, increasing our share of green government bonds, and engaging with governments. Currently, we do not have an analysis available of the quantitative impact

Physical risk
The damage caused by (extreme) climate events such as flooding or cyclones, as well as for climate adaptation, may fall to governments. The most significant short-term risks vary by country and depend on geographical location, among other factors. In the long term, physical climate-related risks may arise from investments in countries that do not adapt to climate change, which can lead to reduced creditworthiness and risks that may affect interest rates and spreads.

Transition risk
Regarding transition risks, we expect that these will impact our government bond portfolio in the long term. This is due to policy changes requiring countries to invest in supporting the climate transition. Such changes could potentially affect their credit ratings, which may influence interest rates and spreads. The impact will depend on the development of government policies and societal attitudes toward sustainability and will vary by country.

Own policies

As part of our Socially Responsible Investment (SRI) policy (see the text box), we have developed a policy for engagement with governments. With this policy, we aim to engage in dialogue focused on the country's efforts to contribute to (international) climate goals related to combating climate change, such as meeting the objectives of the Paris Agreement. Whenever possible, we prefer to collaborate with other investors and local parties in engagement processes with governments. A coalition of investors has greater financial resources and external influence, which means that a collective effort has a larger impact and is more effective than an individual initiative. Another advantage of a collective initiative is that tasks can be shared.

Actions

By the end of 2024, the share of green bonds in our government bond portfolio was 3.9%. In 2025, we want to investigate the extent to which the government bond portfolio aligns with the objectives of the Paris Agreement.

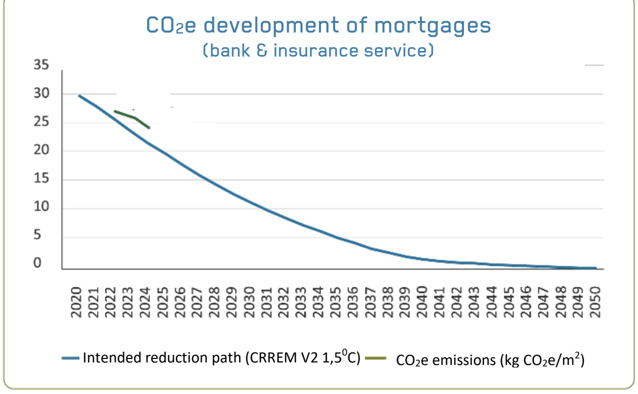
Achmea is part of a climate engagement coalition with Australia, where discussions have focused on the Nationally Determined Contributions of the Australian government under the Paris Agreement. As part of the sub-sovereigns working group, we have also engaged with the state of Victoria regarding its transition strategy and green bond program. Additionally, we have supported a Global Investor Statement calling for government actions to achieve a climate-resilient, ‘net zero’ emissions economy by 2050 or earlier.

ENVIRONMENTAL – CLIMATE CHANGE

C. Investments in mortgages and Banking loan portfolio

Climate transition plan

We are both investors in mortgages and mortgage lenders. The difference is that for the mortgage portfolios in which we invest, we do not always have a direct customer relationship, and therefore have less influence than when we are providing mortgages ourselves. For the mortgage portfolios, both in our role as an investor and as a mortgage lender, we have developed reduction targets and action plans.



Our ambition for the mortgage portfolio is to achieve 'net zero' by 2050 regarding the Scope 1 and Scope 2 emissions of the homes we finance (energy consumption). Our short-term interim target is to reduce CO_2 emissions by 33% by 2030 compared to 2022. This target is based on forecasts from the Netherlands Environmental Assessment Agency (Planbureau voor de Leefomgeving, PBL) for 2023 regarding the built environment in the Netherlands. The target pertains to approximately 98% of the total mortgage portfolio (excluding Acier and Orange credit).

We have compared our financed emissions with the most recent transition pathway from the Carbon Risk Real Estate Monitor(CRREM), which is based on CRREM lines for single-family homes and apartments. This pathway illustrates how high emissions can be in a single year to meet the goals of the Paris Agreement in a 1.5°C scenario. To converge with the CRREM pathway, the CO_2 intensity per square meter must decrease to 11.01 kilograms/m² by 2030. Our interim target for 2030 exceeds the CRREM pathway but aligns with developments in the Dutch housing market. As shown in the image on this page, our emissions in 2024 were 24.6 kg CO_2/m², which is 7.5% lower compared to 2022.

Since we do not own the homes on which the mortgages rest, achieving our reduction targets depends on the actions of homeowners to make their homes more sustainable. Instead of excluding customers with poor energy labels, we focus on helping them improve the sustainability of their homes. To achieve 'net zero' by 2050, we are also dependent on government policy and the development of renewable energy in the Netherlands. Our approach is based on three pillars: informing and engaging customers, offering product and financing solutions, and providing sustainability services.

Managing climate related risks

Our mortgage portfolio primarily consists of residential mortgages with real estate in the Netherlands as collateral. This portfolio is exposed to climate-related physical and transition risks. In Table 17 and Figure 18 of Annex C, we present the results of a quantitative resilience analysis of our mortgage portfolio. The results are a preliminary exploration of the impact, and we are working to enhance our understanding of the outcomes.

Physical risks

The physical risks of our mortgage portfolio are related to the collateral, with location and building characteristics influencing exposure to issues such as foundation problems (pile rot, subsidence), flooding, and heavy rainfall. The costs of repairs can pose significant challenges for our customers, as only a portion of these physical risks can be insured. Damage can considerably reduce the value of the collateral, which can also impact us in the event of default and any subsequent forced sale. The risk of flooding caused by rising water levels increases in the long term and depends on the adaptive measures taken by the Dutch government. Currently, we do not differentiate in the acceptance of new mortgages based on geographical location and physical risks.

Transition risks

Transition risks are more challenging to assess than physical risks, particularly because trends in housing prices affect mortgage portfolios. These trends are driven by transactions influenced by regulations regarding energy labels and households' preferences for energy-efficient homes. Our

Spotlight: Green finance framework

To attract green financing, Achmea has established a Green Finance Framework (GFF), which offers sustainable investment opportunities in high-quality Dutch mortgages. The proceeds from financial instruments issued under this framework are used for new and existing energy-efficient homes in the Netherlands, as well as for energy-efficient commercial buildings in the Netherlands and beyond. Achmea was the first Dutch insurer to develop a GFF, which aligns with the Green Bond and Green Loan Principles and has received positive assessments from ESG rating agencies ISS and CFP Green Buildings. The framework is primarily used for the (re)financing of existing mortgages. In 2022, Achmea issued a bond of € 500 million under this framework, followed by a second bond of € 500 million in 2024. More details are available on our website.

Climate transition plan includes measures that, in our opinion, mitigate this risk.

(Own) policies

SRI Policy

Mortgages are also included in our Socially Responsible Investment (SRI) policy. We want to help our customers make their homes more sustainable by offering financing options that contribute to combating climate change.

Mortgage acceptance policy

The Mortgage acceptance policy is a set of guidelines and procedures that we use to assess and approve mortgage applications. These guidelines vary depending on the type of mortgage and can be found on our website. Purchasing a new home is an ideal opportunity to consider sustainability options. In our mortgage acceptance policy, we have included that customers can finance energy-saving improvements without needing an immediate spending plan; the additional loan (Energiebesparingsbudget, Energy Saving Budget) can be drawn for up to two years. The unutilised portion will be deducted from the mortgage principal after this period. This additional loan can exceed the market value of the property by 6% and is excluded from income assessment under certain conditions, in accordance with government requirements for granting loans. The senior management of our Dutch banking division oversees the implementation of the policy.

Actions

We aim to help our customers make their homes more sustainable. To this end, we provide information as well as a range of services for home improvements. Our offerings include insulation, solar panels, and green roofs. In 2024, we expanded our service offerings to include heat pumps, further enhancing the options for our customers to create energy-efficient and environmentally friendly homes.

In 2023, we introduced a green loan component in our mortgage products, offering a lower interest rate for loans that contribute to the sustainability of the home. We also plan to provide interest rate discounts for homes with an A+ label or higher, which is expected to be implemented in 2025.

Regarding the increase in the percentage of mortgages aligned with the EU Taxonomy, we have developed climate transition plans to reduce the CO_2 emissions in our portfolio. This is expected to have a positive impact on the criteria for Substantial Contribution concerning alignment with Climate Change Mitigation. We aim to achieve this by encouraging customers to improve the energy efficiency of their homes. However, due to the complexity of the Do No Significant Harm criteria, we will not be able to fully align our portfolio with the EU Taxonomy. We have not set any objectives that need to be achieved in the future.

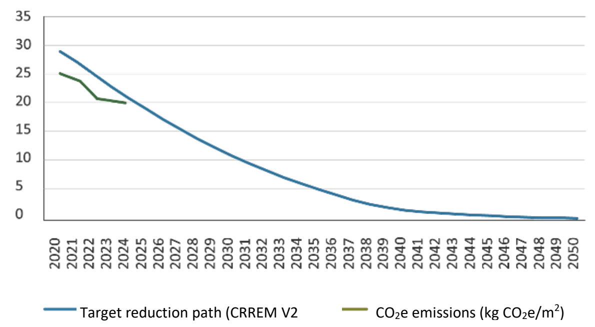
D. Investment property

Climate transition plan

We aim to make our real estate portfolio more sustainable by investing in properties that meet high sustainability standards and also align with the needs of our tenants. We intend to purchase new sustainable real estate and enhance our existing portfolio. Additionally, we assess all our acquisitions for climate-related risks. With our focus on sustainability, we want to contribute to higher living comfort for current and future generations while minimising resource use and the impact on the climate. Sustainable real estate means lower CO_2 emissions, which positively contributes to the environment.

The majority of our investment portfolio is managed by Achmea Real Estate, which also manages real estate for third parties. We have set reduction targets and developed action plans for our investment property and the real estate we manage on behalf of third parties. Our strategy also includes reducing CO_2 emissions from construction materials as a result of future investments through the use of biobased and circular materials. This means that we use sustainable materials such as wood (which absorbs CO_2 during growth), recycled plastic, and locally produced natural building materials in both new construction and renovation projects.

CO₂e development of investment property



In 2019, a baseline measurement was conducted for the homes in our portfolio and those managed on behalf of third parties. Based on this, a roadmap for CO_2 emission reduction was developed. This roadmap compares current emissions to the 1990 level and identifies steps to achieve our reduction target. In 2024, we updated this roadmap to include recent acquisitions and sustainability plans.

We have also aligned our objectives with the most recent transition pathway of the Carbon Risk Real Estate Monitor (CRREM), which is based on the CRREM lines for single-family homes and apartments. This pathway indicates the emissions that are permissible in a single year to meet the targets of the Paris Agreement in a 1.5 °C scenario. To be in line with this, the CO_2 intensity in 2030 must be less than 11.01 kg CO_2/m².

ENVIRONMENTAL – CLIMATE CHANGE

Our goals and ambitions for our own investment property are focused on both reducing CO_2 emissions and improving energy labels. We aim for a 'net zero' portfolio investment property by 2050. This objective is based on the Scope 1 and 2 emissions of the properties and pertains to the direct investment real estate that we hold for our own account. Additionally, we aim to achieve a reduction of at least 55% in CO_2 emissions by 2030 compared to 1990, in line with the climate ambitions of the Dutch government and the EU. To meet our CO_2 interim target for our own direct investment property, we strive for each property in our portfolio to have at least an energy label A by 2030. We expect to achieve this for our direct investment property by 2027.

Achmea Real Estate has similar CO_2 targets. For the energy labels of the real estate funds it manages, the ambition is for these to have at least an energy label A by 2030.

The CO_2 emissions in our homes within the real estate portfolios have steadily decreased over the past few years. This is due to the greening of the energy mix and the sustainability improvements made to real estate, where we have upgraded homes with better insulation, solar panels, and removed gas from the homes. Additionally, we have purchased new, sustainable real estate and, in some cases, sold properties with poor energy labels if they are located in less desirable areas. This results in a reduction of CO_2 emissions per square meter in the portfolio.

In 2024, the emissions for our own direct investment property were 63% lower compared to the levels of 1990, significantly surpassing our target of a 55% reduction by 2030. In 2025, it will be evaluated whether our interim targets need to be adjusted, if necessary.

Managing climate related risks

Our investment real estate is exposed to both physical climate-related risks and transition risks. In Table 19 and Figure 20 of Annex C, we present the results of a quantitative resilience analysis of our real estate portfolio. The results are a preliminary exploration of the impact, and we are working to enhance our understanding of the outcomes

Physical risks

Physical risks play a significant role in investment property, as exposure to heat, precipitation, drought, or flooding risks affects the value of properties. Some weather-related risks are currently insurable, while others are not. For instance, damage caused by heavy rainfall is insured. Other risks, such as flooding or foundation problems due to subsidence from drought, are insurable or difficult to insure. Government measures could effectively mitigate the impact of these risks. The long-term effects are difficult to estimate. In the long term, the impact may increase due to more extreme weather conditions and flooding. Additionally, damage to foundations from subsidence may only become apparent in the medium to long term. In the short and medium term, we expect heat stress will become an increasingly important concern for building occupants.

To prepare our real estate investment portfolios for the impacts of climate change, we identified the buildings with the highest risks in 2024.

This helps us in developing corresponding adaptation plans. We aim to have adaptation plans in place for all high-risk buildings by the end of 2025. To achieve this, we utilize the Framework for Climate Adaptive Buildings (FCAB) developed by the Dutch Green Building Council (DGBC). This involves assessing climate effects, determining the vulnerability of buildings, and defining necessary measures to enhance resilience. We also evaluate our acquisitions for climate-related risks and opportunities, and we assess them against ESG indicators.

Transition risks

The real estate sector faces stricter energy efficiency requirements, which can directly affect the value of properties and thus lead to transition risks. Currently, we expect that the need to mitigate transition risks will have the greatest impact on our residential portfolio. Adapting buildings to reduce emissions incurs costs, such as initial investments in renewable energy systems or energy-efficient technologies, which can impact the financial performance of investment property.

Own Policies

Our investment property for our own account is also included in our Socially Responsible Investment (SRI) policy.

ESG-strategy Achmea Real Estate

The ESG strategy focuses on climate mitigation and adaptation for real estate managed by Achmea Real Estate, and includes various initiatives, such as CO_2 reduction roadmaps and improvements in energy efficiency. The senior management of this division oversees the implementation of the policy.

We ensure that all acquisitions are GPR Building certified. GPR Building is an assessment method for mapping the sustainability of a building. This assessment method employs five sustainability themes: energy, environment, health, usability, and future value. Our goal is to achieve an average GPR Building score of 7.5 or higher for all new acquisitions, with a target minimum score of 8 for energy. Our CO_2 reduction targets are crucial in the purchase of new properties and the improvement of existing ones, with a focus on reducing energy consumption as a key requirement. We investigate and plan sustainability improvements, using CO_2 roadmaps to outline the necessary investments for the coming years. Our actions include upgrading building systems to improve their energy consumption, such as insulation, and implementing solutions for renewable energy, while reducing material-bound CO_2 by using sustainable materials.

Actions

In 2024, we improved the energy label of homes in our own direct real estate portfolio. For the period 2024-2029, an amount of approximately € 19 million has been budgeted for sustainable renovations in our own direct real estate. Additionally, Achmea Real Estate has renovated properties within the real estate funds it manages on behalf of third parties.

In 2024, we assessed the climate-related risks of each building in the portfolio. The next step is to incorporate building characteristics into the risk analysis. After completion, we can develop an adaptation plan for those buildings with unacceptably high risks. We aim to complete this by 2025 at the latest.

Regarding the increase in the percentage of real estate aligned with the EU Taxonomy, we will begin in 2025 to further map the climate risks of properties with high or very high climate risk. We have not set any targets to be achieved in the future.

METRICS AND TARGETS FOR ALL ASSET CLASSES

We monitor the progress of our objectives and action plans. For specific targets, please refer to the sections for the relevant investment category. For most investments, we measure the CO_2 emissions and track progress against the established goals, where applicable. Additionally, we measure supplementary metrics depending on the investment category.

The table on the following page shows the portion of investments for which we have determined the financed emissions, broken down by investment category. As agreed in the Climate Commitment of the Dutch financial sector, we continue to explore whether we can measure the CO_2 emissions of all relevant investments. Relevant investment categories for which we do not yet measure the financed emissions include asset-backed securities and some retail loans and supranational bonds. Currently, it is not always possible to measure the CO_2 emissions of all relevant investments due to the lack of a standardised methodology or sufficient data. In some cases, CO_2 data may be unavailable or incomplete. We consider deposits, derivatives, cash, and balances linked to capital policies (linked to mortgage loans) as not relevant for measuring CO_2 emissions, as these investments have minimal climate impact and there is no measurement method for these investments.

ENVIRONMENTAL – CLIMATE CHANGE

TABLE 5: FINANCED CO_2 EMISSIONS – MILESTONES AND TARGETS

	CARRYING AMOUNT	AMOUNT WITH ACTIVE MANAGEMENT CO_2 REDUCTION	COVERAGE	CO_2 FOOTPRINT PORTFOLIO (TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)			MILESTONES AND GROSS TARGETS (TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)					NET TARGETS
	€ MLN	€ MLN	%	BASE YEAR	2023	2024	2020	2025	2030	2040	2050	
Own risk												
Listed equities	2,536	2,425	96%	N/A[1]	60.1	38.8	107.1	77.2	40.5	10.2	-	Net zero 2040
Corporate bonds	16,268	7,329	45%	N/A[1]	57.2	47.9	107.1	77.2	40.5	10.2	-	Net zero 2040
Government bonds	7,120	-	0%	N/A[1]	-	-			N.v.t.			Net zero 2050
Investment loans	716	-	0%	N/A[1]	N/A				N.v.t.			Net zero 2050
							MILESTONES AND GROSS TARGETS (KG CO_2/M^2)					NET TARGETS
Mortgages (Investments insurers)[2]	8,461	8,461	100%	26.6	25.8	24.4	N/A	23.4	18.0	N/A	-	Net zero 2050
Banking credit portfolio banking[2]	17,189	16,629	97%	26.6	25.8	24.6	N/A	23,4	18.0	N/A	-	Net zero 2050
Investment property[3]	1,510	532[6]	35%	44.2	20.6	20.0	N/A	N/A	19.9	N/A	-	Net zero 2050
Risk policyholders							MILESTONES AND GROSS TARGETS (TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)					NET TARGETS
Equities	3,479	3,479	100%	N/A	47.3	36.7	77.4	52.7	26.4	6.6	-	Net zero 2040
Corporate bonds	697	448	64%	N/A	41.6	64.1	77.4	52.7	26.4	6.6	-	Net zero 2040
Government bonds	2,703	-	0%	N/A	-	-			N/A			Net zero 2050
Assets under Management					N/A		MILESTONES AND GROSS TARGETS (TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)					NET TARGETS
Listed equities	5,774	5,761	100%	N/A	N/A	44.5			Various[4]			Net zero 2050
Corporate bonds	3,861	3,191	83%	N/A	N/A	57.3			Various[4]			Net zero 2050
Government bonds	4,450	-	0%	N/A	N/A	169.0			N/A			Net zero 2050
Mortgages	23,795	-	0%	N/A	N/A	24.1			N/A[5]			N/A
Real estate funds:							MILESTONES AND GROSS TARGETS (KG CO_2/M^2)					NET TARGETS
- Achmea Dutch Residential Fund	2,328	2,220	95%	44,2	18.2	15.,51	N/A	N/A	13.26	N/A	-	Net zero 2045
- Achmea Dutch Retail Property Fund	883	838	95%	78,1	57.4	47.99	N/A	N/A	39.05	0,65	-	Net zero 2040
- Achmea Dutch Healthcare Property Fund	760	679	89%	46	28.9	21.42	N/A	N/A	N.v.t.	0,61	-	Net zero 2040
- AP&L	704	692	98%	44,2	20.0	16.29	N/A	N/A	19.89	N/A	-	Net zero 2050

[1]The base year is set at 2023. Therefore, no footprint data is included in the column for the baseline year, but they are presented in the 2023 column.
[2]For the mortgages, the target is set in kg/m², with the baseline year being 2022.
[3]For investment properties, the target is set in kg/m², with the base year being 1990. Real estate funds are not included.
[4]Assets under Management include the investments in Achmea Investment Management's own funds, each of which has its own unique interim targets. All funds have net zero targets by 2050.
[5]For Assets under Management mortgages, the targets will be established in 2025.
[6]The target for investment property is set for the entire direct real estate portfolio (€ 705 million); however, data is only available to measure the footprint for part of the portfolio (€ 532 million).

The weighted average PCAF data quality score for the own account categories is 2.46, for the risk policyholder categories it is 1.87, and for Assets under Management, it is 3.07. Annex C includes more detailed information per category.

ENVIRONMENTAL – CLIMATE CHANGE

TABLE 6: INVESTMENTS IN COMPANIES ACTIVE IN SECTORS WITH HIGH CLIMATE IMPACT (NACE CODE A-H AND L)

€ MLN

	2024
Equities	3,365
Corporate bonds	6,692
Other investments	501
Total[1]	**10,558**

[1]The table includes investments in companies from both the own account and the policyholder risk account portfolio.

TABLE 7: IMPACT INVESTMENTS[1]

€ MILN

	AMOUNT (€ MLN)	WEIGHT	TARGET 2025
Impact investments	3.181	8,1%	10%

[1] These are investments aimed at generating positive, measurable social or environmental effects alongside a financial return. This includes, among others, own risk investments (excluding third interests) in green bonds, social housing, healthcare real estate, and renewable energy infrastructure. The weighting is determined in relation to the investment portfolio of Achmea's Dutch insurance entities and Achmea B.V.

TABEL 8: GREEN BONDS INVESTMENTS[2]

€ MILN

	AMOUNT (€ MLN)	WEIGHT IN ASSET CLASS
Own risk		
Government bonds	275	3.9%
Corporate bonds	2,048	12.6%
Subtotal	**2,323**	
Policyholder account		
Government bonds	111	4.1%
Corporate bonds	159	22.8%
Subtotal	**270**	
Total	**2,594**	

[2.] Financial instruments issued by governments, international institutions, or companies, where the proceeds are specifically allocated for the financing of sustainable, social or 'green' projects. These projects focus on generating renewable energy, improving energy efficiency in buildings, promoting sustainable transportation, and water and waste management, and projects that address specific social issues.

METHODOLOGY Determining CO_2e emissions as outlined in Table 5 requires the use of estimates and assumptions. In Annex C (tables 4 to 9), more details about the methodologies, data sources, and key assumptions for calculating the CO_2e emissions are included. Table 6 has been compiled by selecting NACE codes A through H and L in our investment administration. The information on the NACE codes was obtained from our data provider, using the NACE code corresponding to the issuing entity. In some cases, a NACE code has been established based on a professional assessment.
The investments in Tables 7 and 8 have been determined by selecting those investments in the investment administration that meet the definition of impact investments and investments in green bonds. This is done based on an overview from our data provider (MSCI), assessed by our asset manager, who identifies the investments that meet the definitions (see footnote in the table). These are then marked in the investment administration. The weighting in Table 7 is done by comparing the fair value of the impact investments at the reporting date with the fair value of own risk investments (excluding third interests), excluding the investments of our banking activities, foreign subsidiaries, and the deposits we hold with banks related to savings mortgages. The weighting in Table 8 is determined by dividing the amount of green bonds at the reporting date by the fair value of the investment categories (government bonds and corporate bonds).
The definitions of the indicators are included in Appendix B. Glossary.

SCOPE Regarding Table 5, more details about the scope of the CO_2e calculation are included in Annex C (Tables 4 to 9). For Tables 6, 7, and 8, the scope is aligned with the own risk investments and those on behalf of policyholders (including foreign subsidiaries).

ENVIRONMENTAL – POLLUTION OF WATER AND SOIL

Risks

Insurance and services: There is a risk that costs for hospitals and other healthcare institutions may increase due to water pollution caused by pharmaceutical residues and regulations surrounding this issue. Furthermore, reputational damage may occur as a result of a scandal related to pollution in healthcare that has been procured by health insurers.

Negative impact

Insurance and services: In healthcare, pharmaceutical residues from production and their use at home and in healthcare institutions end up in surface water and soil, leading to negative effects on water and soil quality.

Pollution of water and soil

Pollution refers to the presence of harmful substances in various environments, that significantly could affect living organisms and ecosystems. Water pollution involves the contamination of water by chemicals, microorganisms, and waste materials. Soil pollution refers to the contamination of soil by harmful substances. These substances can harm human health, the environment, or affect the proper use of land.

Opportunities

No significant opportunities have been identified.

Positive impact

Insurance and services: Zilveren Kruis, along with the Dutch health insurers within the umbrella organisation Zorgverzekeraars Nederland, has signed the Green Deal Zorg. Together, both in the Netherlands and abroad, the healthcare can be influenced and encouraged to adopt sustainable practices, including reducing the environmental impact of medication usage.

Material item

Relevant activities

Insurance and services: Health Insurance.

Most significant stakeholders

- Policyholders and customers
- Healthcare providers
- Pharmacists/pharmaceutical companies
- Health insurers
- Governments
- Society

Boundary of the value chain

Downstream: Insurance customers, intermediaries, healthcare providers*.

* We consider payments to healthcare providers as payments that would otherwise have been made directly to the policyholders (therefore downstream).

ENVIRONMENTAL – POLLUTION OF WATER AND SOIL

Medicines play a valuable role in the daily lives of many people and contribute to the quality of life, as well as to the prevention and treatment of diseases. However, the use of medications also leads to pharmaceutical residues in groundwater and surface water through urine and faeces, which causes environmental damage. Furthermore, it still occurs that unused liquid medicines are flushed down the sink or toilet, which further contributes to the contamination of both groundwater and surface water. The production of medicines also has a significant climate and environmental impact. In the Netherlands, the National Institute for Public Health and the Environment (Rijksinstituut voor Volksgezondheid en Milieu, RIVM) has investigated the impact of medication use on water quality and estimated that at least 190 tonnes of pharmaceutical residues enter the Dutch surface water annually[1]. As a health insurer, we are committed to the goals set out in the Green Deal Sustainable Healthcare 3.0 (Green Deal Duurzame Zorg 3.0, see chapter on Climate Change, textbox Green Deal Sustainable Healthcare 3.0 for more information). Based on research (as part of the Dutch Green Deal Sustainable Healthcare 3.0) and expert judgment, we consider reducing the environmental burden of medications to be a material topic regarding its impact on our health insurance value chain in both the Netherlands and our international operations.

As our impact lies within our value chain and the information regarding this is still limited, we have not been able to obtain all the information about our upstream and downstream activities. Therefore, our approach to managing the impact of this topic is still under development.

OUR STRATEGY RELATED TO THIS TOPIC

As the largest health insurer in the Netherlands, we believe that we can contribute to the sustainability process within the Dutch healthcare sector and our international activities. We aim to make sustainable solutions accessible to our customers through our vision of 'Sustainable Living. Together.' An important aspect of this is Bringing health closer, where we take responsibility together with partners for financing healthcare, organising services, and improving health outcomes. Our commitment to the Green Deal Sustainable Healthcare 3.0 in the Netherlands is an integral part of our strategy to make health more accessible for everyone.

The Green Deal Sustainable Healthcare 3.0 is a specific arrangement in the Netherlands. For our international operations, where our market shares are smaller than in the Netherlands, our approach aligns with the health insurance sector in those countries, taking into account the local context. Based on developments within the healthcare sector and in collaboration with other parties in the value chain in that country, we will adapt our policies and measures as necessary. Currently, we have not developed specific policies and/or actions for our international operations.

Example of foreign operations: Union

Union, active in Slovakia, aims to contribute to combating water and soil pollution caused by wastewater with high concentrations of pharmaceutical residues. In 2025, a study will be initiated to investigate the impact of pharmaceutical residues on the quality of wastewater. Additionally, the aim is to promote responsible procurement practices for medicines. In the coming years, the goal is to build on these findings and implement additional controls on prescribing medicines to ensure that consumption aligns with the EU average.

HOW WE MANAGE OUR IMPACTS, RISKS AND OPPORTUNITIES

APPLICABLE REGULATIONS AND COMMITMENTS

The Green Deal Sustainable Healthcare 3.0 contains goals aimed at reducing the environmental impacts of medication use. The Green Deal Sustainable Healthcare 3.0 is related to the Approach to Medication Residues in Water ('Ketenaanpak Medicijnresten uit Water'), which outlines actions to address this issue and fostering collaboration between healthcare providers and governments.

In 2024, we collaborated with other Dutch health insurers to concretise our approach, resulting in the Implementation Plan for Dutch Health Insurers (Uitvoeringsplan Zorgverzekeraars Nederland). The measures outlined in this plan are aimed at reducing pharmaceutical residues in water while also contributing to the reduction of greenhouse gas emissions, decreasing environmental pollution, and limiting the use of resources. This plan will continue to evolve in the coming years. By working together, we aim to reduce the administrative burdens for healthcare providers through alligned obligations and standardised requirements.

With regard to pollution, the Implementation Plan for Dutch Health Insurers comprises three key components: procurement policy, raising awareness among insured individuals, and sustainability criteria for the procurement of preferred medicines. Through

[1] Pharmaceutical residues and water quality: an update, 20-12-2020

ENVIRONMENTAL – POLLUTION OF WATER AND SOIL

the first component, we express our expectation that healthcare providers commit to the actions described by their industry organisations in line with the Green Deal Sustainable Healthcare 3.0. The second component focuses on increasing awareness among our policyholders, contributing to a proper use of medicines and correct disposal. The final component is intended to ensure that manufacturers who produce sustainably and offer medicines with a lower climate and environmental impact throughout their lifecycle, including production, distribution, delivery, and use, are recognised for their efforts.

OWN POLICIES

For the first component, the procurement policy, we developed a national uniform procurement policy for 2025 in 2024 in collaboration with other Dutch health insurers. This policy aligns with the Green Deal Sustainable Healthcare 3.0 and is aimed at pharmacists, hospitals, and mental healthcare. Zilveren Kruis's procurement policy refers to this national uniform procurement policy, making it a part of Zilveren Kruis's procurement policy. The procurement policy for 2025 for all types of healthcare was published on the Zilveren Kruis website on 1 April 2024.

Important aspects of the procurement policy for pharmacists include minimising waste through appropriate prescribing and actively informing patients about the disposal of unused medicines. Pharmacists are encouraged to promote responsible medication use by advising on timely medication reduction, prescribing environmentally-friendly options such as powdered inhalers, and advocating for non-pharmacological interventions in collaboration with, among others, general practitioners. Hospitals are expected to implement plans to reduce medicine waste and overuse based on effective interventions. In mental healthcare, Dutch health insurers aim for a reduction in medication use and waste, with a target of 20% for medicine waste by 2026, compared to 2023.

ACTIONS

In 2024, we developed a national uniform procurement policy for 2025 in collaboration with other Dutch health insurers. The methods for measuring the reduction of medication use and waste within the sector, however, still need to be established. By the end of 2026, we aim to have developed an understanding of the environmental impacts of medicines within the sector, in cooperation with the Dutch health insurers.

For the last two components of the Implementation Plan for Dutch Health Insurers, we will explore potential actions in 2025 and further develop them as necessary.

Senior management in our Dutch Healthcare division oversees the implementation of the policies and measures arising from the Implementation Plan for Dutch Health Insurers. Currently, the financial resources allocated for these measures are part of our regular business operations. Future financial resources related to these initiatives are yet to be determined.

METRICS AND TARGETS

The Green Deal Sustainable Healthcare 3.0 formulates fundamental goals for sustainable healthcare. Many of these goals are not sufficiently measurable, or baseline measurements are lacking. The Ministry of Health, Welfare and Sport (VWS) is currently in the process of setting up the monitoring for the Green Deal Sustainable Healthcare 3.0. KPIs and objectives will be established in conjunction with this.

ENVIRONMENTAL – BIODIVERSITY

Risks

Insurance and services: Companies may be required to suspend their operations temporarily or permanently, leading to a decrease in premium income. The frequency and severity of nature-related damages could exceed expectations, leading to more claims than anticipated, which may not be adequately reflected in pricing. Additionally, association with sectors that contribute to biodiversity loss can lead to reputational damage and potential liability.

Investments and financing: Loss of biodiversity can lead to operational challenges, higher costs, and reduced profitability for the companies in which we investment, negatively impacting financial performance due to lower investment returns.

Negative impact

Insurances and services: Insurance activities can contribute to biodiversity loss by insuring companies and individuals whose activities are harmful to ecosystems.

Investments and financing: Financing activities can cause biodiversity loss when investing in companies that harm ecosystems. This can result in the overexploitation of natural resources.

Biodiversity

Biodiversity refers to the variability of living organisms from all sources: land, ocean, freshwater, and the atmosphere. It is an essential and indispensable characteristic of nature that ensures that ecosystems are productive, resilient, and adaptive. The direct impact factors of biodiversity loss include the various ways in which the diversity of life, such as animals, plants, fungi, and microorganisms, is declining. Specifically, pollution (including nitrogen) and the impacts and dependencies of ecosystems are considered as key factors.

Opportunities

Insurance and services: Developing new policies and insurance products that, for example, support new companies in their efforts to protect and restore biodiversity.

Investments and financing: Investing in activities and funds aimed at restoring and protecting biodiversity can lead to new diversification opportunities in the market, thereby meeting changing needs.

Positive impact

Insurances and services: Insurance activities can positively contribute to biodiversity by insuring companies and individuals who are committed to the protection and restoration of biodiversity, or by encouraging them to do so.

Investments and financing: Supporting companies that focus on the protection and restoration of biodiversity.

Material item

Relevant activities

Insurance and services: Non-life insurances in the Netherlands and Slovakia.

Investments and financing: Investments in companies. Asset management.

Most significant stakeholders

- Policyholders and customers
- Institutional, corporate clients
- Business partners
- Companies in which we invest
- Intermediaries
- Governments
- Society

Boundary of the value chain

Downstream: Insurance customers, investments for own account and third parties, and damage repair companies.

ENVIRONMENTAL - BIODIVERSITY

Biodiversity refers to the variability of living organisms from all sources: land, ocean, freshwater, and the atmosphere. Its loss is caused, among other things, by climate change, pollution, exploitation of natural resources, and invasive species. This loss threatens not only ecosystems but also society, businesses, and financial institutions like Achmea, which rely on a stable economy.

OUR STRATEGY RELATED TO BIODIVERSITY

As a financial service provider, we have limited direct impact on biodiversity. Our most major impact arises from our downstream value chain, particularly through our insurance and investment activities. We primarily focus on companies, as the impact on individuals is smaller. Companies that we insure and in which we invest may depend on biodiversity and ecosystems for the continuation of their activities. Loss of biodiversity can lead to operational problems, higher costs, and consequently, a decrease in profitability. This can then negatively affect our financial performance through reduced profitability of our insurance portfolios or lower returns on investments.

By providing insurance or investing in companies that could harm biodiversity, we can be associated with biodiversity loss. However, as an insurer and investor, we have the potential to make a positive impact and help mitigate or reverse biodiversity loss. We engage with companies we invest in to motivate them to restore and protect biodiversity, and we encourage our insurance customers to do the same. Additionally, we develop policies and insurance products that help companies mitigate environmental risks. The image below illustrates how impact, risks, and dependencies are interconnected.

Biodiversity has been identified as material in the double materiality process (see the chapter Process to identify material topics). During this process, the interests and perspectives of stakeholders were incorporated.

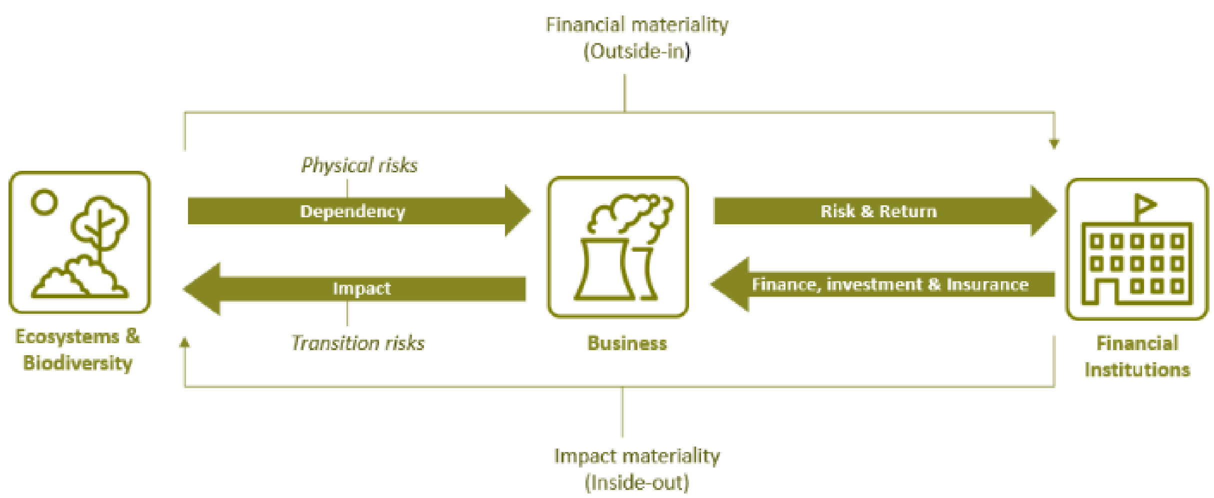
HOW WE MANAGE IMPACTS, RISKS AND OPPORTUNITIES

We recognise the urgent need to address biodiversity loss, and we want to contribute to the conservation and restoration of biodiversity through our insurance and investment portfolios. Assessing the impacts, risks, and opportunities of our portfolios in more detail is an important initial step in developing a transition plan and biodiversity policies. This includes key actions to manage our impacts, risks, and opportunities, as well as potential biodiversity offsets. As we are currently in this first phase, we have not formulated a transition plan and policies yet. In 2025 we aim to develop a groupwide biodiversity policy framework for an overarching biodiversity approach. This will be incorporated into the Achmea sustainability policy framework and will serve as the basis for the further development of biodiversity polices related to our insurance and investment activities.

The financial resources required for the implementation of all activities described in this chapter are part of our regular business operations. Future financial resources related to these activities still need to be determined.

INSURANCES AND SERVICES

An initial assessment is the first step for our insurance activities to get an insight into the impacts and dependencies of our insurance portfolio on biodiversity. In 2025 we aim to conduct a preliminary assessment by applying a referenced approach, such as the TNFD (Taskforce on Nature-related Financial Disclosures) LEAP approach. This approach may assist us in disclosing our nature-related risks and opportunities in a structured manner. We strive to make this assessment as comprehensive as possible. For this purpose, we will make use of open-source data, such as the ENCORE database. Based on the outcomes, we can determine which additional assessments are necessary for a more in-depth understanding. This will enable us to identify the parts of our portfolios that have the most negative impact, show the



highest dependency, or already contribute positively to biodiversity. This will form the basis for establishing appropriate further actions and targets.

Applicable regulations and commitments

To contribute to a positive transition through our insurance activities, we are also member of two working groups of the Principles of Sustainable Insurance (PSI) focusing on Nature-Positive Insurance (NPI). This multistakeholder platform, led and convened by the United Nations, aims to support the necessary acceleration of nature positive actions. The NPI collaborates with participants from the insurance sector and engages with insurance regulators and supervisors, the scientific and academic community, civil society, and other key stakeholders. We are actively involved in the Mainstreaming TNFD working group, where we apply the TNFD LEAP framework and develop supplemental PSI guidance on TNFD for insurance underwriting. We have also joined the Priority Actions working group to assist PSI signatories in aligning with the insurance-relevant objectives of the Global Biodiversity Framework. The outcome of both working groups will be presented in two guidance papers early 2025.

We are also involved in the Hagelunie Innovation Fund, which provides financial support for innovative projects in agriculture and (greenhouse) horticulture. The fund focuses on promoting research into more efficient operations and reducing damage risks in these sectors, as well as sharing the results of this research. We contribute to the selection and guidance of the projects within the fund. An example of this is the recent establishment of biodiversity strips at 20 greenhouse horticulture companies. The goal of this project is to promote insect biodiversity while simultaneously improving pest control in greenhouses.

Within our insurance activities, we have developed an initiative aimed at promoting biodiversity. We support both individuals and businesses in the installation of green roofs. These roofs can help reduce greenhouse gas emissions and ambient temperatures, while also creating a habitat for various plants and animals, benefiting biodiversity.

For our foreign operations, such as Union, where our market share is lower than in the Netherlands, our approach is tailored to the insurance sector in those countries, taking into account the local context. Based on developments within the sector, we will formulate policies and actions, using the approach in the Netherlands as a guideline. However, implementation may vary due to local regulations and cultural differences. Currently, we have not developed specific policies and/or actions for our foreign subsidiaries.

INVESTMENTS AND FINANCING

Own policies

To assess our impact, we initiated an analysis of our own risk investment portfolio (on-balance sheet), and the investment funds managed by Achmea Investment Management that invest in listed equity and corporate bonds. The preliminary findings indicate the need for further in-depth analysis to determine our impact, dependencies, risks, and opportunities in more detail. These analyses will be conducted in 2025. The results of the analysis conducted in 2024 for our investment risk are included in the Biodiversity Whitepaper 2024, which can be found on our website.

Although we are still analysing our investment activities, we have already included biodiversity into our existing investment policy. In our Socially Responsible Investment (SRI) policy (available on our website) Nature & Environment is one of the themes. In this theme, our focus includes the preservation and improvement of biodiversity. Currently the objectives for our investments in this theme are aimed at preventing the degradation of biodiversity in highly vulnerable ecosystems, preventing serious soil pollution, and irresponsible management of agricultural land.

ESG factors can have a significant impact on the long-term performance of our investments. For this reason, our asset managers integrate these factors into investment analyses and decisions. Examples of ESG factors related to biodiversity include toxic emissions and waste, water stress, and biodiversity and land use.

Impact investing

Achmea has committed to allocating at least 10% of its own investments to impact investments by 2025. One example of this is our investment in the Triodos Food Transition Europe Fund. This fund supports the transition to ecologically and socially resilient food and agricultural systems. The fund provides long-term private equity aligned with the mission of leading European sustainable food companies that respond to the growing demand for sustainably produced food. In this private equity strcture, Triodos opts for an evergreen long-term strategy with the companies in its portfolio. By the end of 2024, the portfolio will consist of 11 participations in sustainable companies.

Engagement

The theme Nature & Environment is part of our normative and thematic engagement programmes. The engagement guidelines, part of our SRI policy (and available on our website), outline our expectations regarding the companies in which we invest. Our expectations regarding this theme are in line with the Rio Declaration on Environment and Development and the UN Convention on Biological Diversity.

We engage with companies that violate the principles of the UN Global Compact or that may do so, as well as with companies that do not comply with the OECD guidelines for multinational enterprises. Thematic engagement programs that focus on biodiversity and related topics include initiatives that address, for example, the environmental impact of single-use plastics or water management. By emphasising the environmental effects of plastic use and the importance of water conservation, we contribute to a more sustainable future and promote responsible use of these resources.

Exclusion

The exclusion policy for companies and countries, which is part of our SRI policy, outlines the companies and countries in which we do not invest directly. In the decision to exclude a company, factors such as the impact of the company's behaviour on society and/or the environment, the severity, scale, irreversibility, and likelihood are taken into consideration. In practice, violations of environmental standards often stem from soil or water pollution and/or pose a threat to biodiversity. The list of companies we exclude, can be found on our website.

Voting

We demonstrate a strong commitment to biodiversity as a responsible investor through targeted voting and engagement initiatives. This means that during shareholder meetings, we give extra attention and support to shareholder proposals related to biodiversity and related issues, such as pollution, waste management, water resources, and land use. Information about our voting behaviour is available through the Vote Disclosure System (VDS) on the Achmea Investment Management website. In Annex D, we have included an overview of our voting activities regarding shareholder proposals, as well as a summary of our normative and thematic engagement.

Applicable regulations and commitments

In 2021, Achmea Investment Management committed to the Finance for Biodiversity Pledge, in which the signatories are dedicated to the protection and restoration of biodiversity through their financial activities and investments. This includes collaboration, knowledge sharing, discussions with companies, impact assessment, setting objectives, and publicly reporting on these efforts. By signing the Pledge, we have committed to establishing objectives by 2024 and reporting on them in 2025.

We are also involved in collective engagement initiatives. In the second half of 2023, Nature Action 100 was established, an international collaboration in which institutional investors engage collectively with the 100 companies that have the greatest impact on biodiversity. The objective of this initiative is to provide investors with a platform for collaboration and to support companies in reducing their impact on biodiversity. Achmea Investment Management plays an active role in this collaboration by participating in six of the dialogues.

We have also joined PRI Spring, a PRI initiative for nature management, which brings investors together to protect and restore biodiversity. This initiative is based on the Kunming-Montreal Global Biodiversity Framework. In the first phase, deforestation and land degradation are addressed, as these issues impact biodiversity loss. The initiative targets both companies and policymakers.

We also participate in the collective Protein Diversification Engagement by FAIRR. This organisation focuses on the ESG impact of food production, particularly concerning intensive livestock farming and soybean cultivation. These sectors have a significant effect on various sustainability topics, such as water usage, greenhouse gas emissions, and health. Through this collective engagement, FAIRR aims to encourage companies to transition from meat production to vegetarian products with a lower climate and environmental impact.

A group of investors who have signed the Finance for Biodiversity Pledge has called for discouraging deep-sea mining. The ocean, as the largest ecosystem on earth, plays a crucial role in combating climate change, protecting biodiversity, and supporting sustainable social and economic stability. Deep-sea mining can have an irreversible negative impact. Therefore, we, as co-signatories of the call, assert that deep-sea mining should not be further developed until the environmental impact and the social and economic risks have been fully assessed.

Furthermore, Achmea Investment Management also signed collective investor statements related to biodiversity and environmental issues, such as supporting the UN treaty on plastic pollution and the environmental risks associated with nickel mining.

Actions 2025

As we are in the initial stages of this topic, actions are still under development. Therefore, we do not have a list of key actions taken in 2024. However, we have established initial and monitoring activities for 2025, which are described below.

Currently, no metrics are used to monitor the effectiveness of actions to manage this material topic, and metrics are not validated by an external party.

ENVIRONMENTAL – BIODIVERSITY

Insurances
As an initiation activity for 2025 regarding insurance, we will conduct an initial assessment to map the effects and dependencies of our property insurance portfolio on biodiversity. This assessment will serve as the basis for establishing further actions and targets.

Own risk investments
As an initiation activity for 2025 regarding our own risk investments, we are working on the development of governance, strategy, and the expansion of our engagement activities. As a monitoring activity for 2025, the impact of our corporate investment portfolio will be evaluated using data from Iceberg Data Lab. Additionally, we will report annually on the biodiversity footprint (in km² of average species abundance) of our own risk investments in both the Achmea annual report and the SRI report. For monitoring, we will take into account the recommendations of the TNFD and the Partnership for Biodiversity Accounting Financials.

Investment funds Achmea Investment Management
As an initiation activity for 2025 related to the investment funds of Achmea Investment Management, employees will receive training on biodiversity impact analysis, how to interpret results, and solutions for reducing portfolio impact. Additionally, there will be collaboration with customers to develop biodiversity policies, mapping investment portfolio risks, and develop solutions to reduce the biodiversity footprint of the investment portfolios. We will complete the biodiversity roadmap with at least two customers.

As monitoring activity for 2025, we will report on the biodiversity footprint (in km² of average species richness) of the investment funds of Achmea Investment Management (listed equities and corporate bonds) in the SRI report on our website. Additionally, we will monitor companies in high-risk sectors within the investment portfolio for involvement in deforestation and provide an annual report on this in the SRI report. As a portfolio activity for 2025, we will formulate targets by the end of 2025 at the latest, to reduce the biodiversity footprint of our equity and corporate bond funds.

Employees
To develop and implement an effective biodiversity strategy, it is important to provide our employees with training on biodiversity. A good understanding of biodiversity enables them to comprehend and recognise the impact, risks, and opportunities, comply with regulations, and engage with stakeholders. As an initiation activity for 2025, employees who play a role in our sustainability transition within Achmea will undergo biodiversity training by the end of 2025 at the latest. This training will cover nature-related effects, dependencies, risks, and opportunities, as well as the relationship with our activities.

METRICS AND TARGETS
As we are still in the initial stages of this topic, we are in the process of developing metrics and targets.

ENVIRONMENTAL – RESOURCE INFLOW AND WASTE

Risks
For health insurance activities, no material risks have been identified.
For non-life insurance activities, however, significant resources are used by suppliers of products and services related to damage repairs of insured objects of customers. To reduce material usage, sustainable repair suppliers may need to invest in technology, knowledge, and process modelling, which could lead to higher costs for sustainable repairs (such as increased claims). Due to the rising demand for sustainable repairs in the near future, the costs of sustainable parts may also increase to the point where they exceed the costs of new parts. Additionally, while sustainable repair may be possible, it could exceed the total value of the insured object, leading to higher costs instead of replacements.

Negative impact
Resource inflows in the healthcare insurance value chain is significant due to the high consumption of materials such as pharmaceuticals, medical equipment, and personal protective equipment, placing pressure on the environment. Scarce resources, such as minerals needed for chips in medical devices, require careful management measures to minimise their inflow. Additionally, waste is generated through the use of medical supplies such as incontinence products.
In the non-life value chain, suppliers consume considerable resources for damage repairs, including construction materials and car parts. This consumption can have negative environmental impacts. During the repair process, a significant amount of waste can be generated. Furthermore, damaged products may be replaced with new ones, with the old products considered waste.

Resource inflows and waste
Material usage refers to the input of resources, such as raw materials, used in a company's operations or value chain. In our health insurance, this pertains to the resources used within the health insurance value chain. In non-life insurance, it relates to the materials used in the damage repair process (claims handling). Waste is any material that the owner no longer considers useful and therefore discards. In our health insurance activities, this definition applies to the waste generated during medical procedures. In non-life insurance, it refers to the waste produced during the damage repair process.

Opportunities
No material opportunities have been identified for health insurance activities.
In non-life insurance activities, there is an opportunity to strengthen the reputation as a sustainable insurer by encouraging customers and damage repairers to carry out sustainable repairs (including reuse).

Positive impact
Reducing resource inflows and waste generation can have a positive impact, especially by collaborating with our partners within the healthcare sector and integrating sustainability and circularity principles into procurement.
For non-life insurance, suppliers and customers can be encouraged to adopt sustainable repair policies by offering premium discounts or partnering with organisations that adhere to circular standards. This approach not only helps to mitigate the negative environmental effects of improper waste management but also promotes responsible use of resources.

Material item

Relevant activities
Insurance and services: Health insurance in the Netherlands.

Most significant stakeholders
- Policyholders and customers
- Intermediaries
- Business partners
- Governments
- Society

Boundary of the value chain
Downstream: Insurance customers, intermediaries, healthcare providers*.

* We consider payments to healthcare providers as payments that would otherwise be made directly to policyholders (therefore downstream).

Our health insurance activities can have a negative impact on the environment through our value chain. In the Netherlands, the healthcare sector accounts for 13% of the national consumption footprint for abiotic (non-living) resources. Within healthcare, various types of waste are generated, primarily due to the procurement of medical products and services. For example, incontinence materials contribute approximately 85 million kilograms of waste in the Netherlands each year.

Based on research (as part of the Green Deal Sustainable Healthcare 3.0) and expert judgment, we have established that resource inflow and waste are a material topic for our health insurance activities. We have not conducted our own screening on this. Although we also have an impact within our non-life insurance activities, we believe this impact to be less significant, which has led to the classification of this topic as non-material for our non-life insurance activities. Once more data becomes available about the value chain, we will reassess this.

As our impact lies within our value chain and the information regarding this is still limited, we have not been able to obtain all the information related to our upstream and downstream activities. Therefore, our approach to managing the impact of this theme is still under development.

OUR STRATEGY RELATED TO RESOURCE INFLOW AND WASTE

As the largest health insurer in the Netherlands, we are committed to sustainability, as we consider it essential for promoting healthy aging. By signing the Green Deal Sustainable Healthcare 3.0 (Green Deal Duurzame Zorg 3.0, see chapter Climate Change for more information), we aim to make sustainable solutions accessible to our customers. We achieve this through our vision of 'Sustainable Living. Together,' with our ambition 'Bringing healthcare closer' being a component.

The Green Deal Sustainable Healthcare 3.0 focuses on promoting green and climate-neutral healthcare, aiming to minimise greenhouse gas emissions and ensure the efficient circular use of resources and materials, while maintaining the accessibility of healthcare. The circular approach is aimed at responsibly managing resources and securing supply. The healthcare sector must transition from a throwaway culture to an approach centred on reuse. This forms an integral part of our broader sustainability strategy.

The Green Deal Sustainable Healthcare 3.0 is specifically focused on the Netherlands. For our international operations, where our market shares are smaller than in the Netherlands, our approach aligns with the health insurance sector in those countries, taking into account the local context. Based on developments within the healthcare sector and in collaboration with other parties in the value chain in that country, we will adjust our policies and actions as necessary. Currently, we have not developed specific policies and/or actions for our international operations.

HOW WE MANAGE OUR IMPACTS, RISKS AND OPPORTUNITIES

APPLICABLE REGULATIONS AND COMMITMENTS

We are collaborating with other Dutch health insurers within the framework of the Green Deal Sustainable Healthcare 3.0. In line with national objectives, Dutch health insurers have set the goal of reducing primary resource consumption and promoting circular healthcare. By 2030, we aim to reduce primary resource consumption by 50% compared to 2016. Additionally, we strive for a maximum of 25% of waste in healthcare to consist of unsorted residual waste by 2030. We intend to achieve this through better resource management and effective waste separation. The ultimate goal is to achieve maximum circular healthcare by 2050.

These objectives have been incorporated into the Implementation Plan for Dutch Health Insurers (Uitvoeringsplan Zorgverzekeraars Nederland), which focuses on four key elements. The first element is aimed at waste reduction, with a target of 25% less unsorted residual waste by 2026 compared to 2018. Research has been conducted on the possibilities for health insurers to jointly establish sustainability criteria for procurement, with the aim of minimising packaging, encouraging reuse, and preventing waste, particularly in the areas of medical devices, food, and medicines. The second element concentrates on the reuse of medical devices that have been purchased directly from suppliers, aiming to achieve a 20% reuse rate by 2026. The third element focuses on reducing incontinence materials, with a target of 5% fewer purchased medical devices by 2026 compared to 2022. Finally, the goal is to reduce the primary resource consumption of procured healthcare by 20% by 2026 compared to 2016.

OWN POLICIES

In our procurement policy, we indicate that we expect healthcare providers to commit to the actions established by their industry organisation within the framework of the Green Deal Sustainable Healthcare 3.0. The procurement policy of Zilveren Kruis refers to this national uniform procurement policy, making it a part of Zilveren Kruis's procurement policy. The procurement policy for 2025 for all types of healthcare was published on the Zilveren Kruis website on 1 April 2024. The senior management of the Dutch Healthcare division oversees the achievement of these goals within our procurement policy.

ENVIRONMENTAL – RESOURCE INFLOW AND WASTE

ACTIONS

In 2024, we investigated how health insurers and care administration offices can jointly establish sustainability criteria for procurement contracts with suppliers of medical devices. Furthermore, through our procurement policy, we focused on reducing waste and promoting reuse by healthcare providers, particularly regarding medical devices, food, and medicines. If regulations could hinder these initiatives, we have also advocated for adjustments to the regulations. Additionally, we contributed to a sector initiative that encourages healthcare providers to reduce the use of resources when acquiring medical devices.

In 2025 and beyond, we will work together with other Dutch health insurers on the further development of the actions arising from the Implementation Plan for Dutch Health Insurers.

Currently, the financial resources allocated for these actions are part of our regular business operations. Future financial resources linked to these actions still need to be determined.

METRICS AND TARGETS

The Green Deal Sustainable Healthcare 3.0 formulates fundamental goals for sustainable healthcare. Many of these goals are not sufficiently measurable, or baseline measurements are lacking. The Ministry of Health, Welfare and Sport (VWS) is currently in the process of establishing the monitoring for the Green Deal Sustainable Healthcare 3.0. KPIs and targets will be determined in conjunction with this.

ENVIRONMENTAL – EU TAXONOMY INFORMATION

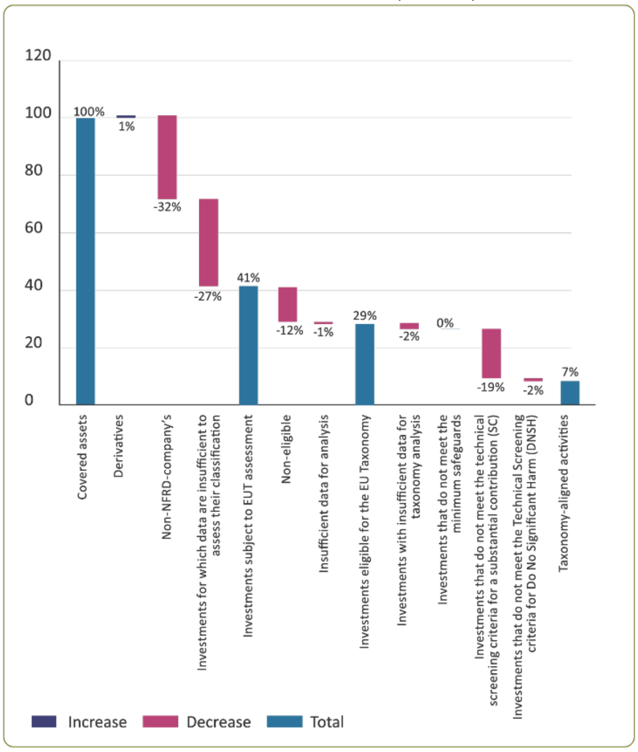
EU-TAXONOMY FOR SUSTAINABILITY

The aim of the EU Taxonomy is to invest in economic activities that make the greatest contribution to achieving environmental objectives in line with the European Green Deal. It is a classification system that establishes criteria for economic activities that contribute to net-zero greenhouse gas emissions by 2050 and to other environmental objectives. The EU Taxonomy creates a level playing field for both financial and non-financial enterprises within the EU. Achmea is obligated to comply with this legislation.

According to the EU Taxonomy, an activity is considered sustainable when it positively contributes to at least one of the six environmental objectives and does not significantly harm the other environmental objectives (Do Not Significantly Harm (DNSH)), while also meeting minimum safeguards. The six defined environmental objectives are:1) climate change mitigation, 2) climate change adaptation, 3) sustainable use and protection of water and marine resources, 4) transition to a circular economy, 5) pollution prevention and control; and 6) protection and restoration of biodiversity and ecosystems. Achmea is a financial service provider with a strong focus on insurance activities. Below is a summary of the key reporting topics, such as information on investments, insurance, and banking activities. The full EU Taxonomy disclosure, including an explanation of and the application of the EU Taxonomy criteria, is included in Appendix E.

Taxonomy-aligned investment (based on revenue)

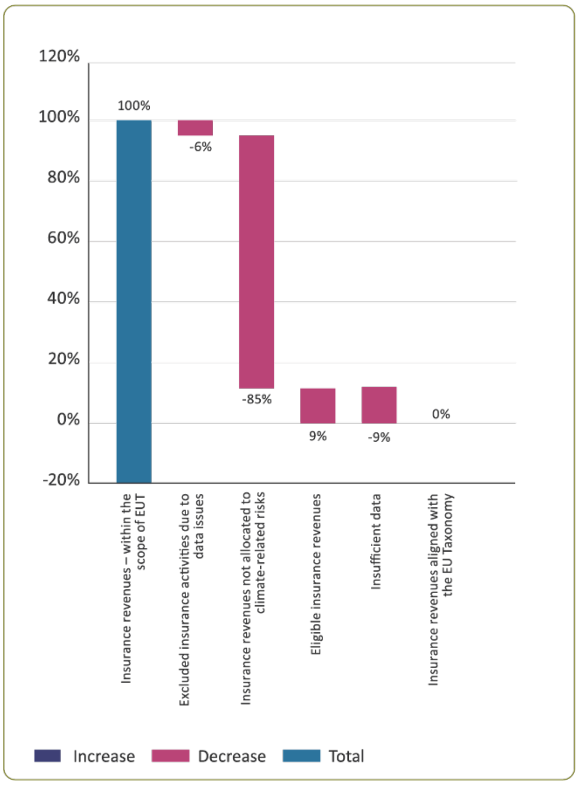
See the figure below. Of the total activities, € 13.8 billion (2023: € 10.3 billion) meets the EU Taxonomy criteria based on the KPI 'revenue'. This represents approximately 5% of our total investments. Based on the KPI 'capital expenditures' ('Capex'), € 1.4 billion (2023: € 1.4 billion) is compliant. The difference between the 'revenue' KPI and the 'capital expenditures' KPI is due to the fact that the mortgage portfolios and real estate are only included under revenue. Mortgages and properties with energy labels A or higher are the main factors influencing the alignment percentage.



Taxonomy-aligned banking activities

Of the total banking activities, which amount to € 18.2 billion (2023: € 15.3 billion), € 2.5 billion (2023: € 1.9 billion) is in accordance with the criteria of the EU Taxonomy ('taxonomy aligned'). This represents 13.7% (2023: 12.1%) of the total amount.

Taxonomy-aligned insurance activities



Health and life insurance activities fall outside the scope of the EU Taxonomy, meaning that € 20.2 billion is not further considered. Of the remaining € 5.2 billion, € 4.5 billion is not related to climate risks. € 0.5 billion (9%) meets the technical screening criteria and DNSH criteria, making it eligible for alignment ('taxonomy eligible'). Currently, there is no clear method to determine whether our commercial customers meet the DNSH criteria. As a result, based on the availability of data, we cannot comply with the DNSH criteria. Consequently, 0% of the gross premiums received (2023: 0%) meets the criteria of the EU Taxonomy ('taxonomy aligned').

SOCIAL – INTRODUCTION

Achmea's vision, 'Sustainable Living. Together', focuses on creating a sustainable and inclusive society where everyone can thrive and no one is left behind. We strive for equal access and opportunities for all and aim to contribute to social progress by empowering people and promoting solidarity. In our products, services, and as an employer, we take human rights and labour rights into account. In our Human rights and labour rights statement (see the text box for a general description and for the full version our website), we demonstrate how we respect human and labour rights, promote equal opportunities, and enhance inclusivity.

We have identified six social material topics where our impacts, risks, and/or opportunities are considered material. The image on the following page provides an overview of these topics. In this section on social issues, we start by discussing the social impact we have as an employer on our employees. However, our impact extends beyond just our own employees. We also influence the workers in the value chain, stemming from our role as an (health) insurer and investor. Finally, we address the material topics related to the products and services we offer to consumers and customers in our role as a financial service provider.

OUR APPROACH TO SOCIAL TOPICS AND COMMITMENTS

We have various commitments that contribute to social themes. We respect human rights as outlined in the Universal

ACHMEA'S HUMAN RIGHTS AND LABOUR RIGHTS STATEMENT

Achmea's Human rights and labour rights statement, which is published on our website, outlines our approach to human and labour rights in our various roles as an employer, financial service provider, business partner, investor, and as a socially responsible company.

Our commitment to human rights and labour rights

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

Identification of human rights and labour rights risks

We aim to prevent any negative impact on human rights and labour rights in areas that we can directly influence. Additionally, we focus on identifying, preventing, and mitigating negative impacts related to our own business activities or products and services through business partners, even if we do not directly contribute to them.

By analysing our business operations, customers, business partners, and suppliers, we aim to identify the areas with the greatest risks. This includes the most urgent violations of human rights and labour rights that could have serious negative consequences for individuals due to our activities or those of our business partners.

We conduct due diligence to identify actual and potential negative impacts on human and labour rights related to our operations, the products and services of our business partners, and our financing and investments. When negative impacts occur and are identified by us, we seek remedial measures or collaborate on solutions if it is established that we have caused or contributed to this impact.

Complaints mechanisms

We have established a policy to address complaints regarding human rights and labour rights. This policy applies to employees, customers, business partners, and other stakeholders, and pertains to our insurance and service activities as well as our investment and financing activities. Employees can report inappropriate behaviour to a confidential advisor or through the Whistleblower Scheme (see the chapter on Responsible employer practices). Customers and other stakeholders can communicate their concerns and needs regarding human rights and labour rights directly to us through the Achmea complaints mechanism. More information about this complaints mechanism can be found in the chapter on Working conditions in the value chain.

Monitoring of performance, governance, and decision-making

The Executive Board is responsible for the strategy and policy of the company, including aspects related to human and labour rights. The Supervisory Board oversees this. We evaluate our approach to human rights by regularly monitoring compliance with our policies and standards, engaging in dialogue with stakeholders, and participating in initiatives that enhance our approach. The Executive Board has approved the Human rights and labour rights statement and is responsible for its update.

SOCIAL – INTRODUCTION

Declaration of Human Rights, including the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO), the eight fundamental ILO conventions, and the OECD Guidelines for Multinational Enterprises.

In addition, we endorse international general and sector-specific standards, such as the principles of the UN Global Compact, the UN Principles for Responsible Investment (PRI), the UNEP FI Principles for Responsible Banking (PRB), and the UNEP FI Principles for Sustainable Insurance (PSI). For our Dutch subsidiaries, we are affiliated with the National Coalition for Financial Health (Nationale Coalitie Financiële Gezondheid (NCFG)), comply with the Gradual Quota Act and target figures (wet Ingroeiquotum en streefcijfers), and the Jobs Agreement and quota for people with disabilities (wet Banenafspraak en quotum arbeidsbeperkten), and we have signed the Equal Opportunities Declaration (Verklaring gelijke kansen).

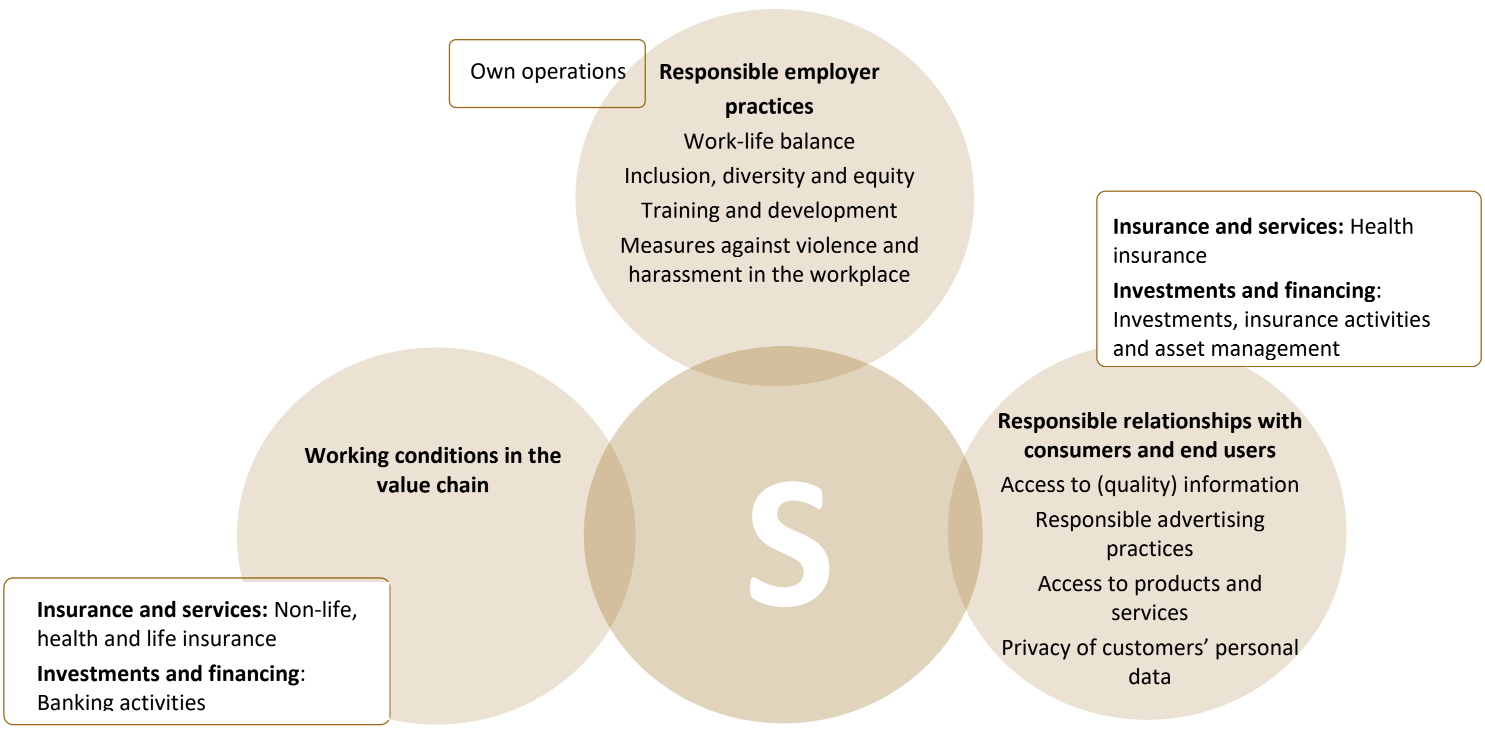
We have not identified any instances of non-compliance with the UN Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, including within our value chain.

As a financial service provider, we adhere to the Dutch Insurance Companies Code of Conduct (Gedragscode voor Verzekeraars) and the Dutch Banking Code (Code Banken).

The Insurance Companies Code of Conduct is mandatory for all members of the Dutch Association of Insurers and focuses on the core values that help insurers define their social role based on their business vision. This code supports insurers in clarifying their social responsibilities and provides guidelines for risk management, creating opportunities, and demonstrating social engagement. The implementation of this code includes translating the code of conduct into our own business policy (the Achmea General Code of Conduct), establishing a complaints procedure, and actively collaborating with the Stichting Toetsing Verzekeraars (Stv) to evaluate whether we comply with the binding self-regulation of the Association of Insurers. The Banking Code is mandatory for all banks in the Netherlands and aims to strengthen trust in the banking sector and promote sustainable changes within banks. Banks must report annually on their compliance with the code, which is assessed by an independent supervisory committee.

In addition, we are a partner in the Creditors' Coalition (Schuldeiserscoalitie), which advocates for a social debt collection policy. Next to insurers, energy companies, debt collection agencies, telecom companies, bailiffs, and housing corporations also participate in the coalition.

As an investor, we are committed to various initiatives, including the Covenant for International Responsible Investment in the Insurance Sector (IMVO Covenant).



SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Risks

Inadequate employer practices can lead to significant financial risks for the organisation. Stress and burnout among employees may result in increased turnover, creating substantial costs for recruitment and training new hires. Furthermore, insufficient measures to address violence and harassment expose the organisation to legal liabilities, potentially resulting in costly lawsuits. Disengaged employees are likely to be less productive, negatively impacting overall business performance and revenue. A poor reputation can also deter customers, leading to lost sales and decreased market share.

Negative impact

Insufficient engagement in ID&E initiatives can result in employees feeling excluded, complicating decision-making processes and negatively impacting workplace morale. Furthermore, a lack of investments in training and skills development, along with an unsafe work environment prone to violence and harassment, can create significant barriers to a positive corporate culture negatively impacting job satisfaction. Insufficient work-life balance can have negative effects on employee well-being and productivity, leading to increased stress and burn-out.

Responsible employer practices

The following topics are material:

A. Inclusion, diversity and equity (ID&E): The inclusion of individuals from diverse demographic backgrounds and the fair treatment of employees in the workplace regarding pay, benefits, and promotions.

B. Training and skills development: Providing education and resources to employees to improve their knowledge, skills, abilities, and job performance.

C. Work-life balance: Demands of both work and personal roles can coexist without conflict.

D. Measures against violence and harassment in the workplace: Preventing actions that are unwelcome to the person towards whom they are directed.

Opportunities

Responsible employer practices offer valuable financial opportunities for the future. A strong commitment to ID&E enhances the organisation's reputation, making it easier to attract and retain top talent, which drives innovation and growth. Additionally, investing in training, skills development, and workplace safety can lead to lower healthcare costs and increased motivation, which may contribute to a more effective and successful organisation. Fostering employee well-being and job satisfaction can reduce turnover and absenteeism, leading to lower operational costs and increased productivity.

Positive impact

ID&E: By focusing on ID&E, we can create an environment where employees feel connected, which strengthens innovation and improves our reputation, making it easier to attract and retain talent.
Training and skills development: Investing in training and development enhances career opportunities, job security, productivity, and innovation.
Work-life balance: A good work-life balance promotes employee wellbeing, increases job satisfaction, reduces stress, and contributes to greater engagement.
Measures against violence and harassment in the workplace: Taking measures against violence and harassment creates a workplace where employees feel safe and valued, improves wellbeing and job satisfaction, reduces stress, and promotes engagement.

Material item

Relevant activities

Own operations.

Most significant stakeholders

- Employees (internal and external)
- Central Works Council
- Dutch Social and Economic Counsil (SER)
- Other external networks

Boundary of the value chain

Internal activities: Employees who are employed by Achmea B.V. or a subsidiary, as well as employees who are not employed, insofar as it concerns individual contractors working for us (self-employed individuals), and individuals from companies that primarily engage in employment activities, such as temporary employment agencies.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

RESPONSIBLE EMPLOYER PRACTICES

OWN POLICY

People strategy

Achmea stands for 'Sustainable Living. Together'. We are in the process of developing a People strategy that stems from this vision. We aim to realise this vision by recruiting, developing, deploying, and retaining talent within a safe and healthy workplace. This approach will support our organisational objectives that align with the developmental aspirations of our employees, and ensures the continuity of the organisation, both in the short and long term. Additionally, our People strategy will be sustainable and purpose-driven, focusing on achieving financial, social, and environmental goals while minimising unintended side effects.

We believe that responsible employer practices are essential to protecting human rights and labour rights and for promoting a more just and inclusive world. By integrating sustainability and human rights into our People strategy that is being developed, we will create a positive work culture that respects the rights and dignity of every individual, which can contribute to the well-being of society. Additionally, this can help us retain talent and enhance our attractiveness as an employer.

The People strategy is being developed in collaboration with employee representation, such as trade unions and works councils, and reflects our commitment to sustainable value creation for customers, employees, the company, and society.

Our vision of responsible employer practices applies to all employees within Achmea's own workforce. This concerns employees who are employed by Achmea B.V. or a subsidiary, as well as employees who are not employed, insofar as it concerns individual contractors working for us (self-employed individuals), and individuals from companies that primarily engage in employment activities, such as temporary employment agencies. Employees of outsourced services, employees of suppliers, and consultants are not part of our own workforce.

To enhance the readability of this chapter, some reporting requirements under ESRS S1 Own workforce have been included in Appendix B, concerning the characteristics of both our own employees and employees who are not employed (Reporting requirements S1-6 and S1-7).

The descriptions included in this chapter apply to all employees within our own workforce. However, policies and approaches may vary across foreign operating companies (see the description in the sections on foreign operating companies for any differences). This ensures that they align with the specific national, cultural, and legal contexts in which these companies operate. This allows us to effectively respond to the diverse environments in which we are active.

Achmea General code of conduct

Trust is the foundation of our work culture, where employees are fully committed to customers and develop their skills while respecting the interests of the organisation. The Achmea General code of conduct, available on our website, contains rules for fair and proper behaviour of our employees. Compliance is mandatory for all employees. Non-compliance can lead to serious consequences, such as dismissal or prosecution. All employees complete the mandatory e-learning on Integrity, which explains the code of conduct and its associated rules. Subsidiaries of Achmea have their own code of conduct. If one is not available, the Achmea General Code of Conduct applies.

The code of conduct regulates interactions among employees, customers, and suppliers, with a focus on collaboration and trust. Unacceptable behaviour such as sexual harassment, discrimination, and violence is not tolerated. Additionally, the code of conduct covers the appropriate use of company resources and information, explains how to handle conflicts of interest, and emphasises the importance of preventing corruption. Employees are encouraged to admit and share mistakes to learn and improve processes. Specific procedures and the Achmea Incident policy apply in the event of incidents and emergencies. There are procedures for submitting complaints about various subjects, such as unwanted behaviour and working conditions.

Respecting human and labour rights

As stated in our Human rights and labour rights statement (see Social – Introduction for a short description and for the full version our website), we are committed to respecting human and labour rights, promoting equal opportunities, and enhancing inclusivity. We consider these rights as essential for our workforce. This includes, amongst others, the freedom of association, the right to collective bargaining, and protection against discrimination based on gender, race, or other characteristics. We prohibit child or forced labour and human trafficking in our operations.

We believe that all individuals are entitled to basic rights and freedoms, irrespective of nationality, race, ethnicity, gender, language, sexuality, religion, or political opinion. We are committed to respecting human rights as outlined in the Universal Declaration of Human Rights (UDHR), the International Covenants on Civil and Political Rights (ICCPR) and the International Convenant on Economic, Social and Cultural Rights (ICESCR). We are also committed to upholding labour rights based on the International Labour Organisation (ILO) core conventions regarding fundamental principles, as

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

well as workers' rights in our business relationships. We aim to ensure that our HR policies are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). These principles, based on the Protect, Respect, Remedy Framework, serve as a global standard for mitigating adverse human rights impacts associated with business activities. Additionally, our Human rights and labour rights statement reflects our support for international standards, such as the UN Global Compact, of which Achmea became a member in 2024.

As an employer, we place great importance on creating a safe and healthy work environment for our workforce. We ensure that they have the opportunity to express their concerns, needs, and complaints when necessary. To this end, we offer various procedures and policies, such as the Achmea General code of conduct, the Whistleblower policy, the policy on undesirable behaviour, the confidential advisor policy, procedures for reporting and managing customer-related aggression, and the general individual complaint procedure for employees who feel that a human resource policy has been wrongly or incorrectly applied to them. Employees who file a complaint will not suffer any adverse consequences. Senior management oversees the implementation of the policy.

Annually, the Executive Board receives a report of the number of complaints and the issues reported by employees. Additionally, the annual Employee Engagement Survey ((Medewerker Betrokkenheidsonderzoek (MBO)) includes questions on employees' experiences with undesirable behaviour. Where appropriate, measures are taken based on reports to prevent or resolve undesirable behaviour. In 2024, a special project group was tasked with making recommendations for optimising Achmea's processes for reporting undesirable behaviour.

Identification of human and labour rights risks

To ensure our responsibility, we aim to prevent negative impacts on human rights and labour rights in areas where we can exert influence. Through due diligence, we identify actual and potential adverse human and labour rights issues related to our own workforce. Examples in this respect are the regular Risk Inventory & Evaluation (RI&E), the annual MBO and Achmea's complaint procedures. When verified negative impacts occur, we aim to take steps to remediate them where we have caused or contributed to the negative impact. We have no indications that individuals with special characteristics, who work in a specific context or engage in particular activities, are at greater risk of suffering harm.

We implement various programmes that promote sustainable employability, such as facilitating job-to-job transitions within the sector (intra-sectoral mobility), the pluspool for employees over 60 years old, and mobility programmes outlined in our social plan. These initiatives enhance job security and help mitigate the negative effects of potential job loss for our employees.

Whistleblower policy

Anyone who works for Achmea can report a (suspected) wrongdoing. A wrongdoing refers to an action or negligence that jeopardises the public interest. This may include violations of legislation, as well as threats to public health, the safety of individuals or the environment. It can also indicate risk to the proper functioning of the organisation due to improper actions or negligence.

If an employee believes that the usual procedures for reporting an incident are inadequate, the employee can utilise the Whistleblower policy. Through this policy, incidents can be reported to an internal or external confidential advisor. Reports are handled according to the guidelines of the Whistleblower policy, which protects the rights of the employee. Additionally, reports are treated confidentially to ensure the privacy of the employee is protected.

EMPLOYEE PARTICIPATION AND ENGAGEMENT

We believe it is important to involve employees in the development, implementation, and evaluation of our policy, with the aim of improving engagement within Achmea. However, we do not consult our employees or employee representatives regarding the establishment of the targets described in this chapter and the monitoring of performance against those targets. Nevertheless, we are open to feedback and suggestions from employees on this matter.

We value social dialogue, which occurs individually during regular meetings between managers and their employees. Additionally, this occurs at the collective level between the employer and employee representation bodies, such as the Works Council (OR) and labour unions.

Within Achmea, regular discussions take place with various employee participation bodies within Achmea. In the Netherlands, meetings are regularly held with the labour unions to discuss topics such as working conditions, work related aspects, and the social plan. Both members and non-members of the unions are involved in setting the agenda for the discussion of the Collective Labour Agreement (CLA) and in the decision-making process regarding the outcomes of these negotiations. Within our foreign operating companies, meetings with labour unions take place within the context of local law and regulations.

To engage and inform our employees about our organisation and policies, we utilise various communication channels, such as the intranet and Microsoft Viva Engage. Our management plays a crucial role in this process, as they are the first to share information with their teams.

To assess employee satisfaction, we conduct a MBO annually. The results of the survey are discussed within the teams, after which managers and employees jointly determine actions to address areas for improvement. Feedback from the survey is documented and integrated into decision-making processes to ensure alignment with organisational goals. Employees are informed about how their feedback has influenced decisions and actions through team discussions and updates. This approach not only drives improvements but also enhances transparency and engagement across the organisation.

MATERIAL TOPICS

In developing and implementing our sustainable employment practices, we focus on four material HR topics. These are: A) Inclusion, diversity and equity, B) Training and skills development, C) Work-life balance, and D) Measures against violence and harassment. In the context of the DMA 2024, we have identified these topics as material based on the judgment of internal experts, taking into account the local context, including the social security system in the specific country where our foreign operations take place. In the following paragraphs we discuss these topics in more detail.

The financial resources allocated for implementing all the actions outlined in this chapter are part of our regular operations. Future financial resources for these initiatives have yet to be determined.

A. INCLUSION, DIVERSITY & EQUITY

Our commitment to inclusion, diversity, and equity (ID&E) is a long-term investment in creating a cohesive and resilient workplace. An inclusive environment fosters a sense of belonging, enhancing employee well-being and engagement, while diversity drives innovation, helping us remain adaptable and competitive.

OUR STRATEGY RELATED TO INCLUSION, DIVERSITY & EQUITY

With our ID&E ambitions, we aim to strengthen our reputation, build trust with customers, and attract talent. However, we acknowledge that ID&E can also present challenges. For example, it can influence decision-making processes and lead to feelings of undervaluation among employees if engagement is not authentic. Additionally, some employees may feel uncomfortable with our efforts to promote inclusivity.

By addressing these challenges, we emphasise the importance of valuing every individual and contributing positively to society. We strive to create sustainable value for customers, employees, our organisation, and the community. Additionally, we want to promote an inclusive environment where everyone has equal opportunities to live and work freely.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

Own policies

We are committed to promoting ID&E in the workplace. We have developed various ID&E policies and ambitions aimed at ensuring an inclusive work environment and promoting equal opportunities for all.

1-Achmea policy

The primary objective of the 1-Achmea policy is to establish an inclusive working environment that provides equal opportunities for all employees. This policy centres around a unified 1-Achmea approach, focusing on five key areas for growth: creating an inclusive work environment, promoting gender diversity in higher management positions, fostering multicultural diversity, supporting employees with special talents, and promoting inclusivity and equal opportunities for the LGBTI+ community.

Ambitions for growth in these areas have been set for 2025 and 2030. The goal of our 1-Achmea policy is to value and promote inclusivity and equal opportunities for all employees at every stage of their careers. The policy aims to enhance employee engagement and productivity by leveraging diverse perspectives. This includes promoting gender diversity in leadership, multiculturalism, and support for the LGBTI+ community, while addressing risks, such as stress and burnout.

ID&E Policy for the Executive Board and Supervisory Board

In addition to the 1-Achmea policy, we have an ID&E policy specifically for the Executive Board and Supervisory Board. This policy aligns with our overall commitment to ID&E, emphasising the importance of diversity in leadership. It ensures that ID&E principles are integrated into leadership roles, which may help reduce homogeneity in decision-making.

Gender equality and equal pay for equal work

Currently, we do not have a separate policy for gender equality and equal pay for equal work, but these principles are an essential part of our overall policy and ID&E programme. We are in the process of developing a specific policy focused on gender equality and equal pay for equal work. This policy is aimed at promoting equal opportunities regardless of gender or cultural background and ensuring fair pay for equal work. The implementation of this policy is scheduled for 2025. Additionally, our Remuneration policy promotes a gender-neutral compensation structure, contributing to a fair and equitable work environment for everyone.

Applicable regulations and commitments

We are committed to external initiatives that align with our values and goals. These initiatives not only reflect our ethical priorities but also reinforce our commitment to creating an inclusive and socially responsible organisation. The Charter

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Talent to the Top aims to increase the representation of women in senior management positions. The Performance Ladder Social Enterprise (Prestatieladder Socialer Ondernemen (PSO)) focuses on integrating individuals from the PSO target group in our workforce, promoting social inclusion and employment opportunities for underrepresented groups. In collaboration with the Dutch General employers' association (Algemene Werkgeversvereniging Nederland (AWVN)) and the Ministry of Social Affairs and Employment, we endorse the Declaration of Equal Opportunities (Verklaring van gelijke kansen), which seeks to foster equal opportunities in the workplace and ensure that all employees have fair access to career opportunities, regardless of their background.

Actions and approaches

1-Achmea

In 2024, we have converted our 1-Achmea policy into actionable plans to enhance inclusivity and diversity. One of the initiatives is to empower the chair of division management so that they can develop their own ID&E strategy with expert support. This allows each unit to set specific ambitions within a broader framework. We are enhancing insights across the organisation by developing a gender dashboard for managers, improving multicultural data, and conducting an organisation-wide survey on the working climate. Additionally, we aim to improve communication by fostering collaboration within our diversity networks, establishing a communication calendar, and implementing a clear ID&E communication strategy that outlines our process and goals. Our visible interventions include creating inclusive spaces, improving facility accessibility, and enhancing diversity in hiring practices. We strive to integrate ID&E principles as part of our HR transformation programme.

ID&E policy for the Executive Board and Supervisory Board

In 2024, we made strides in promoting ID&E within our leadership. We have integrated diversity criteria into the appointment process for senior management, the Executive Board, and the Supervisory Board. As a result, these criteria are central to leadership selections, contributing to a more diverse and inclusive organisation. Additionally, diversity has been incorporated into the leadership pipeline and is regularly discussed by the Executive Board and the Supervisory Board. For the future, we plan to annually assess diversity in leadership appointments and continue to discuss this topic at the board level.

Gender equality and equal pay for equal work

We are committed to the fundamental principle that women and men have the right to equal pay for work of equal value. We conduct evaluations to assess the pay gap between men and women to ensure equal pay. The Metrics and targets part includes a table related to the uncorrected gender pay for our employees. On 1 January 2024, an initial analysis was conducted. The resulting KPIs and actions are currently being developed.

Foreign operating companies

The current policies implemented in the Netherlands serve as guidelines for our foreign operating companies. However, the implementation may differ based on local regulations, economic conditions, and cultural differences.

At Union, a specific ID&E policy is still being established, with the commitment to treating all employees equally being included in the CLA. Interamerican and Eureko Sigorta have implemented comprehensive policies aimed at fostering a diverse and inclusive workforce. Eureko Sigorta's policies focus on gender equality and a discrimination-free workplace, aligning with legal standards and the company's values. The policy of Interamerican promotes ID&E through advocacy on human rights, targeted training against bias, regular audits, and a zero-tolerance approach to non-compliance.

In 2024, we took various actions at our foreign operating companies to promote ID&E. At Union, we have introduced monthly monitoring of workforce demographics, a company-wide awareness webinar, employee feedback surveys, and specialised training for managers on inclusive leadership. At Interamerican, we focus on increasing the number of women in management positions through succession planning and ID&E training. Additionally, we conduct annual ID&E surveys to further enhance our inclusivity strategies.

Monitoring

The senior manager Leadership & Inclusion guides the 1-Achmea's ambitions and programme, while management is responsible for the implementation of the ID&E initiatives within their own divisions.

The 1-Achmea policy applies to all divisions in the Netherlands, managed by HR. Each division collaborates with HR managers and ID&E leads to execute the policies, with progress monitored through performance dialogues and updates reviewed by the HR management team. The steering group for employee development and organisation evaluates the progress of ID&E initiatives.

The Executive Board is responsible for the overall ID&E policy. The director of the HR department is responsible for the ID&E policy, while the design and ultimate responsibility for this lies with the Executive Board. The Supervisory Board oversees the implementation of the ID&E policy, with the Selection and Appointment Committee monitoring compliance with the policy during the appointments of members of the Executive Board and the Supervisory Board.

Engagement

To ensure our policies effectively meet employee needs, we engage stakeholders through consultative processes.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Employees contribute through diversity networks, ensuring that diverse perspectives are included in decision-making. We currently employ this approach during the development of specific policies. For instance, we are exploring the possibilities of Gender Transition Leave and are collaborating with Achmea Pride. The Central Works Council (COR) and the Steering Committee for the Development of employees and organisation provide broad representation from both employees and management across various parts of the organisation. Updates are shared during regular COR meetings. The Executive Board exemplifies inclusive leadership, promoting this throughout the organisation.

Our policies are available through our own intranet, the diversity portal of the Social and Economic Council (Sociaal Economische Raad (SER)), and it is communicated through an ID&E communication plan.

In our foreign operating companies, new employees receive training on the ID&E policy and the code of conduct. Policies are online available, and feedback is collected through surveys to enhance understanding and identify areas for improvement.

Processes to remediate negative impacts and channels to raise concerns

In the Netherlands, our ID&E policy is founded on an integrated approach that encompasses setting goals, creating plans, executing actions, measuring and monitoring progress, evaluating and adjusting, and addressing any negative impacts of the policy and objectives.

If employees feel that the ID&E policy is not being followed correctly, they may raise their concerns through various channels, including their line manager, HR, or Achmea's diversity networks. We encourage employees to speak out against unwanted behaviour and provide support through managers, confidential advisors, and internal resources.

Our foreign operating companies have developed their own processes to address negative impacts and channels to raise concerns. At Eureko Sigorta, these processes include identifying of discrimination, implementing corrective actions, supporting affected employees, and monitoring to prevent recurrence. Effectiveness is evaluated through employee feedback and by tracking incidents. Interamerican mostly adheres to our general processes, particularly in setting goals, conducting audits, and establishing communication channels for ID&E concerns. With additional documentation on evaluation processes and the potential establishment of a Diversity Network, Interamerican aligns with our integrated approach.

METRICS AND TARGETS

We have established goals and ambitions for ID&E for 2025 and 2030. Each year, we set measurable targets to support our vision and have defined overarching diversity objectives for these years. To achieve these targets, we employ both centralised and decentralised strategies for implementing coherent and integrated actions across the organisation.

During 2024, diversity played an important role in the appointments of senior management and directors. ID&E is integrated into our leadership pipeline, and we assess effectiveness through the ID&E dashboard, relying on annual Statics Netherlands (Centraal Bureau voor de Statistiek (CBS)) reports for insights on multicultural diversity. These metrics are integrated in the leadership structure and the evaluation of the management team.

Gender diversity

We aim to fill 35% of management positions with women by 2025, with the ultimate goal of reaching 40% by 2030. These inclusion and diversity goals align with the Charter Talent to the Top, where we aim for a representation of 35% women in top management by 2025. At the end of 2024, 34.5% of top management of employees employed by Achmea Internal Services or Achmea B.V. were women; while for Achmea as a whole, this was 34.9%.

Additionally, we seek to achieve the Performance Ladder Social Entrepreneurship PSO Basic Step 1, which means that 1.16% of FTEs must come from the PSO target group, supporting social inclusion.

Age and gender

The tables below present diversity data by age and gender for Achmea Group. Metrics have not been validated by an external organisation.

TABLE 1: EMPLOYEES BY AGE AND GENDER (HEADCOUNT)

	31 DECEMBER 2024		31 DECEMBER 2023	
	MALE	FEMALE	MALE	FEMALE
<30 years	756	1,068	712	1,124
30-50 years	3,806	4,347	3,792	4,272
>50 years	3,207	2,578	3,122	2,486
Total	**7,769**	**7,993**	**7,626**	**7,882**

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

TABLE 2: SUPERVISORY BOARD AND EXECUTIVE BOARD BY GENDER OF ALL GROUP COMPANIES

	31 DECEMBER 2024			
	MALE		FEMALE	
Country	%	#	%	#
The Netherlands				
Supervisory Board Achmea B.V.[1]	67%	5	33%	3
Executive Board Achmea B.V.	50%	3	50%	3
Supervisory Board other group companies[1]	84%	18	16%	3
Directors of other group companies	76%	28	24%	9
Greece				
One-tier[2]	79%	19	21%	5
Slovakia				
Supervisory Board[1]	71%	5	29%	2
Executive Board	75%	3	25%	1
Türkiye				
One- tier[2]	87%	7	13%	1

[1] 67% of the members of the Supervisory Board of Achmea B.V. are considered independent based on the ESRS definition, specifically for Achmea B.V. combined with principle 2.1.8 of the Dutch Corporate Governance Code. Of the other Supervisory Boards in the Netherlands and Slovakia, 59% are independent.
[2] The members in Greece, 17% are independent and non-executive. Of the members in Türkiye, 25% are independent and non-executive.

TABLE 3: MEMBERS OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES BY GENDER BASED ON FUNCTIONS - ALL GROUP COMPANIES

	31 DECEMBER 2024			
	MALE		FEMALE	
	%	#	%	#
The Netherlands	64%	107	36%	60
Greece	83%	35	17%	7
Slovakia	71%	12	29%	5
Türkiye	87%	7	13%	1
Total Achmea	**69%**	161	**31%**	**73**

PRINCIPLES FOR DETERMINING INFORMATION ON AGE AND GENDER

Methodology

See Appendix B. for a general description of the methodology used to determine the FTE counts. Table 2 includes, in addition to the Executive Board and Supervisory Board of Achmea B.V. itself, the directors with similar job titles from the group companies. The entities in Greece and Türkiye have a one-tier board structure and are therefore included in the table as one category. Members of the Supervisory Board, Executive Board, and/or Management may hold multiple (executive or supervisory) positions in various subsidiaries. Table 3 lists the number of positions for these individuals; one person may hold multiple positions

Scope

These tables include all group companies of Achmea, both in the Netherlands and abroad.

Gender pay gap

The table below gives the difference between the average gross hourly wage for male and female employees within Achmea. This difference is expressed as a percentage of the average gross hourly wage of male employees. A positive percentage means that the average gross hourly wage for men is higher than that for women. The calculations are based on the gross hourly wage, in order to exclude differences caused by part-time and full-time positions.

TABLE 4: GENDER PAY GAP WITHIN ACHMEA

	THE NETHERLANDS EXCL. THIRD-PARTY COMPANIES		TOTAL ACHMEA	
	2024	2023	2024	2023
Ratio of average gross hourly wage	16.6%	17.9%	21.4%	N/A

In the table, the calculated gross hourly wage for women is lower than that for men. This is because of the following reasons:

- There are relatively large numbers of men working in higher salary scales, resulting in a higher average hourly wage for men than for women.
- The average number of years of service at Achmea is lower for women than for men.

The average age of women is lower than that of men. This may indicate that men more often reach higher positions in the salary scales due to having more work experience, both within and outside Achmea. When third-party companies and foreign operating companies are included, the pay gap widens. Because there are relatively many women employed in these sectors compared to the Netherlands, and the salaries, especially in the foreign operating companies, are generally lower.

In table 4, the average of all men is compared to the average of all women, regardless of the positions they hold. In Table 5, we demonstrate that within the different salary scales, the difference is smaller. Here too, the differences are primarily caused by the fact that men are, on average, older, have more years of service, and therefore occupy higher levels within the salary scale.

TABLE 5: GENDER PAY GAP WITHIN ACHMEA BY SALARY SCALE

Ratio of average gross hourly wage	THE NETHERLANDS EXCL. THIRD-PARTY COMPANIES		TOTAL ACHMEA	
	2024	2023	2024	2023
Top management	0.4%	1.5%	1.3%	N/A
CLA employees J en K	5.3%	5.6%	7.4%	N/A
CLA employees G – I	4.0%	4.1%	10.8%	N/A
CLA employees F or lower	1.6%	2.4%	-4.7%	N/A

Employees at Achmea are paid equally regardless of gender, sexual orientation, or religious background. In 2024, Achmea conducted an analysis for its Dutch employees who fall under the Achmea CLA to determine whether men and women indeed receive equal pay. The starting salaries of employees were included in this analysis, taking into account the date

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

they started. In line with previous years, the analysis of employees covered by the CLA shows that when adjusted for factors such as scale and years of service, gender has no influence on the salary of these employees within Achmea. Achmea's remuneration method shows that there is usually little room for deviation in salary after the starting date, unless a promotion has occurred.

PRINCIPLES FOR DETERMINING INFORMATION ON THE PAY GAP

Methodology

See Appendix B for a general description of the methodology used to determine the FTE counts. The category of top management, as included in Table 5, consists of the Executive Board, Management, and senior management. The CLA categories, as mentioned in Table 5, are based on the CLA for employees employed by Achmea B.V. Subsidiaries with a different CLA are classified and included within these categories. The classification has been done based on expert judgment by the HR department.

Scope

The Netherlands excluding third-party companies includes employees who are employed by Achmea Internal Services and fall under the Achmea CLA, as well as employees who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself. The total includes all employees employed by Achmea and its subsidiaries, both in the Netherlands and abroad.

Pay ratio

The pay ratio shows the salary of the highest-paid individual (at Achmea the CEO) compared to the median salary of our employees in the Netherlands and abroad. In addition, the pay ratio has also been calculated by comparing the salary of the highest-paid individual with the median salary of our employees working for Achmea in the Netherlands, excluding third-party companies.

TABLE 6: PAY RATIO - MEDIAN

	2024	2023
Based on median salary of all employees	27.8	N/A
Based on median salary employees – Dutch operations only excl. third-party companies	24.5	25.6

In compliance with the Dutch Corporate Governance Code requirements, we have also provided the pay ratio calculated based on the average salary of our employees.

TABLE 7: AVERAGE SALARY (DUTCH CORPORATE GOVERNANCE CODE)

	2024	2023[1]	2022	2021	2020
Based on average salary employees	18.8	19.8	22.7	20.9	24.2

[1]The figure for the year 2023 has been adjusted from 19.1 to 19.8 because the figure last year was calculated based on the average number of FTEs in the financial year instead of the number of FTEs at year-end.

PRINCIPLES FOR DETERMINING INFORMATION ON PAY RATIOS

Methodology

To determine the pay ratio based on the median, as included in Table 6, the salary before statutory payroll tax has been used to determine the median salary of the employees.

For the pay ratio in accordance with the Corporate Governance Code 2022, as shown in Table 7, the remuneration of the chair of the Executive Board for 2024 has been determined based on salary costs (including social security contributions) and pension costs. For internal employees (expressed in FTEs), the average remuneration has been determined based on salary costs (including social security contributions) and pension costs. The salaries include the variable remuneration paid out in a financial year. The number of employees has been determined as the number of FTEs at the end of the year. The comparative figures for the years 2022, 2021, and 2020 have not been adjusted based on the revised Corporate Governance Code 2022.

Scope

Employees who are employed by Achmea or a subsidiary, both in the Netherlands and abroad. The Netherlands excluding third-party companies includes employees who are employed by Achmea Internal Services and fall under the Achmea CLA, as well as employees who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself.

Employee Engagement Survey (MBO)

The level of inclusion is assessed through our MBO, with the inclusion score based on various questions related to inclusion. Our goal is to achieve a minimum inclusion score of 8.0 in the MBO by 2025, with the intention of extending this ambition to 2030 and beyond.

TABLE 8: INCLUSION

	TARGET 2025	RESULT 2024
Employee Engagement Survey: Inclusion	8.0	7.8

PRINCIPLES FOR DETERMINING INCLUSION INFORMATION

Methodology

The inclusion score is determined based on the annual MBO. All employees with a fixed-term or open-ended contract who are employed by Achmea B.V. before 1 September receive an invitation to participate. The MBO consists of a questionnaire that allows employees to provide feedback on various topics, including inclusion. The score in the table is the average of all participants in the MBO.

Scope

The inclusion score includes all employees in the Netherlands excluding third-party companies. This includes employees who are employed by Achmea Internal Services and fall under the Achmea CLA, as well as employees who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

B. TRAINING AND SKILLS DEVELOPMENT

This section elaborates on how we are committed to fostering growth of knowledge and skills within our workforce. Investing in training and development can bring various benefits, such as career development, job security, increased productivity, and improved motivation. This can result in employees who are more engaged and think more creatively. Additionally, these investments can help improve work-life balance, allowing our employees to remain engaged and productive, which ultimately benefits our organisation.

OUR STRATEGY RELATED TO TRAINING AND SKILLS DEVELOPMENT

Our learning and development strategy centres on fostering resilience and adaptability within our workforce. The engagement and expertise of all our employees serve as a key building block in our strategy.

We prioritise employee well-being and engagement by providing opportunities for learning and personal development within a supportive work environment. As part of our responsible employer practices, we consider learning and skills development as core competencies for employees, teams, and the organisation. We consider the development of professional skills an essential organisational process that is integral to our culture as a learning organisation.

Although we strive to become a skills-based organisation, we recognise that knowledge and skills quickly become outdated. This requires regular re-skilling and up-skilling. Therefore, our recruitment and selection process focuses on learning agility and a growth mindset, ensuring our employees are well-prepared to adapt and thrive in an ever-changing landscape.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

Own policies

We have learning and development policies aimed at supporting personal growth, adaptability, and career development to ensure our employees remain sustainably employable. This policy can contribute to career growth and helps to reduce risks such as stagnation, lack of motivation, and burnout.

All You Can Learn

The All You Can Learn (AYCL) policy, established in 2022, provides Achmea employees in the Netherlands, including those hired through employment agencies with at least 3 months of continuous employment, access to a range of training options. This allows, for development in both their current roles as well as future career opportunities.

Employees are supported both financially and through allocated study time. For job-related learning, we aim to cover all costs, and employees can attend classes and exams during work hours. For future career development, we offer financial support up to € 5,000 with repayment agreements for larger amounts under certain conditions, such as early termination of employment.

Voluntary training must enhance job performance or support career growth, requiring manager approval for courses costing € 5,000 or more. Employees can pursue up to two courses at a time, with conditions on course completion and time allocation, as coordinated with the manager.

Talent, Development & Performance (Talent, Ontwikkelen en Presteren (TOP))

As work becomes more dynamic and unpredictable, our employees and our organisation need increasing agility and adaptability, particularly in performance management. Motivation, driven by autonomy, mastery, and purpose, is essential for success. In 2019, we replaced traditional performance management with the TOP framework for the employees in the Netherlands which emphasises dialogue, learning capacity, and job satisfaction. Evaluation scores and reward assessments are no longer linked. Employees collaborate with their teams and managers to shape their TOP experiences. Discussions about training needs, employability, and skill gaps are also part of the TOP dialogue.

According to the ESRS S1-13, must we report on the percentage of employees who have participated in regular performance and career development evaluations, broken down by gender. However, due to TOP, no performance reviews are conducted with employees, preventing us from reporting on this.

Sustainable employability

Training and skills development are focused on sustainable employability. The training and development portfolio includes not only role-specific courses and professional skills training but also supports personal development and maintaining a strong position in both internal and external job markets. Employees can therefore qualify for positions other than their current roles, both within and outside of Achmea.

Foreign operating companies

Our foreign policies aim at sharing our company goal of fostering a resilient and adaptable workforce but differ in implementation and focus areas, depending on local legislation, cultural differences and organisational priorities.

Eureko Sigorta prioritises continuous employee development through structured annual training reviews to enhance programmes in line with business goals. It utilises an internal training platform for knowledge-sharing and skill-building, including a train-the-trainer initiative. Employees have access to various learning opportunities, covering technical skills, leadership, sustainability, and mandatory training, with an emphasis on actual needs like Data and AI training. Eureko Sigorta also organises expert-led seminars, known as ‘Eureko talks’, to boost knowledge and awareness.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Interamerican's training policy is designed to equip employees with essential skills to excel in their roles and support company growth. Collaboration between management and HR is aimed to ensure that training aligns with corporate goals, with stakeholders identifying needs and monitoring effectiveness.

In 2024, Interamerican introduced various initiatives, including training in financial literacy, leadership, and dealing with violence and harassment. During the European health and safety week, they also offered training in health and safety. Additionally, employees were given access to language courses and LinkedIn learning.

Union is updating the education section on its intranet to expand training opportunities and trainings needs have been integrated into the evaluation process.

Actions and approaches

Our learning and development approach focuses on enhancing sustainable employability, with an emphasis on both job-specific knowledge and skills, as well as personal growth, in order to strengthen employees' positions in the labour market. The implementation of our AYCL policy provides employees in the Netherlands with access to various of free, voluntary training courses without needing managerial approval.

In addition to our policies and an expanded training portfolio, we have implemented initiatives to foster a resilient, adaptable, and engaged workforce. These initiatives address various career stages and roles, improve leadership, and sustainable employability. We have developed an online platform called 'My Learning' that empowers employees to manage their career development by setting goals and exploring growth opportunities. Engagement data is tracked to ensure the platform remains relevant to their evolving needs. We also offer targeted training to equip employees with the necessary knowledge and tools for their roles, supported by guided learning frameworks that outline mandatory skills and advancement pathways.

Many learning activities are integrated into daily work, including informal learning and workplace training. We plan to offer personalised training using learning analytics and AI in the future. In addition, we provide personalised career advice to help employees align their skills with market demands. We monitor participation and satisfaction to ensure the effectiveness of these programmes.

We support managers in enhancing their leadership skills, particularly in guiding teams through organisational changes. We do this with leadership assessments and feedback, which allow us to measure the impact of the programme.

Monitoring

We monitor the effectiveness of this policy through participation rates and employee feedback. Regular reviews conducted by HR and Learning Councils support that this policy remains effective and aligned with our strategic objectives.

Training and skills development is coordinated by each business unit's Learning Council or, for smaller staff units, by the management team. The Learning Council is responsible for planning, monitoring, and directing the development of expertise and related investments, aligning them with the strategic goals of the divisions through a dashboard. Collaboration with functional and content owners, subject matter experts, and managers who are engaged in specific training topics is essential in this regard.

The HR Director oversees the implementation of training and skills development across Achmea. The HR Director is responsible for facilitating collaboration between HR and the Learning Councils, and the implementation of the processes related to monitoring employee participation, assessing training effectiveness, and gathering employee feedback.

In our foreign operating companies, HR and management jointly identify the needs, involve employees in the process, and plan and evaluate the effectiveness of the training.

Engagement

In developing our policies and initiatives for training and skills development, we have taken into account the input of key stakeholders, including the needs of employees. All policies related to employees are discussed with works councils and labour unions, ensuring that the perspectives and needs of employees are integrated into the development and implementation of our policies.

Our employees are regularly informed on updates on policies and learning initiatives through the intranet and targeted messages, ensuring all employees are aware of growth opportunities. These topics are also discussed in TOP performance dialogues between managers and employees. Managers play a critical role in guiding employee development, ensuring alignment with business objectives, and implementing learning policies through individual development plans. HR and the Learning Councils are responsible for monitoring policy effectiveness, addressing any training issues, and ensuring access to skills development.

Processes to remediate negative impacts and channels to raise concerns

Employees experiencing issues, such as difficulties with booking a training course or with the quality of the training, can report this to HR or use feedback channels. Depending on

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

the nature of the complaint, HR may respond directly, forward the complaint to the training provider, or consult with specialists. Generally, employees receive feedback within two weeks, after which the next steps can be taken.

We have established Service Level Agreements (SLAs) with our training providers, ensuring that the standards for course quality, data security, and service are met. If a provider receives consistently negative feedback, we will remove them from our training offerings. This helps us ensure the quality of our offerings.

HR and the Learning Councils monitor employee feedback, participation rates, and performance data to evaluate and improve training policies, making adjustments as needed. An escalation process is also available for unresolved complaints, allowing employees to approach HR for further support. This approach aims to achieve rapid conflict resolution while evaluations help maintain the quality and relevance of our training offerings

METRICS AND TARGETS

To foster a resilient, adaptable and engaged workforce, we have formulated KPI's.

We measure the annual participation of employees in the AYCL programme. In 2024, this percentage was 68%, exceeding our target of 50%. Additionally, we collect feedback after the training on the quality of the content and the effectiveness of the instructor (evaluation score) to assess the quality of the training in our AYCL offering. In 2024, a score of 8.6 was achieved, which is well above our target of 7.5. We aim to define additional KPI's to measure the impact on the employability, resilience, and adaptability of our employees.

TABLE 9: ALL YOU CAN LEARN

2024

	RESUL 2024	TARGET
% employees that participated in All You Can Learn	68%	50%
Employee Satisfaction Score for All You Can Learn courses (scale 1 – 10)	8.6	7.5

TABLE 10: TRAINING AND SKILLS DEVELOPMENT

2024

		MALE	FEMALE
% employees that participated in performance and career development reviews			
-	The Netherlands excl. third-party companies	N/A[1]	N/A[1]
-	Other	94.9%	95.1%
Average number of training hours per employee			
-	The Netherlands excl. third-party companies	22.0	25.0
-	Other	8.4	9.2
-	Total	19.1	20.2

[1]Since 2019, we have replaced the traditional career and appraisal discussions with TOP, a new approach focused on continuous learning and intrinsic motivation. The holding of TOP discussions is not recorded.

PRINCIPLES FOR DETERMINING INFORMATION ON TRAINING AND SKILLS DEVELOPMENT

Methodology

The percentage of employees who participated in AYCL, as shown in Table 9, is defined as the number of employees who completed one or more training courses or programmes under AYCL during the year, divided by the total number of internal employees at year-end. The evaluation score for completed AYCL training courses is based on the ratings given by participants, as recorded in the training portal.

For the percentage of employees who participated in regular performance evaluations, as included in Table 10, a 'regular evaluation' is defined as an assessment based on criteria known to the employee and their manager, which occurs at least once a year with the employee's knowledge. To determine this percentage, the number of employees who have undergone such an evaluation during the year is divided by the number of employees eligible for such an evaluation. The average number of training hours per employee, as shown in Table 10, is calculated by multiplying the number of hours per training course, as provided by the trainers, by the number of completed training courses. These results per training course are then summed, and the total is divided by the total number of employees at year-end.

Scope

The information in Table 9 is based solely on employees in the Netherlands, excluding third-party companies. This includes employees who are employed by Achmea Internal Services and fall under the Achmea CLA, as well as employees who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself. The information included in Table 10 encompasses employees in the Netherlands, excluding third-party companies, with an employment contract (see also above). 'Others' includes all other employees with an employment contract at Achmea or a subsidiary, both in the Netherlands and abroad.

C. WORK-LIFE BALANCE

Promoting flexible work arrangements contributes to both the mental and physical health of employees. This can lead to less stress and higher job satisfaction. By focusing on a good work-life balance, we aim to increase employee engagement and improve the well-being of our employees, which benefits the effectiveness of the organisation.

OUR STRATEGY RELATED TO WORK-LIFE BALANCE

Our work-life balance strategy reflects our commitment to responsible

employment practices and the realisation of 'Sustainable Living. Together'. This strategy applies to all Achmea subsidiaries and emphasises the importance of employee well-being for optimal performance, while also highlighting our output-oriented approach. We believe that supporting the physical, mental, social, and financial health of our employees contributes to both personal satisfaction and organisational success. By focusing on results-oriented thinking and reciprocity, we ensure a balance between individual contributions and collective success. For 2024, we have formulated the goal: 'Working at Achmea also means working on your well-being', with a good work-life balance being central to our broader HR strategy.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

The policies and actions described in this part apply to all Achmea employees in the Netherlands. Any exceptions are outlined in the paragraphs about foreign operating companies. The responsibility for implementing policies and actions lies with the director of the HR department and ultimately with the Executive Board.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

Own policies

Our People strategy promotes work-life balance through three pillars: employee well-being, flexible work arrangements, and sustainable working together.

Employee well-being

The pillar on employee well-being aims to inspire and support employees in working with joy and passion in a healthy way. The goal is to prioritise a healthy work environment and balance, mitigating stress and fostering a safe workplace, taking into account psychosocial workload. Our strategy includes absenteeism management, promoting healthy behaviour, and preventing burn-out. This approach has led to the introduction of a 34-hour workweek in 2021 for the Achmea employees in the Netherlands, aimed at promoting a healthier balance between work, learning, and caregiving.

Flexible work arrangements

We have formalised work arrangements through the CLA for Achmea employees in the Netherlands. The CLA includes various types of leave, including parental, adoption, and foster care leave, as well as options for adjusting work patterns, leave savings plans, and sabbaticals. By offering flexible working hours and the option to work from home, we aim to improve the work-life balance of employees. With this, we hope to achieve a reduction in stress, an increase in productivity, and an improvement in employee satisfaction.

We offer several employee benefits that exceed legal minimums, including flexible working hours without a minimum employment term, unlimited mourning leave, and enhanced birth and maternity leave pay. Employees can also take more long-term care leave with partial pay and sabbaticals. All our employees, both in the Netherlands and abroad, are entitled to family-related leave.

Sustainable working together

The pillar on sustainable working together emphasises sustainable employability by supporting employees in their well-being and prepare for future changes or in the event of reduced employability. The principles of employability provide employees with guidelines on what they can expect and what support they can receive from managers and HR. With this proactive approach, we aim to equip employees with tools and support for personal growth, resilience and adaptability.

Foreign operating companies

Although all Achmea subsidiaries are committed to employee well-being and work-life balance through flexible work arrangements, health and wellness programmes, and family support, the specific implementation of this policy may vary based on local legislation and cultural differences. All our subsidiaries are dedicated to fair work by aligning their policies with both legal requirements and the needs of employees.

At Eureko Sigorta, we aim to improve the well-being of our employees by implementing various initiatives. This includes discussions on sustainable employability, e-learning, support for mental and physical health, extended leave for working parents, and more efficient time management to reduce overtime. Additionally, we offer the opportunity for remote working, monitor well-being initiatives, and ensure inclusive communication about our policies.

At Union, we focus on three key objectives: organising biannual health days with health checks and massages, establishing an Employee Assistance Programme that will start in early 2025, and introducing sabbatical leave, allowing employees to take up to three months off after five years of service.

At Interamerican, we promote work-life balance by offering flexible working hours, remote work options, childcare subsidies, and additional leave. We organise family-friendly events, well-being initiatives, and introduce a new framework for career pathways to enhance engagement. One of our long-term goals is to improve recognition and reward by 2027.

Applicable regulations and commitments

We align our policies with ILO standards, particularly regarding maternity protection and employee rights, which means that women have the right to a safe and healthy working environment, including maternity leave, protection against discrimination, and access to healthcare during and after pregnancy.

In addition, we have a Risk Inventory and Evaluation (Risico Inventarisatie en Evaluatie (RI&E))-policy based on the Working Conditions Act aimed at creating a safer and healthier workplace. An important aspect of this is the Psycho-Social Workload (Psycho Sociale Arbeidsbelasting (PSA)) policy, which focuses on preventing and reducing psychosocial workload. For more information, please refer to the section on Measures Against Violence and Harassment in the Workplace in this chapter.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Actions and approaches

Employee well-being

We promote employee well-being through an integrated approach that is embedded at all levels of the organisation. We offer a range of products and services at organisational, team, and individual levels, accessible through our online platform and 'Healthy working plazas'. Employees can access various resources without needing managerial approval, including company doctors, psychologists, physiotherapists, nutritionists, work-life coaching, menopause advice, and budget coaching. In addition, we are introducing new initiatives such as speed dates and events focused on topics as lifestyle and young parents.

In 2024, we introduced several initiatives. We encourage employees to integrate more rest and relaxation into their workday, for example by shortening meetings by 5 or 10 minutes. Additionally, we offer five meeting-free days during the spring, May, and autumn holidays, so employees have space for personal tasks, relaxation, and free time.

Flexible work arrangements

Our employees can take advantage of flexible working hours and the option to work from home, enhancing the work -life balance. The CLA formalises various (family) leave arrangements for employees in the Netherlands, including parental, adoption, and foster care leave, while also allowing employees to adjust their working patterns. Additionally, in alignment with the ILO Maternity Protection Convention, we offer 16 weeks of paid maternity leave and adjusted working hours to support new parents during their parenthood.

Sustainable working together

We aim for sustainable employability by providing employees with the opportunity to take control of their well-being and prepare for future changes. We do this by promoting one-on-one conversations between employees and managers. We monitor absenteeism and use data to identify early warning signs, enabling proactive management interventions. We have also developed e-learnings and training for employees and managers to prevent absenteeism and increase employability. We track and assess effectiveness through absenteeism monitoring and quarterly MBO.

Foreign operating companies

Our foreign operating companies are committed to the health and well-being of their employees by offering flexible work options and support for working parents. Additionally, initiatives are developed to promote rest and recovery. To monitor employee engagement and well-being, surveys are used to assess progress.

Monitoring

We evaluate the effectiveness of well-being initiatives, health solutions, and interventions, as well as the results of the RI&E, on an annual basis. Adjustments are made as necessary to ensure safe and healthy working conditions, including psychosocial workload. Work-life balance is assessed in our MBO, and absenteeism is monitored. KPIs such as vitality scores, are used to track employee health.

Through these processes, we aim to be better informed on the negative factors in employee safety and health. Based on data, we make decisions to improve the health and well-being of our employees.

Engagement

We engage with our employees about the impact of our well-being policy through various channels. For employees in the Netherlands, the CLA is readily accessible in our intranet. The RI&E policy is available through prevention officers, who serve as key resources for guidance on health and safety matters.

To ensure that our employees in the Netherlands are informed about new employability principles, we have developed a toolbox available for all employees. This toolbox includes various formats and interventions, an animated film, and e-learnings. Managers receive training through the AYCL programme which includes the course 'Prevention, absenteeism, behaviour & leadership' and the e-learning 'Gatekeeper improvement act'. Employees can access e-learnings about 'Being and remaining employable' and 'Absenteeism, and then what?'. During the implementation phase, webinars were organised for HR advisors and presentations on these principles were shared with internal stakeholders.

To further enhance engagement, inspiration sessions are organised for management teams, and employees are given the opportunity to participate in speed dating to discuss initiatives related to employability and well-being. We encourage regular 1-on-1 contacts between employees and managers about employability, particularly during the TOP dialogue. If work does not align with circumstances or capabilities, the employability principles provide guidance on what to do and what to expect from managers and HR employability experts.

METRICS AND TARGETS

We track our progress in work-life balance through two KPIs: vitality and absenteeism. Vitality serves as our primary KPI for work-life balance.

TABLE 11: VITALITY AND ABSENTEEISM

	TARGET 2024	RESULT 2024	RESULT 2023
Vitality	7.2	7.4	7.2
Absenteeism	<4%	4.08%	4.12%

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

TABLE 12: % OF EMPLOYEES WHO HAVE TAKEN FAMILY LEAVE

	2024	2023
Male	8%	5%
Female	17%	13%
Total	12%	9%

PRINCIPLES FOR DETERMINING INFORMATION ON WORK-LIFE BALANCE MEASURES

Methodology

The vitality score, shown in Table 11, is determined based on the annual MBO. All employees with a fixed-term or open-ended contract who are employed by Achmea B.V. before 1 September receive an invitation to participate. The MBO consists of a questionnaire that allows employees to provide feedback on various topics, including vitality. The score in the table is the average of all participants in the MBO. The absenteeism rate, also in Table 11, is calculated by dividing the number of recorded sick hours by the total number of available hours for employees. This information comes from our HR systems.

In Table 12, the percentage of employees who have taken family leave is determined by dividing the number of employees who have utilised a form of family leave (including maternity, paternity, parental, and caregiving leave) by the total number of employees at year-end. 99% of Achmea employees are entitled to family-related leave. The missing 1% consists of employees above the collective labour agreement, working in countries where family-related leave is not regulated by law.

Scope

The vitality score, as shown in Table 11, includes all employees in the Netherlands, excluding third-party companies. This includes employees who are employed by Achmea Internal Services and fall under the Achmea collective labour agreement, as well as employees who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself. Regarding the absenteeism KPI, it concerns all employees in the Netherlands, excluding third-party companies (including hired employees). Table 12 contains information from both the Dutch Achmea entities and the foreign subsidiaries.

D. MEASURES AGAINST VIOLENCE AND HARASSMENT IN THE WORKPLACE

A safe and healthy workplace is an important human right and can contribute to the well-being, innovation, and engagement of employees. An important aspect of employee well-being is preventing violence and harassment, as well as the promotion of a respectful and inclusive environment where employees feel safe and valued.

OUR STRATEGY RELATED TO MEASURES AGAINST VIOLENCE AND HARASSMENT IN THE WORKPLACE

Our commitment to 'Sustainable Living. Together' highlights the importance of employee well-being and vitality. We believe that employees are most effective when they are physically, mentally, socially, and financially healthy. Acknowledging the harmful effects of violence and harassment, both physical and mental, has significant implications for the health and engagement of employees, as well as for the success of the organisation. These effects highlight the need for social and psychological safety within the workplace.

Not taking action to prevent or address incidents of physical or mental violence, harassment, or unwanted behaviour can lead to significant consequences, including decreased employee satisfaction, health decline, reduced productivity, and damage to our corporate culture. These challenges also pose legal risks, potential financial losses, and reputational harm, underscoring the necessity for proactive measures.

By implementing effective approach against violence and harassment, we can create a safer and more inclusive workplace where employees feel valued and supported. This not only enhances employee well-being but also strengthens our organisational culture, resulting in higher engagement and productivity. This approach applies to all our subsidiaries and departments.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

Own policies

Achmea General code of conduct

The Achmea code of conduct provides guidelines for the integrity and appropriate employee behaviour of employees. We do not accept undesirable behaviour, either towards colleagues or the outside world. Additional details on the code of conduct can be found in the beginning of this chapter.

Risk Inventory and Evaluation policy

The aim of the Risk Inventory and Evaluation (RI&E) policy is to establish a safer and healthier workplace by providing a structured framework for the systematic identification, assessment, and management of risks that affect employee well-being and safety. This involves recognising various types of risks, including physical, chemical, ergonomic, and psychosocial risks. These risks are evaluated for their likelihood and severity. Based on this evaluation, priorities are established to determine which risks need immediate attention, and action plans are created to mitigate or eliminate these risks through changes in procedures, equipment, or policies. It is a dynamic policy that is monitored and updated in response to new risks, incidents, or changing working conditions. Conducting a RI&E is an important requirement to comply with the Working Conditions Act.

Psychosocial workload policy

The objective of the Psychosocial workload (PSA) policy, which is part of the RI&E policy, is to prevent or minimise excessive psychosocial workloads. The PSA policy focuses on work-related stressors, such as high workload, aggression, violence, bullying, harassment, and the promotion of a discrimination-free environment. It specifically addresses psychological and social risks in the workplace with the aim of enhancing employee well-being and safety.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

Actions and approaches

We are committed to address issues related to harassment and unwanted behaviour in the workplace. By identifying and addressing inappropriate behaviour early, while protecting employees from negative repercussions when reporting such behaviour, we can proactively prevent further issues and promote a healthier work environment.

In 2024, we implemented various initiatives to raise awareness among the executive team, management teams, and employees and to address unwanted behaviour. We achieve this through roadshows, leadership programmes, and training sessions. Employees have been informed about how to report incidents, and confidential advisors have been introduced. Some workshops have included discussions on dilemmas and statements regarding transgressive behaviour. In the coming years, we plan to conduct culture workshops, and establish protocols for managing threatening situations, while also integrating customer contact training and discussions about a healthy and safe working environment into our leadership meetings.

The RI&E policy and PSA policy

The RI&E policy offers a systematic approach to identifying and mitigating risks, enhancing workplace safety through monitoring and proactive action plans. The PSA policy specifically addresses risks that may lead to mental health issues and violence. Together, both policies promote proactive risk management and encourage the reporting of harassment or unsafe behaviour.

In 2024, actions were taken in line with the RI&E and PSA policies. This includes awareness campaigns and training programmes designed to help employees manage stress and aggression. Employees can report incidents through confidential advisors and the ‘Speak Up’ page.

We also aim to monitor PSA incidents and regularly assess the effectiveness of our actions, making adjustments to policies and processes to enhance employee well-being. Recommendations for enhancing the reporting process will be developed.

Promoting a safe working environment

We have undertaken decentralised actions across various business units to foster awareness and promote a safe working environment. For instance, at Stichting Achmea Rechtsbijstand, we established a counter to consolidate knowledge and experiences, alongside workshops focused on customer behaviour. In Facilities Management and Document Logistics, we held team workshops and awareness sessions, monitored by the management team. In Accounts Receivable Management, we incorporated the concept of a ‘safe working environment’ into the Team Barometer, supported by regular monitoring. At Zilveren Kruis, we launched an action plan to tackle undesirable behaviour, integrating it into leadership programmes and enhancing awareness among our management teams.

Foreign operating companies

The policies of our foreign operating companies are also focused on maintaining a safe and respectful workplace, where violence and harassment are not tolerated. We promote a culture of mutual respect, inclusivity, and dignity. Reporting mechanisms may vary for each operating company.

Monitoring

Important stakeholders for the implementation and monitoring of the Achmea General code of conduct are the Committee for unwanted behaviour, the Executive Board, HR, confidential advisors, and the works council. The Committee for unwanted behaviour investigates complaints, provides advice, and holds hearings. Monitoring involves direct communication with management, collaboration with confidential advisors, and annual evaluations. The committee also offers guidance on policy and the enforcement of the approach. Records of complaints are maintained for five years. The committee publishes annual reports on unwanted behaviour in collaboration with HR and Compliance. In these reports the number and nature of complaints are detailed to the group HR director, the Executive Board, the Supervisory Board, and the works council.

The Executive Board and the Supervisory Board oversee adherence to the policies, with support of Compliance and Internal Audit. The Facilities department is responsible for managing unwanted customer behaviour, with an emphasis on physical safety. Company doctors and health professionals ensure compliance with health and safety laws.

The RI&E and PSA policies are regularly evaluated and adjusted to better address employee needs and ensuring the effectiveness of preventive and corrective measures.

We are currently developing a method to monitor negative behaviour from customers towards our employees and to establish corrective procedures and actions. The effectiveness will be tracked and evaluated annually through the MBO and RI&E and PSA assessments, with comprehensive reviews conducted every two years.

Engagement

Our aim is to raise awareness among our staff by making information, policies, and interventions easily accessible. Employees are informed about the policy and how to report unwanted behaviour through various channels. The intranet is utilised for communicating the process of submitting complaints.

SOCIAL – RESPONSIBLE EMPLOYER PRACTICES

We encourage employees to speak out about unwanted behaviour and provide support through managers, confidential advisors, and internal resources. Training, workshops, and communication reinforce the policy and make employees aware of their rights and available resources.

Information is accessible through the confidential advisors and Speak Up sites, and we focus on this topic each year during the integrity week. The Committee on unwanted behaviour shares annual reports with the Executive Board and HR, which include findings and recommendations. Additionally, we collect information through the MBO regarding employees' experiences and preferences regarding a safe work environment.

Processes to remediate negative impacts and channels to raise concerns

Recovery processes involve bi-annual monitoring, detailed procedures for managing individual incidents, and regular reassessments of policies and measures. The various actions and processes are outlined in more detail below.

Our code of conduct is included in the mandatory Integrity e-learning for all internal and external employees, which must be completed within three months of employment and is repeated every three years.

On an individual level, employees can seek assistance from confidential advisors for guidance or to gain a better understanding of the policy. Achmea's Confidants Scheme is a crucial resource for employees seeking support on sensitive issues such as workplace conflicts and harassment.

Employees can submit complaints about unwanted behaviour by emailing the Committee on unwanted behaviour. We strive to ensure that employees can report inappropriate behaviour without fear of negative consequences. The procedure for submitting complaints is communicated through company resources, such as our internal network.

We also provide employees with access to a comprehensive guide titled ‘Dealing with aggression and threats,’ which outlines the approach to handling aggression and threats directed at employees or facilities. These threats can take many forms, including physical contact, hostile phone calls, or threatening communications via email or letters, such as from an angry customer or even serious threats such as bomb threats. To prepare employees for such challenging situations, we offer specialised training on managing aggression. The guide highlights among others preventive, repressive, and organisational measures, along with guidelines for reporting incidents.

Additionally, anyone working for Achmea can report suspected misconduct through our Whistleblower policy. Additional details on our Whistleblower policy can be found in the introduction of this chapter. The Whistleblower policy offers various internal and external reporting channels and ensures protection for employees who report potential wrongdoing.

Foreign operating companies

Our foreign operating companies each have structured procedures for addressing unwanted behaviour and fostering a respectful workplace.

METRICS AND TARGETS

Reports of violations of codes of conduct and regulations can be made through confidential advisors. In 2024, there were a total of 19 confidential advisors, 18 internal and 1 external. These confidential advisors handled 140 cases in 2024 (2023: 118 cases).

In 2024, the Committee on Unwanted Behaviour ruled on 2 complaints filed in 2023, both of which were dismissed. There were 5 new complaints reported (2023: 4 complaints), of which 2 were declared inadmissible and 1 complaint was resolved through conflict mediation. The handling of 1 complaint was postponed due to the absence of the complainant. The committee also has 1 complaint still under review. The new complaints relate to bullying (4) and (sexual) harassment (1). Additionally, there were 3 reports concerning the Whistleblower policy (2023: 1 report). In 2024, we received no indications of reports regarding serious human rights incidents involving employees. No fines, penalties, or compensation were awarded.

The data for 2023 and 2024 relates to incidents involving employees within our organisation. We plan to expand this data in 2025 by incorporating incidents from external customers directed at our employees.

SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

Risks

Insurance and services: Higher costs due to measures implemented by healthcare providers to enhance the health, safety, and well-being of healthcare personnel. The reliance on costly temporary staff to cover for the shortage and/or absence of internal employees contribute to these expenses. Inadequate patient care stemming from staff shortages can lead to an increasing and more complex demand for care, as well as potential reputational damage.

Investments and financing: No material risks identified.

Negative impact

Insurance and services: High workloads along with more than average mandatory overtime among healthcare professionals in the value chain contribute to elevated stress levels, reduced productivity, and adverse effects on mental health. This can impact the quality of care delivered to patients.

Investments and financing: Companies invested in may violate labour rights, which can result in unsafe working conditions and unfair compensation.

Working conditions in the value chain

The collective aspects that shape the professional environment of employees within the value chain. It includes regulated working hours and overtime, a balanced division between professional and personal life, the assurance of physical and mental health and safety at work, the respect for workers' rights such as freedom of association, the prohibition of discriminatory and unfair labour practices, and the provision of a living wage that ensures a decent standard of living for workers and their families based on the normal working hours and country-specific economic conditions.

Opportunities

No material opportunity identified.

Positive impact

No material positive impact identified.

Material item

Relevant activities

Insurances and services: Health insurance.

Investments and financing: Investments in companies.

Most significant stakeholders

- Policyholders and customers
- Investee companies
- Asset managers
- Institutional and private investors
- Workers in the value chain
- Subcontractors
- Suppliers
- Regulatory and advisory bodies
- Governments

Boundary of the value chain

Upstream

Downstream: Companies in which we invest for the risk of policyholders. Investment funds managed by Achmea Investment Management. Healthcare providers*.

* We consider payments to healthcare providers as payments that would otherwise be made directly to policyholders; therefore, this is regarded as downstream.

SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

This chapter describes the influence that Achmea has on labour conditions within the value chain. It specifically concerns employees in the value chain related to our (i) health insurance activities, which are part of our insurance and services, and (ii) investments and financing.

Due to our health insurance and our investment and financing activities we could negatively impact working conditions in the value chain. Within our health insurance activities, the material negative impact is systematic, mainly due to the ongoing high workload in the healthcare sector. The negative impact in investments and financing is related to the specific company in which we invest. This can occur, for example, when the company does not meet the required labour standards or is involved in human rights violations.

As a result of the material negative impact, this topic has been deemed material in the double materiality process (see the chapter Process to identify material topics). Throughout this process, we considered the interests and perspectives of stakeholders.

In any of our operations under our direct control or within our value chain, we will not tolerate the use of (modern) slavery, child labour, forced labour, or human trafficking. Within our 'tier 1' business partners (direct relations) we have not identified specific groups that might be particularly vulnerable to impacts or marginalisation. Additionally, we have not identified material risks and opportunities arising from impacts and dependencies associated with specific groups of value chain workers. We will continue to monitor this.

We have no indications that employees working at our locations who are not part of our own workforce, as well as employees working in joint ventures, are materially affected by our activities. Although workers at suppliers in the value chain may also be impacted by our activities, we do not include them in our reporting. We focus on 'Tier 1' parties, the first level of Achmea's business partners. However, we do plan to report on this in the future. For more details on our value chain, please refer to the chapter Description of our company, section Our value chain.

Our actions are part of an ongoing process and stem from the policies, guidelines, and codes described in this chapter. Implementing them does not require specific measures or a detailed action plan. Therefore, we do not have a list of key actions that were carried out in 2024 or that are planned for the future.

For all the actions outlined in this chapter, the financial resources allocated for their implementation are considered part of our regular operations. Future financial resources related to these initiatives have yet to be established.

INSURANCE AND SERVICES: HEALTH INSURANCE

OUR STRATEGY RELATED TO WORKING CONDITIONS IN THE VALUE CHAIN

The healthcare sector is experiencing a high workload, with professionals encountering aggression, inappropriate behaviour, and exposure to diseases. This ongoing pressure, along with more than average mandatory overtime, can lead to elevated stress levels, reduced productivity, and adverse effects on mental health. Ultimately, this can impact the quality of care provided to patients.

By creating a positive workplace, we can not only enhance the well-being of healthcare professionals but also improve the overall quality of healthcare. Satisfied and healthy healthcare professionals are better able to provide high-quality care, ultimately benefiting patients and society.

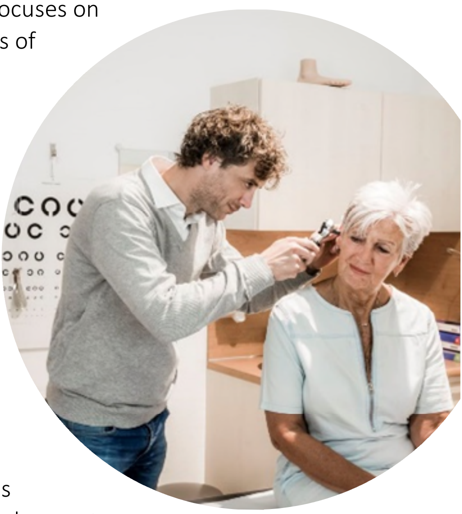
HOW WE MANAGE OUR IMPACT, RISKS AND OPPORTUNITIES

Applicable regulations and commitments

In the Netherlands we are committed to the Integral Care Agreement (Integraal Zorgakkoord or IZA) and the Future-proof Labour Market Care & Welfare Programme (Toekomstbestendige Arbeidsmarkt Zorg & Welzijn or TAZ). The IZA and TAZ relate to all internal and external employees at healthcare providers in the Netherlands. The IZA and TAZ can contribute to reducing the material negative impact.

Regarding our foreign activities, where our market share is smaller compared to the Netherlands, our policies and actions align with the local context of those countries.

The IZA aims to ensure good, accessible, and affordable healthcare in the future. It focuses on enhancing the attractiveness of permanent employment, reducing the regulatory burden, and promoting digitisation and innovation. The TAZ focuses on innovative working methods, where the care process is organised differently using social and technological labour-saving innovations. Additionally, there is an emphasis on employee retention, which is promoted through good employment practices and increasing job satisfaction. Learning and development also play a role, with attention to (new) developments, allowing employees to grow alongside changes in healthcare. Both the IZA and TAZ have been



SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

developed under the guidance of the Ministry of Health, Welfare and Sport, in consultation with relevant stakeholders, while taking into account the interests of employees in the value chain of Dutch healthcare providers. Our measures related to the IZA are implemented through the procurement policy of, among others, Zilveren Kruis.

Progress monitoring takes place within the IZA, for which various criteria have been established. We do not have our own processes to address negative impacts within the framework of the IZA, but we utilize our Human rights and labour rights statement and the complaints mechanism (see section Human rights).

Health insurers play an important role in the financing of the IZA. Allocation of financial resources to healthcare providers is based on plans assessed by health insurers. Payments to healthcare providers, based on achieved KPIs, are proportional to the health insurers' national market share. The market share of Achmea is 30.1%. The allocation of financial resources by Achmea due to the IZA is shown in the table below. The IZA will run from 2023 to 2026.

ACHMEA'S CONTRIBUTION TO IZA

TRANSFORMATION PLAN AMOUNTS BY STATUS (€ MILLION)

	TOTAL AMOUNT	(EXPECTED) CONTRIBUTION ACHMEA
Requested: Total amount requested for all submitted transformation plans	656	197
Available: Amount agreed between participants and health insurers for approved transformation plans	213	64
Estimate: Amount available for approved transformation plans	197	59
Payable and paid: Final amount payable and paid by health insurers	16	5

Engagement

The viewpoint of employees in the value chain is represented through their professional and industry associations (e.g., V&VN) and trade unions. In relation to IZA and TAZ, consultations with professional associations and trade unions are conducted under the guidance of the Ministry of Health, Welfare and Sport. We do not engage directly with healthcare workers ourselves.

Own policies

Human rights

To address negative impacts, we use our Human rights and labour rights statement and the complaints mechanism. Within the framework of the IZA, we do not have our own processes.

The Achmea Human rights and labour rights statement (see the Social - Introduction section for a general description) also reflects our role as a business partner. We expect our business partners and suppliers to comply with human and labour rights legislation, avoiding any direct or indirect involvement in violations of international standards.

Healthcare providers are encouraged to offer equal rights and opportunities to all employees, without discrimination based on race, gender, origin, social status, age, religion, political views, sexual orientation, or health. We expect them to ensure safe working conditions, protect employees' physical integrity, and promote personal development and training. Additionally, we expect them to pay a living wage that ensures a decent standard of living, not exploit workers and refrain from engaging in forced labour or child labour. Furthermore, we encourage an inclusive corporate culture that enhances the participation of individuals facing disadvantages in the labour market.

In addition, there are various laws in the Netherlands that regulate working conditions, such as the Occupational Health and Safety Act (Arbowet) and the Working Hours Act (ATW). These laws are supplemented by specific regulations for different sectors and professions.

Through our complaints mechanism (or grievance mechanism), workers in the value chain can directly express their concerns and needs to us. A more detailed description of the complaints mechanism can be found in this chapter. At this moment, we are not yet able to report on how we assess whether workers in the value chain are aware of and trust our complaints mechanism.

In 2024, we did not receive any indications of reports regarding serious human rights issues or incidents involving value chain workers working at healthcare providers in the Netherlands.

Senior management oversees the implementation of the IZA and policies.

METRICS AND TARGETS

To track the progress of the agreements outlined in the IZA, their effectiveness is monitored and reported quarterly under the responsibility of the Ministry of Health, Welfare and Sport. We have not established goals or criteria ourselves. The health, safety, and well-being of workers in the value chain are influenced by numerous factors, making it impossible to evaluate the effectiveness of actions.

SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

INVESTMENTS AND FINANCING

OUR STRATEGY RELATED TO WORKING CONDITIONS IN THE VALUE CHAIN

We are a large institutional investor. We allocate the insurance premiums received from our customers and use the investment returns to fulfil our financial commitments to them. We have a responsibility to manage the premiums entrusted to us by our customers in a responsible manner. Therefore, we want to invest in companies that comply with international labour standards and uphold human rights. We do not want to invest in companies that violate working conditions. This approach also helps us manage the reputational, financial, and social risks associated with our investment portfolios.

HOW WE MANAGE OUR IMPACT, RISKS AND OPPORTUNITIES

To manage the material negative impact, we follow our Socially Responsible Investment (SRI) policy and applicable laws and regulations.

Own policies

SRI policy

Companies in which we invest, may violate labour rights, resulting in unsafe working conditions and unfair wages. To manage this material negative impact, we have implemented our SRI policy. This policy is based on five societal themes, one of which focuses on labour standards. The Declaration of Fundamental Principles and Rights at Work from the International Labour Organisation (ILO) forms the basis of our labour standards. This declaration outlines fundamental employee rights, including the right to association, the prohibition of workplace discrimination, the prohibition of forced labour, and the abolition of child labour. The UN Global Compact provides guidelines on how companies should respect these labour standards.

Additionally, our SRI policy is informed by the UN Global Compact, the OECD guidelines for multinational enterprises, and the UN Guiding Principles on Business and Human Rights. We are also engaged in several initiatives, including Long-Term Investors in People's Health (LIPH), the Investor Alliance for Human Rights, the Platform Living Wage for Financials (PLWF), the Workforce Disclosure Initiative (WDI), Responsible Business Conduct (IRCB), and the United Nations Principles for Responsible Investment (UN PRI). If there are new initiatives related to labour rights, we will evaluate them and decide on our participation or endorsement.

Engagement

Engagement can play an important role in preventing or mitigating negative impacts on workers in the value chain. Our engagement guidelines, which are part of the SRI policy (published on our website), outline our expectations regarding the companies we engage with. Where necessary, we engage in discussions with the companies we invest in based on these guidelines. We do not have direct engagement with their employees.

We conduct normative engagement with companies that violate or are at risk of violating international standards. Additionally, we engage thematically with companies operating in specific sectors, chains, or regions where we assess the risks of labour standards violations to be particularly high. During this process, we identify best practices within the market or sector and encourage underperforming companies to adopt these practices. We also engage with governments through collaborative initiatives regarding labour rights and working conditions.

Voting at shareholder meetings is essential for us as a committed investor to influence companies effectively. In our voting policy, we place emphasis on agenda items related to labour standards. Moreover, where relevant and feasible, we (co-)file shareholder resolutions with companies that are facing significant labour standards issues. In Annex D, we have included an overview of our voting regarding shareholders proposals, including proposals related to labour rights. This supplement also provides an overview of our normative and thematic engagement.

Monitoring and dialogue are essential for effective engagement. We report on our activities and progress through the (semi)annual SRI reports available on our website.

Senior management oversees the implementation of the SRI policy.

Exclusion

In accordance with our SRI policy, we do not invest in companies or countries that systematically violate international standards, such as labour rights. We do not tolerate any form of forced or compulsory labour, modern slavery, or human trafficking. We are committed to protecting children's rights and do not accept any form of child labour.

Based on our due diligence process, we assess whether a company should be excluded. In making this decision, we consider factors such as the impact of the company's behaviour on society and/or the environment, as well as the severity, scale, irreversibility, and likelihood of the situation. Additionally, we expect companies to have a code of conduct for their suppliers that is integrated into their procurement and outsourcing policies and contracts.

Labour standards are also part of our country exclusion policy. Countries are assessed based on the ITUC Global Rights Index.

SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

Achmea's complaints mechanism

Through our complaints mechanism (or grievance mechanism), stakeholders such as customers, consumers, and workers in the value chain can directly express their concerns and needs to us. Through this mechanism, we address complaints, concerns, and inquiries related to communication, environmental issues, and human rights matters. Reporters can contact Achmea via our general website, via our brands, or by e-mail and telephone. Procedures are the same for every stakeholder. After handling the complaint, we ask customers for feedback on their experience and their satisfaction with the resolution.

In our complaints policy, we explain how we follow up with the issues raised. Each reporter has the freedom to submit their complaint in their preferred manner. We register the details of the report, including where and why something went wrong, as well as the specific products or subjects involved in the report. We strive to maintain as much telephone contact with reporters as possible. Reports that could cause significant harm to the reporter or Achmea receive extra attention. Specific procedures apply to complaints directed to the Executive Board or those of social or business significance. We will ensure that submitting a complaint does not have negative consequences for the reporter.

We strive to handle reports in a timely manner. During the internal transfer of a report, we share as much relevant information as possible, including details about the circumstances and the emotional state of the reporter. Previously made agreements are also passed on, so the reporter does not have to repeat their story multiple times. We keep reporters informed about the progress. They receive an initial substantive response within five working days. If we are unable to respond on time, we inform them of this and make new arrangements.

If a reporter is not satisfied with the response, they can request a second review. We will re-examine the report and check whether all questions have been answered and if our previous position was correct. If we still cannot reach a resolution, we will inform the reporter about the next steps, including the option to go to dispute resolution bodies or the court. In cases where a new review does not yield a different outcome, we will refer the reporter directly to the dispute resolution bodies.

We analyse all reports to improve our services. This involves collecting data on where problems occur and the impact on the reporter. The process is designed to ensure the privacy of reporters is protected. The quality of our complaint handling is regularly evaluated to further optimise our processes. Using KPIs, we monitor our performance in complaint management, including the speed of the first substantive response, the quality of communication, and the accuracy of evaluations.

Employees can report incidents through the whistleblower policy (see the chapter Responsible employer practices). Reports are handled in accordance with the guidelines of the whistleblower policy, which protects the rights of the whistleblower.

Human rights and due diligence

As described in our Achmea Human rights and labour rights statement (see Social - Introduction for a general description), we are committed to preventing and addressing negative impacts on human rights and labour rights in areas where we have influence. We analyse our business activities, customers, business partners, and suppliers to identify key risks, enabling us to determine the significant issues related to human and labour rights that may negatively impact individuals. By conducting due diligence, we map both actual and potential adverse effects related to our activities and business relationships. When we identify negative impacts, we strive for corrective measures or work together on solutions, provided it is evident that we have caused or contributed to this impact.

In our SRI policy, human rights is one of the five societal themes, along with labour rights and working conditions. Within this theme, we emphasise fundamental human rights, such as respect for the (land) rights of indigenous peoples, (gender) equality, combating discrimination, and children's rights. We use various tools to help prevent and/or reduce human rights violations by companies or countries within our investment portfolios. To identify and assess potential material impacts on value chain workers, we have established a due diligence process in accordance with OECD guidelines. This process enables us to identify, prevent, mitigate, and account for actual and potential negative impacts associated with our business. We periodically assess the companies in our investment portfolio, taking into account their societal and environmental impact, the severity, scale, and irreversibility of any violations, as well as the likelihood of these issues occurring. Companies are assessed on a quarterly basis by the research agency ISS-ESG. Based on their findings, we make a final decision.

SOCIAL – WORKING CONDITIONS IN THE VALUE CHAIN

When companies in our investment portfolio cause (potential) negative impacts, we leverage our influence to prevent or mitigate these impacts. If necessary, we expect companies to take recovery measures and/or provide compensation. We use our influence trough engagement, or by exercising influence through our votes at shareholder meetings.

For additional information about our SRI policy, please refer to the chapter Climate change, as the SRI policy is also connected to ESRS E1 Climate change and ESRS E4 Biodiversity. The full SRI policy can be found on our website.

METRICS AND TARGETS

We engage with companies that violate internationally recognized standards and principles regarding human rights, labour standards, the environment, or anti-corruption. This normative engagement is conducted in collaboration with ISS ESG. To identify the companies that will be included in the normative engagement program, a due diligence process is followed. Appendix D contains more information about the engagements that took place in 2024, both for normative (Table 3) and thematic engagements (Table 4).

In the Achmea SRI theme policy, published on the website, objectives have been set for 2030. In our SRI annual report, we report on the progress of these goals for each core theme. However, for the reporting year 2024, no specific objectives have been established, and we do not foresee setting specific objectives for the coming years.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

Risks

Access to (quality) information: Risks may emerge from legal obligations to provide consumers with accurate and complete information about products and services. Failing to provide this information, or providing insufficient information, can result in reputational damage and associated costs.

Responsible advertising practices Unethical or controversial advertising and promoting activities can damage our reputation and lead to loss of customers and revenue. Failure to comply with regulations can result in legal consequences.

Access to products and services: Failing to meet the duty of care regarding access to products and services can lead to compliance and reputational risks. This may undermine the trust of customers and society and pose a risk to our reputation.

Privacy of customers' personal data: Data breaches, misuse of customer data, and non-compliance with data protection regulations can lead to financial losses, reputational damage, legal liability, and loss of trust.

Negative impact

Access to (quality) information: By providing unclear, inaccurate, and incomplete information, it becomes more difficult to make well-informed decisions.

Responsible advertising practices: Unethical or socially irresponsible advertising and promotion can have negative effects. Misleading information and greenwashing can create confusion. Harmful advertising targeting vulnerable groups exposes them to inappropriate messages, negatively impacting their purchasing behaviour and well-being.

Access to products and services: Exclusion through unequal treatment and the failure to ensure the availability and affordability of products and services can harm (financial) well-being. Without accessible and affordable products and services, individuals cannot insure themselves against certain risks, leading them to seek costly alternatives and potentially ending up in vulnerable financial situations.

Privacy of customers' personal data: Privacy violations due to inadequate protection of privacy and data can result in reputational damage, fraud, sanctions, and a loss of trust in the financial sector. Due to sensitive personal data, such violations can have significant consequences for customers.

Responsible relationships with consumers and customers

A. Access to (quality) information: Clear, accurate, and complete information is essential for informed decision-making.

B. Responsible advertising practices: Presenting information truthfully and transparently, avoiding misleading claims and greenwashing, and refraining from harmful advertising practices aimed at vulnerable populations.

C. Access to products and services: Availability and affordability of products and services. Ensuring equal access promotes social inclusion. This includes non-discrimination, where everyone is treated equally.

D. Privacy of customers' personal data: Collection, use, and processing of personal data and how customers' rights regarding data and privacy are respected. This includes customers' right to privacy, protection against unauthorised use of personal information, and protection against unsolicited communication.

Opportunities

Access to (quality) information: The market position can be enhanced by offering services that assist consumers in selecting or upgrading to the insurance that best meets their needs. This results in fewer customer complaints, higher customer satisfaction, and consequently a better reputation.

Responsible advertising practices: Improvement of market position, building trust and maintaining long term relationship with customers and prospects.

Access to products and services: Offers the opportunity to grow, increase customer satisfaction, promote financial inclusion, and gain a competitive advantage.

Privacy of customers' personal data: By providing a safe and reliable service, customer loyalty and satisfaction can be increased.

Positive impact

Access to (quality) information: By providing clear, accurate, and complete information, decision-making is improved. This leads to better-informed choices and allows for responses and actions based on this information.

Responsible advertising practices: The use of ethical and socially responsible methods for advertising and promoting products and services, while avoiding harmful advertising targeted at vulnerable populations.

Access to products and services: By increasing the availability and affordability of insurance with a wide range of policies at different price levels, individuals can protect themselves against risks and obtain financial protection. Additionally, equal access to insurance products is ensured, creating an inclusive environment by treating everyone fairly and equally.

Privacy of customers' personal data: Is a fundamental pillar of trust in the financial sector.

Material item

Relevant activities

Access to (quality) information, Access to products and services: Insurance products and services sold by Achmea in the Netherlands.

Responsible advertising practices: All products and services sold by Achmea in all sectors in the Netherlands to consumers under Achmea's main and flank brands.

Privacy of customers' personal data: Own operations: All activities in all sectors.

Most significant stakeholders

- Policyholders and customers
- Consumers
- Intermediaries
- Regulatory and advisory bodies
- Supervisors
- Governments

Boundary of the value chain

Upstream

Internal activities: of Achmea, including activities/business partners outside Achmea (including intermediaries).

Downstream: Policyholders and clients.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

We have identified four material topics concerning ESRS S4 Consumers and end users: (1) Access to (quality) information; (2) Responsible advertising practices; (3) Access to products and services; and (4) Privacy of customer's personal data. For more information, see the chapter Interaction material topics and strategy.

INTRODUCTION

Since several topics that we need to report on concerning ESRS S4 Consumers and end users are components of multiple material topics, we have chosen to address these topics in this introductory section rather than discussing them separately under each material topic.

OWN POLICIES

Human rights

The Achmea Human rights and labour rights statement (see Social – Introduction for a general overview and our website for the complete version) outlines our approach to human rights and labour rights across our various roles, including our position as a financial service provider for our customers.

We strive to make our products and services available, sufficient, affordable, and accessible to everyone. Insurance can play an important role in reducing poverty and promoting social inclusion. Insurance ensures, among other things, income security throughout life, provides protection against financial losses, and facilitates access to affordable healthcare.

Responsible advertising practices are also part of our approach. In our advertising efforts, we aim to reflect the diversity of society by featuring individuals of different ages, backgrounds, and origins. We also value promoting an inclusive environment. Discrimination, whether based on ethnic or national origin, religion, gender, age, disability, or sexual orientation, is not tolerated.

The way we manage our impact regarding human rights is included in the relevant chapters related to ESRS S4 Consumers and end users.

ENGAGEMENT

Vereniging Achmea (Achmea Society) plays an important role in safeguarding the interests of Achmea customers. All customers of Achmea are automatically members of this association, which focuses on representing collective customer interests and ensuring the continuity of Achmea Group and creating value. A detailed description of Vereniging Achmea is included in the chapter Interests and views of stakeholders.

In relation to both Access to quality information and Access to products and services, we involve customers in evaluating and enhancing our information. We do this through various methods, such as targeted surveys, councils, panels, and NPS measurements. Customers can provide feedback, both positive and negative, through our websites and social media. This feedback is used to adjust and refine our communication strategies.

Regarding Responsible advertising practices, we do not engage directly with consumers about advertising. However, we conduct market research to evaluate the effectiveness of our advertisements. Based on this, we regularly review our marketing strategies and campaigns.

COMPLAINTS MECHANISM

Through our complaints mechanism (or grievance mechanism), customers as well as other stakeholders can directly express their concerns and needs to us. A description of our complaints mechanism can be found in the chapter Working conditions in the value chain.

ACTIONS

Our actions are part of an ongoing process and are guided by the policies, guidelines and codes outlined in the chapters on Consumers and End-users. The implementation does not require specific actions or a detailed action plan. As a result, we do not have a specific list of key actions that have been undertaken in 2024 or planned for the future.

MEASURES AND TARGETS

Our central objectives regarding customer interests are outlined in the Stakeholder Value Management (SVM). SVM includes the agreements made between the Executive Board and the senior management of the Achmea entities and encompasses strategic themes and KPIs associated with the targets. More information about SVM can be found in the chapter Integration in remuneration policy.

There is no engagement with customers and consumers when it comes to setting goals, monitoring performance against these objectives, and identifying areas for improvement.

RESOURCES

The financial resources allocated for implementing the actions described in the chapters on Consumers and End-users are regarded as part of our regular operations. Future financial resources related to these topics have not yet been established.

MONITORING EFFECTIVINESS

Since our policies and actions are part of a continuous process, we do not assess the effectiveness of these policies and actions in relation to the material sustainability impacts, risks, and opportunities linked to the material topics discussed in the chapters on Consumers and End-users.

Senior management oversees the implementation of the policies and actions.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

A. ACCESS TO (QUALITY) INFORMATION

Access to (quality) information regarding products and services can improve the financial health and well-being of individuals and society by enabling people to make more informed financial decisions and choose appropriate insurances. This means that clear, accurate, and high-quality information must be available about the products and services being offered. This material topic is important to consumers and our customers, as they rely on accurate and accessible information about products and services. As a result, this topic has been identified as material in the double materiality process (see the chapter Process to identify material topics). During this process, the interests and perspectives of stakeholders have been taken into account.

OUR STRATEGY RELATED TO ACCESS TO (QUALITY) INFORMATION

Quality information enables consumers to make informed choices and gain a better understanding of the products and services they purchase. This contributes to transparency, consumer protection, and trust in the financial sector. Access to high-quality information can also enhance the financial health and well-being of individuals and society, as consumers are able to make more informed financial decisions and select appropriate insurance coverage. We strive to support consumers in making informed decisions about products and services by providing clear explanations and using straightforward language in our terms and conditions.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIESD

To manage our material positive impact, we follow relevant codes and regulations that guide our practices. Alongside compliance with these codes and regulations, we have developed our own policies for managing this impact.

Applicable regulations and commitments

Access to quality information is regulated in the Dutch insurance sector and is under the supervision of the Dutch Authority for the Financial Markets (AFM). Health insurers are also under supervision of Dutch Health Authority (NZA).

The Dutch Association of Insurers represents both life and non-life insurers in the Netherlands. As a member of the association, Achmea must adhere to the self-regulation established by the association. This self-regulation includes a set of regulations, covenants, protocols, and codes of conduct. The ten core codes related to customer interests set a quality standard for the sector.

These codes are specifically aimed at consumers and business parties with comparable levels of knowledge and skills related to insurance (for example, self-employed individuals). Each core code is periodically assessed by the auditors of the independent Foundation for the Assessment of Insurers (Stv).

One of the core codes is the Code of conduct for Information Provision. This code aims to ensure that insurers provide clear and understandable information allowing customers to make informed decisions about taking out, adjusting, terminating, or renewing an insurance policy. Insurers must ensure that the information is accessible, clear, and understandable. The information should provide a balanced, consistent, and transparent view of the characteristics of the insurance products. This core code applies to all forms of communication, including websites, brochures, and social media. Specific aspects of access to quality information are also addressed in other core codes, such as the Code of conduct for complaint handling, and the Protocol for insurance inspections (medical acceptance) and the Code of conduct claim handling. The self-regulation is revised regularly to reflect societal changes. An example of this is the core code Protocol on payment delays. This guideline specifically focuses on communication with vulnerable households facing payment issues.

Own policy

Trusted communication

Achmea has developed the Trusted communication standard as a guideline for all communications. This standard serves as the foundation for all our customer information, regardless of the Achmea brand or channel. Additional agreements may apply for the different Achmea brands. Trusted communication is Achmea's writing style, which enables employees to write clearly and recognisably in a way that engages the reader. This allows us to make high-quality information about products and services accessible to our customers. The standard was updated to version 2.0 in 2024. Employees of the Dutch entities are trained to use this standard and are required to complete the Trusted communication e-learning, which they must repeat every three years.

We aim to communicate our products and services in a simple, transparent, and straightforward manner. We use accessible language and try to avoid complex words, abbreviations, and jargon wherever possible. We also refrain from using fine print. For our private customers, we write at a B1 level according to the Common European Framework of Reference for Languages (CEFR), ensuring that most of our customers can understand us. For other groups, such as business customers or healthcare providers, we may use a higher language level to ensure clear and professional communication that meets their specific needs and

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

expectations. The CEFR standard applies to all forms of communication, including letters, emails, policy conditions, brochures, flyers, websites, commercial promotions, campaigns, chat conversations, and social media.

Websites

The websites of the Achmea brands are designed to ensure that everyone has easy and equal access to our content. To achieve this, entities must comply with the minimum level AA of the international accessibility standard from the Web Content Accessibility Guidelines (WCAG). The healthcare offices of our health insurance need to adhere to the EU Digital Accessibility Directive. This means that the websites and apps meet the WCAG 2.1 level A and level AA accessibility standard.

The guidelines for digital accessibility can be categorised into four principles. By following these principles, we ensure that everyone can participate digitally:

- Perceivable: Information and user interface components must be presentable to users in ways they can perceive.
- Operable: User interface components and navigation must be operable.
- Understandable: Information and the operation of user interface must be understandable.
- Robust: Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

Product Approval & Review Process

For new insurance products, a PARP (see explanatory text box) is conducted and documented in a Key points memorandum. Existing products also undergo periodic reviews. We monitor signals related to its products, with follow-up actions discussed in the Product Review Committee.

The PARP is part of the Achmea control framework, which provides structured guidelines for risk management and achieving objectives. The framework includes policies on self-regulation and complaints handling, as well as policy documents and controls related to compliance and regulatory themes. Results from quality controls and other measures are documented in the CoTheSys system.

Additionally, Tactical campaign management and the Legal framework for customer communications (JKK) help mitigate the risks associated with providing incorrect or unclear information. The JKK outlines the legal requirements that the various communication channels of Achmea in the Netherlands must comply with. As a financial service provider, Achmea takes into account various legal regulations and codes of conduct, such as the Financial Supervision Act, which are incorporated into the JKK. The JKK serves as a tool to translate the numerous rules into practice. While the JKK primarily provides rules for communication with customers, the basic standards also apply to communication with suppliers, intermediaries, and other market parties. The JKK includes general requirements for all communication as well as specific requirements for emails and letters. However, the JKK also serves as a writing guide for language, design, and style. Legal Affairs Distribution & Innovation is responsible for the JKK, while the decentralised parts of the JKK fall under the responsibility of the Legal Affairs departments of the various product divisions.

Product Approval & Review Process (PARP)

The Product Approval & Review Process (PARP) is a procedure for introducing and periodically reviewing products. It ensures that products are not traded or distributed without considering the interests of consumers (including the impact on consumers) and the interests of Achmea (including the associated risks and opportunities). Key factors in this process include the duty of care towards customers, compliance with legislation, and keeping up with societal developments.

The PARP policy applies to all Dutch legal entities of Achmea, with the exception of divisions that operate under a proportional governance regime, as well as Achmea Reinsurance Company, which is governed by its reinsurance policy. The policy applies to all insurance products and services offered after 31 December 2012, as well as investment services to institutional clients. Exceptions include products offered to professional investors and customised products or services offered exclusively to a single client without the intention of making them more widely available. For foreign operating companies, the Achmea International PARP Policy applies, which follows similar principles.

The PARP policy is approved by the Executive Board of Achmea B.V. The statutory management of the group companies is responsible for its implementation.

Human rights, engagement, complaints mechanism, actions, resources, and monitoring effectiveness

An overview of how we address human rights, engagement, complaints mechanism, actions, resources and monitoring effectiveness in relation to Access to (quality) information can be found in the in the introduction section of Consumers and end-users.

METRICS AND TARGETS

In 2024, Achmea received approximately 3,700 complaints regarding information, ranging from language use to unclear communication. All complaints were addressed individually, and feedback was provided to the reporter. Improvements were made to communication, terms, or websites wherever possible.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

Achmea is periodically assessed against the Code of conduct for information provision. This assessment is conducted every four years by Stv. The Code of conduct for Information Provision was last assessed in 2022, with the next assessment scheduled for 2026. The results of this assessment are shared with the regulatory authority AFM. Additionally, we voluntarily participate in the comprehensive quality module for Information Provision. No AFM fines were imposed in 2024.

TABLE 1: TRAINING TRUSTED COMMUNICATION

DESCRIPTION OF THE TARGET	TARGET 2024	RESULT 2024
Trusted communication 2.0: % of Dutch employees have completed a training at the 'Knowledge' level.	80% (Grade 8.0)	84% (Grade 8.4)

PRINCIPLES FOR DETERMINING INFORMATION

Methodology
The percentage is calculated by dividing the number of employees who have successfully completed the training at the 'Knowledge' level by the number of employees required to take the training.

Scope
Employees who are employed by Achmea Internal Services and fall under the Achmea collective labour agreement, as well as those who are classified above this agreement and have an employment relationship with this entity or Achmea B.V. itself.

B. RESPONSIBLE ADVERTISING PRACTICES

Responsible advertising practices involves ethical and socially responsible promotion of products and services. This means presenting information in an honest and transparent manner, avoiding misleading claims and greenwashing, and refraining from harmful advertising practices targeted at vulnerable populations. We consider responsible advertising to be in line with our ‘Sustainable Living. Together’ vision. Ensuring transparency, honesty, and respect in our communication is essential for building trust. By implementing responsible advertising, we can contribute to a more sustainable society, encouraging consumers to make informed choices that support environmental and social well-being.

OUR STRATEGY RELATED TO RESPONSIBLE ADVERTISING PRACTICES

We consider prevention and proactive measures that increase consumer awareness to be important components of responsible advertising practices. This means that we run campaigns that inform consumers about safety and potential risks they may face. We aim to help them making informed decisions. Prevention campaigns enhance our brand reputation and customer relationships. We avoid sensationalism in our advertisements and emphasise positive behaviour that contributes to overall well-being and sustainability.

As a financial institution, we have a social responsibility to protect our customers. They must receive accurate information and should be able to trust the information we provide. This enables customers to make informed decisions regarding our products and services. This way we create trust. Conversely, unethical, or controversial advertising and promotions can damage our reputation, which can lead to customer and revenue loss, and potentially result in legal consequences. We are therefore committed to responsible advertising by being transparent and honest in all our advertising practices.

Responsible advertising practices has been identified as a material theme in the double materiality process (see the chapter Process to identify material topics). During this process, the interests and perspectives of stakeholders have been taken into account.

HOW WE MANAGE OUR IMPACT, RISKS AND OPPORTUNITIES

To manage our material positive impact, we follow regulations and codes. In addition, we have our own policy to manage this impact.

Applicable regulations and commitments

Advertising practices are highly regulated in the Netherlands. The Dutch Authority for Consumers and Markets (ACM) oversees the fair sale of products and services to consumers. The Dutch Advertising Code outlines rules that all advertising must adhere to. It specifies, among other things, that advertising must not be misleading, must not be unnecessarily offensive, and must adhere to good taste and decency.

In addition to general rules, specific advertising codes apply to the promotion of certain products and services. The Dutch Consumer Protection Act safeguards consumers against unfair contract terms and misleading advertising. The Telecommunications Act regulates the commercial communications through electronic means, including commercial emails, telemarketing, and the use of cookies on websites. These laws and regulations ensure that advertising activities are conducted fairly, transparently, and respectfully.

In our Privacy policy (see the chapter Privacy of customers’ personal data), we incorporate elements of the Telecommunications Act to ensure user-friendly access to information on our brand websites. This allows us to guarantee transparency and respect for user privacy while providing an open and accessible digital environment for consumers.

Our approach

We are aware of the impact that our advertisements and promotions can have on the public. We avoid harmful advertising practices that may target vulnerable populations. We strive for inclusivity and diversity in our advertisements and promotions and ensure that we present information in an honest and transparent manner. We aim to communicate our products and services clearly, simply, and transparently. We use accessible language and avoid complex words, acronyms, jargon, and small print whenever possible.

Sustainability claims in our advertisements are assessed against national communication guidelines regarding sustainability. The Integrated Governance, Risk, and Compliance (IGRC) system ensures that we manage sustainability risks related to marketing and communication as well. The IGRC policy is aimed at all internal and external stakeholders, including the Supervisory Board, the Executive Board, management of group subsidiaries and business units, (senior) managers, risk managers, compliance officers, actuaries, and internal auditors. Senior management oversees the implementation of the policy.

The development of mass media communication follows a fixed assessment and approval process. For example, at Centraal Beheer, this occurs based on an assessment framework, with internal control of this process carried out by Risk Management and Compliance.

Legal requirements have been translated into practical guidelines that are detailed in the Legal framework for customer communications (JKK). All communication and marketing employees must apply these guidelines in their daily work. Achmea and our foreign subsidiaries position themselves as a corporate, employer, and institutional brand. Additionally, our customer brands have their own identity and brand values. Our guidelines also apply to our marketing and communication partners.

Prevention campaigns

Prevention campaigns are an important part of our advertising. Examples of such prevention campaigns include Zilveren Kruis' sunscreen campaign, Interpolis' bicycle lights campaign, and Centraal Beheer's 'Small dents days’. When consumers see that we prioritise their safety and inform them about preventing issues, it can create a sense of reliability and care. This may encourage customers to recommend our brands to others, potentially increasing the NPS while simultaneously strengthening their trust and loyalty towards Achmea.

Human rights, engagement, complaints mechanism, actions, resources, and monitoring effectiveness

An overview of how we address human rights, engagement, complaints mechanism, actions, resources and monitoring effectiveness in relation to Responsible advertising practices can be found in the in the introduction section of Consumers and end-users.

METRICS AND TARGETS

As responsible advertising practices is a new material theme, we have not yet established specific metrics and targets for this theme in 2024. However, now that we have a clearer understanding of the theme, we intend to define metrics and targets in 2025.

C. ACCESS TO PRODUCTS AND SERVICES

Access to products and services refers to the availability and affordability of offerings for consumers. Our ‘Sustainable Living. Together’ vision is to create an inclusive society where everyone can participate and live harmoniously in a pleasant and healthy environment. We strive to enhance societal value by ensuring equal access, equal opportunities, and fostering solidarity within the community. It also provides us with opportunities to view matters from different perspectives and viewpoints, as our (potential) customers come from diverse backgrounds and experiences. By taking this into account, we can further enhance our products, services, and customer-oriented offerings.

OUR STRATEGY RELATED TO ACCESS TO PRODUCTS AND SERVICES

We aim to provide accessible and fair insurance solutions that meet the diverse needs of consumers. This enables us to grow, enhance customer satisfaction, and promote financial inclusion. Failing to offer affordable products and services can lead to reputational damage and a decline in revenue.

Considering the material negative and positive impacts on access to products and services, along with the associated risks, this topic has been recognised as material in the double materiality process (see the chapter Process to identify material topics). During this process, we incorporated the interests and perspectives of stakeholders.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

To manage the material negative and positive impacts on access to products and services, along with the associated risks, we follow relevant codes and regulations that guide our practices (see the description below). Furthermore, we have developed our own policies for managing impacts and risks, which is outlined in the section on Customer centric insurance in this chapter.

Applicable regulations and commitments

The use of data and advanced technologies, such as artificial intelligence (AI), makes ethical considerations and the principle of solidarity important in the insurance sector. With the help of data and AI, we can offer customers personalised products, combat fraud, and expedite the claims process. While this provides benefits, it also increases the risk of discrimination. This highlights the importance of ethics in our approach. We have a responsibility to protect vulnerable groups. Therefore, it is essential to ensure that they have equal access to insurance. By doing so, we can build trust and uphold the principle of solidarity, ensuring that all customers are treated fairly and justly in a rapidly changing digital world. Elements of the General Data Protection Regulation (GDPR) are included in the ethical standards.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

SPOTLIGHT: ACCESS TO HEALTHCARE IN THE NETHERLANDS

Our vision of health goes beyond the absence of illness. It also includes overall well-being, mental resilience, physical activity, healthy eating, and a sense of safety and security within the community. Rising healthcare costs require affordable insurance policies and transparent billing, while access to care and an ageing population demand an adequate provision of services in the regions. Preventive measures necessitate a healthier environment and the activation of policyholders and communities. As a health care insurance provider, we fulfil various roles: paying for care, coordinating care, and improving health.

Paying for Care: Every resident or employee is required to have a (basic) health insurance policy under the Health Insurance Act (Zvw). The Zvw promotes social inclusion through three main elements: everyone must have health insurance, insurers are required to accept all applicants regardless of their health status, and there is a prohibition on premium differentiation, ensuring that everyone pays the same premium for basic insurance, regardless of age or health. As a health insurer, we implement various measures to ensure that healthcare is accessible to everyone. We aim to limit premium increases by reducing organisational costs and negotiating effectively with healthcare providers within budget constraints. We provide supplementary and dental insurance to help mitigate the financial risks associated with non-Zvw healthcare expenses. Additionally, we support policyholders with flexible payment options and prompt reimbursement of claims.

Coordinating Care: Insurers must ensure accessible healthcare, including treatment (cure) and care. Insurers are required to ensure that healthcare is accessible within a reasonable time and distance, as required by the Health Insurance Act. The healthcare purchasing policy focuses on meeting this obligation, with monitoring and annual evaluations for improvements. Periodic agreements and programmes between the government, insurers, and stakeholders aim to enhance the quality, affordability, and accessibility of healthcare. These are reflected in insurers' policies on healthcare organisation and coverage. Additionally, the National Healthcare Authority supervises compliance, and penalties can be imposed on insurers that fail to meet their obligations.

Improving Health: By concentrating on enhancing the health of the Dutch population, we aim to positively impact health outcomes and indirectly affect healthcare costs and access. We act as health partners for employers and encourage healthy behaviour among our policyholders. We work together with regional initiatives, such as Amsterdam Vital & Healthy, to integrate health and well-being and promote healthy workplaces through campaigns and events.

The core code Ethical framework for data-driven applications was introduced in 2021 as part of the self-regulation by the Dutch Association of Insurers. As a member of this association, we are required to comply with all codes of this self-regulation. Compliance with the core codes is evaluated by the independent Foundation for the Assessment of Insurers (Stv). The core codes specifically target private customers and business parties that are comparable to consumers in terms of knowledge and skills regarding insurance (for example, self-employed individuals without staff).

The core code Ethical framework for data-driven applications is based on the recommendations of the High-level expert group on Artificial Intelligence. This advisory body of the European Commission has formulated seven requirements for the ethical use of AI. These requirements have been translated into thirty standards for the Dutch insurance sector. Insurers should be transparent about how data is collected, used, and shared. Decisions must be made fairly, without bias or discrimination, to ensure equal treatment. Insurers are accountable for their data practices and the consequences thereof, while privacy, personal information, and the rights of individuals must always be respected.

In 2024, the Dutch Association of Insurers aligned the core code with the European Union Artificial Intelligence Act, which took effect in 2024 and serves as a substantial regulatory framework for AI. This act aims to ensure that AI systems respect fundamental rights and values, promoting safety and non-discrimination. The updated version of the core code will be applicable to Association members starting in 2025.

The Achmea Ethical wheel has been developed as part of the implementation of the core code Ethical framework for data-driven decision making. This tool can assist in the discussion about what constitutes correct behaviour and the potential dilemmas that can arise in this respect. The Ethical Wheel uses a number of questions to facilitate discussions on ethical issues in the work process and to define the considerations and decisions within this framework.

The AFM oversees fair and transparent financial market processes, fostering healthy relationships among market participants and ensuring the careful treatment of customers. The AFM values a human-centred approach in determining insurance premiums and the digitisation of services. While the AFM supports digitisation to improve efficiency and accessibility, it also emphasises that the quality of customer interactions and the comprehensibility of insurance products must not be compromised. The goal is to balance technological advancement with fair and transparent treatment of consumers.

The periodic thematic risk studies, conducted by the Association of Insurers and Stv, focus on assessing and analysing various risks within the Dutch insurance sector concerning customer interest and reputation. One of the studies focuses on the human dimension in the acceptance process. This study provides insight into how insurers strive to address the specific circumstances of individual insurance applicants. The basis for defining the 'human dimension' consists of eighteen findings from the Netherlands Institute for Human Rights. This allows insurers to take the specific and individual situation of an applicant into account, giving the applicant the opportunity to adequately explain their circumstances. Each decision to reject an insurance policy is clearly substantiated. In the event of a rejection, an alternative solution is offered, along with information on how the applicant can submit an objection or complaint. An insurer makes decisions based on data but also considers the story behind that data. This promotes a human-centred approach, contributing to improved customer relationships and ensuring fair treatment.

Own policies

Customer centric insurances

The Achmea Guiding Principles regarding the duty of care throughout the duration of an insurance policy aim to ensure a customer-centric approach and maintain trust. These guiding principles serve as guiding frameworks for fulfilling the duty of care during the duration of products and services. Consumers should be treated fairly, and insurance policies should be applied consistently and without discrimination. We aim to fulfil the promises made in the insurance contract and act in the best interest of the policyholder. By engaging with customers and encouraging feedback, we try to address their needs and concerns. We regularly evaluate and improve our services and processes based on customer insights and market developments. Our goal is to build trust and create a positive experience throughout the duration of the insurance policy. These principles are reflected in our policy Customers expect quality. Senior management oversees the implementation of this Dutch policy.

We aim to ensure the availability and affordability of our products and services by offering reasonable prices with a broad acceptance rate. Each brand within Achmea adopts a personal customer approach that aligns with its identity. Customers have the option to easily adjust or terminate their insurance.

To better understand the needs and preferences of different customer segments, we conduct market research. This allows us to better tailor our products and services to these segments. We also aim to establish a clear and up-to-date price that reflects the product and its features. Determining the price of a product is an important aspect of the PARP process. The principle is that each product is appropriately priced, taking into account quantities, returns, costs, and risks.

We aim to create inclusive insurance products that cater to diverse groups of consumers. By actively gathering feedback from our customers, we seek to improve our products and ensure competitive and fair pricing. It is essential that our pricing structures are transparent. This helps customers understand how their premiums are calculated and strengthens trust in our services. With this approach, we aim to provide high-quality insurance solutions that meet the needs of consumers.

Product Approval & Review Process

The Product Approval & Review Process (PARP) is a vital process for the introduction and review of products at Achmea. It ensures that products are not marketed or distributed without considering the interests of both customers and Achmea. A more detailed description of the PARP can be found in the chapter Access to (quality) information.

Human rights, engagement, complaints mechanism, actions, resources, and monitoring effectiveness

An overview of how we address human rights, engagement, complaints mechanism, actions, resources and monitoring effectiveness in relation to Access to products and services can be found in the in the introduction section of Consumers and end-users.

METRICS AND TARGETS

No targets are published for the material theme Access to Products and Services.

D. PRIVACY OF CUSTOMERS' PERSONAL DATA

Privacy is important for protecting individual rights and plays a significant role in promoting trust and safety in our society. Violations of privacy can damage customers' trust in Achmea and negatively affect trust in the financial sector as a whole. The risks associated with privacy breaches are significant due to the digitalisation of services and emerging developments such as AI. In an era where data plays an increasingly central role and cyberattacks are becoming more frequent, the risk of data misuse is increasing.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

Considering the potential negative impact and risks of privacy breaches, we have identified this issue as material within the process of double materiality (see the chapter Process to Identify material topics). During this process, we incorporated the interests and perspectives of stakeholders.

OUR STRATEGY RELATED TO PRIVACY OF CUSTOMERS' PERSONAL DATA

Given the importance of data for delivering services to our customers, data security and privacy protection are of great significance. This is not only crucial for our customers' trust but is also what other stakeholders expect from us. Our goal is to comply with relevant regulations. This means being transparent and informing our customers about how we use data through a privacy statement that meets applicable requirements.

HOW WE MANAGE OUR IMPACT, RISK AND OPPORTUNITIES

Applicable regulations and commitments

We safeguard the privacy of our customers' personal data through various measures. We have implemented internal controls aimed at compliance and management of operational risks. This also ensures our compliance with the General Data Protection Regulation (GDPR), which regulates the processing of personal data within the European Union. The Dutch Data Protection Authority oversees the laws and regulations related to the processing of personal data.

By adhering to local codes, such as the Code of conduct for Insurers from the Association of Insurers, and to regulations in Türkiye and Australia, we not only protect the interests of our customers but also take into account the interests of other stakeholders.

Own policies

To ensure the privacy of our customers' personal data, we have a Privacy policy. This policy is aligned with local laws and regulations and enables us to effectively protect the confidentiality and security of personal data. The Privacy policy outlines how we securely process personal data in accordance with laws and regulations. It addresses topics such as data security, procedures for data breaches, and any actions we need to take. Additionally, the rights of data subjects are described.

The Privacy policy also includes guidelines for situations where we engage third parties to process our data. When a third party acts as a processor for Achmea, Achmea remains ultimately responsible. We assess the processor beforehand to ensure that they meet the requirements necessary for fulfilling our responsibilities and for compliance with privacy legislation. The policy also includes monitoring to ensure implementation as part of the IGRC policy. Furthermore, the policy indicates when privacy impact assessments should be conducted, for example, in the case of new products, to identify risks and necessary measures. Related topics, such as duty of care, customer due diligence, outsourcing, and data and cyber security, are addressed in various other internal policy documents.

The Privacy policy has been approved by the Executive Board and local governing and supervisory bodies. Management is responsible for the implementation of the policy and the associated processes. The policy is for internal use. We have established a Privacy Board under the Group Risk Committee to make cross-chain (ethical) decisions regarding the processing of personal data and to support the Executive Board. To address privacy issues, we have set up an additional structure with the Executive Board and divisional directors to coordinate the approach to divisional cross-cutting issues and IT dependencies. The Digital Operational Resilience Act (DORA) and the increasing use of AI will require further future adjustments to ensure data security.

Our governance framework, as outlined in the IGRC policy, consists of the Three Lines Model, with regular audits and assessments of the control framework to ensure compliance with privacy standards. Reports on this are made available to the responsible management in accordance with Achmea's governance, are included in Achmea's group reports, and are accessible to supervisors. Reports are for internal use only. The Three Lines Model ensures the independence of key functions such as compliance, risk management, and actuarial (second line) and internal audit (third line) in relation to the line organisation (first line).

In the event of privacy breaches, incident reports are prepared outlining the corrective measures taken. Relevant authorities and stakeholders are informed about the incident and the actions taken to remediate it.

Mandatory training and awareness campaigns are in place to raise our employees' awareness of the use of personal and sensitive (e.g., medical) data. The secure processing of data is also included in our Code of conduct (see the chapter Responsible employer practices) and the Data and IT Security Policy (see the chapter Data and Cybersecurity).

We inform customers and other stakeholders about the handling of sensitive data through privacy and cookie statements on our websites. These statements explain what personal information is collected, the intended use of that information, and provide information about customers' rights and the procedure for submitting complaints.

SOCIAL – RESPONSIBLE RELATIONSHIPS WITH CONSUMERS AND END-USERS

Human rights, engagement, complaints mechanism, actions, resources, and monitoring effectiveness

An overview of how we address human rights, engagement, complaints mechanism, actions, resources and monitoring effectiveness in relation to the privacy of customers’ personal data can be found in the in the introduction section of Consumers and end-users.

Through our complaints mechanism, customers and other stakeholders can directly express their concerns and needs to us. Employees can use the whistleblower policy to report incidents, which are then investigated (see the chapter Responsible employer practices).

METRICS AND TARGETS

We monitor compliance with the Privacy policy with regard to customers' personal data using various indicators, including the monitoring of privacy key controls.

Material privacy breaches are not disclosed due to their sensitivity and confidentiality. However, in 2024, no material privacy breaches were identified. We do observe an increase in smaller privacy breaches, such as misaddressing. This increase is partly attributed to the growing digitalisation, which is changing the way we process and manage data.

Additionally, we raise awareness among employees about the privacy of customers’ data through a mandatory e-learning on privacy, which all new employees who work with personal data must complete. The target is that every employee in the Netherlands who is required to follow the training completes the e-learning on privacy. Due to illness or prolonged absence of employees, and because new employees have three months to complete the e-learning, the achievement rate is below 100%.

A training on privacy is also provided in our foreign operating companies. However, since information regarding participation in these companies is not available, we are unable to provide it.

TABLE 2: PRIVACY INDICATORS

DESCRIPTION TARGET	TARGET 2024	RESULT 2024
% Dutch employees who have completed the mandatory privacy e-learning	100%	96.5%

PRINCIPLES FOR DETERMINING INFORMATION ABOUT PRIVACY INDICATORS

Methodology

The % of Dutch employees who have successfully completed the privacy e-learning is calculated by dividing the number of employees who have successfully completed the training at the end of the year by the total number of employees for whom the training was mandatory at the end of the year.

Scope

The percentage of Dutch employees who have successfully completed the privacy e-learning includes all employees in the Netherlands, excluding third-party companies. This relates to employees who are employed by Achmea Internal Services and fall under the Achmea collective labour agreement, as well as employees who are graded above this agreement and have an employment contract with this entity or Achmea B.V. itself. Also included are the contracted employees from the units that fall under the Netherlands, excluding third-party companies (see Annex B).

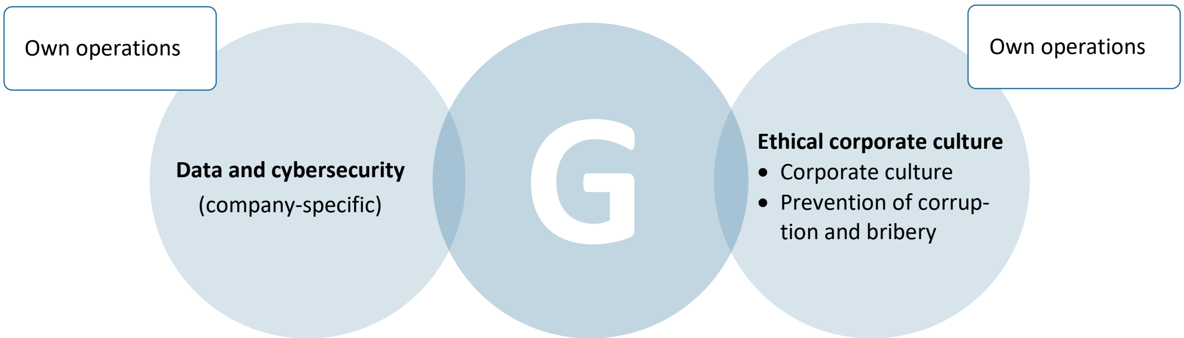
BUSINESS CONDUCT – INTRODUCTION

Achmea stands for 'Sustainable Living. Together'. The way we shape our business operations is essential to realising this vision. We have identified three material topics related to governance: 1) Corporate culture, 2) Prevention of corruption and bribery, and 3) Data and cybersecurity. The first two topics are addressed in the reporting standard ESRS G1 Business Conduct. The material topic Data and cybersecurity does not fall under this reporting standard. To report on the sustainability-related impacts, risks, and opportunities of this material topic, we have developed entity-specific reporting requirements.

Due to the strong overlap between 'Corporate Culture' and 'Prevention of corruption and bribery' in terms of policies and actions, we have chosen to address these topics together in the chapter on 'Ethical corporate culture'. The material topics related to governance are presented in the image below. These topics will be discussed in more detail in the following two chapters.

GOVERNANCE AND COMMITMENTS

As part of our sustainability efforts, we have entered into various commitments that help us achieve our goals. These commitments are often linked to both governance and social issues. The principles addressed in the social topics, such as human rights, are also relevant to our governance topics. In addition, we adhere to the Dutch Corporate Governance Code. More information on this is included in the Governance section.



GOVERNANCE – ETHICAL CORPORATE CULTURE

Risks

Corporate culture: A corporate culture that does not promote ethical behaviour can lead to fraudulent conduct, resulting in reputational risks and legal actions against the company.
Prevention of corruption and bribery: The absence of effective anti-corruption measures can pose financial risks by increasing the likelihood of fraudulent claims from customers or suppliers. This may also lead to legal actions against the company, reputational risks, and personal repercussions for those involved, as corruption and bribery are criminal offences.

Negative Impact

Corporate culture: A negative corporate culture can result in a lack of accountability, unethical behaviour, and an inadequate response to environmental and social issues.
Prevention of corruption and bribery: Inadequate prevention and detection of corruption and bribery can undermine trust, disrupt fair competition, and hinder economic growth.

Ethical corporate culture

Corporate culture: Formulates objectives based on values and beliefs. The culture serves as a guideline for the organisation's activities, supported by shared assumptions and group norms, such as value or mission statements and a code of conduct.
Prevention of corruption and bribery: Involves managing the risks of unethical practices. This concerns the abuse of entrusted power for personal gain and includes practices such as fraud, extortion, collusion, and money laundering. It may also involve offering or accepting gifts or other benefits, both cash and in-kind, to influence someone towards dishonest or illegal behaviour.

Opportunities

Corporate culture: Shared values and principles, regardless of function, location, or position within the organisation, will contribute to a positive perception of the organisation among both current and future stakeholders.
Prevention of corruption and bribery: No material opportunities identified.

Positive impact

Corporate culture: Clear ethical guidelines promote ethical business practices and behaviour, leading to improved morale, productivity, employee engagement, and psychosocial safety. This creates a work environment where employees feel valued and motivated, and enhances the reputation of the financial sector.
Prevention of corruption and bribery: No material positive impact identified.

Material item

Relevant activities

All of Achmea's activities in all sectors.

Most significant stakeholders

- Policyholders and customers
- Employees
- Suppliers
- Business partners
- Authorities
- Society

Boundary of the value chain

Upstream: Business partners and suppliers.

Internal activities: Employees.

Downstream: Policyholders and customers.

GOVERNANCE – ETHICAL CORPORATE CULTURE

Our corporate culture is focused on promoting ethical business practices and behaviour, which can have a positive effect on both the moral compass and engagement of our employees, as well as on our reputation. A culture that fails to achieve this can pose risks of fraud, legal actions, and reputational risks. Practices such as fraud, extortion, collusion, and money laundering are not only prohibited but also undermine trust in our organisation and the financial sector. Therefore, it is essential to effectively manage these risks. An ethical corporate culture has been identified as material in the double materiality process (see the chapter Process to identify material topics). During this process, we considered the interests and perspectives of stakeholders.

This chapter highlights the ethical values underpinning our corporate culture and our strategies to prevent corruption and bribery. It encompasses all activities of Achmea across various sectors. While implementation may vary depending on local circumstances and regulations, the core principles remain the same.

OUR STRATEGY REGARDING ETHICAL CORPORATE CULTURE

As a financial service provider, we are committed to an integrity-driven corporate culture that is open and transparent, with no room for corruption and fraud. Any violation of these principles can damage the reputation of the financial sector.

All employees of Achmea play a crucial role in promoting integrity within our organisation. We expect them to act with integrity towards customers and to deal fairly with suppliers and business partners, which means adhering to the applicable rules and guidelines. Furthermore, it is essential that we create an environment where employees feel free to speak up about situations that are in violation of these rules and guidelines.

With a strong focus on integrity and transparency, we aim to develop a culture where ethical business practices and behaviour are the norm, and employees feel supported in embracing this conduct. This not only strengthens our image as a reliable financial service provider but also enhances the trust of our customers and partners in Achmea. Ultimately, it is our collective responsibility to ensure the integrity of our organisation and contribute to a strong and sustainable financial sector.

HOW WE MANAGE OUR IMPACT, RISKS AND OPPORTUNITIES

OWN POLICY

To promote integrity and prevent corruption and bribery, we have implemented various measures, such as the Achmea General code of conduct and the Whistleblower policy (see the chapter Responsible employer practices for more information). All employees, both domestically and internationally, are required to act in accordance with the code of conduct. Furthermore, Dutch employees are obligated to take an oath or make a promise for the financial sector.

Our Integrity and fraud policy highlights the integrity risks we face in our operations, including corruption, gifts, secondary activities, and the involvement of third parties. The primary principle of this policy is to prevent any form of corruption or bribery. The policy also outlines the implementation of the Systematic Integrity Risk Analysis (SIRA).

For suppliers, we have established a Supplier due diligence process in the Netherlands aimed at screening (potential) suppliers and managing internal risks related to corruption, bribery, or conflicts of interest. This includes procurement and outsourcing processes, as well as the integrity measures outlined in the Integrity and fraud policy. (Potential) suppliers are informed about our standards and values through a code of conduct, which our employees involved in procurement must sign.

Additionally, we have a Group Ethics committee, consisting of colleagues and external parties, that provides advice on ethical issues. These matters often involve multiple dimensions and various departments. Current themes include digitalisation (such as cookies and algorithms), experimental healthcare needs, and socially responsible investing. Individual, confidential matters are also addressed.

In all our policies, we take into account (local) laws and regulations. Senior management oversees the implementation of the policy.

APPLICABLE REGULATIONS AND COMMITMENTS

We have committed ourselves to various external codes, including the Dutch Code of conduct for insurers of the Dutch Association of insurers. This code helps insurers define their social role based on their corporate vision.

REPORTING INCIDENTS

Incidents reported by external parties can be submitted in accordance with our complaints mechanism (see the chapter Working conditions in the value chain). For incidents reported by employees, the Incident policy and the Whistleblower policy apply. Reported incidents are investigated, and corrective actions are taken where necessary. More information about the Whistleblower policy is included in the chapter Responsible employer practices.

Integrity-related incidents are communicated to the Executive Board, the Audit & Risk Committee of the Supervisory Board, and the relevant regulators through periodic risk and compliance reports. In the case of significant integrity incidents, the Chief Risk Officer directly informs the chairs of the Executive Board and the Audit & Risk Committee.

GOVERNANCE – ETHICAL CORPORATE CULTURE

Depending on legislation (such as the Financial Supervision Act or the GDPR) or local regulations, certain categories of incidents must be reported to regulators, including the AFM, DNB, or other local authorities.

FRAMEWORK

We have developed a Risk framework for integrity management which looks at two perspectives. Firstly, the organisational perspective, where integrity risks related to employees and products are managed in accordance with the General Code of conduct and the Integrity and fraud Policy. These policy documents also reference other policies and guidelines, such as those concerning conflicts of interest, secondary activities, the Incident policy, and the Whistleblower policy. Secondly, there is the customer and relationship perspective. To manage relational integrity risks arising from the obligations of the Financial Supervision Act (Wft), the Sanctions Act 1977 (Sw), and the Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft), Customer Due Diligence (CDD) is in effect. Additionally, we implement measures to manage risks based on international standards, such as tax legislation (FATCA/CRS), with our Tax policy ensuring compliance with tax regulations.

We conduct a Systematic Integrity Risk Analysis (SIRA) annually, with responsibility resting with the business units. The implementation closely aligns with the best practices of DNB. The SIRA provides insight into the integrity risks faced by each entity and the extent to which these risks are managed. All foreign business units also carry out the SIRA and report their findings and necessary actions to local management.

In 2024, the SIRA was conducted for each entity with input from various staff departments. A new scenario was introduced for risks related to socially responsible investing and greenwashing. Integrity risks are addressed by periodically evaluating the effectiveness of fraud control measures using the Integrated Governance, Risk, and Compliance system. The results are reported to management and the Executive Board. In the case of incidents, evaluations are carried out to determine if adjustments are needed in the SIRA, in addition to the annual updates

Our monitoring frameworks are designed to prevent integrity violations related to money laundering, terrorist financing, sanctions evasion, corruption, conflicts of interest, tax fraud, internal and external fraud, market manipulation, cybercrime, and socially unacceptable behaviour. Detected integrity violations, including corruption and bribery, are followed up in accordance with the Incident policy.

TRAINING AND COMMUNICATION

We are committed to raising internal awareness of our corporate culture, based on ethical business practices and ethical behaviour, through both training and communication.

To support this, we have implemented three mandatory training sessions for specific groups of employees focused on integrity, privacy, and safe working practices. The e-learning course on Integrity is mandatory for all employees of Achmea, including members of the Executive Board and the Supervisory Board.

In addition to these sessions, we offer specific training programmes for certain roles, such as compliance functions, as well as mandatory training related to the Wft in the Netherlands. Furthermore, new internal and external employees are required to complete training on the code of conduct. For our foreign business units, local training and awareness sessions are conducted in accordance with the relevant regulations. All mandatory training is monitored for participation, and appropriate measures are taken if the training is not completed. We also communicate through various channels, including the intranet and messages from the Executive Board, highlighting the principles that underpin our corporate culture.

ACTIONS

Our actions are part of an ongoing process and originate from the policies, guidelines, and frameworks described in this chapter. Implementing these does not require additional specific measures or a detailed action plan. Therefore, we do not have a list of key actions that have been implemented in 2024 or that are planned for the future.

For all actions described in this chapter, the financial resources allocated for the implementation of the described actions are considered part of our regular business operations.

METRICS AND GOALS

We have set a target for the percentage of Dutch employees who have successfully completed the e-learning on Integrity. All Dutch employees are required to participate in this training, which is regularly updated to keep the content relevant and effective. New employees must complete this training within three months of their start date to ensure they are aware of our integrity standards from the outset. For current employees, the training is scheduled based on a training cycle, ensuring that everyone remains informed about our integrity policy and practices. Due to illness or prolonged absence of employees, and because new employees have three months to complete the e-learning, the achievement rate is below 100%.

GOVERNANCE – ETHICAL CORPORATE CULTURE

To assess the effectiveness of our measures, we have established controls within our internal control framework to monitor their effectiveness. We take additional actions as necessary. Our objectives have not been validated by an external entity.

TABLE 1: INDICATORS OF ETHICAL CORPORATE CULTURE

DESCRIPTION	TARGET 2024	RESULTS 2024
% of Dutch employees who have successfully completed the integrity e-learning	100%	97.3%
Number of convictions for violating anti-corruption and anti-bribery laws	0	0
Amount of fines for violating anti-corruption and anti-bribery laws	0	0

PRINCIPLES FOR DETERMINING INFORMATION ON INDICATORS OF ETHICAL CORPORATE CULTURE

Methodology

The % of Dutch employees who have successfully completed the integrity e-learning is calculated by dividing the number of employees who have successfully completed the training at the end of the year by the total number of employees for whom the training was mandatory at the end of the year.

The number of convictions for violating anti-corruption and anti-bribery laws, as well as the amount of fines for breaching these laws, is determined, where applicable, based on the monitoring systems described in this chapter. Reporting is in accordance with data point ESRS G1-4-24a.

Scope

The percentage of Dutch employees who have successfully completed the integrity e-learning includes all employees in the Netherlands, excluding third-party companies. This pertains to employees who are employed by Achmea Internal Services and fall under the Achmea collective labour agreement, as well as employees who are graded above this agreement and have an employment contract with this entity or Achmea B.V. itself. Also included are the contracted employees from the units that fall under the Netherlands, excluding third-party companies (see Appendix B).

The number of convictions for violating anti-corruption and anti-bribery laws, as well as the amount of fines for breaching these laws, pertains to Achmea and all its group companies, both domestically and internationally.

GOVERNANCE – DATA AND CYBERSECURITY

Risks

Violations of data and cybersecurity can cause direct and indirect financial losses and reputational damage, undermining stakeholder trust and negatively impacting financial performance.

Negative impact

Inadequate security measures can lead to significant data breaches of confidential (customer) information, which can damage customer trust and also affect trust in the financial sector as a whole.

Data and cybersecurity

Protecting digital information from unauthorised access, corruption, or theft throughout its lifecycle. It relates to all aspects of information security, including the physical security of hardware and storage devices, administrative and access controls, as well as the logical security of software applications. This theme also includes the organisation's policies and procedures.

Opportunities

Technological advancements, such as the use of AI, offer opportunities to improve IT infrastructure and optimise processes, leading to greater efficiency and lower costs.

Positive impact

Data security is important for the financial sector because of the processing of sensitive information. It plays a key role in maintaining overall trust in the industry.

Material Item

Relevant activities

Own operation: Own IT security monitoring, including outsourced services from customers and suppliers.

Most significant stakeholders

- Policyholders and customers
- Employees
- Business partners
- Supervisors
- Authorities

Boundary of the value chain

Downstream

GOVERNANCE – DATA AND CYBERSECURITY

Data security is important in the financial sector because of the sensitive information that is managed. Customers and other stakeholders expect their personal and financial data to be well protected. It is important to protect information from unauthorised access, modification, or theft. This includes all aspects of information security, such as physical security of hardware, administrative controls, and software security. A breach of Achmea's security can lead to financial losses and reputational damage. This could damage confidence in both Achmea and the entire financial sector.

Due to the importance of data and cybersecurity for Achmea, this topic has been identified as material in the double materiality analysis. The analysis took into account the interests and perspectives of stakeholders (see the chapter Process to identify material topics). Data security is a topic which can be viewed as a governance issue. However, it is not addressed as a topic in ESRS G1 Business Conduct. Therefore, this theme is considered to be an entity-specific topic for Achmea.

OUR DATA AND CYBERSECURITY STRATEGY

We are committed to reliable data and cybersecurity to protect sensitive information and create a secure environment that meets legal requirements. This helps to enhance the trust of customers and other stakeholders and contributes to confidence in our organisation and the financial sector as a whole. We consider data and cybersecurity to be an important prerequisite for privacy. The topic aligns with the building block of Expertise in data & digital, part of our 'Sustainable Living. Together' ambition.

HOW WE MANAGE OUR IMPACT, RISKS AND OPPORTUNITIES

OWN POLICY

The policy described in this chapter applies to all our Dutch and foreign subsidiaries. However, the implementation of this policy may differ for our foreign subsidiaries, depending on local circumstances and the size of the business. Due to the sensitive nature of the policy, specific details of our approach to data and cybersecurity cannot be disclosed publicly.

Achmea's Security policy outlines the general objectives for protecting the data of employees and customers. The primary focus is on safeguarding data while maintaining the availability of the services we provide. Achmea's data governance policy emphasises the importance of data quality. To ensure this in source systems, a Data Governance Board oversees the implementation of initiatives in line with the Achmea Data Governance Framework.

Achmea's Outsourcing policy is focused on the secure outsourcing of IT- and business services, often to specialised and/or local service providers. Risk assessments are conducted for outsourcing agreements, and Service Level Agreements (SLAs) are established. Contractual security obligations are outlined in a security agreement. For cloud solutions, we conduct risk assessments on specific risks and control measures are identified before implementing these solutions. Additionally, there are mandatory certification and assurance requirements based on the risk profile of IT and cloud providers, ensuring that the cloud solutions meet security standards and the Integrated Governance, Risk, and Compliance system.

Social aspects are mainly addressed in the internal General code of conduct (see the chapter Responsible employer practices) and the Privacy policy (see the chapter Privacy of customers' personal data). In case of incidents, we adhere to the Incident Guidelines, which define incidents and describe the associated procedures (see the chapter Ethical corporate culture). We have implemented procedures for submitting complaints through the complaints mechanism (see the chapter Working conditions in the value chain) and the Whistleblower policy (see the chapter Responsible employer practices).

APPLICABLE REGULATIONS AND COMMITMENTS

Data and cybersecurity management is based on internationally accepted standards. To measure our cybersecurity, we use recognised market standards, including the ISF Standard of Good Practice, ISO standards, and the NIST Cybersecurity Framework. Additionally, we collaborate with and/or receive information on data and cybersecurity from various institutions and governments, including the National Cyber Security Centre (NCSC), the Digital Trust Centre (DTC), Insurance-ISAC, and the DNB Threat Intel Based Ethical Red Team program (TIBER-NL). Specific regulations may also apply based on local circumstances, such as the Network and Information Systems Directive (NIS2) for banks.

ACTIONS

We take various actions to ensure the integrity, confidentiality, and availability of IT systems and customer portals. In the event of significant incidents, compensatory measures are implemented, and relevant authorities are informed.

In response to the ongoing threat of cyberattacks, we invest in security measures and improve response times, with the goal of continuously enhancing our cyber maturity. This is achieved through monitoring, the use of security alerts, and ensuring knowledge and expertise available.

We also invest in a resilient infrastructure and systems, with customer portals secured by multi-factor authentication. A ransomware resilience program has been implemented for detection, prevention, and recovery, and continuous improvements are made based on developments. In the event of data breaches, affected parties and regulatory authorities are informed about the impact and corrective actions, where necessary. Additionally, we monitor developments related to emerging technologies, such as AI and cloud computing. If needed, action plans are set up. We also keep track of upcoming legislation, such as the Digital Operational Resilience Act (DORA).

With these actions, we aim for strong data and cybersecurity that protects the organisation and builds trust with our customers and other stakeholders. We have a cybersecurity insurance policy for incidents with material impact. To date, no claims have been made under this insurance.

Our actions are part of an ongoing process. Their implementation does not require additional specific measures or a detailed action plan. Apart from the actions mentioned here, we do not have a list of other significant actions that were executed in 2024 or planned for the future. All actions are considered part of our regular business operations, with financial resources allocated for the execution of the mentioned actions.

ORGANISATION

The IT Security department plays a crucial role in our operations. This department carries out various activities, including Security Information and Event Management (SIEM), vulnerability management, and penetration testing. To ensure oversight of security measures, Information Security Officers have been appointed for each business unit.

Coordination in the area of data security takes place through a structured approach involving multiple consultation bodies. This includes various working committees, such as the Strategic Security Consultation, which focuses on quickly resolving issues. The IT Security board participates in the implementation of IT security measures. Additionally, the Decentralised Security Consultation (DSO) is used to manage decentralised actions arising from the Integrated Security Approach. The structure of the consultation bodies varies depending on local needs. The Chief Risk Officer, a member of the Executive Board, is responsible for the implementation of security and data policies throughout the organisation.

MONITORING

Through measures focused on monitoring and oversight, we aim to effectively protect our organisation and our stakeholders. We have implemented a comprehensive monitoring system for IT security that operates at both the entity and organisational levels. This system tracks the status of internal controls and outstanding actions and provides insights into the functioning of cybersecurity measures. Results are discussed with the Executive Board and the Supervisory Board based on quarterly reports, with the possibility of increasing the reporting frequency if necessary. In the event of serious security incidents or data breaches, the relevant supervisory authorities are informed, and assessments of system integrity are conducted. IT security reports, based on threat levels, are generated weekly and are also available for foreign subsidiaries.

The effectiveness of data and cybersecurity controls is evaluated based on key controls within the IGRC system. Automated controls are implemented based on risk assessments. Reports are prepared and discussed quarterly, with significant risks escalated to the Executive Board.

TRAINING

A key challenge is ensuring that employees have the necessary knowledge and awareness to effectively address security challenges. We prioritize awareness and education through a wide range of programs. Depending on their role, employees in the Netherlands are required to complete a security awareness e-learning course every three years. IT security officers from foreign subsidiaries must undergo mandatory training that meets local requirements. In the Netherlands, employees can also set their own learning priorities and take courses on new developments and technologies, such as AI and cloud technology, to promote professional growth. By investing in employee training, we aim to enhance our overall security and maintain a high service standard for our customers and other stakeholders.

METRICS AND TARGETS

Due to the confidential nature of this subject, no information is disclosed regarding metrics and targets. Information about security incidents is not made public, as third parties could use this information to identify weaknesses within the organisation; internally, this information is only shared with a limited number of colleagues. More information about mandatory training can be found in the chapter Ethical corporate culture.

ANNEX A: APPROACH TO SUSTAINABILITY REPORTING

ABOUT THESE SUSTAINABILITY STATEMENTS

The Executive Board of Achmea B.V. is responsible for the preparation of these Sustainability statements, which has been drafted under the supervision of the Group Finance department. The operational responsibility for performing the double materiality analysis lies with the Sustainability department. The outcome of this analysis is formally approved by the Executive Board and shared with the Supervisory Board. The sustainability strategy is established by the Sustainability department and approved by the Executive Board. The resulting sustainability policy and associated actions are established and monitored in collaboration with the business units and the Sustainability department. Additionally, the Risk Management department oversees sustainability risks as part of the overall risk management process. A project team, set up for the implementation of the Corporate Sustainability Reporting Directive (CSRD) and part of the Achmea Together Sustainable programme, oversees the content of the external reporting. This team also assesses the accuracy and plausibility of the qualitative and quantitative information provided by the business units and included in these Sustainability statements.

The CSRD Steering Committee approves the fundamental principles, draft texts, and final texts. The content is also reviewed by the programme board of the Achmea Together Sustainable programme, the Risk Management department, the Compliance department, and the various business units within Achmea. The final version is ultimately approved by the Executive Board of Achmea, with the Supervisory Board overseeing this process. The CSRD Steering Committee is chaired by the Director of Financial & Performance Management and includes the Directors of Reporting and Sustainability, as well as the managers of Investor Relations and the Competence Centre Finance.

PRINCIPLES FOR PREPARATION OF REPORT

This year, Achmea has reported on sustainability information for the first time in accordance with the requirements of the CSRD and the European Sustainability Reporting Standards (ESRS), as adopted by the European Commission, referenced in Article 29b of Directive 2013/34/EU, and with the specifications adopted pursuant to Article 8(4) of Regulation (EU) 2020/852 of the European Parliament and the Council. The CSRD has not yet been implemented in Dutch law, meaning that Achmea still needs to comply with the requirements of the Non-Financial Reporting Directive (NFRD). We believe that the requirements of the NFRD are included in the more comprehensive CSRD, and therefore we choose to voluntarily report in accordance with the CSRD. Previously, Achmea used the general standards of the Global Reporting Initiative (GRI) and the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) when compiling its sustainability information, as included in the Executive Board report. Since the information required under these frameworks largely overlaps with the CSRD requirements, we no longer utilise these frameworks.

The consolidation scope for the Sustainability statements is the same as that for our annual accounts. For more information, see the Consolidated Financial Statements, Note 1. General accounting principles. All entities included in the consolidation for the financial statements are also included in the sustainability assessment, which addresses aspects such as double materiality and strategy.

An exception to this is the two entities acquired from Blue Sky Group (BSG) by Achmea as at 31 December 2024. Due to insufficient sustainability information being available, this acquisition has not been included in the disclosures of the Sustainability statements.

In addition to the entities that are part of the consolidation scope for the financial statements, we have also included upstream and downstream business relationships in the Sustainability statements as part of the value chain, insofar as we can independently or in collaboration with other organisations influence or significantly affect their sustainability decisions.

The results of the double materiality analysis is included in the chapter Process to identify material topics and also in the chapters with topical information. For writing a chapter on a material topic that is also elaborated upon in one of the topical ESRS standards, we used the disclosure requirements included therein as a basis. The only entity-specific material topic is Data and cybersecurity. For this topic, we utilised the general disclosure requirements of the ESRS to determine the content of the chapter. For the topics that correspond with ESRS standards, we used the objectives and metrics mentioned in the standards, supplemented by indicators that arise from our current management approach, which in some cases are entity-specific.

To determine which information we will disclose regarding the material impacts, risks, and opportunities, we first consider the relevance of the information in relation to what we want to present or explain. This includes the interaction between the strategy and the business model on one hand, and the material effects, risks, and opportunities that have been identified on the other. Additionally, we assess whether the information meets the needs of the identified stakeholders. For more information about the groups of stakeholders, please see the chapter Interests and views of stakeholders.

In the Sustainability statements for 2024, Achmea has not taken advantage of the option to omit 'classified and sensitive' information. We have also not utilised the option to exclude information regarding intellectual property, know-

ANNEX A: APPROACH TO SUSTAINABILITY REPORTING

how, or innovation results, or information that could significantly harm our commercial position.

As required by ESRS 1 and ESRS E1, we have included the disclosures mandated by EU legislation regarding the EU Taxonomy in these Sustainability statements. This information is presented in a separate chapter (see chapter Environment – EU Taxonomy Information), which includes a summary of the key details. To enhance the readability of the report, the detailed tables are included in Annex E of the Sustainability statements.

REPORTING STRUCTURE

For our sustainability reporting, we provide information on material impacts, risks, and opportunities, categorised based on our main activities: Insurance & services, Investment & financing, and Own Operations. Within Insurance & services, we further distinguish between non-life, health, and life insurance, as well as services. For Investment & financing, we differentiate between corporate investments (including investments in shares and corporate bonds), government bonds, mortgages, and investment property. Our Own Operations consist of our internal business operations and our personnel.

The table below shows the alignment between Achmea's activities as categorised for sustainability reporting and financial reporting.

The activities within Insurance & services include the primary activities of the Non-life Netherlands segment, the Health Netherlands segment, the Pension & life Netherlands segment, and the primary activities within the International activities segment, which encompasses our operations in Australia, Greece, Slovakia, and Türkiye. Finally, this also includes the activities of Achmea Reinsurance, which are part of the Other activities segment. The activities within Investment & financing encompass the activities in the Retirement services Netherlands segment, the activities of Achmea Bank, and investments related to (re)insurance activities. The activities within Own operations include specific activities from the Other activities segment, which covers a wide range of functions such as shared service centres and staff departments, including HR and Facilities Services in the Netherlands. For financial reporting, the costs of these services are allocated to the respective segments. However, for sustainability reporting, these services are included in the activities of Own operations. Additionally, HR and Facilities Services related to the International activities segment are also included.

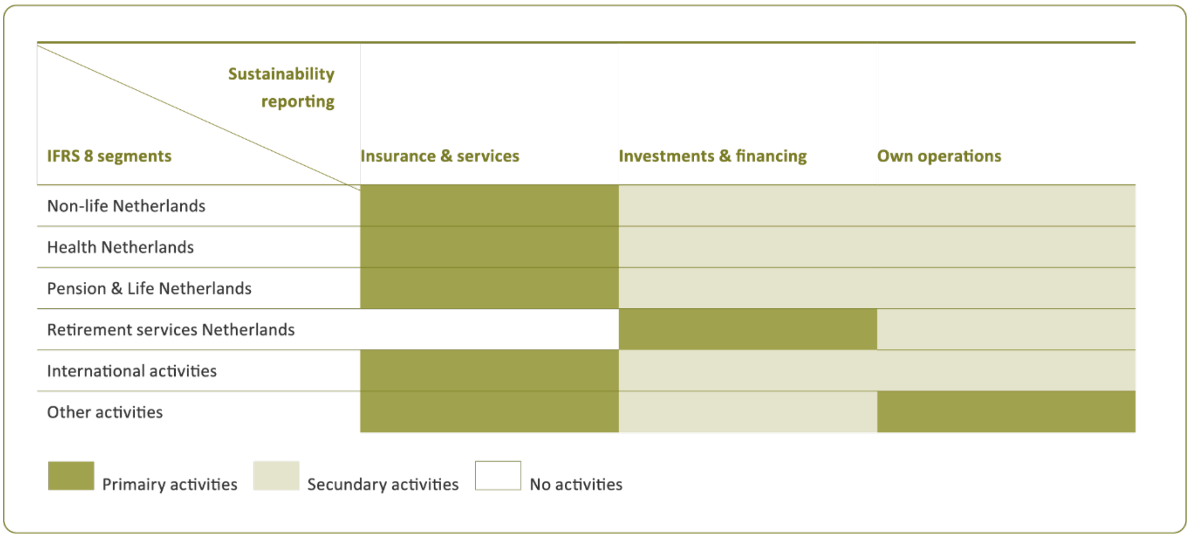
ESTIMATION UNCERTAINTY

In this report, we use metrics based on certain estimates, averages, or assumptions, except for information related to the EU Taxonomy. The underlying data is either directly obtained from customers/policyholders or sourced from external data providers. When this is not available, we use sector averages. For certain measures, such as our financed emissions, climate-related physical and transition risks, and insurance-related emissions, we combine various data sources and use various assumptions and estimates. In the topical chapters, particularly in the chapter on Climate change, Annex C (CO_2e emissions and climate-related risks), we disclose the key estimates and assumptions as well as the methodology and scope. For the EU Taxonomy, estimates or approximations are not permitted: if the standard template cannot be applied, the outcome is zero, non-alignment, or non-eligibility. Additionally, forward-looking information, such as expected financial impacts, is subject to a certain degree of uncertainty given its future nature.

TRANSITIONAL PROVISIONS AND PHASING IN

Value chain information

The information in these sustainability statements is based on Achmea's own operations and the defined value chain. As various stakeholders are involved in sustainability reporting, not all data or methodologies are currently available, and



these will become accessible in the coming years. When sustainability information related to upstream or downstream business relationships in the value chain is not available, we will refrain from providing further clarification in accordance with the transitional provisions in the ESRS. This specifically pertains to the metrics and targets for the value chain of (part of) our investment and insurance activities in the area of climate change (ESRS E1), as well as metrics and targets related to the value chain concerning water and soil pollution (ESRS E2), biodiversity (ESRS E4), resource inflow and waste (ESRS E5), and working conditions in the value chain (ESRS S2). Currently, detailed policies and action plans are lacking for most of these topics. In the section on topical information, we disclose our ambitions and outline the journey we are undertaking to further refine these policies and actions, which is also dependent on the availability of more information regarding the value chain. We are committed to preparing an action plan to follow up on these initiatives. Overall, we have established targets and metrics for the material topics related to our own operations, although some targets and metrics are still under development. This includes, for example, the metrics related to the material themes in the chapter on customers and end-users and on ethical corporate culture.

Comparative figures

As this is the first year we are reporting in accordance with the requirements of the CSRD, we are taking advantage of the option to omit comparative figures in certain cases. For the topical chapter on Climate change, no comparative figures are included for climate-related physical and transition risks related to investments in companies, mortgages, and real estate investments. No comparative figures are also provided for investments in companies in sectors with a significant climate impact, investments in green bonds, and premium income related to companies operating in specific sectors. For the insurance-related emissions in our Dutch health activities, no comparative figures are available. Regarding the EU Taxonomy information, the tables containing the key KPIs include comparative figures, while we will not do so for the underlying tables on numerators and denominators due to limited added value. For the topical chapter on Responsible employer practices, no comparative figures are included, except for the FTEs and a number of indicators for the Dutch activities. For the topical chapters related to governance (e.g. Ethical corporate culture and Data and cybersecurity), no comparative figures are provided.

Phasing in

In accordance with the ESRS requirements, Achmea adopts a phased approach where necessary, as permitted by the ESRS. In addition to the information from the value chain, this includes the disclosure of expected financial effects arising from material climate-related physical and transition risks (E1-9), excluding information about corporate investments, mortgages, and investment property.

TIME HORIZONS

In general, we assess material impacts, risks, and opportunities over the short, medium, and long term. The short term corresponds to the reporting period of the financial statements. Since sustainability-related issues often manifest over time, the nature of these topics requires a more forward-looking reporting approach, whereas financial information is limited to the annual reporting period. For forward-looking information, we define:

- Short term: up to 1 year.
- Medium term: between 1 year and 10 years.
- Long term: more than 10 years.

Our time horizons differ from the general guidelines included in the ESRS to better reflect the characteristics of the business (lifecycles, duration) and the prudential perspectives.

INCORPORATION BY REFERENCE

Some ESRS disclosure requirements are closely related to disclosures we included in other parts of the annual report. Therefore, these disclosures are not included in these Sustainability statements but in other sections of the annual report. These include:

- Governance, chapter on Biographies Executive and Supervisory Board members, which provides details about their expertise and skills, including their knowledge of sustainability (ESRS 2.21c);
- Governance, chapter on Corporate Governance, paragraph on the Executive Board and paragraph on the Supervisory Board, which contains information about the responsibilities and roles of the Executive Board and the Supervisory Board (ESRS 2.22);
- Consolidated Financial Statements, Note 2. Capital and Risk Management, which includes more detailed information about risk management within Achmea (ESRS 2.53c/d/e); and
- Consolidated Financial Statements, Note 4. Segment Information, which includes information about revenue per segment (ESRS 2.40a/b).

COMPARATIVE FIGURES AND METHODOLOGY CHANGES

In some cases, it is not feasible to adjust comparative figures for previous periods to achieve consistency with the current period. This may be due to the fact that data from earlier periods was not collected in a way that allows for retroactive correction. Additionally, it may be impractical to reconstruct the necessary information. If it is not feasible to adjust the comparative figures for one or more prior periods, this will be noted and explained below and in the relevant chapter. Specific provisions apply during the transition period.

Although we did not report in accordance with the requirements of the CSRD last year, we have already included several metrics in the annual report for 2023. A significant portion of these are also included in these sustainability statements, with the specific methodology and scope

ANNEX A: APPROACH TO SUSTAINABILITY REPORTING

explained in the relevant topical chapter. The methodology used is continuously being improved, and more data is becoming available.

For 2024, we have implemented the following key changes:
- In determining the financed CO_2 emissions of corporate investments, we supplement missing data with estimates based on sector averages to achieve 100% coverage. The comparative figures have been adjusted. See the chapter on Climate change and Annex C for more information.
- We have made improvements to the methodology for measuring CO_2 emissions for our Dutch motor insurance portfolio. The comparative figures have been recalculated based on this revised methodology. See the chapter on Climate change and Annex C for more information.
- In accordance with the EU Taxonomy, we determine which portion of the revenue from insurance activities qualifies for alignment with the EU Taxonomy based on the part of the gross written premiums related to coverage for climate risks, rather than the premium for the total insurance contract. The comparative figures have been adjusted. See Annex E for more information.
- For the calculation of FTEs, starting in 2024, we will use the standard working week of the relevant country for employees under the collective labour agreement (or a comparable category) instead of the 34-hour working week in the Netherlands. The comparative figures have been recalculated based on this methodology. See the chapter on Responsible employer practices and Annex B for more information.

DUE DILIGENCE

These sustainability statements includes information on due diligence in various chapters, as indicated in the table below:

CORE ELEMENTS OF DUE DILIGENCE	CHAPTER IN SUSTAINABILITY STATEMENTS
a) Embedding due diligence in governance, strategy and business model	Governance of sustainability – Roles, responsibilities and expertise
b) Engaging with affected stakeholders in all key steps of the due diligence	Governance of sustainability – Roles, responsibilities and expertise
c) Identifying and assessing adverse impacts	Chapter containing specific topical information
d) Taking actions to address those adverse impacts	Chapter containing specific topical information
e) Tracking the effectiveness of these efforts and communicating	Chapter containing specific topical information

AUDITOR'S SCOPE AND LEVEL OF ASSURANCE

Achmea has engaged its external auditor, EY, to perform an assessment of the information in these sustainability statements, including the annexes, with the exception of all comparative figures. EY has provided a limited assurance report that provides a 'limited level of assurance' regarding the reliability and acceptability of the sustainability information included in this part of the Executive Board report. The activities performed in obtaining a limited level of assurance are aimed at determining the plausibility of the information and is not as in-depth as those for assurance engagements focused on obtaining a reasonable level of assurance. Therefore, the level of assurance obtained in review engagements is significantly lower than that obtained in audit engagements. EY does not provide assurance on the assumptions and feasibility of future information, such as targets, expectations, and ambitions included in the report. The content of the websites referred to in this report, the other components of the Executive Board report (excluding the sections mentioned in 'Incorporation by reference'), and the supplements are not covered by the limited assurance report. The limited assurance report can be found under Additional information, Limited assurance report of the independent auditor regarding the sustainability information.

ANNEX B: DETAILED INFORMATION OWN WORKFORCE

Annex B contains an overview of the indicators with information on our employees and hired staff (non-employees) used to measure progress on sustainability and provides insights required under certain frameworks. The CSRD requires insight to be given into the composition of the own workforce. This annex includes further information beyond what is presented in the chapter Responsible employer practices. FTE information is based on data from Achmea's HR information system in the Netherlands and written statements for the foreign operating companies. To ensure a practical bundling of expertise, Achmea has an operational organisation model consisting of distribution divisions, product divisions, internal services departments and policy-setting staff services. For the implementation of Achmea's personnel policy, HR employs the organisational structure shown in the table below. There are no records of employees identifying themselves with a gender other than male or female. Therefore, the tables in this chapter only reflect on the male/female distinction. See chapter Other operating expenses in the financial statements for the wage and salary information.

TABLE 1. NUMBER OF EMPLOYEES OF ACHMEA AS AT 31 DECEMBER

	31 DECEMBER 2024		31 DECEMBER 2023	
	FTE	EMPLOYEES	FTE	EMPLOYEES
Achmea Bank	321	316	185	182
Achmea Investment Management	335	312	324	301
Centraal Beheer	848	878	865	896
Central Services	1,226	1,271	1,123	1,163
Pension & Life Division	415	430	441	455
Non-Life Division	2,739	2,793	2,674	2,725
Finance	536	528	534	524
Human Resources	136	135	132	130
Achmea IT	444	437	430	423
Strategy & transformation	794	778	782	765
Interpolis	170	170	174	173
Achmea Pension Services	402	398	366	363
Achmea Real Estate	171	164	346	334
Zilveren Kruis	2,401	2,518	2,345	2,449
Other	589	577	596	588
Subtotal for Achmea in the Netherlands, excl. third-party companies	**11,527**	**11,705**	**11,317**	**11,471**
Eurocross Assistance	255	239	189	204
InShared	184	205	160	178
Customer Contact Services	450	682	543	828
Subtotal for third-party companies	**889**	**1,126**	**892**	**1,210**
Achmea in the Netherlands	**12,415**	**12,831**	**12,209**	**12,681**
Achmea Australia	128	131	126	128
Eureko Sigorta	666	666	690	690
Interamerican Greece	1,401	1,420	1,309	1,329
Union	709	714	675	680
Subtotal for international subsidiaries	**2,904**	**2,931**	**2,800**	**2,827**
Total	**15,318**	**15,762**	**15,009**	**15,508**

TABLE 2. NUMBER OF ACHMEA EMPLOYEES BY CONTRACT TYPE AND GENDER

	31 DECEMBER 2024		31 DECEMBER 2023	
GENDER	PERMANENT CONTRACT	TEMPORARY CONTRACT[1]	PERMANENT CONTRACT	TEMPORARY CONTRACT
Male	7,405	364	7,281	344
Female	7,290	703	7,143	740
Total	**14,695**	**1,067**	**14,424**	**1,084**

[1] As of 31 December 2024, there are 8 men (31 December 2023: 0 men) and 7 women (31 December 2023: 1 woman) working with a non-guaranteed number of hours (0-hour contract), these are included in the Temporary contract column.

ANNEX B: DETAILED INFORMATION OWN WORKFORCE

TABLE 3. GENDER DIVERSITY BY JOB-LEVEL PER COUNTRY

	31 DECEMBER 2024				31 DECEMBER 2023			
	MALE		FEMALE		MALE		FEMALE	
	%	#	%	#	%	#	%	#
THE NETHERLANDS (EXCLUDING THIRD PARTY COMPANIES)								
Top management	65.5%	192	34.5%	101	67.5%	193	32.5%	93
Other	52.0%	5,937	48.0%	5,475	52.1%	5,809	47.9%	5,343
Total	**52.4%**	**6,129**	**47.6%**	**5,576**	**52.5%**	**6,002**	**47.5%**	**5,436**
GREECE								
Top management	85.7%	6	14.3%	1	87.5%	7	12.5%	1
Other	49.8%	703	50.2%	710	49.2%	650	50.8%	671
Total	**49.9%**	**709**	**50.1%**	**711**	**49.4%**	**657**	**50.6%**	**672**
SLOVAKIA								
Top management	66.7%	22	33.3%	11	69.0%	20	31.0%	9
Other	27.9%	190	72.1%	491	27.2%	177	72.8%	474
Total	**29.7%**	**212**	**70.3%**	**502**	**29.0%**	**197**	**71.0%**	**483**
TÜRKIYE								
Top management	83.3%	5	16.7%	1	60.0%	3	40.0%	2
Other	42.6%	281	57.4%	379	41.6%	285	58.4%	400
Total	**42.9%**	**286**	**57.1%**	**380**	**41.7%**	**288**	**58.3%**	**402**
OTHER (INCLUDING THIRD PARTY COMPANIES)								
Top management	52.8%	19	47.2%	17	56.3%	18	43.8%	14
Other	33.9%	414	66.1%	807	34.6%	463	65.4%	876
Total	**34.4%**	**433**	**65.6%**	**824**	**35.1%**	**481**	**64.9%**	**890**
CONSOLIDATED								
Top management	65.1%	244	34.9%	131	66.9%	241	32.5%	119
Other	48.9%	7,525	51.1%	7,862	48.7%	7,384	47.9%	7,764
Total	**49.3%**	**7,769**	**50.7%**	**7,993**	**49.2%**	**7,625**	**47.5%**	**7,883**

TABLE 4. NUMBER OF ACHMEA EMPLOYEES BY CONTRACT TYPE AND COUNTRY

	31 DECEMBER 2024		31 DECEMBER 2023	
COUNTRY	PERMANENT CONTRACT	TEMPORARY CONTRACT	PERMANENT CONTRACT	TEMPORARY CONTRACT
The Netherlands	11,679	913	11,461	1,016
Australia	124	7	113	15
Greece	1,380	40	1,313	16
Slovakia	620	94	658	22
Czech Republic	36	10	32	10
Türkiye	852	3	843	5
Suriname	4		4	
Total	**14,695**	**1,067**	**14,424**	**1,084**

TABLE 5. NUMBER OF ACHMEA EMPLOYEES BY EMPLOYMENT RELATIONSHIP AND GENDER

	31 DECEMBER 2024		31 DECEMBER 2023	
GENDER	FULL-TIME	PART-TIME	FULL-TIME	PART-TIME
Male	6,970	799	6,867	758
Female	5,031	2,962	4,857	3,026
Total	**12,001**	**3,761**	**11,724**	**3,784**

ANNEX B: DETAILED INFORMATION OWN WORKFORCE

TABLE 6. NUMBER OF ACHMEA EMPLOYEES BY CONTRACT TYPE, GENDER AND COUNTRY

	31 DECEMBER 2024				31 DECEMBER 2023			
	FULL-TIME		PART-TIME		FULL-TIME		PART-TIME	
COUNTRY	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
The Netherlands	5,640	3,291	761	2,900	5,619	3,174	716	2,968
Australia	48	77	1	5	51	72	2	3
Greece	686	695	23	16	635	653	22	19
Slovakia	211	484	1	18	195	463	2	20
Czech Republic	16	20	3	7	15	23	1	3
Türkiye	369	461	10	15	352	469	15	12
Suriname	-	3	-	1	-	3	-	1
Total	**6,970**	**5,031**	**799**	**2,962**	**6,867**	**4,857**	**758**	**3,026**

TABLE 7. NUMBER OF EMPLOYEES THAT LEFT ACHMEA AND TURNOVER RATE

	31 DECEMBER 2024
Number of employees that left Achmea	1,648
Turnover rate (%)	10.6%

TABLE 8. NUMBER OF EMPLOYEES AND NON-EMPLOYEES

	31 DECEMBER 2024		31 DECEMBER 2023	
GENDER	EMPLOYEES[1]	NON-EMPLOYEES[2]	EMPLOYEES[1]	NON-EMPLOYEES[2]
Male	7,769	1,214	7,625	1,285
Female	7,993	1,113	7,883	1,195
Total	**15,762**	**2,327**	**15,508**	**2,480**

[1] Employees are employees with an employment contract with Achmea.
[2] Non-employees are individual contractors who work for us (self-employed persons), and persons from companies that are mainly engaged in job placement, such as temporary employment agencies.

KEY ESTIMATES AND PRINCIPLES USED TO DETERMINE THE INFORMATION RELATED TO THE CHARACTERISTICS OF OUR OWN WORKFORCE

Methodology

FTE information is based on information from Achmea's personnel information system in the Netherlands and written statements for foreign operating companies. FTEs are calculated based on a standard working week for the relevant category and country. For our Dutch business operations, a working week of 34 hours applies to collective labour agreement personnel and 40 hours for personnel who do not fall within the collective labour agreement and to employees abroad. All figures are calculated at the end of the year (no average for the year). The number of employees is equal to the number of employees. In the 2023 annual report, all FTE numbers were based on a 34-hour working week in accordance with the Achmea collective labour agreement. For the sake of comparability, the 2023 FTE numbers in Table 1 have been adjusted to the number of hours per week for the entities Eurocross, Inshared, Achmea Australia, Eureko Sigorta, Interamerican Greece, Union and Customer Contact Services. The total number of FTEs for 2023 has therefore decreased from 15,636 to 15,009.

There are no registrations of employees who identify with a gender other than male or female, which is why the tables in this chapter only make the distinction between male and female.

Employee turnover in the reporting period is calculated as a percentage of the number of employees at the end of the previous reporting period.

The information relating to self-employed workers is compiled in the same way and according to the same procedures as for employees.

Scope

Employees who are employed by Achmea B.V. or a subsidiary, as well as employees who are not employed, insofar as they are individual contractors who work for us (self-employed persons), and persons from companies that are mainly engaged in job placement, such as employment agencies. This concerns both the entities in the Netherlands and our foreign operating companies.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

This section gives amongst others insight into the carbon emissions connected to our business operations. We also disclose the financed carbon emissions connected to our investments and funding and the insurance associated emissions for the retail motor vehicle portfolio and health care in The Netherlands. In the table below our GHG emissions are included including the targets we have set. Metrics in this chapter have not been validated by an external body other than the assurance provider.

TABLE 1: GHG EMISSION OF ACHMEA B.V. CONSOLIDATED (INCLUDING TARGETS)

	RETROSPECTIVE						MILESTONES AND TARGET				
	BASE YEAR	EMISSIONS BASE YEAR (T CO_2)	EMISSIONS 2023 (T CO_2)	EMISSIONS 2024 (T CO_2)	REDUC-TION SINCE BASE YEAR	REDUC-TION SINCE PRIOR YEAR	2025	2030	2040	2050	ANNUAL % TARGET / BASE YEAR
Scope 1 GHG emissions											
Gross Scope 1 GHG emissions (tCO_2e)	2019	11,200	7,449	8,923	-20%	20%	n/a	Unk.	Unk.	Unk.	9,1%
% of Scope 1 GHG emissions from regulated emission trading schemes	Achmea has no exposures related to Emission Trading Schemes										
Scope 2 GHG emissions											
Gross location-based Scope 2 GHG emissions (tCO_2e)	2019	14,500	8,856	10,627	-27%	20%	n/a	Unk.	Unk.	Unk.	9,1%
Gross market-based Scope 2 GHG emissions (tCO_2e)	2019	14,500	536	1,789	-88%	234%	n/a	Unk.	Unk.	Unk.	9,1%
Significant Scope 3 GHG emissions											
Total Gross indirect (Scope 3) GHG emissions (tCO_2e)		**161,700**	**2,424,689**	**6,858,794**	**-**	**183%**					
1. Purchased goods and services	2019	3,100	1,960	1,892	-39%	-3%	n/a	Unk.	Unk.	Unk.	9.1%
2. Capital Goods	Not a significant category										
3. Fuel- and energy-related activities	2024	n/a	n/a	1,800	-	-	n/a	Unk.	Unk.	Unk.	9.1%
4. Upstream transportation and distribution	Not a significant category										
5. Waste generated in operations	2019	1.100	611	426	-61%	-30%	n/a	Unk.	Unk.	Unk.	9.1%
6. Business traveling	2019	5.900	3,621	3,279	-44%	-9%	n/a	Unk.	Unk.	Unk.	9.1%
7. Employee commuting	2019	15.600	9,907	9,347	-40%	-6%	n/a	Unk.	Unk.	Unk.	9.1%
8. Upstream leased assets	Not a significant category										
9. Downstream transportation	Not a significant category										
10. Processing of sold products	Not a significant category										
11. Use of sold products	Not a significant category										
12. End of life treatment of sold products	Not a significant category										
13. Downstream leased assets	Not a significant category										
14. Franchises	Not a significant category										
15. Investment and other category											
- Of which Financed emissions (own risk and RRP)	Refer to table 5 in chapter Climate change		2,146,400	2,773,890	-	29%	Refer to table 5 in chapter Climate change				
- Of which Finance emissions (Assets under Management)			Unk.	1,416,000	-	-					
- Of which Insured emissions (Non-Life insurance activity)	Refer to table 10	136,000	262,590	254,995	-	-3%	Refer to table 10				3.4%
- Of which Insured emissions (Health (NSLT) insurance activity)	2024	Unk.	Unk.	2,397,165	-	Xx%	n/a	Unk.	Unk.	Unk.	9.1%
Total GHG emissions											
Total GHG emissions (location- based) (tCO_2e)		**187,400**	**2,440,994**	**6,878,344**	-	182%					
Total GHG emissions (market- based) (tCO_2e)		**172,900**	**2,432,674**	**6,869,506**	-	182%					

[1] The column Base year only contains CO_2e data from the company's own operation in the Netherlands. The emission columns for 2023 and 2024 also contain the CO_2e data of the international activities.

[2] The emissions from the Asset under Management investments are prepared from the perspective of the asset manager. Investments for Own Account and Account Risk Policyholders who are invested in the funds of the asset manager are not eliminated.

See the Climate Change chapter for a qualitative interpretation of the developments in the figures and the following tables for more information.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

TABLE 2: GHG INTENSITY PER NET REVENU

	2024	2023
Insurance revenue	25,419	22,931
Investment income from other activities	713	582
Income from service	534	513
Other income	18	44
Net revenue used to calculate GHG intensity	**26,684**	**24,070**
Total GHG emissions (location-based) per net revenue (tCO_2e / million Euro)	257.8	101.4
Total GHG emissions (market-based) per net revenue (tCO_2e / million Euro)	257.4	101.1

The increase in GHG intensity is driven by the addition of health insurance-related emissions and the financed emissions of the Assets under Management in 2024.

A. OWN OPERATIONS

TABLE 3: BREAKDOWN OF GHG EMISSION OF OUR OWN OPERATIONS

	2024 (T CO_2)						BASE YEAR (2023)	REDUCTION	TARGET 2030
	NETHERLANDS	GREECE	SLOVAKIA	TÜRKIYE	OTHER	TOTAL			
Scope 1	5,213	2,632	390	502	186	8,923	7,440	20%	
Scope 2	8,363	1,573	127	409	155	10,627	8,852	20%	
Scope 3	13,242	1,833	467	606	596	16,744	16,308	3%	
Gross carbon emissions own operations	**26,818**	**6,038**	**984**	**1,517**	**937**	**36,294**	**32,600**	**11%**	20,086
Emissions compensated by supplier	12,589	-	-	911	66	13,566	13,827		
Total compensated by Achmea:	14,229	-	-	-	-	14,229	12,634		
Net carbon emissions own operations	**-**	**6,038**	**984**	**606**	**871**	**8,499**	**6,139**	**38%**	Net zero in 2030

Compared to 2023, CO_2e emissions have increased, mainly due to a scope expansion in Greece, where in 2024 emissions from the clinics' own operations have also been included, an increase in the amount of electricity used in the Netherlands due to an increase in office presence and the first inclusion in 2024 of CO_2e emissions associated with working from home.

KEY ESTIMATES AND PRINCIPLES USED TO DETERMINE THE INFORMATION RELATED TO OUR CARBON EMISSIONS

In accordance with the Greenhouse Gas Protocol (GHG Protocol), the carbon emissions are expressed in different Scope categories. Scope 1 emissions are direct emissions from own sources or sources that are controlled by Achmea. Scope 2 emissions are indirect emissions from the generation of purchased energy and/or services. Scope 3 emissions are all relevant indirect emissions (not included in Scope 2) connected to our business operations that occur in Achmea's value chain. This concerns, for instance, the carbon footprint of our employees' commuter mileage, but also financed emissions via our investments and funding and the insurance associated emissions of our insurance portfolios.

For the measurement of the carbon footprint of our own operations, the basis for most of the emission factors, is the List of CO_2 emission factors (www.CO2emissiefactoren.nl). An emission factor is a representative value that quantifies the environmental impact of products and processes, for example to convert MWh of electricity into tonnes of CO_2e. For paper we use the Milieubarometer of Stichting Stimular. For air travel our travel agent uses the emission factors published by the Climate Neutral Group (CNG). Since 2021 our waste processor has used a new tool for its calculations, the impact checker (www.impactinstitute.com). If available, local emissions factors are used for different countries. When local emission factors are not available, general emissions factors are used.

Achmea uses green procurement in its business operations. This relates to for example gas, electricity, fuel for leased cars and external servers. For electricity, for instance, the origin and source of this green electricity are established in what are known as Guarantees of Origin (GOs). In table 1 and 3 we report the gross emissions. When green procurement is applicable this is reported as Emissions compensated by suppliers. In Table 1, green purchased electricity is not included in the gross market-based scope 2 emissions. Achmea does not use electricity generated from the combustion or biodegradation of biomass.
We measure the carbon footprint for our own operations based on our energy use, mobility (commuting and business travel), refrigerants use, paper consumption, waste, outsourced servers and energy usage of employees working from their homes. Commuting distance is estimated by multiplying the distance between the employee's registered place of work and their place of residence by the number of registered travel days. An adjustment is made for holidays and absenteeism.

When there is no measured or reported data available for one or more entities, the missing data is added by extrapolation based on FTE per subsidiary and emission from the subsidiaries that do have measured or reported data. See below for more information about the measurement method for our investment and insurance activities.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

B. FINANCED EMISSIONS

TABLE 4: FINANCED GHG EMISSIONS FROM ACHMEA'S CONSOLIDATED PERSPECTIVE

2024	AMOUNT INVESTMENT	AMOUNT INVESTMENT IN SCOPE	INVESTMENTS FOR WHICH THE CARBON FOOTPRINT HAS BEEN MEASURED		PCAF QUALITY SCORE	ABSOLUTE CARBON EMISSIONS	CARBON FOOTPRINT PORTFOLIO	CARBON INTENSITY
	€ MILLION	€ MILLION	€ MILLION	%	WEIGHTED AVERAGE	KTON CO_2	(TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)	CO_2/M^2
OWN RISK								
Listed equity	2,536	2,492	2,492	98%	2.32	96	38.3	N/a
Corporate Bonds	16,268	16,258	16,258	100%	2.53	571	35.1	N/a
Government bonds	7,120	7,120	7,110	100%	1.20	1,218	171.3	N/a
Mortgages (investments insurance operations)	8,461	8,461	8,461	100%	3.28	91	10.7	24.4
Mortgages banking credit portfolio	17,189	17,189	16,629	97%	3.44	164	9.9	24.6
Investment property	1,510	1,510	1,337	89%	2.00	7	5.6	20.0
Investment loans	716	716	-[1]	-[1]	5.00	N/a	N/a	16.6
Other relevant categories	3,324	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other non-relevant categories	9,889	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Subtotal	**67,014**	**53,746**	**52,287**	**78%**		**2,147**	**41.1**	
ACCOUNT AND RISK POLICY HOLDERS								
Listed equity	3,479	3,479	3,479	100%	2.21	128	36.7	N/a
Corporate Bonds	697	697	697	100%	3.02	44	63.5	N/a
Government bonds	2,703	2,703	2,656	98%	1.11	455	171.1	N/a
Other relevant categories	941	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other non-relevant categories	566	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Subtotal	**8,386**	**6,879**	**6,832**	**81%**		**627**	**91.7**	
Total Achmea Consolidated	**75,400**	**60,625**	**59,119**	**78%**		**2,774**	**46.9**	

[1] Due to the lack of sufficiently detailed data, only the CO_2 intensity was measured for the investment loans.

TABLE 5: FINANCED GHG EMISSIONS FROM THE ASSET MANAGER PERSPECTIVE1

2024	AMOUNT INVESTMENT	AMOUNT INVESTMENT IN SCOPE	INVESTMENTS FOR WHICH THE CARBON FOOTPRINT HAS BEEN MEASURED		PCAF QUALITY SCORE	ABSOLUTE CARBON EMISSIONS	CARBON FOOTPRINT PORTFOLIO	CARBON INTENSITY
	€ MILLION	€ MILLION	€ MILLION	%	WEIGHTED AVERAGE	KTON CO_2	(TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)	CO_2/M^2
Listed equities	5,774	5,774	5,761	99.8%	2.07	257	44.5	N/a
Corporate Bonds	3,861	3,861	3,191	82.6%	2.40	183	57.3	N/a
Government bonds	4,450	4,450	4,450	100.0%	4.00	752	169.0	N/a
Mortgages	23,795	23,795	23,795	100%	3.40	201	8.4	24.1
Real estate funds	4,675	4,429	3,503	75%	2.00	24	6.8	22.1
Other relevant categories	-	-	-	-	-	-	-	-
Other non-relevant categories	7,913	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total from asset manager perspective	**50,469**	**42,310**	**40,701**	**81%**		**1,416**	**34.8**	

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

TABLE 6: FINANCED GHG EMISSIONS FROM ACHMEA'S CONSOLIDATED PERSPECTIVE

2023	AMOUNT INVESTMENT	AMOUNT INVESTMENT IN SCOPE	INVESTMENTS FOR WHICH THE CARBON FOOTPRINT HAS BEEN MEASURED		PCAF QUALITY SCORE	ABSOLUTE CARBON EMISSIONS	CARBON FOOTPRINT PORTFOLIO	CARBON INTENSITY
	€ MILLION	€ MILLION	€ MILLION	%	WEIGHTED AVERAGE	KTON CO_2	(TONNES OF CO_2/MILLION EURO INVESTED CAPITAL)	CO_2/M^2
OWN RISK								
Listed equity	1,508	1,443	1,443	96%	2.12	88	61.3	N/a
Corporate Bonds	14,745	14,019	14,019	95%	2.79	591	42.1	N/a
Government bonds	6,283	6,019	6,005	96%	4.00	961	160.1	N/a
Mortgages (investments insurance operations)	8,401	8,401	8,401	100%	3.23	103	12.3	25.8
Mortgages banking credit portfolio	14,141	13,669	13,669	97%	3.51	148	10.8	25.8
Investment property	1,334	1,334	1,302	98%	2.00	9	6.8	21.0
Investment loans	746	746	-	-	5.00	N/a	N/a	18.1
Other relevant categories	3,084	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other non-relevant categories	7,683	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Subtotal	**57,924**	**45,631**	**44,839**	**77%**		**1,900**	**42.4**	
ACCOUNT AND RISK POLICY HOLDERS								
Equities	2,695	2,695	2,695	100%	2.09	127	47.3	N/a
Corporate bonds	420	383	383	91%	2.68	15	40.2	N/a
Government bonds	1,799	487	487	27%	4.00	103	211.3	N/a
Other relevant categories	2,721	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Other non-relevant categories	5,144	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Subtotal	**12,778**	**3,565**	**3,565**	**28%**		**246**	**68.9**	
Total Achmea Consolidated	**70,702**	**49,196**	**48,404**	**68%**		**2,146**	**44.3**	

The increase in absolute CO_2e emissions in 2024 compared to 2023 (29%) is mainly driven by growth in the investment portfolio as a whole (+7%), an increase in the part for which we measured CO_2e (+21%) and a shift between asset classes to relatively CO_2e-intensive government bonds (in 2024 16% of the measured portfolio, in 2023 13%).

In 2024, we also report emissions from the perspective of the asset manager for the first time. This table includes the investments managed by Achmea's subsidiaries and consist of both internal and external investments. The investments on Achmea's balance sheet (table 4) may have been invested in the funds of the asset manager, so there is double counting between tables 4 and 5. The categories consist exclusively of the investment funds managed or established by Achmea Investment Management, Achmea Real Estate and Achmea Mortgage Funds. These external investments are not included in the balance sheet of Achmea B.V. So-called 'Assets under advice', which fall within our fiduciary activities (where we cannot determine the size and composition of the investments), are not included.

METHODOLOGY FOR DETERMINING THE FINANCED EMISSIONS

When calculating the absolute carbon emissions, carbon footprint and carbon intensity, we follow the recommendations of the Partnership for Carbon Accounting Financials (PCAF). In accordance with the GHG Protocol, the carbon emissions are expressed in different Scope categories. For the carbon emissions of investments we define these categories from the perspective of the entity/property in which we invest. Scope 1 emissions are direct emissions from own sources of the investee/property that are under direct control. Scope 2 emissions are indirect emissions from the generation of energy and/or services purchased by the relevant investee/property. Scope 3 emissions are all relevant indirect emissions connected to the value chain of the investment entity/property. The operational control approach has been used. The avoided emissions described by PCAF were not considered relevant in the investment portfolio and were therefore not calculated. The baseline value and base year should not be changed unless there are significant changes in the target or scope.

Corporate investments (equities and corporate bonds)

Scope 1 and 2 emissions are included in the calculation of the carbon emissions of these investments; Scope 3 emissions are also calculated, explained and included in a separate table (table 8). The portion of a company's carbon emissions that are allocated to the corporate investment is determined by the ratio of the value of Achmea's investment (numerator) and the value of the company in which it invests (denominator). This ratio is called the attribution factor. The value of the company (denominator) is Enterprise Value Including Cash (EVIC) and this is defined as the sum of the market capitalisation of ordinary shares and preference shares, the value of total debt and cash and cash equivalents. Use of EVIC is in line with PCAF recommendations.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

The absolute carbon emissions of the investments are calculated by multiplying the attribution factor by the total carbon emissions for the company: for an attribution factor of 1%, 1% of the carbon emissions of the company in which Achmea invests are allocated to Achmea. To determine the carbon footprint, the absolute carbon emissions are divided by the total market value of the equity or corporate bond portfolio and multiplied by €1 million. This is how we calculate the carbon emissions for each million euros invested. The same method is used for investments for the account and risk of policyholders.

Investments in government bonds

To calculate the carbon footprint of government bonds, we only include Scope 1 emissions as stipulated in the United Nations Framework Convention on Climate Change (UNFCCC). Scope 2 and 3 emissions have been left out due to the lack of uniform and reliable data. These carbon emissions are expressed both including and excluding LULUCF (emissions from Land Use, Land-Use Change and Forestry). These emissions can be attributed to Achmea's investment, whereby the allocation is based on the Gross Domestic Product (GDP) of the country in question adjusted for Purchasing Power Parity (PPP). Furthermore, we report the carbon footprint (both including and excluding LULUCF): this is the absolute carbon emissions per 1 million euros of invested capital.

Investments in mortgages and banking credit portfolio

When calculating the absolute carbon emissions for mortgages, we first calculate the energy consumption for the collateral. We include gas and electricity consumption in the scope, which means we restrict ourselves to the property's Scope 1 and Scope 2 emissions. This energy consumption is estimated based on the floor area, energy label and type of property (single-family, multi-family, other). If no floor area data are available for a specific building, Achmea uses the average for this type of building as a proxy. This energy consumption is then converted into carbon emissions by multiplying energy consumption by an attribution factor that is calculated by dividing the nominal value of the mortgage by the property's original value and by an emission factor. This method is in line with the recommendations of PCAF. To determine the carbon footprint, the absolute carbon emissions are divided by the total book value of the mortgage portfolio and multiplied by € 1 million. This is how we calculate the carbon emissions for each million euros invested. To determine Carbon intensity, the absolute carbon emissions are divided by the total floor area multiplied by the attribution factor. This is how we calculate the carbon emissions per m2.

Investment property

When measuring the carbon emissions of investment properties, the first step is to determine the energy consumption of the property. We include the Scope 1 and Scope 2 emissions (emissions under the influence of the owner) and in the case of commercial properties also the Scope 3 emissions (emissions of the tenant). This energy consumption is then converted into carbon emissions by multiplying the energy consumption by emission factors. At individual property level this is expressed in carbon emissions per m2 and the sum of these is reported.

Investment loans

When calculating the carbon emissions of the investment loans, we take account of the energy consumption of the residential properties managed by housing corporations. Due to restrictions on the availability of data, we only include the Scope 1 emissions (emissions connected to gas). The carbon intensity (CO_2 per m2) of the portfolio containing loans to housing corporations is calculated as the sum of the value of each loan to a housing corporation versus the total portfolio value multiplied by the housing corporation's carbon emissions per m^2.

Other relevant categories

Other relevant categories are those asset classes for which a GHG emissions calculation methodology has not yet been determined or there is no reliable data available yet, but is expected for the future. Examples of asset classes include regional government bonds, asset-backed securities and loans.

Other non-relevant categories

Other non-relevant categories are those asset classes for which a GHG emissions calculation methodology has not been determined and is not expected. Examples of asset classes include cash investments and derivatives.

SOURCE AND SCOPE OF CARBON DATA

Corporate investments (equities and corporate bonds) and government bonds
We use data from MSCI to calculate the carbon footprint of our investments in equities, corporate bonds and government bonds (both for own risk and risk policyholders). To define the weighted average PCAF data quality score per asset class, as presented in the table on the previous page, more accurately, we have included the hierarchy per asset class in the table below. Data quality is determined on the basis of standards as prescribed by the PCAF, in which each investment is awarded a score of 1 (reported emissions) to 5 (estimated emissions). This score will improve in future as more companies report on carbon emissions. The table below shows what percentage of the measured population falls into the relevant data quality score category.

Investments in mortgages and banking credit portfolio
When calculating the carbon emissions per mortgage, we use energy consumption and emission factor tables compiled by PCAF based on data from Statistics Netherlands (CBS) and extrapolations. This methodology yields two tables: one for use when we know the floor area of the property and one for when we do not. The availability of floor area data increases data quality; this is why Achmea aims to use floor area wherever possible.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

Investment property
Energy consumption of investment properties is determined based on data derived from smart meters, manual readings, invoices and the Typical Domestic Consumption Values (TDCVs) of national network operators. The carbon footprint for (estimated) energy consumption is based on the emission factors given on www.CO2emissiefactoren.nl.

Investment loans
The Carbon intensity (CO_2e per m^2) is based on the annual benchmark of results for housing corporations in the Netherlands published by Aedes (Results of Aedes benchmark 2022). Aedes is the Dutch Association of Housing Corporations.

METHODOLOGY FOR CHANGES IN THE FINANCIAL YEAR

Compared to 2023, methodology changes have been made to increase the coverage and quality of the reported information. For the Listed Equities and Corporate Bonds categories, we apply sector averages to those investments for which CO_2e data is not available to report full coverage of the investments in scope. In addition, green bonds are no longer reported as zero CO_2e but the issuer's emissions are applied. For comparability, the figures for 2023 have been adjusted. This has resulted in 2023 financed emissions increasing from 1,902 ktonnes, as reported in the 2023 annual report, to 2,146 ktons as included in Table 6. Data quality has decreased due to the application of the sector average, which is particularly visible in corporate bonds, where 26% now receives a score of 5 for own account (2023: 0%) and 22% for Risk Policyholder Account (2023: 0%) in Table 7.

TABLE 7: PCAF QUALITY SCORE PER CATEGORY

	2024					2023				
	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
OWN RISK										
Listed equity	-	85%	-	12%	3%	-	94%	-	6%	-
Corporate bonds	-	79%	-	11%	10%	-	74%	-	-	26%
Government bonds	93%	-	-	7%	-	-	-	-	100%	-
Mortgages bank (investments insurance operations)	-	-	74%	24%	2%	-	-	79%	19%	2%
Mortgages banking credit portfolio	-	-	62%	32%	6%	-	-	44%	52%	4%
Investment property	-	100%	-	-	-	-	100%	-	-	-
Investment loans	-	-	-	-	100%	-	-	-	-	100%
ACCOUNT AND RISK POLICYHOLDERS										
Listed equity	-	90%	-	10%	-	-	96%	-	3%	1%
Corporate bonds	-	60%	-	19%	21%	-	77%	-	1%	22%
Government bonds	96%	-	-	4%	-	-	-	-	100%	-
ASSET MANAGEMENT (NOT INCLUDED IN BALANCE SHEET)										
Listed equity	-	96%	-	4%	-	N/a	N/a	N/a	N/a	N/a
Corporate bonds	-	80%	-	20%	-	N/a	N/a	N/a	N/a	N/a
Government bonds	-	-	-	100%	-	N/a	N/a	N/a	N/a	N/a
Mortgages	-	-	65%	32%	3%	N/a	N/a	N/a	N/a	N/a
Real estate funds	-	100%	-	-	-	N/a	N/a	N/a	N/a	N/a

TABLE 8: BREAKDOWN OF ABSOLUTE GHG EMISSIONS FROM ACHMEA'S CONSOLIDATED PERSPECTIVE

	2024				
	SCOPE 1 & 2 EMISSIONS	PCAF QUALITY SCORE	SCOPE 3 EMISSIONS	PCAF QUALITY SCORE	TOTAL
	(KTON CO_2)	(WEIGHTED AVERAGE)	(KTON CO_2)	(WEIGHTED AVERAGE)	(KTON CO_2)
OWN RISK					
Listed equity	96	2.32	992	2.68	1,087
Corporate bonds	571	2.53	7,034	2.71	7,606
Subtotal	**667**		**8,026**		**8,693**
ACCOUNT AND RISK POLICYHOLDERS					
Listed equity	128	2.21	1,653	2.53	1,780
Corporate bonds	44	3.02	249	3.29	293
Subtotal	**172**		**1,902**		**2,074**
Total	**839**		**9,928**		**10,767**

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

TABLE 9: BREAKDOWN OF ABSOLUTE GHG EMISSIONS FROM ACHMEA'S ASSET MANAGER PERSPECTIVE

	2024				
	SCOPE 1 & 2 EMISSIONS	PCAF QUALITY SCORE	SCOPE 3 EMISSIONS	PCAF QUALITY SCORE	TOTAL
	(KTON CO_2)	(WEIGHTED AVERAGE)	(KTON CO_2)	(WEIGHTED AVERAGE)	(KTON CO_2)
ASSET MANAGEMENT (NOT INCLUDED IN BALANCE SHEET)					
Listed equity	257	2.07	1,721	2.44	1,978
Corporate bonds	183	2.40	1,048	2.73	1,230
Government bonds	752	4.00	-	-	752
Total	**1,192**		**2,769**		**3,961**

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

C. INSURANCE ASSOCIATED EMISSIONS

NON LIFE INSURANCE

TABLE 10: INSURANCE ASSOCIATED EMISSIONS

	INSURANCE REVENUE 2024 € MLN	INSURANCE REVENUE 2024 IN SCOPE FOR CALCULATION € MLN	COVERAGE %	GHG EMISSIONS 2024 (KTON CO_2)	GHG EMISSIONS 2023 (KTON CO_2)	GHG EMISSIONS IN BASEYEAR[1] (KTON CO_2)	COMPARED TO PREVIOUS YEAR %	COMPARED TO BASEYEAR %	TARGET
THE NETHERLANDS									
Retail motor vehicle portfolio	1,169	1,052	90%	139.9	142.4	136.0	-2%	3%	Net zero in 2050
Other relevant categories	2,144	-	-	Unk.	Unk.	Unk.	N/a	N/a	Net zero in 2050
Other non-relevant categories	1,009	-	-	N/a	N/a	N/a	N/a	N/a	N.v.t.
Subtotal	**4,321**	1,052	24%	139.9	142.4	136.0	-2%	3%	
GREECE									
Retail motor vehicle portfolio	173	173	100%	93.1	95.8	N/a	-3%	N.v.t.	Net zero in 2050
Other relevant categories	-	-	-	Unk.	Unk.	Unk.	N/a	N/a	Net zero in 2050
Other non-relevant categories	115	-	-	N/a	N/a	N/a	N/a	N/a	N.v.t.
Subtotal	**288**	173	60%	93.1	95.8	N/a	-3%	N.v.t.	
SLOVAKIA									
Retail motor vehicle portfolio	43	30	70%	19.3	21.4	N/a	-10%	N.v.t.	Net zero in 2050
Other relevant categories	-	-	-	Unk.	Unk.	Unk.	N/a	N/a	Net zero in 2050
Other non-relevant categories	46	-	-	N/a	N/a	N/a	N/a	N/a	
Subtotal	**88**	30	34%	19.3	21.4	N/a	-10%	N.v.t.	
TÜRKIYE									
Retail motor vehicle portfolio	31	31	100%	2.8	3.0	N/a	-7%	N.v.t.	Net zero in 2050
Other relevant categories	324	-	-	Unk.	Unk.	Unk.	N/a	N/a	Net zero l in 2050
Other non-relevant categories	96	-	-	N/a	N/a	N/a	N/a	N/a	
Subtotal	**452**	31	7%	2.8	3.0	N/a	-7%	N.v.t.	
Total	**5,145**	1,286	25%	255.0	262.6	136.0			Net zero in 2050

[1] For the Dutch portfolio, the base year has been set at 2021. For the international portfolios, the base year is 2023.

The underlying differences between the countries are mainly caused by the use of national attribution factors and average annual mileage. For example, the average number of kilometers driven per car in Greece is more than twice as high as that in the Netherlands and the attribution factor in Türkiye is significantly lower than the other countries. For more information about the sources used, see the section on methodology on the next page. For a further analysis and explanation of the results, please refer to the Climate Change chapter.

In addition to the absolute net CO_2 emissions targets mentioned above, Achmea has set interim targets for the average insurance-related emissions per car in grams of CO_2 per kilometre for the Dutch portfolio.

TABLE 11: INTERIM TARGETS

	2024	2023	BASEYEAR (2021)	REDUCTION SINCE BASE YEAR %	REDUCTION SINCE PRIOR YEAR %	2030	2050
Average insurance related emissions per car (gram/kilometer)	6.72	6.85	7.12	-5.6%	-1.9%	-15%/-20%	-100%

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

Table 12 shows the data quality score of the emission calculation. The data quality is determined using standards as prescribed by the PCAF, with each investment being scored from 1 (reported emissions) to 5 (estimated emissions).

TABLE 12: PCAF QUALITY SCORE PER CATEGORY

	2024				
	SCORE 1	SCORE 2	SCORE 3	SCORE 4	SCORE 5
NETHERLANDS					
Retail motor vehicle portfolio	-	95%	0%	5%	-
GREECE					
Retail motor vehicle portfolio	-	-	55%	38%	7%
SLOVAKIA					
Retail motor vehicle portfolio	-	62%	36%	-	2%
TÜRKIYE					
Retail motor vehicle portfolio	-	100%	-	-	-

The weighted average PCAF data quality score for all portfolios is 2.1.

PRINCIPLES FOR DETERMINING CO_2 EMISSIONS NON-LIFE INSURANCE

Methodology

The calculation of the insurance-related emissions is based on the PCAF Insurance-Associated Emissions Standard, Personal line Motor (November 2022). The insurance-related emissions are calculated by multiplying an attribution factor with the emissions from the insured vehicle. The attribution factor is determined by dividing the paid insurance premium by the total costs of using the insured vehicle. Achmea applies an attribution factor that is in line with PCAF requirements and calculated specifically for the different markets. This factor is 5.12% for vehicles in Netherlands, 6.09% for Germany, 6.35% for Greece, 6,08 for Slovakia and 2,08 for Türkiye, and best matches the populations covered by the calculation.

The emissions of the insured vehicles are calculated by multiplying the vehicle-specific emissions based on make and type by the estimated consumption of the vehicle based on the fuel type (PCAF method: Option 2a (p.46-48 of the report)). The data on vehicle-specific emissions were obtained from local sources, for example the National Road Transport Agency (RDW) for the Dutch portfolio. If no such local source exists, for example in Greece, the PCAF database, which is based on data from the European Environmental Agency (EEA, 2020 and 2024), is used where cars can be matched based on make, model and year of manufacture. In case no specific data per vehicle is available we have estimated the emissions of the car based on the average emissions of the fuel type of the same type of car (based on make, model, year of manufacture and fuel).

In addition to the calculation of the absolute insurance-related emissions, we also calculated the average insurance-related emissions per car per kilometer for the cars in the portfolios of Centraal Beheer, Interpolis, FBTO and Inshared. This average is the weighted average of the emissions per kilometer of each car that we have insured. While the absolute emissions provide insight into the total impact of the portfolio on the climate, the average per car per kilometer provides insight into the quality/efficiency of the portfolio and also allows comparison with other portfolios.

Table 10 shows the breakdown of insurance revenue into revenue from the motor vehicle portfolio, other relevant categories and other non-relevant categories. The other relevant categories are the categories for which we expect to be able to measure CO_2e emissions in the future after establishing a calculation methodology. Examples of these categories are home insurance and travel and breakdown assistance insurance. The other irrelevant categories are the categories for which we do not expect a future CO_2 calculation. These are, for example, life and income insurance.

Source and scope of emissions data

The data on the number of kilometers driven is obtained from the Central Bureau of Statistics (CBS) for the Dutch portfolio, Turkish Statistical Institute for the Turkish portfolio or European averages from The European Automobile Manufacturers' Association (ACEA). We use the most recent available data. The data on emissions from the electricity supply (only for electric cars) is provided by Nowtricity.

Achmea sells retail motor vehicle insurance through five brands in the Netherlands. We have included the portfolios of four of the brands in the calculations: Centraal Beheer, Interpolis, FBTO and InShared. The portfolio managed via Avéro Achmea (underwriting agents) has been excluded for the time being due to a lack of data. For other countries, all brands and portfolios are considered. For the Greek and Turkish portfolio all personal vehicles are included, for example, cars, motorcycles and trucks. For the Dutch and Slovak portfolio only personal cars are obtained due to a lack of reliable data on other types of vehicles. We aim to increase the coverage of the calculation and include other insurance portfolios in the coming years.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

METHODOLOGY FOR CHANGES IN THE FINANCIAL YEAR FOR THE NON-LIFE INSURANCE EMISSIONS CALCULATION

For the Dutch portfolio, in 2023, a correction (scaling) was applied for the years 2021 to 2023 due to a missing part of the portfolio. In 2024, a recalculation was carried out for the year 2023, based on a full portfolio. This recalculation led to an adjustment of the comparative figures for 2023, which improves the reliability, comparability and accuracy of the historical data. The absolute GHG emissions reported in the annual report 2023 where 135kton, based on the new calculations the GHG emissions are 142.4kton for 2023.

In the context of uniformity and consistency in the historical figures, the average CO_2 (IAE) emissions for the base year 2021 and 2022 have also been recalculated. This new calculation is based on an extrapolation, in accordance with the current methodology, using the most up-to-date data and a refined calculation method. Thanks to these adjustments, the figures are more in line with the current methodology. As a result, the comparative figures have been significantly improved and aligned with the current quality standards, which strengthens both accuracy, comparability and uniformity. The average insurance related emissions per car (gram/kilometer) reported in the annual report 2023 where 7.01gr/km for 2023 and 7.31gr/km for 2021 (base year), based on the new calculations the average is 6.85gr/km for 2023 and 7.12gr/km for 2021 (baseyear).

B. HEALTH INSURANCE

TABLE 13: COVERAGE OF HEALTH INSURANCE-RELATED EMISSIONS

INSURANCE REVENUE (€ MILLION)	2024	
Total Health	18,556	100%
In scope CO_2e-emission calculation (Segment Health Netherlands)	17,649	95%

TABLE 14: INSURANCE-RELATED HEALTH INSURANCE EMISSIONS

	CO_2-EMISSIONS (KTON)	PCAF DATA QUALITYSCORE
Long term healthcare (Wlz)	602	3.0
Basic and supplementary health insurance (Zvw)	1,795	2.6
Total	**2,397**	

PRINCIPLES FOR DETERMINING THE CO_2 EMISSIONS OF HEALTH INSURANCE

Methodology

Achmea, in collaboration with Zorgverzekeraars Nederland, commissioned Stichting Stimular to determine the emission factors for healthcare in the Netherlands. The emissions per type of healthcare are calculated on the basis of the estimated care costs per type of care. For both the basic health insurance without equalization for 2022 and the Wlz (Long-Term Care Act), this concerns the estimated healthcare costs for 2022 that health insurers periodically submit to the healthcare institute. The national health care expenditure for supplementary health insurance comes from the health care expenditure table of the Central Bureau of Statistics Netherlands (CBS). Where possible, the CO_2e emissions from healthcare procurement are split into the Scope 1, 2 and 3 of the healthcare organisations from which it purchases healthcare.

The emission factors of the supplementary health insurance and the Wlz are derived from the emission factors for the basic health insurance per type of care, whereby a connection has been made with the types of care under the supplementary health insurance and the Wlz on the basis of the classification of the types of care in the basic health insurance. Emission factors for healthcare procurement are determined in one of the ways described below, subject to the availability of detailed information. In all cases, the factors are based on financial data (issue per euro of purchase). Due to the diversity in the healthcare field, another unit for summarizing purchased care is not yet possible.

1. *Calculating CO_2e emission factors based on national healthcare costs:* This method can be applied when both an overall footprint and industry revenue figures are available. This applies to forms of care such as general practitioner care and MDZ (multidisciplinary care), nursing and care, specialist medical care, medical mental health care and GRZ-ELV-GZSP. This methodology is in line with the way in which the PCAF standard. For general practitioner care and MDZ, the Scope 1 and 2 emissions of healthcare providers have been determined as an average emission per FTE on the basis of the Envirometer benchmark for GP practices, and extrapolated to the entire sector on the basis of CBS data, whereby the assumption has been made on the basis of practical experience within the Environmental Platform for the Healthcare Sector (MPZ) that 1 FTE GP corresponds to 2 FTE practice classroom. For nursing and care and medical specialist care, the data from the EVZ sector report on sustainability Scope 1 (direct) and Scope 2 (indirect) emissions published in September 2022 were used. The Scope 1 and 2 emissions relate to the emissions from the energy consumption of the healthcare real estate. The Scope 3 in general practitioner care and MDZ, nursing and care, medical mental health care and GRZ-ELV-GZSP is not known. For these types of care, a multiplier of 2.3 from the care sector (nursing and care) was used to calculate the full footprint. This multiplier is determined on the basis of the total footprint (including Scope 3) of two care organisations

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

published in 2019. The emissions of the own vehicle fleet are not included in the determination of this multiplier, but for general practitioner care and mental health care and disability care, the emissions from business traffic are included on the basis of data from the Envirometer Included. For specialist medical care, a multiplier of 3.8 was used to determine the Scope 3; this was determined on the basis of the published footprint of UMC Utrecht published in 2021 and the EMC published in 2024.

2. *Calculating CO_2e emission factors based on data from individual companies:* This method can be used if we know the footprint of several companies in the sector. The average value per euro is determined by dividing the total footprint by the combined turnover of those companies. This applies specifically to pharmaceutical care. The CO_2e emission factor is determined on the basis of the average emissions per euro of turnover of four pharmaceutical companies over 2021 (AstraZeneca) or 2022 (GSK, Merck & co and Sanofi).

3. *Calculating CO_2e emission factors based on estimates*: For sectors with insufficient data, emission factors have been estimated on the basis of previously calculated emission factors or data from other databases (such as DEFRA). This method applies to oral care, obstetrics, paramedical care, medical aids, patient transport, maternity care and various other healthcare costs (including cross-border care). The emission factor for oral care is equal to that of specialist medical care. For obstetrics and paramedical care, the emission factor is equal to that of general practitioner care and MDZ. The emission factor for medical devices and maternity care comes from DEFRA 2019, specifically 'therapeutic appliances and equipment' and 'domestic services and household services' respectively. For patient transport, the CO_2e emission factor was determined on the basis of data from the Ambulance Care Sector Compass 2022, information from the Hollands Midden Regional Ambulance Service and additional calculations. The emission factor for various other healthcare costs has been determined by using a weighted average of emission factors of other types of healthcare.

As this is the first estimate of such figures for the Dutch healthcare sector, international data (DEFRA 2019) have been used for validation and converted to euros in 2022 (conversion factor: 1.141 and inflation correction: 15.27%) to facilitate comparability with the calculated emission factors. The emission factors calculated on the basis of the 2022 turnover figures are only valid for that specific year. For use in 2023, these factors have been adjusted for inflation, with a CPI change rate of 3.8% applied.

Achmea has linked the CO_2e emission factor per euro spent to the financial data per type of care, as indicated for the risk equalisation of the basic health insurance. The financial charges for 2023 are derived from the cost summary statement as included in the quarterly statement of the second quarter of 2024. For supplementary health insurance, the cost estimates per type of care for 2023 from our administration have been used. For long-term care financed through the care administration office, the costs for 2023 per type of care are based on the 2023 distribution model.

Due to the diversity in the healthcare field and the limited availability of data, estimates and assumptions were used to determine the Scope 3 emissions of this healthcare procurement. As a result, the uncertainty on the reported Scope 3 emissions is still high and is still more indicative than normative. With the introduction of the CSRD, the availability and reliability of Scope 3 emissions is expected to increase. This will allow us to determine and monitor our CO_2e emissions more accurately in the future.

Scope portfolio

The calculation includes both the basic health insurance, the supplementary health insurance (Zvw) and the long-term care (Wlz) in the Netherlands and therefore includes all reimbursed care for our insured persons in the Netherlands. The CO_2e emission calculation includes both care contracted and non-contracted by health insurers that falls within the scope of the Health Insurance Act, Long-Term Care Act, dental insurance and supplementary health insurance. Focusing CO_2e emissions on contracted care is not yet possible, as this requires a very extensive and care-related refinement.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

D. INVESTMENT QUANTITATIVE RESILIENCE ANALYSIS

INVESTMENTS IN COMPANIES

TABLE 15: OVERVIEW OF PHYSICAL RISKS

	TOTAL VALUE			ACUTE & CHRONIC RISKS				ACUTE RISK				CHRONIC RISK				NO RISK			
	CARRY-ING AMOUNT	AMOUNT ANALYSED		PARIS-ALIGNED SCENARIO		HOT HOUSE SCENARIO		PARIS-ALIGNED SCENARIO		HOT HOUSE SCENARIO		PARIS-ALIGNED SCENARIO		HOT HOUSE SCENARIO		PARIS-ALIGNED SCENARIO		HOT HOUSE SCENARIO	
€ million	€	€	%	€	%	€	%	€	%	€	%	€	%	€	%	€	%	€	%
Investments own account																			
Listed equity	2,017	1,919	95%	4	0%	16	1%	31	2%	42	2%	16	1%	100	5%	1,876	98%	1,794	93%
Corporate bonds	16,035	12,432	78%	-	0%	76	1%	277	2%	351	3%	61	0%	344	3%	12,094	97%	11,813	95%
Investment funds:																			
- Equity	519	503	97%	1	0%	6	1%	11	2%	11	2%	14	3%	48	9%	481	96%	451	90%
- Real estate	233	149	64%	-	0%	1	1%	4	3%	8	5%	0	0%	1	1%	145	97%	141	94%
Investments risk policyholders																			
Listed equity	54	54	100%	-	0%	0	1%	1	1%	1	1%	-	0%	7	14%	53	99%	46	85%
Corporate bonds	123	79	64%	-	0%	-	0%	-	0%	0	0%	-	0%	-	0%	79	100%	79	100%
Investment funds:																			
- Equity	3,425	3,400	99%	7	0%	24	1%	48	1%	62	2%	26	1%	139	4%	3,333	98%	3,224	95%
- Real estate	574	314	55%	0	0%	2	1%	7	2%	9	3%	1	0%	4	1%	307	98%	304	97%

TABLE 16: OVERVIEW OF TRANSITION RISKS

	31 December 2024	
	TOTAL AMOUNT INVESTED (€)	SHARE OF TOTAL (%)
Investments own account		
Energy-intensive	3,620	19%
Transport	347	2%
Fossil fuel	726	4%
Housing	680	4%
Utilities	762	4%
Agriculture	1	0%
Other sectors – not at risk	12,669	67%
Total investments in companies	**18,804**	**100%**

	31 December 2024	
	TOTAL AMOUNT INVESTED (€)	SHARE OF TOTAL (%)
Investments risk policyholders		
Energy-intensive	1,209	29%
Transport	59	1%
Fossil fuel	178	4%
Housing	180	4%
Utilities	84	2%
Agriculture	1	0%
Other sectors – not at risk	2,466	59%
Total investments in companies	**4,176**	**100%**

PRINCIPLES FOR THE QUANTITATIVE RESILIENCE ANALYSIS OF INVESTMENTS IN COMPANIES

Methodology

To assess the physical risks of equities and corporate bonds, we use MSCI's Climate Value at Risk (CvaR) tool, which assesses climate-related risks based on each company's location. The tool uses various climate scenarios from the Network for Greening the Financial System (NGFS), a group of central banks and regulators, to estimate potential losses from physical risks up to 2100, discounting them into a present value for comparison with the company's current value. This helps identify companies that face high physical risks. In line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), the NGFS has developed six hypothetical scenarios with different impacts of physical risks (hot house world scenarios versus lower physical impact scenarios) and transition risks (from an orderly transition to delayed and disorderly transitions). We define 'high physical risk exposure' as a CVaR of 5% or more, using both a 'Paris-aligned' scenario (NGFS Orderly) and a 'hot house' scenario (NGFS NDC). Since there is no data available on any mitigation measures of the companies in which we invest (e.g. insurance that compensates for the financial damage of a flood), it is an analysis of the gross risks. Within the categories, double counting may occur when counterparties have a combination of acute and chronic risks. The reported amounts relate to the carrying amount of the measured portfolios as at 31 December 2024.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

We assess the transition risks for companies within our portfolio by first identifying a group of sectors that are at increased risk of transition. We then determine our total invested assets in companies that fall under these sectors. The list of sectors that are at increased risk of transition comes from the scientific literature and is widely used within the scientific world, but also the financial sector. Here it is even more emphatic that we are not able to distinguish between different companies that may have taken measures to mitigate their transition risks. This is also an assessment of the gross risks.

Scope
The analysis includes all investments for policyholders' own account and risk, including foreign business units. As the data was not available, the assessment could not be carried out on every investment/counterparty. The opacity is shown in the first three columns.

INVESTMENTS IN MORTGAGES AND BANKING LOAN PORTFOLIO

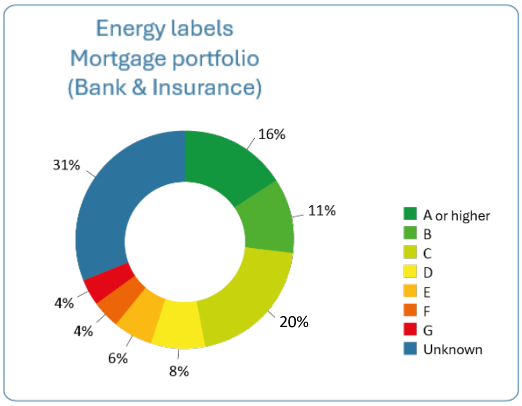
TABLE 17: PHYSICAL RISKS

€ MILLION

2024	HIGH RISK AMOUNT	LESS RISK AMOUNT	AMOUNT FOR WHICH INSUFFICIENT DATA ARE AVAILABLE
Risk of wildfires	327	24,084	1,238
Risk of deterioration of the foundation	366	24,073	1,211
Risk of subsidence	905	23,506	1,238
Risk of precipitation (direct and indirect (pluvial flood) losses)	1,434	22,975	1,241
Flood risk	74	24,332	1,244

FIGURE 18: TRANSITION RISKS

The figure shows the distribution of the energy labels of the mortgages in the investment portfolio of the insurance activities and the banking loan portfolio together.



QUANTITATIVE RESILIENCE ANALYSIS PRINCIPLES INVESTMENTS IN MORTGAGES AND BANKING CREDIT PORTFOLIO

Methodology
To identify physical risks, we conducted a Climate Risk and Vulnerability Assessment (CRVA) in accordance with the European Commission's Appendix A: Generic criteria for DNSH to Climate Change Adaptation. Our assessment screens for relevant physical climate-related risks that may affect the performance of the economic activity over its expected lifetime. Achmea's CRVA uses climate projections up to 2050 based on the worst-case scenario of the KNMI (KNMI'14 WH), in line with the IPCC's Representative Concentration Pathway 8.5 (RCP 8.5) from 'Assessment Report 5' (AR5). Climate-related risks are assessed using an open source methodology from the 'Climate Impact Atlas' of the Climate Adaptation Services Foundation (CAS), which maps different types of physical climate-related risks of collateral in our mortgage portfolio. This methodology also follows the guidelines of the Dutch Green Building Council (DGBC). Currently, our CRVA does not take into account the adaptive capacity at building level. However, future updates will include such data when available. Part of the adaptive capacity at government level, such as flood defences, is taken into account in the data of the 'Climate Impact Atlas'. With regard to transition risks, we look at energy labels and CO_2 footprint. According to our definition, there is a transition risk if an EPC is lower than the 'C label'. As no data are available on the extent to which the physical risk of the collateral is mitigated by the climate mitigation measures, all reported values are exclusive of the mitigation impact of these measures.

Scope
In scope of the analysis are the mortgage loans in the investment portfolio of the insurers and the banking credit portfolio. Due to the lack of data, the assessment could not be carried out for every mortgage loan. These loans are included in the last column.

ANNEX C: DETAILED INFORMATION ENVIRONMENTAL INDICATORS

INVESTMENT PROPERTY

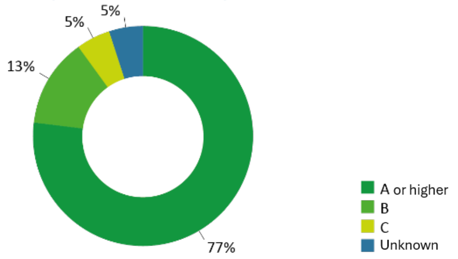
TABLE 19: PHYSICAL RISKS

€ MILLION

2024	HIGH RISK AMOUNT	LESS RISK AMOUNT	AMOUNT FOR WHICH INSUFFICIENT DATA ARE AVAILABLE
Risk of wildfires	13	1,416	81
Risk of deterioration of the foundation	53	1,376	81
Risk of subsidence	192	1,236	81
Risk of precipitation (direct and indirect (pluvial flood) losses)	166	1,263	81
Flood risk	2	1,426	81
Heat stress	232	1,196	81

FIGURE 20: TRANSITION RISKS

The image shows the distribution of the energy labels of our investment property portfolio.



PRINCIPLES FOR THE QUANTITATIVE RESILIENCE ANALYSIS OF INVESTMENT PROPERTY

Methodology

To identify physical risks, we conducted a Climate Risk and Vulnerability Assessment (CRVA) in accordance with the European Commission's Appendix A: Generic criteria for DNSH to Climate Change Adaptation. Our assessment screens for relevant physical climate-related risks that may affect the performance of the economic activity over its expected lifetime. We assume that performance is affected by physical risks if the habitability of real estate is severely affected. Achmea's CRVA uses climate forecasts until 2050 on the basis of the worst-case scenario of the KNMI (KNMI'14 WH), in line with the IPCC's Representative Concentration Pathway 8.5 (RCP 8.5) from 'Assessment Report 5' (AR5). Climate-related risks are assessed using an open-source methodology from the 'Climate Impact Atlas' of the Climate Adaptation Services Foundation (CAS), which maps different types of physical climate-related risks of objects in our investment property portfolio. This methodology also follows the guidelines of the Dutch Green Building Council (DGBC). Currently, our CRVA does not take into account the adaptive capacity at building level. However, future updates will include such data when available. Part of the adaptive capacity at government level, such as flood defences, is taken into account in the data of the 'Climate Impact Atlas'. With regard to transition risks, we look at energy labels and CO_2 footprint. According to our definition, there is a transition risk if an EPC is lower than the 'C label'. As no data are available on the extent to which the physical risk of real estate objects is mitigated by the climate mitigation measures, all reported values exclude the mitigation impact of these measures.

Scope

All investment property investments are included in the analysis. All investment properties are located in the Netherlands.

ANNEX D: DETAILED INFORMATION ON VOTES AND ENGAGEMENTS

This annex gives amongst others insight into the voting and engagement connected to our investment management operations. In the tables below the number of votes and the number of engagements are included. Metrics in this chapter have not been validated by an external body other than the assurance provider.

VOTING AT SHAREHOLDER MEETINGS

We make active use of our shareholder rights and also attempt to exert influence on the businesses in which we invest. For example, we use our voting rights when engagement with companies yields insufficient results. In addition, where relevant and feasible, we submit (co-)shareholder proposals to companies. The tables below show the number of votes and the percentage of votes against, both for the shares held by Achmea itself and for the investments held by Achmea Investment Management through its own funds.

TABLE 1: SHAREHOLDERS PROPOSALS PER TOPIC

2024	ON BEHALF OF ACHMEA		ON BEHALF OF ACHMEA IM (INCL. FUND MANAGEMENT)	
	NUMBER OF VOTES	% AGAINST	NUMBER OF VOTES	% AGAINST
Audit related	2	100%	142	1%
Articles of association related	14	100%	38	55%
Remuneration	28	64%	51	59%
Corporate Governance	32	6%	47	6%
Appointments	15	80%	552	25%
Director related	28	21%	58	28%
Sustainability – other	49	55%	73	58%
Sustainability - climate	61	26%	70	24%
Other	14	86%	187	13%
Non-routing	4	0%	8	0%
Routine	6	0%	9	0%
Social	136	15%	165	15%
Total	**389**		**1.400**	

TABLE 2: MANAGEMENT PROPOSALS PER TOPIC

2024	ON BEHALF OF ACHMEA		ON BEHALF OF ACHMEA IM (INCL. FUND MANAGEMENT)	
	NUMBER OF VOTES	% AGAINST	NUMBER OF VOTES	% AGAINST
Audit related	437	0%	1.306	1%
Stock related	363	4%	2.402	10%
Articles of association related	94	3%	1.223	26%
Remuneration	965	56%	2.993	39%
Appointments	4.497	16%	8.789	19%
Director related	581	4%	2.547	20%
Sustainability – other	23	0%	26	0%
Sustainability - climate	5	100%	6	67%
Other	40	3%	227	16%
No research	36	100%	1	0%
Non-routing	25	0%	901	9%
Routine	493	3%	4.793	4%
Social	19	0%	65	18%
Strategic transactions	12	8%	1.052	32%
Take-over related	56	9%	77	10%
Total	**7.646**		**26.408**	

ANNEX D: DETAILED INFORMATION ON VOTES AND ENGAGEMENTS

KEY PRINCIPLES TO DETERMINE THE INFORMATION RELATED TO VOTING AT SHAREHOLDERS' MEETINGS

Methodology

The tables above show the number of proposals submitted by the shareholders or management of the company in question and voted on behalf of Achmea and Achmea Investment Management. Voting at shareholders' meetings is carried out by Achmea Investment Management and takes place remotely. Achmea Investment Management uses Institutional Shareholders Services (ISS ESG) to exercise voting rights and uses a voting platform to cast votes. In addition, ISS ESG prepares voting analyses and voting advice for each shareholders' meeting based on the voting policy of Achmea and Achmea Investment Management.

Votes are cast in accordance with Achmea's voting policy and Achmea Investment Management's voting policy for the investments it manages on behalf of third parties. The voting policy can be found on the website. If a proposal does not comply with the voting policy, it will be voted against. This policy is based on international best practices and laws and regulations in the field of corporate governance. We take into account, among other things:

- Governance principles of the Organisation for Economic Co-operation and Development (OECD);
- Global Corporate Governance Principles as drawn up by the International Corporate Governance Network (ICGN);
- Principles for Responsible Investment (PRI); and
- Dutch Corporate Governance Code. In addition to the provisions for listed companies, this Code contains a number of principles that apply to shareholders, including institutional investors in particular.

The exercise of voting rights shall take into account applicable national laws and regulations, local market standards and corporate governance codes for each individual market.

Votes cast are recorded in the ISS ESG voting platform and recorded by topic of the agenda at the shareholders' meeting. The clustering in the tables above has been determined on this basis.

Scope

All listed shares of Achmea and Achmea Investment Management in the portfolio.

IN DIALOGUE WITH COMPANIES (ENGAGEMENT)

Through engagement, we want to encourage the companies in which we invest to make their activities more sustainable, to increase the value of our investments and to improve the quality of governance. We engage with companies that violate internationally accepted standards in the areas of human rights, labour standards, corruption, or the environment. We call this normative engagement. To this end, we take a number of important international frameworks as a starting point, namely the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We enter into dialogue with companies on the basis of the engagement guidelines of Achmea and Achmea Investment Management respectively.

TABLE 3: NUMBER OF NORMATIVE ACTIVE ENGAGEMENTS DURING THE REPORTING PERIOD PER THEME

2024	ON BEHALF OF ACHMEA	ON BEHALF OF ACHMEA IM INCL. FUND MANAGEMENT
Human Rights	34	53
Environment	29	49
Labour rights	36	55
Corruption	11	16
Total number of normative dialogues	**110**	**173**
Number of unique companies	66	115

Achmea also has a thematic engagement programme. Throughout the year, on 10 different themes aligned with the five key themes of our SRI policy, we conduct dialogue with companies on sustainability aspects of their business operations that offer room for improvement.

ANNEX D: DETAILED INFORMATION ON VOTES AND ENGAGEMENTS

TABLE 4: NUMBER OF THEMATIC ACTIVE ENGAGEMENTS DURING THE REPORTING PERIOD PER THEME

2024	ON BEHALF OF ACHMEA	ON BEHALF OF ACHMEA IM INCL. FUND MANAGEMENT
Access to Nutrition	8	7
Biodiversity in agriculture	4	6
Climate adaptation and water	4	6
Working conditions in the food chain	6	5
Reduction of CO_2 emissions	27	8
Climate and Transport	5	6
Reduction of plastic in packaging of consumer goods	8	8
Human rights & Governance	9	8
Clothing and circularity	7	9
Access to Healthcare	7	10
Total number of thematic dialogues	**85**	**73**
Number of unique companies	81	72

KEY PRINCIPLES TO DETERMINE THE INFORMATION RELATED TO NORMATIVE AND THEMATIC ENGAGEMENTS

Methodology

The investments managed by Achmea Investment Management are continuously screened by research firm ISS ESG for possible violations of standards. This is done by researching public and expert sources. In the event of a potential breach, a dialogue is initiated, establishing engagement goals for each company. These goals include ending the breach, preventing future violations, sharing relevant information, and cooperation for victim recovery.

The thematic engagement program focuses on companies that can improve their performance both financially and socially, as opposed to the normative engagement program, which focuses on companies that violate standards. The themes for engagement are aligned with Achmea's spearheads. When choosing a theme, the materiality, environmental or social relevance, the size of the company in Achmea's investment portfolios (both shares and corporate bonds) and the likelihood of success of the dialogue are considered. Achmea pays extra attention to Dutch companies within this programme, given its role in Dutch society.

The thematic engagement process involves developing a theme, setting objectives, selecting companies, conducting dialogues with the management of the company in question, evaluating engagement and recording progress.

Achmea Investment Management records the interview reports of the dialogues held in a database, which contains information from ISS ESG and its own dialogues. From this, the number of dialogues can also be determined. The data is used to draw up reports and link them to the investment portfolios of clients, including Achmea.

Scope

All listed shares and corporate bonds of Achmea and Achmea Investment Management in the portfolio.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

EU TAXONOMY REGULATION

The EU Taxonomy is a classification system that defines criteria for economic activities that correspond to the net zero path by 2050 and the broader environmental objectives other than climate. Consequently, the European Commission has established an effective list of economic activities that meet the environmental objective by defining so-called ‘technical screening criteria’ (TSC) for each of the environmental objectives through additional legislation.

According to the EU Taxonomy, an activity is sustainable if it contributes positively to at least one of the six defined environmental objectives of the EU Taxonomy and does not significantly harm the other environmental objectives (DNSH) and meets the minimum safeguards.[2] Achmea B.V. falls within the scope of this legislation and applies these disclosure requirements in its consolidated annual report.

Only those economic activities that can contribute most to the policy goals formulated by the EU are included in the EU Taxonomy. The EU Taxonomy has six environmental objectives. An activity, investment exposure or use of proceeds can only be attributed to a single environmental objective with regard to Substantially contribution. This avoids the risk of double counting.

For Achmea’s (re-)insurance activities the environmental objective ‘Climate change adaptation’ applies and for Achmea’s real estate activities ‘Climate change mitigation’. As a result, the explanatory notes in the annual report (with regard to alignment with the EU Taxonomy) relate in particular to the two objectives mentioned above. For Achmea’s investments all of the six environmental objectives could be applicable, whereas in 2023 for alignment purposes only the objectives ‘Climate change adaptation’ and ‘Climate change mitigation’ were taken into account.

Achmea Group, reported on in the consolidated annual report, is a financial services provider with dominant insurance activities. Although Achmea B.V. itself is not a financial service provider, given the consolidated nature of the annual report we monitor the KPIs as defined for insurers, asset managers and credit institutions in the EU Taxonomy.

The EU Taxonomy requires a number of interpretations and also assumptions due to the lack of certain data. We have aligned our interpretations with what is customary in the market. Based on new guidance and advancing insight, it may be necessary to make changes in the future that may have an impact on the reported information, both in terms of form and content.

PRINCIPAL GENERAL ASSUMPTIONS ON ESTABLISHING ALIGNMENT WITH THE EU TAXONOMY

Meeting minimum safeguards only applies to counterparties that are not private individuals. If applicable, in determining whether the minimum safeguards on investments are met, we use a traffic light system similar to our KYC processes. In case meeting the minimum safeguards cannot be determined, the underlying activities cannot be accounted for as ‘taxonomy-aligned activities’.

Where insufficient data is available for assessing the Technical Screening Criteria, the economic activity is not accounted for as a taxonomy-aligned activity.

ECONOMIC SECTORS

On Achmea's balance sheet, two of its own economic activities have been identified that are tested against the TSC. In the economic activity 'real estate and related the issuance of mortgage loans', Achmea has applied climate change mitigation as its environmental objective. The economic activities of an insurer that may be eligible for alignment with the EU Taxonomy only relate to the environmental objective ‘climate change adaptation'. The TSC provide direction for the information that Achmea must have in order to provide accurate information, how activities should be set up in order to be considered sustainable and provide Achmea with insights into the climate vulnerability of these economic activities. In the case of non-life insurance, the EU Taxonomy is used to determine whether the insurance products are in line with the EU's definition of sustainability.

[2] These three components are included in the Climate Regulation (Commission Delegated Regulation (EU) 2020/852) and further elaborated in 2021/2139.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Investments

Investments eligible for alignment with the EU Taxonomy

In addition to the alignment-assessed activities, all other assets of Achmea are assessed against the general technical screening criteria.

In order to provide insight into the sustainability of Achmea's assets as a financial conglomerate, we do not distinguish between assets included in the consolidated financial statements of Achmea B.V. and the investments Achmea manages for third parties. This means that we include both disclosures for the total investments of the insurer/bank as included in our balance sheet and additional disclosures for the investments we manage for third parties in our role as asset manager. Where portfolio management has been delegated to Achmea by another financial institution, Achmea does not include these assets as the financial institutions themselves already report this. Specifically for the banking activities, we include an explanation of the green asset ratio (GAR).

Key requirements in determining the EU Taxonomy alignment for the investments.

When determining the alignment with the EU Taxonomy, we apply the following regulations from the legislation.

Investments issued by central governments, central banks and supranational issuers are excluded from the calculation of the percentage of investments eligible for alignment with the EU Taxonomy (both in the numerator and in the denominator of Table 1).

Derivatives are not included due to the fact that derivatives are primarily used to reduce risk rather than to finance an asset or an economic activity. The derivatives are part of the denominator in Table 1.

Investments issued by companies that do not fall under the NFRD regime are not included, but are included in the denominator in Table 1.

Most important basic principles and assumptions when establishing alignment with EU Taxonomy for investments

As a result of the above-mentioned regulations, alignment with the EU Taxonomy focuses on the asset classes of equities, corporate bonds and loans, investment property and mortgages. The most important assumptions and assumptions that we use are explained below for each relevant investment class.

For *Equities, Corporate Bonds and Loans,* reconciliation is based on factual information provided by the companies. To do this, we use information collected by data suppliers.

For *Real Estate Investments*, we choose to focus on alignment for the environmental objective Climate change mitigation. The substantial contribution for real estate is a contribution in the field of energy efficiency of the real estate (activities from section 7.1, 7.2 and 7.7). In order to meet the DNSH criteria, it is then necessary to establish the other environmental objectives. The assessment of the minimum safeguards is carried out, where appropriate, by means of an analysis per user.

For *the issuance of mortgage loans,* we apply the possibility offered by EU legislation to apply the Technical Screening Criteria for the investment property (for the purchase and ownership of real estate) (activities from section 7.1 and 7.2).

Achmea has chosen to focus on alignment with the environmental objective Climate change mitigation. The mortgage portfolio is aimed at providing loans to private individuals ('households'), which means that the assessment of the minimum safeguards does not apply.

Achmea does not have any activities from section 7.2 in the category of green renovations (‘known proceeds’). These activities have therefore not been taken into account for analysis. The DNSH criteria are met when there is no material impact due to climate-related risks during the life of the mortgage.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE OF EU-MANDATED WEIGHTED AVERAGES ON THE KPIS OF TAXONOMY-ALIGNED ACTIVITIES

Table 0 presents the table required by the EU for the weighted average of the KPIs on taxonomy-aligned activities of a financial conglomerate. The revenue column only includes the income of the asset managers (Achmea Investment Management, Achmea Real Estate and Achmea Mortgage Funds), the income from banking activities of Achmea Bank and the insurance-related income from the non-life activities. Income from pension and life insurance and health insurance is not included in this. Income includes the following categories from the financial income statement: Income from insurance-related services, Result from associates and joint ventures, Investment result from non-insurance activities, Income from service contracts and Other income.

TABLE 0: WEIGHTED AVERAGE KPIS

€ MILLION

						2024
			KPI PER BUSINESS SEGMENT			
	REVENUE (EXCL. PENSION, LIFE AND CARE)	SHARE IN TOTAL GROUP OUTPUT	KPI TURNOVER BASED	KPI CAPEX BASED	WEIGHTED KPI TURNOVER BASED	WEIGHTED KPI CAPEX BASED
		(A)	(B)	(C)	(A*B)	(A*C)
Asset management	218	4%	4%	1%	0%	0%
Banking activities	688	11%	14%	0%	2%	0%
Insurance operations	5.312	85%	0%	0%	0%	0%
Total	**6.217**	**100%**				
Average KPI					**2%**	**0%**

Tables containing EU-prescribed KPIs and specifications relating to investments on Achmea's balance sheet

Tables 1 to 4 contain the KPIs prescribed by the EU and their specification that relate to the investments recognised in Achmea's consolidated balance sheet. Table 1 shows a KPI that includes the investments that Achmea manages for third parties, with the exception of investments whose management is outsourced to Achmea and which are themselves financial institutions that report under the CSRD.

The assets supporting the transition are investments in economic activities that contribute substantially to the long-term temperature target of the Paris Agreement. Enabling assets refer to investments in economic activities that facilitate other activities that make a substantial contribution to one or more of the environmental objectives of the EU Taxonomy.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 1A: 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

31 DECEMBER 2024	%		€ MILLION
The weighted average value of all the investments of Achmea 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:	6%	The weighted average value of all the investments of Achmea that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	12,588
Turnover-based	7%	Turnover-based	13,760
Capital expenditures-based	1%	Capital expenditures-based	1,447
The percentage of assets covered by the KPI relative to total investments of Achmea (total AuM). Excluding investments in sovereign entities. AuM includes the so called Assets under Advice. In an additional disclosure, Achmea includes a split: a) Own account, b) Asset under management and c) Assets under Advice where the counterpart is no financial institution.		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage ratio	100%	Coverage	200,538

TABLE 1B: 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

31 DECEMBER 2023	%		€ MILLION
The weighted average value of all the investments of Achmea 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:	3%	The weighted average value of all the investments of Achmea that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	5,887
Turnover-based	6%	Turnover-based	10,354
Capital expenditures-based	1%	Capital expenditures-based	1,419
The percentage of assets covered by the KPI relative to total investments of Achmea (total AuM). Excluding investments in sovereign entities. AuM includes the so called Assets under Advice. In an additional disclosure, Achmea includes a split: a) Own account, b) Asset under management and c) Assets under Advice where the counterpart is no financial institution.		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage ratio	100%	Coverage	171,727

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 1C. CONTEXT OF TOTAL INVESTMENTS

	31 DECEMBER 2024			
	TURNOVER		CAPEX	
	€ MILJOEN	%	€ MILJOEN	%
Total investments	**267,020**		**220,764**	
Covered assets	**200,541**	**100%**	**155,568**	**100%**
Derivatives	-1,337	-1%	-1,927	-1%
Non-NFRD-company's	64,561	32%	64,542	41%
Investments for which data are insufficient to assess their classification	54,846	27%	54,846	35%
Investments subject to EUT assessment	**83,080**	**41%**	**38,107**	**24%**
Investments eligible for the EU Taxonomy	**58,462**	**29%**	**4,994**	**3%**
Investments with insufficient data for taxonomy analysis	3,350	2%	1,112	1%
Investments that do not meet the minimum safeguards	59	0%	88	0%
Investments that do not meet the technical screening criteria for a substantial contribution (SC)	37,585	19%	2,283	1%
Investments that do not meet the Technical Screening criteria for Do No Significant Harm (DNSH)	3,709	2%	63	0%
Taxonomy-aligned activities	**13,760**	**7%**	**1,447**	**1%**

The difference between total investments and covered assets is caused by investments that cannot be classified as covered assets under European legislation, which currently include categories such as government bonds, receivables and other assets. Derivatives, investments in non-NFRD companies and investments for which no data is available are not eligible for alignment with the EU Taxonomy.

The difference in total investments between the Revenue and Capex column is caused by the fact that mortgages and investment real estate are only included in the KPI for Revenue.

The 'Investments subject to EUT assessment' row contains the total investments in those companies. The part of the economic activities of these companies that is Eligible is included in the line 'Investments eligible for the EU Taxonomy'. The investments that are eligible for alignment with the EU taxonomy have been analysed at issuer level for compliance with the minimum safeguards and the technical screening criteria for 'Substantial Contribution' and 'Do No Significant Harm'. The result concerns the investments that are aligned with EU Taxonomy (EU Taxonomy aligned activities).

Tables 1 to 9 relate to all assets under management. This concerns both the investments on Achmea's balance sheet and the investments of Achmea Investment Management, Achmea Real Estate and Achmea Mortgage Funds. Achmea Investment Management (AIM) has total assets under management of €206 billion (2023: €190 billion). Of this, €131.6 billion (2023: €115.7 billion) relates to investments by external asset managers, with AIM only having an advisory role. Of these fiduciary investments, €24.7 billion (2023: €17.4 billion) is managed by financial institutions that independently report on alignment with the EU Taxonomy, and are therefore not taken into account. Also excluded are €1.7 billion (2023: €7.1 billion) of liquidity managed by AIM and €22.8 billion (2023: €21.5 billion) of intercompany investments. The remainder, €157.1 billion (2023: €143.9 billion), concerns investments by AIM investment funds and pension fund investments managed by

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Achmea IM. In addition to the total investments on Achmea's balance sheet and the investments of Achmea Investment Management, the tables also include the fiduciary activities of Achmea Real Estate of €9 billion (2023: €11.9 billion) and Achmea Mortgage Funds €17.6 billion (2023: €0).

If the fiduciary activities of Achmea Investment Management, Achmea Real Estate and Achmea Mortgage Funds are excluded and only the investments included on Achmea B.V.'s balance sheet are taken into account, the total investment is €83.2 billion (2023: €70.7 billion), the covered assets are €65 billion (2023: €59.3 billion), the investments eligible for the EU Taxonomy are €29.1 billion (2023: €30.2 billion) (45%; 2023: 51%) and the EU Taxonomy-aligned activities are €4.9 billion (2023: €4 billion) (8%; 2023: 7%).

Do No Significant Harm Economic Activities (Direct Real Estate and Mortgage Loan Issuance)

Climate change adaptation

When Direct Real Estate/Mortgage Loan is aligned with the substantial contribution criteria for Climate Change Mitigation (CCM), it must be determined whether the investment/loan is also in line with the Do No Significant Harm principles for other climate and other environmental goals in the EU Taxonomy.

Achmea has carried out a Climate Risk and Vulnerability Assessment (CRVA) in line with the European Commission's 'Appendix A: Generic criteria for DNSH to Climate Change Adaptation'. Our CRVA screens whether relevant physical climate risks may affect the performance of the economic activity during its expected lifetime. Achmea has defined the performance of mortgage loans as 'impacted by physical climate risks' when the borrower experiences significant disruption or the collateral building is significantly damaged, to the point that the affordability of the loan or the habitability of the building is compromised. For Direct Real Estate, the definition also includes the attractiveness of the building for the occupants and investors.

Climate Risk Vulnerability Assessment

Achmea's CRVA uses climate projections up to 2050 from the KNMI'14 WH scenario of the Royal Netherlands Meteorological Institute (KNMI), which is in line with the Representative Concentration Pathway 8.5 (RCP 8.5) of the Intergovernmental Panel on Climate Change (IPCC) from their Assessment Report 5 (AR5). Climate risks are assessed using open source methodology from the Climate Impact Atlas of the Climate Adaptation Services Foundation (CAS) to map different types of physical climate risks on individual collateral objects in our mortgage portfolio with environmental scores. Achmea's methodology incorporates the guidelines of the Dutch Green Building Council (DGBC). At the moment, our CRVA does not take into account the adaptive capacity at the building level. If sufficient adaptive capacity data becomes available in the future, our CRVA methodology will be updated. In addition, the data from the Climate Impact Atlas take into account some of the adaptive capacity at government level (such as flood defences).

The CRVA relates to certain physical climatic events, which may expose our clients/users/investors and their homes to risk and which may affect the affordability of their mortgage loan, the economic value of the property and/or its attractiveness to the users of the property. Therefore, the location and other building characteristics are relevant for the exposure to the physical risk types. The following climate issues are relevant and included in the CRVA:

- Foundation support (pole rot or subsidence)
- Heavy precipitation (rain)
- Flooding (probability and depth levels)
- Wildfire

Depending on the type of risk, If one of the individual collateral has a medium-risk (for flooding only), high-risk, or very-high risk, the loan or investment is deemed not to meet the DNSH criteria. In case of insufficient data, the loan or investment is deemed not to meet the DNSH criteria.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 2: BREAKDOWN OF THE DENOMINATOR OF THE KPI

		31 DECEMBER 2024	
	%		€ MILLION
The percentage of derivatives relative to total assets covered by the KPI.	-1%	The value in monetary amounts of derivatives.	-1,337
The proportion of exposures to financial and non-financial undertakings from EU-countries not subject to the NFRD* over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from EU-countries not subject to the NFRD*:	
For non-financial undertakings	4%	For non-financial undertakings	8,335
For financial undertakings	5%	For financial undertakings	10,531
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to the NFRD (subject to Articles 19a and 29a of Directive 2013/34/EU) over total assets covered by the KPI:		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
For non-financial undertakings	38%	For non-financial undertakings	77,200
For financial undertakings	9%	For financial undertakings	17,350
The proportion of exposures to financial and non-financial undertakings subject to the NFRD (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 the NFRD*:	
For non-financial undertakings	20%	For non-financial undertakings	39,848
For financial undertakings	3%	For financial undertakings	6,142
The proportion of exposures to other counterparties and assets over total assets covered by the KPI:	21%	Value of exposures to other counterparties and assets:	42,469
The proportion of Achmea'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 Achmea's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities:	
Turnover-based	0%	Turnover-based	0
Capital expenditures-based	0%	Capital expenditures-based	0
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	71%	Turnover-based	142,080
Capital expenditures-based	75%	Capital expenditures-based	150,574
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	22%	Turnover-based	44,702
Capital expenditures-based	2%	Capital expenditures-based	3,547

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 3: BREAKDOWN OF THE NOMINATOR OF THE KPI

	31 DECEMBER 2024		
	%		€ MILLION
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to the NFRD over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to the NFRD:	
For non-financial undertakings		For non-financial undertakings	
Turnover-based	2%	Turnover-based	3,987
Capital expenditures-based	1%	Capital expenditures-based	1,294
For financial undertakings		For financial undertakings	
Turnover-based	0%	Turnover-based	297
Capital expenditures-based	0%	Capital expenditures-based	113
The proportion of Achmea’s investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, Taxonomy-aligned:		Value of Achmea’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	0%	Turnover-based	0
Capital expenditures-based	0%	Capital expenditures-based	0
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets:	
Turnover-based	5%	Turnover-based	9,476
Capital expenditures-based	0%	Capital expenditures-based	40

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 4: BREAKDOWN OF THE NUMERATOR OF THE KPI PER ENVIRONMENTAL OBJECTIVE

	31 DECEMBER 2024			
	OMZET		CAPEX	
	%	€ MILLION	%	€ MILLION
Climate Change Mitigation (1):	7%	13,739	1%	1,430
Of which transitional	0%	26	0%	68
Of which enabling	0%	577	0%	702
Climate Change Adaptation (2):	0%	9	0%	8
Of which enabling	0%	7	0%	100
Sustainable use and protection of water and marine resources (3)	0%	0	0%	0
Transition to a circular economy (4)	0%	1	0%	0
Pollution prevention and control (5)	0%	11	0%	9
Protection and restoration of biodiversity and ecosystems (6)	0%	0	0%	0

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Nuclear and fossil gas related activities

Tables 5 to 9 set out the KPIs required by the EU for activities related to nuclear energy and fossil gas, as they could contribute to decarbonisation.

TABLE 5: NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES

		31 DECEMBER 2024
		Y/N
	Nuclear energy related activities	
1.	Achmea 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.	Y
2.	Achmea 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.	Y
3.	Achmea 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.	Y
	Fossil gas related activities	
4.	Achmea carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Y
5.	Achmea carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Y
6.	Achmea carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Y

Due to the lack of data, there is no consistency between the yes/no answers in Table 5 and the reported figures per category 1 to 6 in Tables 6, 7, 8 and 9. In many cases, there is data available about the yes/no question so that it can be answered. If there are investments in the portfolio with activities in one of the aforementioned categories, this category is marked as 'yes' in Table 5. However, quantitative data to substantiate these categories is relatively often lacking, or companies can fall into more than one category based on their NACE code. In all these cases, the value of the investment in Tables 6, 7, 8 and 9 is presented in category 7 'other activities'. As a result, it is possible that a category in Table 5 is marked as 'yes' but no invested amount is included in Tables 6, 7, 8 and 9.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 6: NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES - TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR)

(€ MILLION)

		AMOUNT AND PROPORTION											31 DECEMBER 2024
		TURNOVER						CAPEX					
		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTION	
ECONOMIC ACTIVITIES		€	%	€	%	€	%	€	%	€	%	€	%
1.	Research, development, demonstration and deployment of innovative electricity generation facilities, licenced by Member States' competent authorities in accordance with applicable national law, that produce energy from nuclear processes with minimal waste from the fuel cycle. The activity is classified under NACE code M72 and M72.1	0	0.0%	0	0.0%	-	0.0%	0	0.0%	0	0.0%	-	0.0%
2.	Construction and safe operation of new nuclear installations for which the construction permit has been issued by 2045 by Member States' competent authorities, in accordance with applicable national law, to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production (new nuclear installations), as well as their safety upgrades. The activity is classified under NACE codes D35.11 and F42.22	2	0.0%	2	0.0%	-	0.0%	36	0.0%	36	0.0%	-	0.0%
3.	Modification of existing nuclear installations for the purposes of extension, authorised by Member States' competent authorities by 2040 in accordance with applicable national law, of the service time of safe operation of nuclear installations that produce electricity or heat from nuclear energy ('nuclear power plants'). The activity is classified under NACE codes D35.11 and F42.22	66	0.0%	66	0.0%	0	0.0%	25	0.0%	25	0.0%	-	0.0%
4.	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with several NACE codes, notably D35.11 and F42.22	0	0.0%	0	0.0%	-	0.0%	1	0.0%	1	0.0%	-	0.0%
5.	Construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. This activity does not include high-efficiency co-generation of heat/cool and power from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with NACE codes D35.11 and D35.30	3	0.0%	3	0.0%	0	0.0%	0	0.0%	0	0.0%	-	0.0%
6.	Construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels connected to efficient district heating and cooling within the meaning of Article 2, point (41) of Directive 2012/27/EU. This activity does not include production of heat/cool in an efficient district heating from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The activity is classified under NACE code D35.30	1	0.0%	1	0.0%	-	0.0%	8	0.0%	8	0.0%	-	0.0%
7.	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	13,688	6.8%	13,688	6.8%	0	0.0%	1,377	0.7%	1,377	0.7%	-	0.0%
8.	Total applicable KPI	13,760	6.9%	13,760	6.9%	0	0.0%	1,447	0.7%	1,447	0.7%	-	0.0%

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 7: NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES - TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)

(€ MILLION)

		AMOUNT AND PROPORTION											31 DECEMBER 2024
		TURNOVER						CAPEX					
		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTION	
ECONOMIC ACTIVITIES		€	%	€	%	€	%	€	%	€	%	€	%
1.	Research, development, demonstration and deployment of innovative electricity generation facilities, licenced by Member States' competent authorities in accordance with applicable national law, that produce energy from nuclear processes with minimal waste from the fuel cycle. The activity is classified under NACE code M72 and M72.1	0	0%	0	0%	-	-	0	0%	0	0%	-	-
2.	Construction and safe operation of new nuclear installations for which the construction permit has been issued by 2045 by Member States' competent authorities, in accordance with applicable national law, to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production (new nuclear installations), as well as their safety upgrades. The activity is classified under NACE codes D35.11 and F42.22	2	0%	2	0%	-	-	36	2,5%	36	2,5%	-	-
3.	Modification of existing nuclear installations for the purposes of extension, authorised by Member States' competent authorities by 2040 in accordance with applicable national law, of the service time of safe operation of nuclear installations that produce electricity or heat from nuclear energy ('nuclear power plants'). The activity is classified under NACE codes D35.11 and F42.22	66	0,5%	66	0,5%	0	0%	25	1,7%	25	1,7%	-	-
4.	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with several NACE codes, notably D35.11 and F42.22	0	0%	0	0%	-	-	1	0,1%	1	0,1%	-	-
5.	Construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. This activity does not include high-efficiency co-generation of heat/cool and power from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with NACE codes D35.11 and D35.30	3	0%	3	0%	0	0%	0	0%	0	0%	-	-
6.	Construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels connected to efficient district heating and cooling within the meaning of Article 2, point (41) of Directive 2012/27/EU. This activity does not include production of heat/cool in an efficient district heating from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The activity is classified under NACE code D35.30	1	0%	1	0%	-	-	8	0,6%	8	0,6%	-	-
7.	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	13,688	99,5%	13,688	99,5%	0	0%	1,377	95,2%	1,377	95,2%	-	-
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	13,760	100%	13,760	100%	0	0%	1,447	100%	1,447	100%	-	-

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 8: NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES - TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES

(€ MILLION)

		AMOUNT AND PROPORTION											31 DECEMBER 2024
		TURNOVER						CAPEX					
		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTATION		CCA + CCM		CLIMATE CHANGE MITIGATION		CLIMATE CHANGE ADAPTION	
ECONOMIC ACTIVITIES		€	%	€	%	€	%	€	%	€	%	€	%
1.	Research, development, demonstration and deployment of innovative electricity generation facilities, licenced by Member States' competent authorities in accordance with applicable national law, that produce energy from nuclear processes with minimal waste from the fuel cycle. The activity is classified under NACE code M72 and M72.1	0	0%	0	0%	-	-	0	0%	0	0%	-	-
2.	Construction and safe operation of new nuclear installations for which the construction permit has been issued by 2045 by Member States' competent authorities, in accordance with applicable national law, to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production (new nuclear installations), as well as their safety upgrades. The activity is classified under NACE codes D35.11 and F42.22	0	0%	0	0%	-	-	0	0%	0	0%	-	-
3.	Modification of existing nuclear installations for the purposes of extension, authorised by Member States' competent authorities by 2040 in accordance with applicable national law, of the service time of safe operation of nuclear installations that produce electricity or heat from nuclear energy ('nuclear power plants'). The activity is classified under NACE codes D35.11 and F42.22	2	0%	2	0%	-	-	0	0%	0	0%	-	-
4.	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with several NACE codes, notably D35.11 and F42.22	29	0,1%	29	0,1%	0	0%	6	0,2%	6	0,2%	0	0%
5.	Construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. This activity does not include high-efficiency co-generation of heat/cool and power from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with NACE codes D35.11 and D35.30	154	0,3%	154	0,3%	0	0%	100	2,8%	100	2,8%	-	-
6.	Construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels connected to efficient district heating and cooling within the meaning of Article 2, point (41) of Directive 2012/27/EU. This activity does not include production of heat/cool in an efficient district heating from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The activity is classified under NACE code D35.30	10	0%	10	0%	-	-	19	0,5%	19	0,5%	-	-
7.	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	44,506	99,6%	44,506	99,6%	0	0%	3,422	96,4%	3,422	96,4%	1	100%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	44,702	100%	44,702	100%	0	0%	3,548	100%	3,548	100%	1	100%

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 9: NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES - TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES

		31 DECEMBER 2024	
ECONOMIC ACTIVITIES		€ MILLION	%
1.	Research, development, demonstration and deployment of innovative electricity generation facilities, licenced by Member States' competent authorities in accordance with applicable national law, that produce energy from nuclear processes with minimal waste from the fuel cycle. The activity is classified under NACE code M72 and M72.1	2	0%
2.	Construction and safe operation of new nuclear installations for which the construction permit has been issued by 2045 by Member States' competent authorities, in accordance with applicable national law, to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production (new nuclear installations), as well as their safety upgrades. The activity is classified under NACE codes D35.11 and F42.22	10	0%
3.	Modification of existing nuclear installations for the purposes of extension, authorised by Member States' competent authorities by 2040 in accordance with applicable national law, of the service time of safe operation of nuclear installations that produce electricity or heat from nuclear energy ('nuclear power plants'). The activity is classified under NACE codes D35.11 and F42.22	4	0%
4.	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with several NACE codes, notably D35.11 and F42.22	0	0%
5.	Construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels. This activity does not include high-efficiency co-generation of heat/cool and power from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The economic activities in this category may be associated with NACE codes D35.11 and D35.30	0	0%
6.	Construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels connected to efficient district heating and cooling within the meaning of Article 2, point (41) of Directive 2012/27/EU. This activity does not include production of heat/cool in an efficient district heating from the exclusive use of renewable non-fossil gaseous and liquid fuels and biogas and bio-liquid fuels. The activity is classified under NACE code D35.30	2	0%
7.	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	142,060	71%
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	142,080	71%

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Premiums

PREMIUMS ELIGIBLE FOR ALIGNMENT WITH THE EU TAXONOMY

Table 10 shows the gross written premiums of the 'lines of business' with (re-)insurance contracts that are eligible for alignment with the EU Taxonomy. The economic activities of an insurer that may be eligible for alignment with the EU Taxonomy are only related to the environmental objective 'Climate change adaptation' and are linked to NACE code K65.12 (non-life insurance) and K65.20 (reinsurance). These are non-life and health insurance contracts that insure climate-related hazards as part of the coverage. This NACE code K65.12 covers insurance and reinsurance services based on Solvency II lines of business (other than life insurance), consisting of health insurance, income insurance, insurance against accidents at work, motor vehicle liability insurance, other motor insurance, insurance for ships, aircraft and transport, insurance against fire and other damage to property and assistance. If a climate-related hazard is part of the insurance, Achmea has designated the entire premium as eligible for alignment with the EU Taxonomy.

Reinsurance activities that insure climate-related risks (in the insurance contracts that are reinsured) are also included in the gross written premiums that are eligible for alignment with the EU Taxonomy.

Table 10 shows the premiums of the (re)insurance activities that are part of the product groups in the Climate Regulation (non-life and health insurance). Subsequently, it was determined whether the policy conditions explicitly mention coverage for climate-related damage, such as storm damage. If a product provides cover for climate-related risks based on the policy conditions, the specific amount of premiums being allocated to cover the climate peril being part of the cover. This is a change in comparison to 2023, when in that case all gross written premiums of the product were included and not only the part of the premiums that is attributable to the climate-related risks. If the current calculation methodology had been applied in 2023, 8.6% of activities would have met the technical screening criteria for 'Substantial contribution' and 'Do no significant harm' instead of the reported 49%. If climate risks are not explicitly mentioned in the policy conditions, the products to which these contracts belong are not included in the premiums that are eligible for alignment with the EU Taxonomy. This concerns, for example, health and disability insurance.

The non-life categories of motor vehicles, hull, transport/aviation liability and fire and other movable property are designated as activities that qualify for the EU Taxonomy.

Of the activities within the scope of the EU Taxonomy, 9% (2023: 5%) are eligible for alignment with the EU Taxonomy (eligible). However, there is currently no clear way to determine whether or not our corporate customers meet the Minimum Safeguard criteria. Based on this observation, we can only conclude that, based on the availability of data, we cannot meet the criteria of Minimum Safeguard. As a result, the allignment rate is zero.

Achmea's insurance entities, that offer insurance products that qualify for the EU Taxonomy, comply with the principles of minimum safeguards.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 10: TAXONOMY ALIGNED INSURANCE ACTIVITIES

	2024	%
Insurance revenue – total as presented in the Financial Statements	**25,419**	
Insurance activities not in scope of EUT	20,179	
Insurance revenue – in scope of EUT	**5,240**	**100%**
Excluded insurance activities due to data issues	310	6%
Insurance revenue not allocated to climate related hazards	4,458	85%
Insurance revenue	**472**	**9%**
- Not meeting the Minimum Safeguards	-	-
- Not meeting the Substantial Contribution Criteria	-	-
- Not meeting the DNSH Criteria	-	-
- Insufficient Data	472	9%
Insurance revenue	**-**	**-**

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 11: THE INSURANCE KPI FOR INSURANCE AND REINSURANCE COMPANIES

									31 DECEMBER 2024
				DO NO SIGNIFICANT HARM					
ECONOMIC ACTIVITIES (1)	ABSOLUTE PREMIUMS, YEAR T (2)	PROPORTION OF PREMIUMS, YEAR T (3)	PROPORTION OF PREMIUMS, YEAR T-1 (4)	CLIMATE CHANGE MITIGATION (5)	WATER AND MARINE RESOURCES (6)	CIRCULAR ECONOMY (7)	POLLUTION (8)	BIODIVERSITY AND ECOSYSTEMS (9)	MINIMUM SAFEGUARDS (10)
	(€ MILLION)	%	%	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)	**-**	**-**	**-**	**N**	**N/a**	**N/a**	**N/a**	**N/a**	**N**
A.1.1 Of which reinsured	-	-	-	N	N/a	N/a	N/a	N/a	N
A.1.2 Of which stemming from reinsurance activity	-	-	-	N	N/a	N/a	N/a	N/a	N
A.1.2.1 Of which reinsured (retrocession)	-	-	-	N	N/a	N/a	N/a	N/a	N
A.2 Non-life insurance and reinsurance underwriting Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	**472**[1]	**9%**	**8.6%**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	**4,767**	**91%**	**91.4%**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**
Total (A.1 + A.2+ B)	**5,240**	**100%**	**100%**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**	**N/a**

[1]Of the €472 million, 100% is eligible for the substantial contribution criteria for climate adaptation.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Asset management

Tables 12 to 17 contain the KPIs prescribed by the EU and their specification that relate to the investments that Achmea manages on behalf of third parties. Tables 12 to 15 for asset managers account for the investments where Achmea has influence on the execution of the investment mandates. Tables 16 and 17 for investment firms account for the investments for which Achmea carries out fiduciary management and therefore has no influence on the execution of the investment mandates. In the comparative figures, this distinction is not made for investments that are managed on behalf of pension funds. In 2024 this distinction has been made, this is the cause of the main difference in covered assets between 2023 and 2024.

TABLE 12A: KPI FOR THE ASSET MANAGEMENT ACTIVITIES

			31 DECEMBER 2024
	%		€ MILLION
The weighted average value of all the investments of Achmea 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 investmetns in undertakings per below:	13%	The weighted average value of all the investments of Achmea that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	8,672
Turnover-based	14%	Turnover-based	9,183
Capital expenditures-based	1%	Capital expenditures-based	580
The percentage of assets covered by the KPI relative to total investments of Achmea (total AuM). Excluding investments in sovereign entities.		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage ratio	100%	Coverage	66,958

TABLE 12B: KPI FOR THE ASSET MANAGEMENT ACTIVITIES

			31 DECEMBER 2023
	%		€ MILLION
The weighted average value of all the investments of Achmea 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 investmetns in undertakings per below:	4%	The weighted average value of all the investments of Achmea that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:	4,921
Turnover-based	8%	Turnover-based	8,953
Capital expenditures-based	1%	Capital expenditures-based	889
The percentage of assets covered by the KPI relative to total investments of Achmea (total AuM). Excluding investments in sovereign entities.		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage ratio	100%	Coverage	118,646

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 12C: CONTEXT OF TOTAL INVESTMENTS

	31 DECEMBER 2024			
	TURNOVER		CAPEX	
	€ MILLION	%	€ MILLION	%
Total investments	**100,985**		**72,916**	
Covered assets	**66,958**	**100%**	**38,888**	**100%**
Derivatives	-3,326	-5%	-3,326	-9%
Non-NFRD-company's	15,056	22%	15,056	39%
Investments for which data are insufficient to assess their classification	22,664	34%	22,664	58%
Investments subject to EUT assessment	**32,563**	**49%**	**4,494**	**12%**
Not eligible	3.174	5%	3.083	8%
Insufficient data for assessment	95	0%	109	0%
Investments eligible for the EU Taxonomy	**29,294**	**44%**	**1,301**	**3%**
Investments with insufficient data for taxonomy analysis	1,207	2%	264	1%
Investments that do not meet the minimum safeguards	17	0%	23	0%
Investments that do not meet the technical screening criteria for a substantial contribution (SC)	15,828	24%	426	1%
Investments that do not meet the Technical Screening criteria for Do No Significant Harm (DNSH)	3,060	5%	8	0%
Taxonomy-aligned activities	**9,183**	**14%**	**580**	**1%**

Tables 12 to 15 relate to the assets under management of Achmea Investment Management, Achmea Real Estate and Achmea Mortgage Funds. Achmea Investment Management (AIM) has total assets under management of €206 billion (2023: €190 billion), of which €131.6 billion (2023: €115.7 billion) relates to investments by external asset managers, with AIM only having an advisory role. These investments are not taken into account for the purposes of Tables 12 to 15. The remainder (€72.8 billion) concerns investments in AIM investment funds. In addition to the investments of Achmea Investment Management, the tables also include the fiduciary activities of Achmea Real Estate of €10.5 billion (2023: €11.9 billion) and Achmea Mortgage Funds of €17.6 billion (2023: €-).

The difference between total investments and covered assets is caused by investments that cannot be classified as covered assets under the Delegated Act, which currently include categories such as government bonds, receivables and other assets. Derivatives, investments in non-NFRD companies and investments for which no data is available are not eligible for alignment with the EU Taxonomy.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 13: BREAKDOWN OF THE DENOMINATOR OF THE KPI

			31 DECEMBER 2024
	%		€ MILLION
The percentage of derivatives relative to total assets covered by the KPI.	-5%	The value in monetary amounts of derivatives.	-3,326
The proportion of exposures to financial and non-financial undertakings from EU-countries not subject to the NFRD over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from EU-countries not subject to the NFRD:	
For non-financial undertakings	3%	For non-financial undertakings	2,048
For financial undertakings	1%	For financial undertakings	372
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to the NFRD (subject to Articles 19a and 29a of Directive 2013/34/EU) over total assets covered by the KPI:		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
For non-financial undertakings	40%	For non-financial undertakings	27,041
For financial undertakings	7%	For financial undertakings	4,933
The proportion of exposures to financial and non-financial undertakings subject to the NFRD (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 the NFRD:	
For non-financial undertakings	29%	For non-financial undertakings	19,701
For financial undertakings	4%	For financial undertakings	2,382
The proportion of exposures to other counterparties and assets over total assets covered by the KPI:	21%	Value of exposures to other counterparties and assets:	13,806
The proportion of Achmea’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 Achmea’s investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policyholders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities:	
Turnover-based	0%	Turnover-based	0
Capital expenditures-based	0%	Capital expenditures-based	0
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	56%	Turnover-based	37,663
Capital expenditures-based	56%	Capital expenditures-based	37,586
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	30%	Turnover-based	20,021
Capital expenditures-based	1%	Capital expenditures-based	612

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 14: BREAKDOWN OF THE NOMINATOR OF THE KPI

			31 DECEMBER 2024
	%		€ MILLION
The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to the NFRD over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to the NFRD:	
For non-financial undertakings		For non-financial undertakings	
Turnover-based	5%	Turnover-based	3,478
Capital expenditures-based	1%	Capital expenditures-based	496
For financial undertakings		For financial undertakings	
Turnover-based	0%	Turnover-based	250
Capital expenditures-based	0%	Capital expenditures-based	58
The proportion of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets:	
Turnover-based	8%	Turnover-based	5,455
Capital expenditures-based	0%	Capital expenditures-based	27

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 15: BREAKDOWN OF THE NUMERATOR OF THE KPI PER ENVIRONMENTAL OBJECTIVE

	31 DECEMBER 2024			
	OMZET		CAPEX	
	%	€ MILLION	%	€ MILLION
Climate Change Mitigation (1):	14%	9,174	1%	572
Of which transitional	0%	7	0%	20
Of which enabling	0%	233	0%	268
Climate Change Adaptation (2):	0%	5	0%	4
Of which enabling	0%	5	0%	78
Sustainable use and protection of water and marine resources (3)	0%	0	0%	0
Of which enabling	0%	0	0%	0
Transition to a circular economy (4)	0%	0	0%	0
Of which enabling	0%	0	0%	0
Pollution prevention and control (5)	0%	4	0%	4
Of which enabling	0%	4	0%	4
Protection and restoration of biodiversity and ecosystems (6)	0%	0	0%	0
Of which enabling	0%	0	0%	0

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 16: SUMMARY OF KPIS TO BE REPORTED BY INVESTMENT FIRMS UNDER ARTICLE 8 OF THE TAXONOMY REGULATION

(€ MILLION)

31 DECEMBER 2024

		TOTAL ENVIRONMENTALLY SUSTAINABLE ASSETS	KPI*	KPI**	% COVERAGE (OVER TOTAL ASSETS)***
Main KPI (for dealing on own account)	Green asset ratio	N/a	N/a	N/a	N/a
		TOTAL REVENUE FROM ENVIRONMENTALLY SUSTAINABLE SERVICES AND ACTIVITIES	KPI	KPI	% COVERAGE (OVER TOTAL REVENUE)
Main KPI (for services and activities other than dealing on own account)	KPI on Revenue****	-	-	-	-

*based on the Turnover KPI of the counterparty

** based on CapEx KPI of the counterparty

***% of assets covered by the KPI over total assets

****Fees, commissions, and other monetary benefits

Due to the lack of consistent data at issuer level, revenues from environmentally sustainable services and activities cannot be calculated and the outcome in Table 16 is nil.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

OWN-ACCOUNT TRADING SERVICES

In Table 17, only the bottom line applies to Achmea (concerns the income received by Achmea Investment Management for fiduciary management). In addition, the columns on Sustainable use and protection of water and marine resources, Transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems will be nil or 'not applicable', as no Technical Screening Criteria have yet been published by the EU for the mentioned environmental objectives.

Due to the lack of consistent data at issuer level, revenues from environmentally sustainable services and activities cannot be calculated and the outcome in Table 17 is nil.

TABLE 17: KPI IF - SERVICES IN THE CONTEXT OF OWN ACCOUNT TRADE (1/3)

(€ MILLION)

				31 DECEMBER 2024							
				CLIMATE CHANGE MITIGATION (CCM)				CLIMATE CHANGE ADAPTATION (CCA)			
				OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)				OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)			
					OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)				OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)		
		TOTAL	OF WHICH COVERED BY THE KPI			OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)			OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)
1.	Total assets invested under investment firms' activities dealing on own account (as per Section A of Annex I of Directive 2014/65/EU)	109,524	-	-	-	-	-	-	-	-	-
2.	On which: on own behalf	-	-	-	-	-	-	-	-	-	-
3.	On which: on behalf of clients	109,524	-	-	-	-	-	-	-	-	-

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TABLE 17: KPI IF - SERVICES IN THE CONTEXT OF OWN ACCOUNT TRADE (2/3)

(€ MILLION)

		31 DECEMBER 2024											
		SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES (WTR)				TRANSITION TO A CIRCULAR ECONOMY (CE)				POLLUTION PREVENTION CONTROL (PPC)			
		OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)				OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)				OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)			
			OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)				OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)				OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)		
				OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)			OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)			OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)
1.	Total assets invested under investment firms' activities dealing on own account (as per Section A of Annex I of Directive 2014/65/EU)	-	-	-	-	-	-	-	-	-	-	-	-
2.	On which: on own behalf	-	-	-	-	-	-	-	-	-	-	-	-
3.	On which: on behalf of clients	-	-	-	-	-	-	-	-	-	-	-	-

TABLE 17: KPI IF - SERVICES IN THE CONTEXT OF OWN ACCOUNT TRADE (3/3)

(€ MILLION)

		31 DECEMBER 2024							
		PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)				OF WHICH ASSETS COVERED BY THE EU TAXONOMY (%) (TAXONOMY-ELIGIBLE)			
			OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)				OF WHICH LINKED TO ACTIVITIES ALIGNED WITH THE EU TAXONOMY (%) (TAXONOMY-ALIGNED)		
				OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)			OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)
1.	Total assets invested under investment firms' activities dealing on own account (as per Section A of Annex I of Directive 2014/65/EU)	-	-	-	-	-	-	-	-
2.	On which: on own behalf	-	-	-	-	-	-	-	-
3.	On which: on behalf of clients	-	-	-	-	-	-	-	-

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

Banking activities

The table below shows the KPIs required by the EU for the assets of credit institutions. The KPIs relate to the environmental objective of climate mitigation, in line with Achmea's climate policy. The assets that are eligible for alignment with the EU Taxonomy are the mortgages related to the financing of residential houses. In the tables below, only the lines from the prescribed tables that contain a value have been copied.

The EU Taxonomy-aligned funded share consists of the mortgages that meet the criteria of no material impact arising from climate risks over the life of the mortgage. The following sub-risks were taken into account: wildfires, pile rot, land subsidence, excessive precipitation and flooding. See the explanation to Table 1b for more information.

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TEMPLATE 18A: BANKING ACTIVITIES

	31 DECEMBER 2024	TOTAL GROSS CARRYING AMOUNT	CLIMATE CHANGE MITIGATION (CCM)					
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL ASSETS COVERED (%)
				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				
					OF WHICH USE OF PROCEEDS (%)	OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)	
	GAR - Covered assets in both numerator and denominator	**17.328**	**17.104**	**2.506**	**2.506**	**-**	**-**	**95%**
2	Financial corporations	235	-	-	-	-	-	1%
4	Credit institutions	223	-	-	-	-	-	1%
5	Of which: Loans and advances	223	-	-	-	-	-	1%
6	Of which: Debt securities, including UoP	-	-	-	-	-	-	0%
7	Other financial corporations	11	11	-	-	-	-	0%
9	Of which: Loans and advances	11	11	-	-	-	-	0%
24	Households	17.093	17.093	2.506	2.506	-	-	93%
25	Of which loans collateralised by residential immovable	17.093	17.093	2.506	2.506	-	-	93%
26	Of which building renovation loans	-	-	-	-	-	-	0%
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	**958**	[redacted]					
33	Non-Financial corporations	19						
34	SME's and NFC's (other than SME's) not subject to NFRD	19						
44	Derivatives	590						
45	On demand interbank loans	18						
47	Other assets (e.g. Goodwill, commodities etc.)	332						
48	**Total GAR assets**	**18.286**						
49	**Other assets not covered for GAR calculation**	**1.283**						
50	Central governments and Supranational issuers	11						
51	Central Banks exposure	1.271						
52	Total assets	19.568						
53	**Off balance sheet exposure - Undertakings subjects to NFRD disclosure obligation**	**21.731**	21.731	4.079	4.079	-	-	
54	Assets under management	21.731	21.731	4.079	4.079	-	-	

ANNEX E. EU TAXONOMY FOR SUSTAINABLE ACTIVITIES

TEMPLATE 18B: BANKING ACTIVITIES

31 DECEMBER 2023		TOTAL GROSS CARRYING AMOUNT	CLIMATE CHANGE MITIGATION (CCM)					
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL ASSETS COVERED (%)
				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				
					OF WHICH USE OF PROCEEDS (%)	OF WHICH TRANSITIONAL (%)	OF WHICH ENABLING (%)	
	GAR - Covered assets in both numerator and denominator	**14.564**	**1.853**	**100%**	**100%**	**100%**	**100%**	**95%**
2	Financial corporations	349	-	-	-	-	-	2%
4	Credit institutions	337	-	-	-	-	-	2%
5	Of which: Loans and advances	306	-	-	-	-	-	2%
6	Of which: Debt securities, including UoP	31	-	-	-	-	-	0%
7	Other financial corporations	12	-	-	-	-	-	0%
9	Of which: Loans and advances	11	-	-	-	-	-	0%
24	Households	14.215	1.853	100%	100%	100%	0%	93%
25	Of which loans collateralised by residential immovable property	14.215	1.853	100%	100%	100%	0%	93%
26	Of which building renovation loans	-	-	-	-	-	-	0%

ANNEX F: CONTENT INDEX

In line with ESRS 2 IRO-2, the content index below shows where the relevant ESRS disclosure requirements can be found in the sustainability report.

CONTENT INDEX ESRS DISCLOSURE REQUIREMENTS

ESRS 2 GENERAL DISCLOSURES

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement BP-1 – General basis for preparation of sustainability statements	Annex A: Approach to sustainability reporting.
Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances	Environmental. Chapter: Climate change: • Paragraph: Health insurance. Sub-paragraph: Metrics and targets • Paragraph: Corporate investments. Sub-paragraph: Management of climate-related risks. • Paragraph Investments in mortgages and banking loan portfolio. Sub-paragraph: Management of climate-related risks. • Paragraph: Investment property. Sub-paragraph: Management of climate-related risks. Annex A - Approach to sustainability reporting. Paragraphs: Time horizons. Incorporation by reference. Changes in methodology for measuring metrics. Appendix B - Detailed information own workforce. Appendix C - Detailed information environmental indicators. Appendix E - EU Taxonomy for sustainability activities.
Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies	General information. Governance of sustainability. Chapter: Roles, responsibilities and expertise.
Disclosure Requirement GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	General information. Governance of sustainability. Chapter: Sustainability matters addressed in 2024.
Disclosure Requirement GOV-3 - Integration of sustainability-related performance in incentive schemes	General information. Governance of sustainability. Chapter: Integration in remuneration policy.
Disclosure Requirement GOV-4 - Statement on due diligence	Annex A - Approach to sustainability reporting.
Disclosure Requirement GOV-5 - Risk management and internal controls over sustainability reporting	Annex A - Approach to sustainability reporting. About this report.
Disclosure Requirement SBM-1 – Strategy, business model and value chain	General information: Strategy and business model. Chapter: Description of our business.
Disclosure Requirement SBM-2 – Interests and views of stakeholders	General information. Strategy and business model. Chapter: Interests and views of stakeholders.
Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	General information. Strategy and business model. Chapter: Interaction material topics and strategy.
Disclosure Requirement IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Annex F - Content index. Chapter: Content index ESRS disclosure requirements.
Minimum disclosure requirement - Policies MDR-P – Policies adopted to manage material sustainability matters	• See information included in disclosure requirements: E1-2, E2-1, E4-2, E5-1, S1-1, S2-1, S4-1, G1-1. • Governance. Chapter: Data and cybersecurity. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraphs: Own policies.
Minimum disclosure requirement - Actions MDR-A – Actions and resources in relation to material sustainability matters	• See information included in disclosure requirements: E1-3, E2-2, E4-3, E5-2, S1-2, S1-3, S1-4, S2-2, S2-3, S2-4, S4-2, S4-3, S4-4, G1-3. • Governance. Chapter: Data and cybersecurity. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraph: Actions.
Minimum disclosure requirement – Metrics MDR-M – Metrics in relation to material sustainability matters	• See information included in disclosure requirements: E1-6, E2-3, E4-5, E4-6, E5-4, S1-6, S1-7, S1-8, S1-9, S1-13, S1-15, S1-16, S1-17, S2-5, S4-5, G1-4. • Governance. Chapter: Data and cybersecurity. Paragraph: Metrics and targets (no reporting on metrics).
Minimum disclosure requirement – Targets MDR-T – Tracking effectiveness of policies and actions through targets	• See information included in disclosure requirements: E1-4, E2-3, E4-4, E5-3, S1-5, S2-5, S4-5, G1-1. Paragraph: Metrics and targets. • Governance. Chapter: Data and cybersecurity. Paragraph: Metrics and targets (no reporting on targets).

ANNEX F: CONTENT INDEX

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability related performance in incentive schemes	General information. Governance of sustainability. Chapter: Integration in remuneration policy.
Disclosure Requirement E1-1 – Transition plan for climate change mitigation	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Climate transition plan. • Paragraph: Health insurance. Sub-paragraph: Climate transition plan. • Paragraph: Corporate investments. Sub-paragraph: Climate transition plan. • Paragraph: Investments in government bonds. Sub-paragraph: Climate transition plan. • Paragraph: Investments in mortgages and banking loan portfolio. Sub-paragraph: Climate transition plan. • Paragraph: Investment property. Sub-paragraph: Climate transition plan.
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	• *Material IRO:* Environmental. Chapter: Climate change: Picture with IRO on first page of chapter. • *Interaction with strategy and business model*: Environmental. Chapter: Climate change. Paragraph: Qualitative risk analysis climate change. • General information. Strategy and business model. Chapter: Interaction material topics and strategy.
Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Own policies. • Paragraph: Health insurance. Sub-paragraph: Own policies. • Paragraph: Corporate investments. Sub-paragraph: Own policies. • Paragraph: Investments in government bonds. Sub-paragraph: Own policies. • Paragraph: Investments in mortgages and banking loan portfolio. Sub-paragraph: Own policies. • Paragraph: Investment property. Sub-paragraph: Own policies.
Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Actions. • Paragraph: Health insurance. Sub-paragraph: Actions. • Paragraph: Corporate investments. Sub-paragraph: Actions. • Paragraph: Investments in government bonds. Sub-paragraph: Actions. • Paragraph: Investments in mortgages and banking loan portfolio. Sub-paragraph: Actions. • Paragraph: Investment property. Sub-paragraph: Actions.
Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Metrics and targets. • Paragraph: Health insurance. Sub-paragraph: Metrics and targets. • Paragraph: Investment property. Sub-paragraph: Metrics and targets for all asset classes.
Disclosure Requirement E1-5 – Energy consumption and mix	Disclosure requirement is not material.
Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	Annex C - Detailed information environmental indicators: Table 1.
Disclosure Requirement E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	Disclosure requirement is not material.
Disclosure Requirement E1-8 – Internal carbon pricing	Disclosure requirement is not material.
Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Disclosure requirement is being phased in according to ESRS 1 Appendix C.

ESRS E2 POLLUTION

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement E2-1 – Policies related to pollution	Environmental. Chapter: Pollution of water and soil. Paragraph: How we manage our impact, risks and opportunities.
Disclosure Requirement E2-2 – Actions and resources related to pollution	Environmental. Chapter: Pollution of water and soil. Paragraph: How we manage our impact, risks and opportunities.
DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement E2-3 – Targets related to pollution	Environmental. Chapter: Pollution of water and soil:

ANNEX F: CONTENT INDEX

	• Paragraph: How we manage our impact, risks and opportunities. • Paragraph: Metrics and targets.
Disclosure Requirement E2-4 – Pollution of air, water and soil	Disclosure requirement is not material.
Disclosure Requirement E2-5 – Substances of concern and substances of very high concern	Disclosure requirement is not material.
Disclosure Requirement E2-6 – Anticipated financial effects from pollution-related impacts, risks and opportunities	Disclosure requirement is being phased in according to ESRS 1 Appendix C.

ESRS E4 BIODIVERSITY AND ECOSYSTEMS

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Environmental. • *Transition plan:* Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities: first part (no transition plan has been established yet). • *Strategy and business-model*: Chapter: Biodiversity. Paragraph: Our strategy related to biodiversity: first and second part.
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	• *Material IRO:* Environmental. Chapter Biodiversity: Picture with IRO on first page of chapter. • *Interaction with strategy and business model*: o Environmental. Chapter: Biodiversity. Paragraph: Our strategy related to biodiversity: first and second part. o General information. Strategy and business model. Chapter: Interaction material topics and strategy.
Disclosure Requirement related to ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement E4-2 – Policies related to biodiversity and ecosystems	Environmental. Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities.
Disclosure Requirement E4-3 – Actions and resources related to biodiversity and ecosystems	Environmental. Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities.
Disclosure Requirement E4-4 – Targets related to biodiversity and ecosystems	Environmental. Chapter: Biodiversity. Paragraph: Metrics and targets.
Disclosure Requirement E4-5 – Impact metrics related to biodiversity and ecosystems change	Environmental. Chapter: Biodiversity. Paragraph: Metrics and targets (no metrics have been established yet).
Disclosure Requirement E4-6 – Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Disclosure requirement is being phased in according to ESRS 1 Appendix C.

ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement E5-1 – Policies related to resource use and circular economy	Environmental. Chapter: Resource inflow and waste. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraph: Own policies.
Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy	Environmental. Chapter: Resource inflow and waste. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraph: Actions.
Disclosure Requirement E5-3 – Targets related to resource use and circular economy	Environmental. Chapter: Resource inflow and waste: • Paragraph: How we manage our impact, risks and opportunities: Sub-paragraph: Applicable regulations and commitments. • Paragraph: Metrics and targets.
Disclosure Requirement E5-4 – Resource inflows	Environmental. Chapter: Resource inflow and waste. Paragraph: How we manage our impact, risks and opportunities.
Disclosure Requirement E5-5 – Resource outflows	Disclosure requirement is not material.
Disclosure Requirement E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Disclosure requirement is being phased in according to ESRS 1 Appendix C.

ESRS S1 OWN WORKFORCE

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	General information. Strategy and business model. Chapter: Interests and views of stakeholders.
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	General information. Strategy and business model. Chapter: Interaction material topics and strategy.

DISCLOSURE REQUIREMENT	REFERENCE

ANNEX F: CONTENT INDEX

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement S1-1 – Policies related to own workforce	Social – Introduction: Paragraph: Our approach to social topics and commitments. Text box: Human rights and labour rights statement. Social. Chapter: Responsible employer practices: • Introduction: Paragraph: Own policies. • Paragraph: Inclusion, diversity and equity: How we manage our impact, risks and opportunities: Own policies. Applicable regulations and commitments. • Paragraph: Training and skills development: How we manage our impact, risks and opportunities: Own policies. Foreign operating companies. • Paragraph: Work-life balance: How we manage our impact, risks and opportunities: Own policies. Foreign operating companies: Applicable regulations and commitments. • Paragraph: Measures against violence and harassment in the workplace: How we manage our impact, risks and opportunities: Engagement.
Disclosure Requirement S1-2 – Processes for engaging with own workers and workers' representatives about impacts	Social. Chapter: Responsible employer practices: • Introduction: Paragraph: Employee participation and engagement. • Paragraph: Inclusion, diversity and equity: How we manage our impact, risks and opportunities: Engagement. • Paragraph: Training and skills development: How we manage our impact, risks and opportunities: Engagement. • Paragraph: Work-life balance: How we manage our impact, risks and opportunities: Engagement. • Paragraph: Measures against violence and harassment in the workplace: How we manage our impact, risks and opportunities: Engagement.
Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns	Social. Chapter: Responsible employer practices: • Introduction: Text box: Whistleblower policy. • Paragraph: Inclusion, diversity and equity: How we manage our impact, risks and opportunities: Processes to remediate negative impacts and channels to raise concerns. • Paragraph: Training and skills development: How we manage our impact, risks and opportunities: Processes to remediate negative impacts and channels to raise concerns. • Paragraph: Measures against violence and harassment in the workplace: How we manage our impact, risks and opportunities: Processes to remediate negative impacts and channels to raise concerns.
Disclosure Requirement S1-4 – 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	Social. Chapter: Responsible employer practices: • Paragraph: Inclusion, diversity and equity: How we manage our impact, risks and opportunities: Actions and approaches. Process for monitoring. • Paragraph: Training and skills development: How we manage our impact, risks and opportunities: Actions and approaches. Process for monitoring. • Paragraph: Work-life balance: How we manage our impact, risks and opportunities: Actions and approaches. Process for monitoring. • Paragraph: Measures against violence and harassment in the workplace: How we manage our impact, risks and opportunities: Actions and approaches. Process for monitoring.
Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Social. Chapter: Responsible employer practices: • Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets. • Paragraph: Training and skills development. Sub-paragraph: Metrics and targets. • Paragraph: Work-life balance. Sub-paragraph: Metrics and targets. • Paragraph: Measures against violence and harassment in the workplace. Sub-paragraph: Metrics and targets.
Disclosure Requirement S1-6 – Characteristics of the undertaking's employees	Annex B - Detailed information own workforce.
Disclosure Requirement S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	Annex B - Detailed information own workforce.
Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue	Annex B - Detailed information own workforce.
Disclosure Requirement S1-9 – Diversity metrics	• Social. Chapter: Responsible employer practices. Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets. • Annex B - Detailed information own workforce.

ANNEX F: CONTENT INDEX

Disclosure Requirement S1-10 – Adequate wages	Disclosure requirement is not material.
Disclosure Requirement S1-11 – Social protection	Disclosure requirement is not material.
Disclosure Requirement S1-12– Persons with disabilities	Disclosure requirement is not material.
Disclosure Requirement S1-13 – Training and skills development metrics	Social. Chapter: Responsible employer practices. Paragraph: Training and skills development. Sub-paragraph: Metrics and targets.
Disclosure Requirement S1-14 – Health and safety metrics	Disclosure requirement is not material.
Disclosure Requirement S1-15 – Work-life balance metrics	Social. Chapter: Responsible employer practices. Paragraph: Work-life balance. Sub-paragraph: Metrics and targets.
Disclosure Requirement S1-16 – Compensation metrics (pay gap and total compensation)	Social. Chapter: Responsible employer practices. Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets: • Sub-sub-paragraph: Gender pay gap. • Sub-sub-paragraph: Pay ratio.
Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts	Social. Chapter: Responsible employer practices. Paragraph: Measures against violence and harassment in the workplace. Sub-paragraph: Metrics and targets.

ESRS S2 WORKERS IN THE VALUE CHAIN

DISCLOSURE REQUIREMENT:	REFERENCE
Disclosure Requirement related to ESRS 2 SBM-2 Interests and views of stakeholders	General information. Strategy and business model. Chapter: Interests and views of stakeholders.
Disclosure Requirement related to ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	• *Material IRO:* Social. Chapter: Working conditions in the value chain: Picture 1e page. • *Interaction with strategy and business model:* o Social. Chapter: Working conditions in the value chain: Introduction first and second part. o General information: Chapter Strategy and business model. Paragraph: Interaction material topics and strategy.
Disclosure Requirement S2-1 – Policies related to value chain workers	• Social. Chapter: Working conditions in the value chain. Paragraph: Insurance and services: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Integral Care Agreement. • Social. Chapter: Working conditions in the value chain. Paragraph: Investments and financing: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: SRI policy. • Chapter: Social – Introduction. Text box: Human rights and labour rights statement.
Disclosure Requirement S2-2 – Processes for engaging with value chain workers about impacts	Social. Chapter: Working conditions in the value chain: • Paragraph: Insurance and services: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Engagement. • Paragraph: Investments and financing: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Engagement: first, second and third part.
Disclosure Requirement S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns	Social. Chapter: Working conditions in the value chain. Text box: Achmea's complaints mechanism.
Disclosure Requirement S2-4 – 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	Social. Chapter: Working conditions in the value chain: • Paragraph: Insurance and services. Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Integral Care Agreement. • Paragraph: Investments and financing. Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: SRI policy.
Disclosure Requirement S2-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Social. Chapter: Working conditions in the value chain: • Paragraph: Insurance and services: Sub-paragraph: Metrics and targets: first part (no metrics has been established yet). • Paragraph: Investments and financing: Sub-paragraph: Metrics and targets: first part (no metrics has been established yet).

ESRS S4 CONSUMERS AND END-USERS

DISCLOSURE REQUIREMENT:	REFERENCE
Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	General information. Strategy and business model. Chapter: Interests and views of stakeholders.

ANNEX F: CONTENT INDEX

DISCLOSURE REQUIREMENT	REFERENCE
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business mode	Social. Chapter: Responsible relationships with consumers and customers: • *Material IRO*: Picture with IRO on first page of chapter. • *Interaction with strategy and business model:* o Paragraph: Access to (quality) information: Our strategy related to access to (quality) information. o Paragraph: Responsible advertising practices: Our strategy related to responsible advertising. o Paragraph: Access to products and services: Our strategy related to access to products and services. o Paragraph: Privacy of customer's personal data: Our strategy related to privacy of customer's personal data: 1e and 2e part. o General information. Strategy and business model. Chapter: Interaction material topics and strategy.
Disclosure Requirement S4-1 – Policies related to consumers and end-users	Social. Chapter: Responsible relationships with consumers and customers: • Introduction: Own policies. • Paragraph: Access to (quality) information: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. Websites. Product Approval & Review Process. • Paragraph: Responsible advertising practices: How we manage our impact, risks and opportunities: Applicable regulations and commitments. • Paragraph: Access to products and services: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. Product Approval & Review Process. • Paragraph: Privacy of customer's personal data: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. • Chapter: Social – Introduction. Text box: Human rights and labour rights statement. Paragraph: Our approach to social topics and commitments.
Disclosure Requirement S4-2 – Processes for engaging with consumers and end users about impacts	• Social. Chapter: Responsible relationships with consumers and customers, introduction. Paragraph: Engagement: . • General information. Strategy and business model. Chapter: Interests and views of stakeholders: Vereniging Achmea.
Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Social. *Processes to remediate:* • Chapter: Working conditions in the value chain. Text box: Achmea's complaints mechanism. • Chapter: Responsible employer practices. Text box: Whistleblower policy. • Chapter: Responsible relationships with consumers and customers: o Paragraph: Access to (quality) information: Product Approval & Review Process: first and second part. o Paragraph: Access to products and services: Product Approval & Review Process. o Chapter: Privacy of customer's personal data. Paragraph: Human rights, engagement, complaints mechanism, actions, resources, tracking effectiveness: second part. *Channels to raise concerns:* • Chapter: Responsible relationships with consumers and customers, Introduction. Paragraph: Complaints mechanism. • Chapter: Working conditions in the value chain. Text box: Achmea's complaints mechanism.
Disclosure Requirement S4-4 – 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	• Social. Responsible relationships with consumers and customers, Introduction. Paragraph: Actions. • Chapter: Working conditions in the value chain. Text box: Achmea's complaints mechanism.
Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Social. Chapter: Responsible relationships with consumers and customers: • Paragraph: Access to (quality) information: Metrics and targets. • Paragraph: Responsible advertising practices: Metrics and targets. • Paragraph: Access to products and services: Metrics and targets. • Paragraph: Privacy of customer's personal data: Metrics and targets.

ESRS G1 BUSINESS CONDUCT

DISCLOSURE REQUIREMENT:	REFERENCE
Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies	• General information. Chapter: Governance, roles, responsibilities and expertise. • Governance. Chapter: Ethical corporate culture. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraph: Incident reporting.

ANNEX F: CONTENT INDEX

Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	General information. Strategy and business model. Chapter: Process to identify material topics.
Disclosure Requirement G1-1– Business conduct policies and corporate culture	Governance. Chapter: Ethical corporate culture. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraph: Own policies.
Disclosure Requirement G1-2 – Management of relationships with suppliers	Disclosure requirement is not material.
Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Governance. Chapter: Ethical corporate culture. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraphs: Incident reporting. Frameworks. Training and communication.
Disclosure Requirement G1-4 – Confirmed incidents of corruption or bribery	Governance. Chapter: Ethical corporate culture. Paragraph: Metrics and targets: Table.
Disclosure Requirement G1-5 – Political influence and lobbying activities	Disclosure requirement is not material.
Disclosure Requirement G1-6 – Payment practices	Disclosure requirement is not material.

CONTENT INDEX APPENDIX B OF ESRS 2

In accordance with Annex B of ESRS 2, a list of data points derived from cross-cutting and thematic standards stemming from other EU legislation is provided below.

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Social. Chapter: Responsible employer practices. Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets.
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	Section Governance. Chapter Corporate governance, first page.
ESRS 2 GOV-4 Statement on due diligence paragraph 30	General information. Annex A - Approach to sustainability reporting. Paragraph: Due diligence.
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Environmental. Chapter: Climate change. Paragraph: Corporate investments. Sub-paragraph: Own policies. Sub-sub-paragraph: Exclusion (no investments in fossil companies).
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Environmental. Chapter: Climate change. Paragraph: Corporate investments. Text box: Engagement highlights.
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	SRI-policy (published on website): Annex C: Exclusion policy for companies and countries. (no investments in controversial weapons.)
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	SRI-policy (published on website): Annex C: Exclusion policy for companies and countries. (no investments in tobacco production).
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Climate transition plan. • Paragraph: Health insurance. Sub-paragraph: Climate transition plan. • Paragraph: Corporate investments. Sub-paragraph: Climate transition plan. • Paragraph: Investments in government bonds. Sub-paragraph: Climate transition plan. • Paragraph: Investments in mortgages and banking loan portfolio. Sub-paragraph: Climate transition plan. • Paragraph: Investment property. Sub-paragraph: Climate transition plan.
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	Environmental. Chapter: Climate change. Paragraph: Introduction climate change: sixth part (not excluded from benchmark).
ESRS E1-4 GHG emission reduction targets paragraph 34	Environmental. Chapter: Climate change: • Paragraph: Non-life insurance. Sub-paragraph: Metrics and targets: . • Paragraph: Health insurance. Sub-paragraph: Metrics and targets: . • Paragraph: Investment property. Sub-paragraph: Metrics and targets for all asset classes.
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Disclosure requirement is not material.
ESRS E1-5 Energy consumption and mix paragraph 37	Disclosure requirement is not material.
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Disclosure requirement is not material.
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Appendix C - Detailed information environmental indicators: Table 1.
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Appendix C - Detailed information environmental indicators: Table 2.
ESRS E1-7 GHG removals and carbon credits paragraph 56	Disclosure requirement is not material.
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical Risks paragraph 66	Disclosure requirement is being phased in according to ESRS 1 Appendix C.
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)	Disclosure requirement is being phased in according to ESRS 1 Appendix C.

ANNEX F: CONTENT INDEX

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)	Disclosure requirement is being phased in according to ESRS 1 Appendix C.
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).	Disclosure requirement is being phased in according to ESRS 1 Appendix C.
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69	Disclosure requirement is being phased in according to ESRS 1 Appendix C.
ESRS E2-4 Amount of each pollutant listed in Annex II of the E- PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil paragraph 28	Data point is not material.
ESRS E3-1 Water and marine resources paragraph 9	Disclosure requirement is not material.
ESRS E3-1 Dedicated policy paragraph 13	Disclosure requirement is not material.
ESRS E3-1 Sustainable oceans and seas paragraph 14	Disclosure requirement is not material.
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Disclosure requirement is not material.
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Disclosure requirement is not material.
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	General information. Strategy and business model. Chapter: Process to identify material topics.
ESRS 2- IRO 1 - E4 paragraph 16 (b)	General information. Strategy and business model. Chapter: Process to identify material topics.
ESRS 2- IRO 1 - E4 paragraph 16 (c)	General information. Strategy and business model. Chapter: Process to identify material topics.
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Environmental. Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities: first part.
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Environmental. Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities: first part.
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Environmental. Chapter: Biodiversity. Paragraph: How we manage our impact, risks and opportunities: first part.
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Disclosure requirement is not material.
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Disclosure requirement is not material.
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Social. Chapter: Responsible employer practices. Introduction. Sub-paragraph: Identification of human and labour rights risks.
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Social. Chapter: Responsible employer practices. Introduction. Sub-paragraph: Identification of human and labour rights risks.
ESRS S1-1 Human rights policy commitments paragraph 20	Social. Chapter: Social – Introduction. Text box: Human rights and labour rights statement.
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 21	General information. Governance of sustainability. Chapter: Roles, responsibilities and expertise. Text box: Achmea's due diligence process.
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Social. Chapter: Social – Introduction. Text box: Human rights and labour rights statement.
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Social. Chapter: Responsible employer practices: Risk Inventory & Evaluation (RI&E) policy. See among others: • Chapter: Responsible employer practices. Introduction. Sub-paragraph: Identification of human and labour rights risks. • Chapter: Responsible employer practices. Paragraph: Measures against violence and harassment in the workplace. Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Own policies.
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	• Chapter: Working conditions in the value chain. Text box: Achmea's complaints mechanism. • Chapter: Responsible employer practices. Text box: Whistleblower policy.
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Disclosure requirement is not material.
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Disclosure requirement is not material.
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Social. Chapter: Responsible employer practices. Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets. Sub-sub-paragraph: Gender pay gap.
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Social. Chapter: Responsible employer practices. Paragraph: Inclusion, diversity and equity. Sub-paragraph: Metrics and targets. Sub-sub-paragraph: Pay ratio.
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Social. Chapter: Responsible employer practices. Paragraph: Measures against violence and harassment in the workplace. Sub-paragraph: Metrics and targets.

ANNEX F: CONTENT INDEX

DISCLOSURE REQUIREMENT AND RELATED DATA POINT	REFERENCE
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Social. Achmea is committed to UNGP's and OESO guidelines. See among others: • Chapter: Social – Introduction: Our approach to social topics and commitments. • Chapter: Responsible employer practices. Introduction. Sub-paragraph: Respecting human and labour rights.
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Social. Chapter: Working conditions in the value chain. Introduction: fourth part.
ESRS S2-1 Human rights policy commitments paragraph 17	Social. Chapter: Social – Introduction. Text box: Human rights and labour rights statement.
ESRS S2-1 Policies related to value chain workers paragraph 18	Social. Chapter: Working conditions in the value chain: • Paragraph: Insurances and services: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: Integral Care Agreement: first part. • Paragraph: Investments and financing: Sub-paragraph: How we manage our impact, risks and opportunities. Sub-sub-paragraph: SRI policy: first part. Chapter: Social – Introduction. Text box: Human rights and labour rights statement.
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Social. Achmea is committed to UNGP's and OESO guidelines. See among others: Chapter: Social – Introduction: Our approach to social topics and commitments.
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 19	General information. Governance of sustainability. Chapter: Roles, responsibilities and expertise. Text box: Achmea's due diligence process.
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Social. Chapter: Working conditions in the value chain. Introduction: second part.
ESRS S3-1 Human rights policy commitments paragraph 16	Disclosure requirement is not material.
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Disclosure requirement is not material.
ESRS S3-4 Human rights issues and incidents paragraph 36	Disclosure requirement is not material.
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Social. Chapter: Responsible relationships with consumers and customers: • Introduction: Own policies. • Paragraph: Access to (quality) information: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. Websites. Product Approval & Review Process. • Paragraph: Responsible advertising practices: How we manage our impact, risks and opportunities: Applicable regulations and commitments. • Paragraph: Access to products and services: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. Product Approval & Review Process. • Paragraph: Privacy of customer's personal data: How we manage our impact, risks and opportunities: Applicable regulations and commitments. Own policies. Chapter: Social – Introduction. Text box: Human rights and labour rights statement. Paragraph: Our approach to social topics and commitments.
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Social. Achmea is committed to UNGP's and OESO guidelines. See among others: Chapter: Social – Introduction: Our approach to social topics and commitments.
ESRS S4-4 Human rights issues and incidents paragraph 35	Social. Chapter: Responsible relationships with consumers and customers: Paragraph: Human rights.
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Governance. Chapter: Ethical corporate culture. Paragraph: How we manage our impact, risks and opportunities.
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Social. Chapter: Responsible employer practices. Text box: Whistleblower policy.
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Governance. Chapter: Ethical corporate culture. Paragraph: Metrics and targets: Table.
ESRS G1-4 Standards of anti- corruption and anti-bribery paragraph 24 (b)	Governance. Chapter: Ethical corporate culture. Paragraph: How we manage our impact, risks and opportunities. Sub-paragraphs: Incident reporting. Frameworks. Training and communication.

ANNEX G: ADDITIONAL SUSTAINABILITY INFORMATION GROUP COMPANIES

All entities within the accounting consolidation are included in the sustainability assessment, which encompasses aspects such as double materiality and group-level strategy. The risk profile of an individual entity may differ from the consolidated perspective, depending on the specific nature of its activities and the geography in which it operates. The consolidated disclosures provide a balanced overview of relevant sustainability aspects, taking into account their significance at the group level. In Note 32, ‘Interest in Subsidiaries,’ of the consolidated financial statements in this annual report, an overview of Achmea's main subsidiaries is presented.

GOVERNANCE

This section of the annual report explains the major topics discussed by the Supervisory Board and its committees during 2024. The Corporate Governance section explains Achmea's governance as well as the main codes of conduct. This part of the annual report fulfils the requirements from the Corporate Governance Code that Achmea voluntarily applies. Finally, the biographies of the directors are provided.

SUPERVISORY BOARD REPORT

2024

Viewing the geopolitical development in 2024 and the start of the new year of 2025, it can be said that Achmea's purpose of sustainable living together has become more relevant than ever. Society awaits hurdles that will involve large financial burden, while the relevant parties that should be working together to make this possible don't cooperate and have alliances as they once did. This is true for the Netherlands, Europe and the world as we know it. It is through this world Achmea is navigating with a compass for sustainable living together. The supervisory board sees that as an inspiring and noble course, that gives perspective to solutions for society and the strategic future of Achmea. The initiative to make social housing more sustainable is an example of this, alongside partners delivering effective contributions towards the climate change while improving social cohesion. The increase of allocation for impact driving investments within its own investment portfolio is also a true attribute of this. The extra investments necessary for the transition provide new possibilities for commercial activities, in broad terms, as well as for Achmea.

Once again, Achmea has made good progress over the past year towards realising the strategic plan 'The Sum of Us'.

The Supervisory Board is proud to mention that the realization of the strategy has resulted in unchanged highs when it comes to customer satisfaction and employee engagement in 2024. Aside from this, the Supervisory Board recognizes an excellent operational result that has increased with 36% to € 858 million. This despite the relatively high inflation in the Netherlands that impacted several objects in the value chain. Under the applicable IFRS 9/17 standard, insurers show greater volatility in non-operating results, with the repercussions of financial markets clearly visible. The net result amounts to € 1.3 billion and is substantiated by a higher operational result and visible favorable changes to the financial markets. The Supervisory Board maintained a good overview of the development of the operational result, as an effective indicator of the underlying result development and the development of the insurance volume that has grown to € 25 billion (+12%) throughout the different categories during the year 2024.

The Supervisory Board discussed the dynamic environment in which Achmea operates. Geopolitical tensions and international conflicts are creating uncertainties for society and businesses. This uncertainty also enhances the likelihood of financial market volatility. These financial markets developed favourably in 2024, leading to good investment results.

Achmea's strategic development in the Netherlands as well as in Europe was a prominent item on the Supervisory Board's agenda. Achmea aims to grow in Europe in the area of direct digital property & casualty insurance. It plans to do so by making broader use of the knowledge and experience of the various Achmea units domestically and abroad with the direct claims model, as well as further developing the digitisation and deployment of data in business operations. Strategic preparations will lead to online property & casualty insurance being offered for the first time in both Spain and Romania in 2025. The Supervisory Board has reflected on the plans a number of times from a strategic perspective, but also from a regulation and risk management perspective.

Strategic explorations with respect to the Pension and Life business were frequently on the Supervisory Board's agenda and were part of the deliberations together with the Executive Board on improving long-term financial development. These explorations ultimately led to the announcement of the partnership with Sixth Street and Lifetri that is expected to improve Achmea's position in the pension and life market, while welcoming over 500,000 new Centraal Beheer customers.

This transaction will create opportunities in the pension buyout market – a market that will further develop in the coming years, because several smaller pension funds will opt for an insured scheme ahead of the Future Pensions Act. The transaction, which has yet to be closed and must also be approved by De Nederlandsche Bank (DNB), will have an immediate financial effect with a cash inflow of € 445 million. As of 2028, the capital generation of Achmea Pension & Life is expected to increase annually by € 100 million.

Achmea also made decisions last year regarding its portfolio of companies, thus adjusting the group's positioning in line with the desired strategic development and risk appetite. For example, Onlia in Canada was sold, and Achmea ceased its activities concerning incoming reinsurance, with the capital involved being released.

Entrepreneurship and customer focus received significant attention once again at Supervisory Board meetings this year. The NPS scores of the various business lines were frequently discussed, including in comparison with competitors. The Board recognises that customer focus is strongly embedded in Achmea's nature, and in cooperation with Vereniging Achmea, effective boosts were given again from within the cooperative organisation. Entrepreneurship also means taking a critical view of activities, which sometimes results in the cessation of these activities. Over the past year, the Board evaluated several buying and selling processes to learn from these, together with the organisation.

Several sessions addressed the topic of sustainability. In its 'Sustainable Living. Together' purpose, Achmea has chosen four domains through which it contributes to the various transitions facing society. Despite developments in the United States in particular, where the pendulum is swinging back on sustainability and climate matters, Achmea continues to commit to its purpose and objectives in its business operations, investment portfolio and insurance portfolio. The Board found that Achmea is well on the way to achieving its 'Sustainable Living. Together' ambitions.

SUPERVISORY BOARD REPORT

Each year the Board discusses legislative and regulatory developments, including future laws and regulations. With some concern, the Supervisory Board notes the increase in the regulatory burden. Discussions were held with the Executive Board about how to address this.

Tasks and duties of the Supervisory Board

The Supervisory Board performs its duties on the basis of three roles: supervisor, advisor (solicited and unsolicited advice) and employer of the Executive Board.

The Supervisory Board convened on 14 occasions in 2024, including eleven regular meetings and three extraordinary meetings. The Supervisory Board maintains a total of three committees that advise the Board: the Audit & Risk Committee, the Remuneration Committee and the Selection & Appointments Committee.

The Audit & Risk Committee convened on ten occasions in 2024, the Remuneration Committee convened six times, and the Selection & Appointments Committee met four times.

The following table provides an overview of the attendance rates for each individual Supervisory Board member. As in previous years, attendance rates were high in 2024. Members who were unable to attend a meeting informed the relevant chair and provided the chair with input prior to the meeting.

Strategy and vision

One of the Supervisory Board's key duties is involvement in developing Achmea's strategy and monitoring its implementation.

In 2024, the Supervisory Board held extensive discussions on the strategy 'The Sum of Us'. The Sum of Us is the strategy through which Achmea aims to bring its Sustainable Living. Together vision into practice. Achmea's 'Sustainable Living. Together' vision is focused on the ambition of creating sustainable value for customers, employees, other stakeholders and society. Achmea does this based on its mission to solve major social issues together. Achmea focuses on the domains that also fit its cooperative identity: Bringing healthcare closer, Smart mobility, Carefree living & working and Income for today and tomorrow.

A comprehensive, multi-day strategy session was held in June 2024 in combination with a company visit to the InShared, Non-life and Centraal Beheer business units. During the strategy sessions, the members of the Supervisory Board and the Executive Board held several working sessions. Extensive discussions were held on global economic developments, the long-term earnings model, the strategic exploration of the Pension and Life business, optimisation from one Achmea, expanding the core business, investing in growth, and growing the International business.

In 2024, the Supervisory Board held comprehensive discussions about sustainability in the broad sense (Environment, Social and Governance) as part of the strategy. Sustainability legislation, sustainability reporting, the double materiality assessment as well as Achmea's sustainability objectives were discussed.

The Supervisory Board endorses Achmea's sustainability goals regarding the movement towards carbon-neutral operations in 2030, carbon-neutral investments in companies in 2040 and a carbon-neutral insurance portfolio in 2050. Those sustainability ambitions were elaborated in the Climate Transition Plan and, in the third quarter of 2024, the Supervisory Board discussed Achmea's Climate Transition Plan update, in which the initial interim targets for the non-life insurance portfolio were also published.

Together with the Executive Board, the Supervisory Board attaches a great deal of importance to the dialogue Achmea conducts with its stakeholders, which helps define the sustainable impact Achmea aims to have on society and how

OVERVIEW OF ATTENDEES

	SUPERVISORY BOARD	AUDIT & RISK COMMITTEE	SELECTION & APPOINTMENTS COMMITTEE	REMUNERATION COMMITTEE
J. van den Berg	13/14		4/4	6/6
T.R. Bercx	13/14			6/6
A. Cano*	7/7	3/3		
M.R. van Dongen	14/14	10/10		
P.H.M. Hofsté	13/14	10/10	3/4	
A.M. Kloosterman	14/14			6/6
E.C. Meijer	12/14			
R.Th. Wijmenga	14/14	10/10		
W.H. de Weijer	14/14		4/4	
Total attendance	96%	100%	92%	100%

* Mr Cano joined in September 2024.

it creates value for its stakeholders in the long term. The elaboration of Sustainable Living. Together in the four domains and Achmea's activities in those domains reflect Achmea's contribution to society. With respect to Achmea's housing agenda, striking results in 2024 include the investments (€ 100 million) from Achmea Real Estate's healthcare fund in senior housing Buurtzorg. In addition, Achmea launched the Achmea Dutch Residential Impact Fund, in which Achmea itself also invested € 50 million. This fund offers institutional investors the opportunity to co-invest and focuses on buying low energy label rental properties, which are then made more sustainable. In this way, Achmea is actively contributing to the important task of increasing the sustainability of the built environment in the Netherlands.

The Supervisory Board endorses the aim of the Executive Board to create space for investment in innovation, digitisation and good customer service through initiatives geared towards growth, increasing profitability and cost savings.As part of its innovation strategy, investments are being made in new technologies and initiatives to better meet customers' needs. In 2024, major steps were taken to effectively and responsibly embed artificial intelligence (AI) into the work processes. Among other things, new AI applications have been developed to further improve customer satisfaction.

Both the Supervisory Board and the Executive Board believe in the importance of cooperation with partners to achieve the intended results, and to this end, discuss developments several times each year. Achmea works with a variety of valued partners, including key partner Rabobank. Interpolis serves Rabobank's customers in both the retail and corporate segments. Growth is also being targeted with partner Garanti Bank in Turkey.

The Board met frequently with the Executive Board in 2024 to discuss strategic exploration of Pension & Life. In addition, a delegation from the Supervisory Board had several meetings with the Executive Board, thus fulling the sounding board and advisory role for the Executive Board. At an extraordinary meeting of the Board, the Supervisory Board approved the Executive Board's carefully considered decision to enter into a strategic partnership with Lifetri and Sixth Street. The interests of all stakeholders, including policyholders, were also thoroughly taken into account. With this transaction, Achmea is strengthening its position and creating opportunities in the pension buyout market – a market that will further develop in the coming years, because several smaller pension funds, ahead of the Future Pensions Act, will opt for an insured scheme.

The Supervisory Board also discussed various dilemmas with the Executive Board, such as the development of Achmea's earnings model, reducing indirect costs, volatility in financial results versus investments with scarce capital in transition and innovation. Another topic of discussion was the challenges surrounding the introduction of the Future Pensions Act, in which the transition to the new pension system is being shaped together with Achmea's pension fund clients. Other dilemmas include the scope of the sustainability targets and balancing the organisation's commitment to achieving the intended transition, and the considerable effort required to meet the very extensive sustainability reporting obligations.

The Supervisory Board is pleased to see that customer satisfaction scores for all business units are high. This shows that our employees are prioritising customer needs, and that our customers appreciate our investments in digital customer service. he Supervisory Board also endorses the important development with respect to customers with old unit-linked policies. A settlement has been reached with five interest groups, based on which customers will be offered clarity on a final settlement.

The Supervisory Board is also pleased to see the continued high scores on the annual Employee Engagement Survey. Along with the Executive Board, the Supervisory Board is seeing tightness in the labour market continuing, with Achmea still managing to fill vacancies well as an attractive employer.

The development of health insurance premiums and premium setting were discussed, including the growth target, an appropriate health insurance premium for customers and the impact of growth on capital requirements. The Supervisory Board stresses the importance of exploiting opportunities to achieve even greater synergy between the health insurance activities and Achmea's other activities.

Furthermore, the Supervisory Board also focused specifically on evaluating a number of merger and acquisition processes with the Executive Board. This addressed the learning points for the organisation for subsequent trajectories and the steering of integration and realisation of the intended synergy benefits.

The Supervisory Board approved the 2025–2027 Business Plan at the end of 2024 and approved the 2025 budget. The Supervisory Board endorses the plans defined by the Executive Board, the proposed measures and the urgency of their implementation.

Finance and risk
In 2024, the Supervisory Board held extensive quarterly discussions on the financial results as well as progress on the financial and strategic objectives. This included discussing the risks and uncertainties, as well as the realisation of the stated objectives on sustainability and the building blocks: customer,

employees, partners and expertise in data & digital. The Supervisory Board is satisfied with the good progress being made on the strategic priorities formulated by the Executive Board.

Achmea achieved strong results over 2024, with all business units contributing to this. The operational result increased sharply. The net result also increased, partly because financial markets were favourable. The solvency ratio remained solid. The Supervisory Board believes this puts Achmea on track to meet its 2025 financial targets.

The Board also discussed the formal reports such as the Solvency and Financial Condition Report, the Regular Supervisory Report and the Public Disclosure QRTs. In addition, the Achmea Valuation 2024 was discussed.

Risks and the effects of those risks on Achmea were an important agenda item for the Supervisory Board in 2024. Consideration was given to Achmea Group's risk appetite, the risk, compliance and actuarial reports, and new risks that are developing. In 2024, for example, topics such as the strategic risks and opportunities surrounding sustainability, the implementation of sustainability laws and regulations, the future business model, capital flexibility, geopolitical instability and inflation, rising labour costs, distribution partners, increasing legislative and regulatory requirements and political developments were considered. Additionally, the risks due to financial market volatility, rising reinsurance premiums, longevity risk, the impact of natural catastrophes, Non-life & Income portfolio risks and increased volatility of results under IFRS 17 were discussed. The issue of ensuring a timely and managed transition as a result of the Future Pensions Act was also discussed.

The internal control of compliance and operational risks, including compliance with the rules governing privacy (GDPR), the duty of care and Customer Due Diligence, as well as the topics of outsourcing and cybersecurity were also extensively discussed. The Supervisory Board endorses the importance the Executive Board attaches to internal control, which naturally involves compliance with applicable laws and regulations. The Supervisory Board has concluded that the integral risk reporting is of a high quality.

The Supervisory Board endorsed the Executive Board’s balanced consideration of the interests of the company and those of its stakeholders and the decision to propose to the General Meeting that a dividend payment for fiscal year 2023 should be made to holders of ordinary shares. The Executive Board also gave shareholders the choice, in accordance with the applicable dividend policy, to receive the dividend entirely or partly in cash and/or in the form of ordinary shares in Achmea's capital. The Supervisory Board endorsed that decision by the Executive Board and in April 2024, the General Meeting decided in favour of the dividend proposal.

In 2024, the Supervisory Board reviewed and approved the Executive Board's decision to issue a Tier 2 bond loan amounting to € 750 million. The Board also reviewed and approved the Executive Board's decision to amend and extend the credit facility and to terminate the current revolving credit facility (RCF). It also approved the Executive Board's decision to issue Restricted Tier 1 (RT1) bonds in 2025 and apply for listing of these bonds on the Irish Stock Exchange. In addition, the update of the Capital Adequacy Policy (CAP) was discussed and approved.

Compliance with laws and regulations and auditing
In 2024, the Executive Board and the Supervisory Board regularly discussed the compliance requirements arising from laws and regulations, external supervisors and national/international industry and other organisations. The Supervisory Board discussed at length the sustainability law and regulations (including the CSRD), customer due diligence legislation, the Diligence Operational Resilience Act (DORA) and cybersecurity, competition and privacy. Discussions were also held with the Executive Board regarding the impact on the business units and employees of the necessary efforts for the introduction of new legislation and regulations such as the Future Pensions Act, DORA, the AI Act and the CSRD.

The Audit & Risk Committee and the Supervisory Board also conducted in-depth discussions with the external auditor and Internal Audit on the conclusions set out in the management letter and the audit memorandum.

The role of employer and remuneration
In its role as an employer, the Supervisory Board discussed remuneration and the composition of the Executive Board and Supervisory Board. Items on the agenda also included the company’s diversity and inclusion policy as well as the diversity and inclusion policy for the Executive Board and Supervisory Board and Achmea’s Management Development policy, including the focus on internal training and advancement.

Achmea’s Remuneration Policy is in line with its identity, strategy, long-term value creation model, sustainability targets and with legislation and regulations on remuneration. At Achmea, without exception, variable remuneration for the Executive Board and all employees in the Netherlands is restricted to a maximum of 20% of the fixed portion of their salary. In its capacity as the most senior body, the Supervisory Board monitors Achmea Group’s remuneration policy. The Supervisory Board assesses whether Achmea’s Remuneration Policy meets the principles for a controlled remuneration policy. The fixed salary of the members of the Executive Board and the applied policy scales were increased by 3% as of 1 January 2024, thus utilising a lower rate than is generally followed for the collective labour agreement increase. For more details, see Explanatory note 33 of the consolidated financial statements and the Achmea Remuneration Report to be published later in 2025.

SUPERVISORY BOARD REPORT

Remuneration of the Supervisory Board members remained unchanged in 2024. For details of the Supervisory Board remuneration actually paid in regard to 2024, see Explanatory note 33 to the consolidated financial statements of Achmea B.V.

Achmea publishes detailed information on its remuneration policy, including the remuneration of the Executive Board and the Supervisory Board, in the 2024 Achmea Remuneration Report, to be published on www.achmea.nl later in 2025.

Composition of the Executive Board
As part of its duty to ensure a well-balanced composition of the Executive Board, the Supervisory Board found that the current Executive Board is diverse in composition and exceptionally well equipped to fulfil its duties. On the advice of the Selection and Appointment Committee, the Supervisory Board reappointed Mr Lamie, Vice-Chair of the Executive Board and Chief Financial Officer, for a new four-year term starting on 1 January 2025.

Composition of the Supervisory Board
The Supervisory Board's composition was on the agenda on several occasions in 2024. In 2024, based on the advice of the Selection and Appointment Committee and after careful review of the current composition of the Supervisory Board and the required competencies on the Board, the Supervisory Board submitted nominations for reappointments and appointments to the General Meeting. This also took into account the diverse composition of the Supervisory Board as a whole. The Supervisory Board nominated Mr Weijer for reappointment. The General Meeting also reappointed Mr De Weijer as of 9 April 2024 for a four-year period. The Supervisory Board also nominated Ms Van Dongen and Mr Kloosterman for reappointment. The General Meeting also reappointed Ms Van Dongen and Mr Kloosterman as of 9 April 2024 for a four-year period.

In connection with the end of a number of appointment terms in 2025, to safeguard knowledge and experience in both the Supervisory Board and the Audit & Risk Committee, the Supervisory Board decided to temporarily expand the Supervisory Board and the Audit & Risk Committee. On the advice of the Selection and Appointment Committee, the Supervisory Board nominated Mr Cano for appointment to the Supervisory Board. The General Meeting appointed Mr Cano a member of the Supervisory Board for a four-year term as of 5 September 2024. As of 31 December 2024, the Supervisory Board had nine members. The Board comprised three female and six male members.

Continuing education
Each year, the Supervisory Board adopts a continuing education programme. Five continuing education sessions (PE sessions) were organised for Supervisory Board members and Executive Board members in 2024. In the various PE sessions, a great deal of attention was given to the issue of Sustainability. The issues raised during these sessions included: ESG in part in the legal context, Investment & finance (Socially Responsible Investment) and Sustainability and acceptance policy in Property & casualty insurance. In addition, the following subjects were also discussed during the education session: Competition, Cybersecurity and DORA legislation, Privacy and Integrity, Political developments and the healthcare domain, People Strategy & Employee Journey and the forecast for legislation and regulations.

In addition, deep dives addressed various topics such as geopolitical developments and the development of the International activities. There were also visits to the InShared, Non-life and Centraal Beheer business units, where the focus was on customer service, the use of AI and the key developments at these business units

COMPOSITION OF THE SUPERVISORY BOARD AS OF 31 DECEMBER 2024

NAME	NATIONALITY	GENDER IDENTITY	POSITION	TERM	YEAR OF FIRST APPOINTMENT	CURRENT TERM
J. van den Berg[1] (1964)	Dutch	Male	Chair	Second	2018	2022-2026
T.R. Bercx[2] (1963)	Dutch	Male	Member	First	2021	2021-2025
A. Cano (1963)	Dutch	Male	Member	First	2024	2024-2029
M.R. van Dongen[1] (1969)	Dutch	Female	Member	First	2020	2024-2028
P.H.M. Hofsté[2] (1961)	Dutch	Female	Member	Third	2015	2023-2025
A.M. Kloosterman[3] (1956)	Dutch	Male	Member	First	2019	2024-2029
E.C. Meijer[2] (1965)	Dutch	Female	Member	First	2023	2023-2027
R.Th. Wijmenga[1] (1957)	Dutch	Male	Member	Third	2015	2023-2025
W.H. de Weijer[1] (1953)	Dutch	Male	Vice-chair	Second	2016	2024-2026

1 Nominated by Vereniging Achmea
2 Nominated by the Central Works Council
3 Nominated by Rabobank

SUPERVISORY BOARD REPORT

EXPERTISE OF THE SUPERVISORY BOARD

NAME	EDUCATION	MANAGEMENT	GOVERNANCE	INSURANCE	BANKING	FINANCE/ RISK/AUDIT	HR/ REMUNERATI	LEGAL/ COMPLIANCE	COMMERCE/ CUSTOMER CENTRICITY	IT	HEALTH
J. van den Berg	Medicine/Management	•	•	•			•		•		•
T.R. Bercx	Psychology/Management	•	•				•			•	
A. Cano	Business Economics / Registered Controller and Management and Administration	•		•		•			•		
M.R. van Dongen	Business economics, corporate finance/management	•	•	•	•	•		•			•
P.H.M. Hofsté	Economics/Accountancy	•	•		•	•		•			
A.M. Kloosterman	Dutch Law	•	•		•		•	•			
E.C. Meijer	Psychology/Business Economics/Management	•	•			•	•	•	•	•	
R.Th. Wijmenga	Econometrics	•	•	•		•		•	•	•	
W.H. de Weijer	Healthcare Management	•	•	•			•				•

Evaluation of the Supervisory Board
Each year, the Supervisory Board carries out a self-assessment of its performance. Once every three years on average, the evaluation is carried out with the support of an external party. The outcome of this evaluation was discussed by the Supervisory Board and the Executive Board.

In response to the areas for improvement from the 2023 evaluation, extra attention was paid in 2024 to strengthening the critical role of the Supervisory Board and strengthening reflection with the help of the outside view.

The overall impression from this 2024 evaluation is positive. The Supervisory Board performs well and cooperation within the committees runs smoothly. There is an open dialogue and room for debate, different opinions and the discussion of sensitive subjects. The Supervisory Board acts independently and its members come from diverse backgrounds and complement each other, it possesses a great deal of relevant expertise and is well-equipped for its duties.

In 2025, the Supervisory Board will focus on maintain its effective functioning. The Supervisory Board will also focus on its strategy, the market and the customer when setting its agenda. In 2025, the Supervisory Board will focus on strengthening its critical advisory and reflective role. Specific attention will also be paid to organising the external view and the dissenting opinion in the discussion within the Board.

The Chair of the Supervisory Board also conducts individual evaluation interviews each year with the Supervisory Board members, and together with another Supervisory Board member, with each of the members of the Executive Board. The functioning of the Executive Board and its individual members is discussed in the Supervisory Board, the Selection & Appointments Committee and the Remuneration Committee.

The results of the evaluation show that the Supervisory Board acts independently in its supervisory role and that advisory role of the Supervisory Board is valued. The relations between the Supervisory Board and the Executive Board are assessed positively. It was established that the reports and information provided to the Supervisory Board and the quality of the information provided are excellent. The interests of the company's stakeholders and sustainability are incorporated in a balanced fashion in these reports.

Culture
The Supervisory Board and the Executive Board discussed, among other things, the open culture and the development of leadership and transparency in communications between the Supervisory Board and the Executive Board. Strengthening the performance culture and the tone at the top also came up, as well as Achmea's employee values: Passionate, Contemporary, Ambitious, Proud and Decisive. In addition, integrity as a part of transparency and an ethical corporate culture was also discussed, and in that context the Board also discussed the Report on inappropriate conduct. The transparent and ethical business culture is based on indicating desirable conduct from the perspective of Achmea's cooperative identity, as determined in Achmea's General Code of Conduct.

Shareholder relations
The Chair of the Executive Board is the primary point of contact for shareholders. The Chair of the Supervisory Board conducts meetings with shareholders on specific topics. This includes aspects such as recommendations for nominating members of the Supervisory Board. In addition, the Chair of the Supervisory Board has contact with shareholders in the context of the General Meeting. The Chair of the Supervisory Board is also invited to attend a number of meetings of the board of Vereniging Achmea as an observer. Vereniging Achmea holds a majority stake (directly and indirectly) in Achmea B.V.

SUPERVISORY BOARD REPORT

With a view to engagement with Achmea customers, Supervisory Board members are invited to attend Members Council meetings organised by Vereniging Achmea.

Relations with the external auditor
Ernst & Young (EY) is Achmea B.V.'s external auditor. EY's appointment is for the financial years 2021 to 2025.

The Chair of the Supervisory Board and the Chair of the Audit & Risk Committee meet annually with the external auditor's lead partner. In addition, in 2024 the Audit & Risk Committee held two private meetings with the external auditor.

The Audit & Risk Committee and subsequently also the Supervisory Board discuss the performance of the external auditor annually. The external auditor is not present on this occasion. The Supervisory Board and the Audit & Risk Committee agree that the working relationship with the accountant EY is good. The cooperation is good and transparent. EY adds value to improving the financial reporting process and challenges the company in a constructive and positive manner.

Based on the external auditor's report, among other things, the Supervisory Board concluded that the level of control of the financial reporting and internal control within Achmea are satisfactory.

Relations with Internal Audit
The Supervisory Board maintains an independent relationship with the Internal Audit department. Following advice from the Audit & Risk Committee, the Supervisory Board lays down the Annual Audit Plan each year. The Audit Memorandum together with the external auditor's management letter provide the Supervisory Board with a good overview of Achmea Group's internal control framework and of the main areas for attention. The Supervisory Board is satisfied with the strong relationship between the Audit & Risk Committee, and the Director of Internal Audit and the Supervisory Board is satisfied with the performance of Internal Audit. The Chair of the Supervisory Board and the Chair of the Audit & Risk Committee meet regularly with the Director of Internal Audit. The Director of Internal Audit is also present at the meetings of the Remuneration Committee as a part of the discussion of the audit of Achmea's Remuneration Policy and at the meetings of the Audit & Risk Committee. The Audit & Risk Committee discusses Internal Audit's performance annually. The Director of Internal Audit is not present on this occasion.

Relations with Risk and Compliance
The Supervisory Board has noted that the Risk and Compliance function is properly anchored in the organisation. The Risk and Compliance reports are of good quality and provide insight into the integral risk profile of Achmea. The Risk and Compliance reporting contains an overview of the developments and points for attention relating to Achmea's primary risks, as well as information on developments in the business units and particulars relating to the financial, operational and compliance risks. The way in which relevant laws and regulations are complied with is also discussed. An overview of new and forthcoming laws and regulations is also given regularly.

Relations with the external regulators
The Supervisory Board notes that Achmea has a good relationship with the external supervisory bodies. The Supervisory Board has an annual consultation meeting with the Management Board of DNB, and the Chair of the Supervisory Board and the Chair of the Audit & Risk Committee regularly speak with DNB and the AFM.
Each year, the Board considers the AFM annual review, DNB risk scores for 2024 and DNB Supervision Plan for the coming year.

Relationship with the Central Works Council (COR)
The Supervisory Board has a good relationship with the Central Works Council. The Supervisory Board noted that there are sound working relations and a constructive and open dialogue between the Executive Board and the Central Works Council. The Supervisory Board members took turns attending meetings of the Central Works Council in 2024. In line with the legally reinforced right of recommendation, the Central Works Council may propose candidates for one-third of the Supervisory Board seats.

Conflicts of interest
In line with the Dutch Corporate Governance Code, transactions involving Supervisory Board members in which there are material conflicts of interest must be published in the Annual Report. No such transactions occurred in 2024.

New additional positions held by Supervisory and Executive Board members lead Compliance to issue advice to the Chair of the Supervisory Board in connection with potential conflicts of interest (or the appearance of these), after which a committee led by the Chair of the Supervisory Board decides on the desirability of the additional position. Current developments may give cause for internal evaluation/re-evaluation.

Audit & Risk Committee report

The Audit & Risk Committee advises the Supervisory Board and prepares the Supervisory Board's decision-making on financial, administrative organisational and compliance matters, as well as on the risk profile and the design of the internal control systems. On 31 December 2024, the Audit & Risk Committee was comprised of the following four Supervisory Board members: Mr Wijmenga (Chair), Ms Hofsté, Ms Van Dongen and Mr Cano.

In 2024, the Audit & Risk Committee's ordinary meetings were dominated by discussions on drawing up financial policy, the results and their development during the reporting period and the adoption of the corresponding budget and the sensitivity of this to potential internal and external risks. In this respect, in 2024 a great deal of attention was again devoted to the periodic reporting by Risk Management, Compliance and Actuarial, as well as to the Internal Audit reports. This discussion took place in the presence of key function holders from Risk Management, Compliance and Actuarial, as well as by the internal and external auditors. The Audit & Risk Committee also discussed the annual and interim results prior to external publication, as well as the quarterly figures for shareholders for consolidation purposes, and the related audit reports of the external auditor. In addition, based in part on the Risk & Compliance reports and Audit Memorandum, explicit discussions were held on Achmea's risk appetite (including the foreign operating companies) and its control.

During the meetings, ample attention was paid to the development of Achmea's solvency and liquidity position and attendees reflected on the development of the solvency in late 2023 and the measures taken to make adjustments. Furthermore, the proposal of the Executive Board to pay a dividend for the 2023 financial year to the holders of ordinary shares was discussed. Part of the proposal was to give shareholders the choice to receive the dividend entirely or partly in cash and/or in the form of ordinary shares in Achmea's capital. The careful consideration and decision, including an extensive explanation for the reasons behind the decision, was endorsed by the Audit & Risk Committee, at which time the Supervisory Board issued a positive advice on this decision.

The Audit & Risk Committee is regularly informed by the Executive Board of the progress on top priorities that deliver a crucial contribution to strategic development and improvements in the operational result, solvency, free capital generation and liquidity. The Audit & Risk Committee closely monitored developments, deepened its understanding on a number of aspects and has established that there was good management of progress. In this context, in an extraordinary meeting, the Audit and Risk Committee endorsed the Executive Board's proposal to move to a new capital-generation metric (the 'Operational Free Capital Generation') and to use this metric for reporting on Group level as of H1 2024.

In a combined extraordinary meeting of the Audit & Risk Committee and the Supervisory Board, discussions were held on the amendment and extension of the credit facility and the termination of the current revolving credit facility (RCF). The Audit & Risk Committee submitted to the Supervisory Board with a positive advice the Executive Board's proposal to enter into a new facility well before the end date of the existing facility.

The Audit & Risk Committee discussed the consideration framework with regard to the 2025 healthcare premium setting with the divisional chair and director of finance of Zilveren Kruis, and the Supervisory Board of Achmea Zorgverzekeringen N.V. and its subsidiary health insurers. The consequences of various scenarios on the result and solvency of both the health insurers and the Achmea group, the uncertainties, the portfolio strategy and the number of policyholders were considered.

Other topics discussed by the Committee included the Solvency and Financial Condition Reporting, the Regular Supervisory Report and Public Disclosure QRTs, as well as the 2023 Achmea Valuation and the 2023 Annual Report. The Annual Reports and Regular Supervisory Reports of Health, Achmea Pensioen- & Levensverzekeringen NV and Achmea Schadeverzekeringen NV were also discussed in the presence of the responsible financial directors. The dividend distribution by the supervised companies within the Achmea Group was also discussed.

The Audit & Risk Committee was briefed on the key developments in injury provisions and the discount rate used therein. Additionally, the Executive Board informed the Audit & Risk Committee periodically in 2024 on the content of the talks with and publications of the regulators.

In discussing the Risk Management & Compliance reports, in addition to the usual focus on compliance and operational risks, the Audit & Risk Committee devoted express attention to the development of the financial ratios, the risks involved and how these are and can be controlled. The Audit & Risk Committee also discussed the management of integrity and fraud risk and the updating of the Achmea Group Risk Appetite. The committee also gained insight into the status of Achmea's model risk, its control and the relevant developments in this area, such as the use of artificial intelligence (AI) technologies.

The update of the Capital Adequacy Policy (CAP) was discussed. The committee issued a positive advice to the Supervisory Board to approve the Executive Board's decision on adopting the CAP update. The AFM annual review, DNB risk scores 2023 and Supervision Plan 2024 were also considered.

Fiscal reporting was discussed in 2024, including how Achmea behaves as a responsible taxpayer and how fiscal risks are managed.

Last year, Audit & Risk periodically discussed the implementation of sustainability legislation that is being managed centrally from the Achmea Sustainable Together programme. The Committee discussed the progress of the implementation of the sustainability reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD) in prelude to publication of the required sustainability statements.

In 2024, the transformation programme 1Finance and the current status of implementation and progress towards achieving the ambition of the transformation programme were discussed in the presence of the programme manager.

The company's risk management and risk appetite are important topics for the Supervisory Board, particularly in the current financial climate with the increased uncertainties regarding matters such as geopolitics and the climate. The Committee advised the Supervisory Board during discussions of the risk appetite, including on the basis of comprehensive risk reporting, Own Risk & Solvency Assessment (ORSA) and the Preparatory Crisis Plan.

Discussions were also held regarding the 2025 market risk budget and the 2025 Investment Plan and related control and monitoring.

The Audit & Risk Committee discussed the EY Audit Plan 2024 with the external auditor EY. In addition, the Audit & Risk Committee discussed the Internal Audit Annual Plan 2025 once again, and presented its positive advice to the Supervisory Board.

Following a positive opinion from the Audit & Risk Committee, the Supervisory Board approved the revision of the Internal Audit charter. The Committee discussed the update of the Compliance, Risk Management and Actuarial charter and the Independence Policy. The Audit & Risk Committee also discussed the evaluation of the work and performance of the external auditor. The evaluation report, including the management response prepared by EY, was also discussed in detail, as was the termination of the contract with the external accountant and entering into a new contract with the external accountant after financial year 2025. The functioning of the internal auditor was also discussed.

A combined meeting of the Audit & Risk Committee of Achmea B.V. and the Supervisory Boards of Achmea Zorgverzekeringen N.V., Zilveren Kruis Zorgverzekeringen N.V. and FBTO Zorgverzekeringen N.V. was held last year, in which the Audit & Risk Committee provided opinions on the proposal of capital payments in the third quarter between basic health insurance entities.
The Audit & Risk Committee endorsed the suggestion to carry out the proposed capital transactions and has issued a positive advice to the involved members of the Supervisory Boards.

At the end of 2024, the financial elaboration, including the result development, of the Group Business Plan 2025–2027 and the budget for 2025 were discussed in detail. The Audit & Risk Committee issued a positive recommendation on this to the Supervisory Board.

At the end of 2024, the Audit & Risk Committee discussed the Executive Board's provisional decision to issue Restricted Tier 1 (RT1) bonds amounting of EUR 300 million in 2025 based on a stand-alone prospectus and to apply for listing of these bonds on the Irish Stock Exchange. The Committee endorsed this proposal and the underlying insights and advised positively to the Supervisory Board.

The Audit & Risk Committee and EY discussed the EY Management Letter. Just as last year, the Audit & Risk Committee concluded together with EY that the internal control system, including the IT environment, is adequate.

The committee also notes that all the issues addressed in EY's management letter have the necessary attention of the Executive Board.

Remuneration Committee report

As of 31 December 2024, the Remuneration Committee is comprised of the following three Supervisory Board members: Mr Kloosterman (Chair), Mr Van den Berg and Mr Bercx. The Remuneration Committee receives advice from internal and external specialists in Achmea's Remuneration Policy, including the Human Resources Director. The Remuneration Committee held six meetings in 2024.

Monitoring responsible remuneration
One of the key tasks of the Remuneration Committee is monitoring the application of and compliance with the variable remuneration policy. Accountable and properly managed remuneration is an important matter for Achmea (for more information please see the annual Achmea Remuneration Report at www.achmea.nl).

In the Remuneration Committee meetings, meticulous reporting is made by the support departments tasked with the implementation of the so-called key controls on the remuneration policy. This includes the annual key controls relating to target setting, the method used to set them, whether goals have been achieved sustainably, and the periodic risk analysis of the Achmea Remuneration Policy and the risk takers and identified staff.

Performance management process
A few years ago, the performance management process was revised and simplified within the Achmea Group. In modifying the process, it was decided to opt for greater simplicity and stricter management by restricting the number of Key

Performance Indicators (KPIs), while also defining them more precisely in a way that suits the strategy and Achmea's sustainable, long-term value creation model, but also within the company's risk profile and risk appetite. There is also a direct link to the Achmea General Code of Conduct. Any violations of the code result in a downward adjustment of the variable remuneration.

Based on the various building blocks (customers, society, sustainability, employees, business and other partners, processes (data and digital) and financial results), a translation is made annually into goals that apply to the Achmea Group, to divisions and parts and/or to individual directors and employees. This creates a sound balance in the type of performance indicator divided across building blocks, short and long-term performance management and in the criteria used as a basis for variable remuneration. Some of these are personal development objectives as well, for instance in the context of strengthening leadership.

The performance management process is evaluated annually and discussed in the Remuneration Committee. In 2024, the Committee discussed proposals to further simplify the process of performance management and variable remuneration. In that context, the objectives of performance management and variable remuneration were also reaffirmed. In 2025, a number of proposals relating to simplification of processes were further developed and submitted to the Committee.

Performance evaluation and variable remuneration
Each year, the Remuneration Committee assesses the performance of the individual Executive Board members over the relevant year. It holds separate meetings with the individual members of the Executive Board to this end. The Remuneration Committee advises on this, particularly as to whether variable remuneration should be awarded.

After the adoption of the 2023 financial statements, in 2024 variable remuneration was allocated to the groups of Achmea employees that qualify for it, including the members of the Executive Board. The amount of the variable remuneration depended on the results and achievement of targets in the performance year 2023. After it was determined that Achmea's financial position was solid and that the payment of variable remuneration was justified, half of the 2023 variable remuneration was paid out in May 2024. The other half has been postponed and will become payable after a sustainability test in 2029. Please also see Explanatory note 33 of the consolidated financial statements and the 2023 Achmea Remuneration Report published on www.achmea.nl in May 2024.

A final decision on whether or not to award variable remuneration over 2024 has yet to be taken. More information on this will be given in the 2024 Achmea Remuneration Report to be published in 2025.

In 2024, there were no downward adjustments or clawback of variable remuneration awarded to the Executive Board relating to previous years.

Internal remuneration ratios
The internal remuneration ratios are discussed annually between the Chairs and the members of the Executive and Supervisory Boards on one hand, and the Central Works Council in one of their consultative meetings on the other hand.

The Remuneration Committee discussed the internal remuneration ratio for 2024 based on two different calculation methods.

As a calculation method for determining the internal remuneration ratio (based on the revised Corporate Governance Code 2022), it examined on the one hand the ratio between the remuneration of the Chair of the Executive Board compared to the average remuneration of the employees (expressed in FTEs) at Achmea in 2024 (including subsidiaries outside the Netherlands). In 2024, the CEO pay ratio based on this calculation method is 18.8 (2023: 19.8, 2022: 22.7, 2021: 20.9 and 2020: 24.2).

In addition, the Remuneration Committee discussed the internal remuneration ratio over 2024 as a ratio between the remuneration of the Chair of the Executive Board compared to the average remuneration of all employees at Achmea in 2024. This is the benchmark based on the Corporate Sustainability Reporting Directive (CSRD). In 2024, the CEO pay ratio was 27.8. The Committee found that the CEO pay ratio calculation based on the CSRD benchmark is a new calculation method based on the average remuneration for all employees at Achmea (both in the Netherlands and abroad). A calculation was made last year of the average remuneration for employees in the Netherlands. A similar calculation over 2024 to compare the 2023 figure yields a CEO pay ratio of 24.5 (compared to 25.6 in 2023).

Laws and regulations
Developments in laws and regulations relating to remuneration policy at financial and other companies also received attention over the past year. Issues discussed included the Directive on Wage Transparency and the Implementing Regulation on Senior Executives in the Public and Semi-Public Sector (Standards for Remuneration) Act 2023.

SUPERVISORY BOARD REPORT

2024 Remuneration Report
A detailed overview of the remuneration of the members of the Executive Board can be found in the Explanatory note 33 of the consolidated financial statements 'Related party transactions'.

For more information on the variable remuneration, please see the 2024 Remuneration Report, which will be published on our website www.achmea.nl later in 2025.

Selection & Appointments Committee report

The Selection & Appointments Committee is responsible for monitoring the appropriate composition and profile of both the Supervisory Board and the Executive Board. The Committee seeks potential candidates and makes recommendations regarding them, in some cases in conjunction with shareholders or the Central Works Council based on rights of nomination or a strengthened right of recommendation.

In 2024, the Selection & Appointments Committee consisted of three members of the Supervisory Board: Mr Van den Berg (Chair), Ms Hofsté and Mr Weijer.

Changes and vacancies
In 2024, the filling of future vacancies in the Executive Board and the Supervisory Board was the subject of discussion on several occasions.

The Selection and Appointment Committee discussed the composition of the Executive Board. After careful review of the current composition of the Executive Board and the required competencies on the Board in light of the current requirements, the Selection and Appointments Committee issued positive advice to the Supervisory Board on the reappointment of Mr Lamie.

The Committee also held extensive discussions on the composition of the Supervisory Board. Members of the Supervisory Board are selected based on a profile of the required professional background, education, local and international experience, skills, diversity and independence. The current composition of the Supervisory Board is such that the members can perform their duties properly because of the appropriate mix of experience and expertise. After careful review of the current composition of the Supervisory Board and the required competencies on the Board in light of the current requirements, the Committee issued a positive recommendation to the Supervisory Board on the reappointment of Mr De Weijer, Ms Van Dongen and Mr Kloosterman. When doing so, the fact was emphasised that reappointment of Mr De Weijer for two years after a period of eight years is important to safeguard the specific knowledge (particularly regarding health) and experience in the Supervisory Board.

In connection with the end of a number of appointment terms of Supervisory Board members in 2025, to safeguard knowledge and experience in both the Supervisory Board and the Audit & Risk Committee, the Selection & Appointments Committee advised the Supervisory Board and the Audit & Risk Committee to temporarily expand. In that context, the Selection and Appointment Committee also issued a positive recommendation to the Supervisory Board to nominate Mr Cano at the General Meeting for appointment as member of the Supervisory Board. The General Meeting appointed Mr Cano a member of the Supervisory Board for a four-year term as of 5 September 2024.

Succession planning
The Selection & Appointments Committee also discussed succession planning for the Executive Board and for the first management level below the Executive Board in 2024, based on the discussion of the leadership pipeline and the management & talent development programme. This meeting was once again held in 2024 with all members of the Supervisory Board in attendance. Items on the agenda included the company's diversity and Management Development policies, including the focus on internal training and internal promotion. The Supervisory Board also discussed succession planning at divisional board level. This provided the Supervisory Board with thorough insight into the management potential and management capabilities within the Group.

The Committee applies the diversity policy with respect to the composition of the Executive Board and the Supervisory Board as adopted by the Supervisory Board. The Supervisory Board endorses Achmea's general diversity and inclusion policy, and on the advice of the Committee applied a number of specific amendments to the diversity policy with respect to the composition of the Supervisory Board and the Executive Board. These specific amendments are: i) a balanced male/female ratio in the Supervisory Board and Executive Board, geared towards achieving a target of at least 1/3 women and at least 1/3 men; ii) the correct mix of experience and expertise from the perspective of suitability of the individual and the composition of the team as a whole; iii) to achieve broader diversity (including multicultural) and a balance in the ages of the Board members.

2024 Annual report and dividends

The Audit and Risk Committee along with the Supervisory Board have discussed the 2024 annual- and accountants report. As elements thereof, the sustainability- and assurance report by EY have been discussed as well. During the discussions of the 2024 half-year and annual report the external auditor was present.

SUPERVISORY BOARD REPORT

EY audited the Achmea B.V. 2024 financial statements and issued an unqualified audit report on 12 March 2024. EY has issued a limited assurance statement on the sustainability information. In line with the proposal by the Executive Board and the recommendation of the Audit & Risk Committee, the Supervisory Board recommends that shareholders approve the 2024 financial statements.

The Executive Board, with the approval of the Supervisory Board, proposes paying a dividend of € 334.9 million for the 2024 financial year after the adoption of the financial statements by the General Meeting, giving shareholders the choice of receiving the dividend entirely or partly in cash and/or in the form of ordinary shares in Achmea's capital.

Apart from the approval of the financial statements, the General Meeting will also be asked to discharge Executive Board members from liability for the management they have conducted and to discharge the Supervisory Board members from liability for the supervision they have conducted in the 2024 reporting year.

Acknowledgements

We would like to take this opportunity to offer our compliments and thanks to the Executive Board, the Central Works Council and all Achmea employees for their great commitment and enthusiasm, which enabled the achievement of many milestones in 2024.

12 March 2025

The Supervisory Board
J. (Jan) van den Berg, Chair
W.H. (Wim) de Weijer, Vice-Chair
A. (Antonion) Cano
T.R. (Tjahny) Bercx
M.R. (Miriam) van Dongen
P.H.M. (Petri) Hofsté
A.M. (Lex) Kloosterman
E.C. (Nienke) Meijer
R.Th. (Roel) Wijmenga

CORPORATE GOVERNANCE

INTRODUCTION

Achmea B.V. is a private company with limited liability, with its registered office in Zeist, the Netherlands. Although in practice Achmea is governed, organised and managed in the same way as many listed organisations, its cooperative origin determines the way in which corporate governance is arranged at the level of the Executive Board, Supervisory Board and shareholders. Achmea adheres to the following relevant corporate governance codes: the Dutch Code of Conduct for Insurers, the Dutch Banking Code and the relevant provisions of the Dutch Corporate Governance Code.

Changes in the Executive Board in 2024

As part of its duty to ensure a well-balanced composition of the Executive Board, in the past year, the Supervisory Board reappointed Mr Lamie, Deputy Chair of the Executive Board and Chief Financial Officer, for a period of four years. This reappointment commenced on 1 January 2025. He has been a member of the Executive Board since 2017.

Changes in the Supervisory Board in 2024

As part of its duty to ensure a well-balanced composition of the Supervisory Board, in the past year, the Supervisory Board made nominations for reappointments and appointments to the General Meeting.

Mr De Weijer was also reappointed for a two-year period as of 9 April 2024. He has been a member of Achmea's Supervisory Board since 2016.

Mr Kloosterman was reappointed for a four-year period as of 9 April 2024. He has been a member of Achmea's Supervisory Board since 2019.

Ms Van Dongen was reappointed for a four-year period as of 9 April 2024. She has been a member of Achmea's Supervisory Board since 2020.

In connection with the approaching end to the appointment terms for a number of Board members in 2025, to safeguard knowledge and experience in both the Supervisory Board and the Audit & Risk Committee, the Supervisory Board decided to temporarily expand the Supervisory Board and the Audit & Risk Committee to ensure continuity.

Mr Cano was appointed to the Supervisory Board on 5 September 2024. He has been appointed for a term of four years.

CORPORATE GOVERNANCE CODES

Achmea adheres to the following relevant corporate governance codes: the Dutch Code of Conduct for Insurers, the Dutch Banking Code and the relevant principles of the Dutch Corporate Governance Code.

Code of Conduct for Insurers

The Code of Conduct for Insurers was drawn up based on core values established in 2018: 'providing security', 'making it possible' and 'social responsibility'. The Code includes principles relating to the conscientious treatment of customers and the continuing education of directors and internal supervisors. This Code of Conduct (the most recent version dates from June 2018) combines existing and new self-regulation of the sector with general provisions, including core values and rules of conduct. Based on the Code of Conduct, insurers give more depth to their public role, drawing on their own corporate vision. Achmea is doing this by means of, for example, the Achmea 'purpose', in which sustainability and social involvement play a prominent role and has anchored this in its processes and the Achmea Code of Conduct. For information about embedding the principles on the conscientious treatment of customers, please see Supplement F - PSI table of this Annual Report. Details on how continuing education of directors and internal supervisors is embedded are included in the relevant sections of this section.

Banking Code

The services we provide to our customers also include banking products, which Achmea offers through Achmea Bank N.V. The Banking Code, Het Maatschappelijk Statuut (the Social Charter) and the rules of conduct associated with the Bankers' Oath together make up the Future-Oriented Banking package. The purpose of this package is to play a role in restoring trust in society in relation to banks and their roles in the community. Achmea Bank N.V. accounts for its compliance with the Banking Code principles on the websites www.achmeabank.nl and www.achmeabank.com. Here, specific examples are used to illustrate how the rules of conduct are complied with.

Dutch Corporate Governance Code

Since 1 January 2004, listed companies in the Netherlands have been required to report on compliance with the Dutch Corporate Governance Code in their annual report on a 'comply or explain' basis. The purpose of the Code is to facilitate with or in relation to other laws and regulations a sound and transparent system of 'checks and balances' within Dutch listed companies and, to that end, to regulate relations between the Management Board, the Supervisory Board and the General Meeting. Compliance with the Code contributes to confidence in the good and responsible management of companies and their integration into society.

Although Achmea has listed instruments (issued bonds), it is not a listed company. We have voluntarily adopted and embedded the majority of the Corporate Governance Code's principles in our governance structure. Where applicable, we are almost fully in compliance with the principles and best practices.

In 2024, we had not complied with the following four principles of the Dutch Corporate Governance Code:
- Independence of the Supervisory Board (principle 2.1.7)
- Independence of Supervisory Board members (principle 2.1.8)
- Independence of more than half of the members of the Audit & Risk Committee (principle 2.3.4)
- Adoption of the remuneration policy for the Executive Board by the General Meeting (principle 3.1.1)

Members of Achmea's Supervisory Board are nominated by our shareholders (i) Vereniging Achmea, (ii) Coöperatieve Rabobank U.A., (iii) Gothaer Allgemeine Versicherung AG, Barmenia Gothaer Finanzholding AG and Schweizerische Mobiliar Versicherungsgesellschaft A.G. jointly and, on the basis of the enhanced right of recommendation, by the Central Works Council (COR).

Members of the Supervisory Board are nominated by the General Meeting based on their expertise and independence and take part in the meetings of the Supervisory Board without reference to or prior consultation with the parties which nominated them. Where appropriate, they refrain from participating in deliberations or decision-making. As of 31 December 2024, three of the nine members of the Supervisory Board of Achmea B.V. did not comply with the independence criterion (principle 2.1.8 of the Corporate Governance Code), because they are Executive Board or Supervisory Board members at an organisation holding more than 10% of the shares in Achmea: Ms Meijer is a Board member for Vereniging Achmea, and Ms Hofsté and Ms Van Dongen are Supervisory Board members for Coöperatieve Rabobank U.A. Both Vereniging Achmea and Coöperatieve Rabobank U.A. hold more than 10% of Achmea's shares.

Principle 2.1.8 of the Corporate Governance Code should be taken in conjunction with principle 2.1.7, which pertains to the criteria for guaranteeing independence of the Board as a whole. The membership of both Ms Hofsté and Ms Van Dongen on the Supervisory Board of Rabobank U.A. (from September 2024) affects this, because their collective membership means that the maximum number of Supervisory Board members per shareholder (one) directly or indirectly holding more than 10 per cent of the company's capital is exceeded. This is a temporary situation that will come to an end when Ms Hofsté steps down as an Achmea Supervisory Board member on 3 March 2025, in conjunction with the end of her third appointment term.

The membership of both Ms Hofsté and Ms Van Dongen on the Supervisory Board of Rabobank U.A., together with their collective membership on the Audit & Risk Committee, also affects the independence of the members of the Audit & Risk Committee, which consists of four members in total. This is also a temporary situation that will come to an end when Ms Hofsté steps down as an Achmea Supervisory Board member on 3 March 2025, in conjunction with the end of her (third) appointment term.

Regarding the principle of determining the remuneration policy, the Supervisory Board determines the salary and the terms and conditions of employment of members of the Executive Board. The Achmea Remuneration Policy is also adopted by the Supervisory Board, after review by the Remuneration Committee. Achmea regards the fixing of the remuneration policy for the Executive Board as a matter for the Supervisory Board and therefore does not submit the matter to the General Meeting. The General Meeting is of course informed annually of the remuneration of the Executive Board members via sections in the annual report on this remuneration and via the annual Remuneration Report.

The manner in which Achmea has adopted and embedded the Corporate Governance Code has been approved by the Supervisory Board. Likewise, our current corporate governance structure was approved by the General Meeting.

Achmea Code of Conduct

Achmea aims to be a leader in terms of its own rules of conduct and in terms of anticipating current and new regulations. For example, Achmea has decided to have all employees take a special oath or affirmation for the financial industry, which is in line with Achmea's cooperative identity. Active control, exercised to foster integrity and prevent integrity violations and fraud, limits any negative impact on trust, returns and the cost of claims. Achmea has therefore drawn up an Achmea Code of Conduct to ensure ethical conduct in accordance with Achmea's values and standards. Achmea's Code of Conduct is available at www.achmea.nl.

By recording duties and responsibilities in the area of fraud, risk management and checks, the control over and limitation of fraud is secured. Should an ethics violation or incident of fraud nevertheless occur, this can be reported on a confidential basis. A whistleblower policy is in place for this purpose and available at www.achmea.nl.

CORPORATE GOVERNANCE

EXECUTIVE BOARD

Responsibilities and role in corporate governance

The Executive Board is responsible for managing the company. This implies that the Executive Board is responsible for day-to-day business at Achmea and day-to-day business at the affiliated companies, for the accomplishment of company targets and for determining strategy and policy aimed at achieving these targets. The Executive Board maintains a set of regulations that govern the specific duties and activities of – and the division of duties between – the individual members, as well as the decision-making process within the Executive Board. The Executive Board is required to inform the Supervisory Board of any fundamental differences of opinion between the Executive Board and the management of the companies or entities. There were no fundamental differences of opinion in 2024. Each board member is directly responsible for specific Achmea activities (for further reference, see the personal profiles of the members of the Executive Board), with clear reporting lines of divisional and staff directors. The entire Executive Board is involved in the risk management anchored in the organisation and policies and their implementation. Together with another member of the Executive Board, the CFO and CRO sit on the Asset Liability Committee, which is chaired by the CFO. They also sit on the Group Risk Committee, which is chaired by the CRO. This facilitates improved short-term management of the balance sheet and also guarantees integral risk management at group level. The Executive Board members ensure that the interests of all parties that have dealings with Achmea, including customers, employees, partners and shareholders are considered in a balanced way. The Executive Board takes Achmea's continuity, the corporate social environment in which we operate and applicable regulations and codes into account when considering these interests. All members of the Executive Board have taken the oath or affirmation.

Achmea uses the 'stakeholders' model, which ensures that overall management and decision-making are in line with the interests of customers, employees, (business) partners, sustainability, society and capital providers. This is all embedded in the strategy and identity of the Achmea Group and subsequently in the leadership profile, business plans and remuneration policy, and is also part of the considerations in every resolution adopted by the Executive Board. The formulation of objectives for the Executive Board and senior management is based on the Stakeholder Value Management model. The annual objectives have been ranked according to six different perspectives: customers, society, employees, partners, processes and financials.

End responsibility for our sustainability policy lies with the Executive Board. The Supervisory Board supervises this process. The Executive Board set up a programme called Achmea Sustainable Together, which implements Achmea's sustainability activities.

Composition and diversity

Members of the Executive Board are appointed by the Supervisory Board on the non-binding nomination of Stichting Administratiekantoor Achmea (the holder of the A-share in Achmea B.V.). Executive Board members are selected based on their proven experience and competencies in the financial services industry. The members of the Executive Board provide a good mix of specific insurance experience (health, non-life, pension & life) and experience in the public/retail market (healthcare, pensions), the various distribution channels (direct, broker and bancassurance) and areas such as Finance, IT and HR.

As of 31 December 2024, the Executive Board was comprised of six members, three men and three women. Achmea aims to establish a good male/female ratio on the Executive Board. When seeking to fill any vacancies in the Executive Board, the Supervisory Board applies a number of points in the diversity policy. These specific points are: i) a balanced gender ratio, geared towards achieving a target of at least 1/3 women and at least 1/3 men; ii) the correct mix of experience and expertise from the perspective of suitability of the individual and the composition of the team as a whole; iii) broader diversity (including multicultural) and a balance in the ages of the members.

NAME	NATIONALITY	GENDER-IDENTITY	EDUCATION	POSITION	APPOINTED
B.E.M. Tetteroo (1969)	Dutch	Female	Economics/Accountancy	Chairman	June 2015
M.A.N. Lamie (1966)	Dutch	Male	Economics/Accountancy	Vice-chairman / Chief Financial Officer	January 2017
M.G. Delfos (1970)	Dutch	Male	International Economic Law	Chief Risk Officer	April 2022
D.C. de Kluis (1969)	Dutch	Female	Psychology	Member	October 2021
R. Otto (1967)	Dutch	Male	Law/MBA	Member	August 2015
L.T. Suur (1974)	Dutch	Female	International business administration	Member	September 2019

CORPORATE GOVERNANCE

Continuing education

At the beginning of each year, the themes for the continuing education programme of both the Executive Board and the Supervisory Board are established in consultation with the chairman of the Supervisory Board and the chairman of the Executive Board. The programme is aimed at maintaining and broadening the expertise of the members of the Executive Board and the members of the Supervisory Board. In addition to these special sessions, which are typically jointly attended by members of the Supervisory Board and Executive Board, attention is also given at regular meetings to relevant developments related to the financial industry, corporate governance, compliance, sustainability, customer centricity and risk and compliance through presentations given by internal and/or external specialists. There is also scope to address subjects of a topical nature.

In addition, the Executive Board and the Achmea leadership team explored innovation, artificial intelligence and leadership during a study trip to Boston in 2024.

SUPERVISORY BOARD

Responsibilities and role in corporate governance

The role of the Supervisory Board is to supervise the policies of the Executive Board and the general affairs of the company and its affiliated business. It advises the Executive Board. In discharging their duties, the members of the Supervisory Board are guided by the interests of the company and its affiliated business. Supervisory Board approval is required for major business-related decisions, such as the transfer of a substantial part of the company's operations, entering into or terminating a long-term partnership, major participations and or the making of large investments, and termination of the employment or substantial change in the working conditions of a significant number of employees. Decisions relating to fundamental and large-scale strategic changes or investments require the approval of both the Supervisory Board and the General Meeting.
The Supervisory Board and its individual members have a responsibility to obtain all relevant information required to perform their duties. These requirements are communicated to the chair of the Supervisory Board. Information sources are usually the Executive Board, the Company Secretary, the Risk and Compliance function, HR, Internal Audit and the external auditor. The Supervisory Board can also obtain information from corporate officers and external advisers who can be invited to attend Supervisory Board meetings or provide continuing education. The Supervisory Board consists of members who, even if they are nominated by shareholders or the Central Works Council, are guided by the interests of the company as a whole and its affiliated business in performing their duties. All members of the Supervisory Board participate in meetings with no reference to or prior consultation with the parties that nominated them. All members of the Supervisory Board have sworn the oath or affirmation.

Composition and diversity

The composition of the Supervisory Board and nominations in the event of vacancies reflect the cooperative shareholder structure and employee participation through Achmea's Central Works Council (COR). The size of the Supervisory Board was set at a maximum of 10 members on the proposal of the A share holder; the nominations of the major shareholders were also aligned to that number. Vereniging Achmea is authorised to nominate candidates for four seats on the Supervisory Board. As the indirect holder of the A share, Vereniging Achmea also has the right to appoint the chair from among the members of the Supervisory Board. Coöperatieve Rabobank U.A. can put forward a candidate for a single seat. Gothaer Allgemeine Versicherung AG, Barmenia Gothaer Finanzholding AG and Schweizerische Mobiliar Versicherungsgesellschaft A.G. have the right to jointly nominate one candidate The Central Works Council will appoint three members of the Supervisory Board. This arrangement is in keeping with the legal framework of the Central Works Council's right of recommendation.

In principle, every member of the Supervisory Board attends a meeting of the Central Works Council at least once a year. The General Meeting appoints and reappoints members of the Supervisory Board on the formal recommendation of the Supervisory Board. All the proposed changes to the composition of the Supervisory Board are discussed with the Central Works Council.

As of 31 December 2024, the Supervisory Board had nine members, consisting of six men and three women. When seeking to fill a vacancy, a number of specific points from the Supervisory Board's diversity policy are taken into account: i) a balanced gender ratio, geared towards achieving a target of at least 1/3 women and at least 1/3 men; ii) the correct mix of experience and expertise from the perspective of suitability of the individual and the composition of the team as a whole; iii) broader diversity (including multicultural) and a balance in the ages of the members. Members of the Supervisory Board are selected and appointed based on a profile of the required professional background, education, local and international experience, skills, diversity and independence.

The current composition of the Supervisory Board is such that the mix of experience and expertise present allows the commissioners to fulfil their obligations. In addition to diversity in terms of knowledge, expertise and age, there is also gender diversity. Achmea therefore meets the legal target for male/female diversity in the Supervisory Board.

All members of the Supervisory Board are in compliance with the Management and Supervision of Legal Entities Act in terms of the number of supervisory board memberships that they hold.

Please see the Supervisory Board Report for details of the composition of the Supervisory Board as of 31 December 2024 and the expertise table.

Continuing education

For information on how the continuing education programme is organised for both the Executive Board and the Supervisory Board, please refer to the relevant part of the section headed ‘Executive Board’. In addition, new Supervisory Board members attend an introduction programme specially designed for them. For more information on education courses attended in 2024, please see the Supervisory Board report in this annual report.

Supervisory Board committees

The Supervisory Board maintains three specialised committees that advise the board: the Audit & Risk Committee, the Remuneration Committee and the Selection & Appointments Committee.

Financial, audit, risk and compliance issues as well as sustainability and other reporting are primarily discussed by the Audit & Risk Committee. These meetings are attended by the CFO, the CRO, the Director of Internal Audit and the external auditor. The Directors of Finance, Actuarial, Risk Management and Compliance are invited for the agenda items relevant to them. The Audit & Risk Committee holds meetings with the external auditor in the absence of the members of the Executive Board and the Director of Internal Audit at least twice a year. Please see the Supervisory Board report for further information.

The Remuneration Committee is responsible for formulating guidelines and monitoring the implementation of and compliance with the remuneration policy for the entire Achmea Group. This responsibility includes advising the Supervisory Board on the performance management of the Executive Board’s members (for instance maintaining the balance between short and long-term interests and a focus on customers’ interests and sustainability). Remuneration is regularly evaluated, for instance with the aid of external benchmarks, and the committee assesses whether remuneration levels are appropriate in terms of the duties and responsibilities associated with a position. The Chair of the Executive Board attends all meetings of the Remuneration Committee except when the Chair’s remuneration is on the agenda or in other cases to be determined at the discretion of the committee chair.

The Selection & Appointment Committee’s task is to monitor the composition, profile and functioning of both the Supervisory Board and the Executive Board. The committee looks for and makes recommendations regarding potential candidates, in some cases in consultation with the Central Works Council or the relevant shareholder that has the right to nominate candidates. The Chair of the Executive Board attends all meetings of the Selection & Appointments Committee except if the Chair’s performance is on the agenda or in other cases to be determined at the discretion of the committee chair.

SHAREHOLDERS AND SHAREHOLDERS’ MEETINGS

Shareholders

The majority of Achmea’s shareholders are non-listed European organisations with cooperative roots.

Customers in the Netherlands are directly represented by Achmea’s largest shareholder, Vereniging Achmea, directly and indirectly through Stichting Administratie-Kantoor Achmea (STAK Achmea). Vereniging Achmea holds the depositary receipts issued by STAK Achmea for the ordinary shares held by in the capital of Achmea B.V. by STAK Achmea. As of 31 December 2024, STAK Achmea’s board consisted of the two deputy chairs of Vereniging Achmea and two directors of Vereniging Achmea. The prior approval of Vereniging Achmea’s board is required for the adoption of important resolutions by STAK Achmea. In certain cases, the prior approval of Vereniging Achmea’s Council of Members is also required. As of 31 December 2024, Vereniging Achmea owns – partly through STAK Achmea – a total of 68.02% of the ordinary shares in the capital of Achmea BV.

Coöperatieve Rabobank U.A., Achmea’s second largest shareholder, is likewise a cooperative organisation. As of 31 December 2024, Coöperatieve Rabobank U.A. owns a total of 30.16% of the ordinary shares in the capital of Achmea BV.

Other shareholders, which as of 31 December 2024 jointly hold 1.82% of the ordinary shares in the capital of Achmea B.V., are Gothaer Allgemeine Versicherung AG, Barmenia Gothaer Finanzholding AG and Schweizerische Mobiliar Versicherungsgesellschaft A.G. Just like Achmea, these shareholders are members of the Eurapco alliance of independent European financial services providers (see www.eurapco.com for further information).

CORPORATE GOVERNANCE

	CAPITAL- AND VOTING RIGHTS
Vereniging Achmea (direct and via STAK)[1]	68.02%
Coöperatieve Rabobank U.A.	30.16%
Gothaer Allgemeine Versicherung A.G.	0.52%
Barmenia Gothaer Finanzholding A.G.	0.60%
Schweizerische Mobiliar Versicherungsgesellschaft AG	0.70%

[1] Vereniging Achmea owns 8.17% directly and 59.31% indirectly through Stichting Administratie-Kantoor Achmea.

General Meeting

Due to the statutory two-tier board regime that applies to Achmea, the authority of the General Meeting is restricted. Under the law and agreements in force, certain responsibilities rest with the Supervisory Board. The approval of the shareholders is nevertheless required for important corporate-law issues such as amendments to the Articles of Association, approval of the financial statements and decisions regarding the determination of profit appropriation and the distribution of dividend, resolutions concerning the issue of shares or the granting of rights to subscribe for shares (or appointing the Executive Board to arrange for such issue of shares or granting of rights), the reduction of Achmea's share capital, the appointment and dismissal of members of the Supervisory Board, and resolutions to dissolve, merge or divide Achmea. Crucial strategic resolutions that entail a fundamental change of course in Achmea's strategy and large-scale investments must be approved in the General Meeting. The General Meeting may only adopt resolutions to this effect with due observance of the quorum and voting requirements laid down for this purpose in the Articles of Association (quorum representing at least 80% of the issued capital and votes cast representing at least 80% of the issued ordinary shares).

At the annual General Meeting held in April 2024, in addition to the regular resolutions on the 2023 annual report and financial statements, the profit appropriation and the discharge from liability of the members of the Executive Board and the Supervisory Board, the reappointment by the Supervisory Board of Mr Lamie as member of the Executive Board and the reappointment by the General Meeting of Mr De Weijer, Mr Kloosterman and Ms Van Dongen as members of the Supervisory Board were discussed.

The Special General Meeting of 5 September 2024 considered the General Meeting's appointment of Mr Cano as a member of the Supervisory Board.

The Special General Meeting of 16 December 2024 was devoted to approval of the Executive Board's decision to enter into a strategic partnership in the area of Pension and Life insurance with Lifetri and Sixth Street (the owner of Lifetri).

Voting rights

Specific rights are attached to A-shares, which are held by STAK Achmea, including the right to make a non-binding recommendation to the Supervisory Board concerning the appointment of members of the Executive Board, the appointment of the chairman of the Supervisory Board, the approval of a resolution concerning the dissolution, merger or division of Achmea, and the issue and transfer of Achmea shares. Vereniging Achmea, as depositary receipt holder for the shares held in Achmea by STAK Achmea, has the right to attend the General Meeting, but has no voting rights in respect of these depositary receipts. Shareholders and holders of depositary receipts for shares may authorise someone in writing to represent them. Members of the Executive Board and Supervisory Board are authorised to attend the General Meeting. They have an advisory and informative role in this meeting.

Provisions of the Articles of Association on dividend policy

The rules on the distribution of dividend are set out in Achmea's articles of association. A dividend adopted by the General Meeting is owed and payable four weeks after it has been adopted (unless a different date is determined in this regard). The Executive Board may propose to the General Meeting that the dividend be distributed wholly or in part otherwise than in cash. The General Meeting may resolve to distribute all or part of the net result. On a proposal from the Executive Board, the General Meeting may resolve to distribute an interim dividend. Achmea's dividend policy is explained in more detail in the Notes to the consolidated financial statements.

BIOGRAPHIES EXECUTIVE AND SUPERVISORY BOARD MEMBERS

Executive Board

BIANCA E.M. TETTEROO (1969)

Chair of the Executive Board

Bianca Tetteroo joined the Executive Board in June 2015 and has held the role of Vice-Chair since 1 January 2020. On 13 April 2021, Ms Tetteroo was appointed Chair of the Executive Board.

Ms Tetteroo completed her studies in information management and accountancy at Nyenrode University in 1997. She has also attended various executive training programmes, including on corporate governance and leadership at INSEAD. She began her career in 1988 at the accountancy firm Forvis Mazars. She entered the financial services industry in 1996 at what was then called Fortis, where she held various positions in Asset Management, De Verzekeraar and elsewhere. She joined Achmea in 2009, where she held the position of financial director at Syntrus Achmea. Ms Tetteroo had headed the Pension & Life division since 2012.

Ms Tetteroo is responsible for the focus areas Strategy & Transformation (incl. IT), Human Resources/Management Development, Administrative Office, Corporate Communications & Public Affairs and Internal Audit.

Ms Tetteroo is also on the Eurapco Board (serving as Chair from 1 January 2025), and the Achmea Foundation Board. She is a member of the VNO-NCW Board, and is a member of the Board of the Dutch Association of Insurers (Verbond van Verzekeraars), serving as the Vice-Chair. Starting from 1 July 2024, Ms Tetteroo is a non-executive director of RELX Plc (formerly Reed Elsevier). Until 1 July 2024, she was a Board member of Garanti Emeklilik and until 1 April 2024, of the National Cooperative Council.

MICHEL A.N. LAMIE (1966)

Vice-Chairman and Chief Financial Officer

Michel Lamie joined the Executive Board on 1 January 2017. He was appointed Chief Financial Officer on 1 April 2017 and Vice-Chairman of the Executive Board on 13 April 2021.

Mr. Lamie is responsible for the focus areas Finance, Balance Sheet Management, M&A and Achmea Reinsurance. He is Chairman of the Supervisory Board of Achmea Reinsurance Company N.V. and member of the Management Board of Achmea Pensioen- en Levensverzekeringen N.V. and Achmea Schadeverzekeringen N.V.

Mr Lamie is a chartered accountant and studied Economics and Accountancy at VU University Amsterdam. After earning his degree, Mr Lamie began his career at KPMG, followed by a position as CFO of RSA for the Benelux region. Mr Lamie then worked at Achmea, including as Group Director Finance & Control. He has been a member of the Board of De Goudse Verzekeringen as Vice-Chair since 2005 and, from 2009 to 2016, served as Board Chair. In addition, Mr Lamie served for many years as a director of the Dutch Association of Insurers (Verbond van Verzekeraars) and Chair of the Supervisory Board of insurance broker Van Lanschot Chabot (now known as VLC & Partners). In addition to his positions at Achmea, Mr Lamie was also a member of the Supervisory Board of Royal De Heus until 31 December 2024. Starting from 1 January 2025, Mr Lamie has been appointed non-executive director at Royal De Heus.

DAPHNE C. DE KLUIS (1969)

Daphne de Kluis is a member of the Executive Board of Achmea since October 2021.

Ms De Kluis studied Work and Organisational Psychology at the University of Amsterdam. She joined ABN AMRO in 1998. After holding various positions within Commercial Clients and Corporate & Institutional Banking, in 2009, she was named Global Head of Debt Solutions and, in 2013, Global Head of Financial Restructuring & Recovery. In 2017, she was appointed CEO Commercial Banking and was appointed a member of the Executive Committee of ABN AMRO.

Ms De Kluis is responsible for the Pension & Life division, Achmea Pension Services, Achmea Investment Management, Achmea Mortgage Funds, Achmea Real Estate, Centraal Beheer PPI and Achmea Bank.

BIOGRAPHIES OF EXECUTIVE AND SUPERVISORY BOARD MEMBERS

Ms De Kluis is a member of the Supervisory Board of Achmea Bank N.V., member of the Supervisory Board of Achmea Real Estate B.V. and member of the Supervisory Board of Achmea Investment Management B.V. On 31 December 2024, Ms De Kluis became a member of the Supervisory Board of Achmea IM AM B.V. and Achmea IM FM B.V. She is also a member of the Management Board for Achmea Pensioen- en Levensverzekeringen N.V.

ROBERT OTTO (1967)

Robert Otto joined the Executive Board in August 2015. After reading Law at Leiden University, he began his career in 1992 at ING. In his final position at the banking and insurance group he was responsible for ING Insurance and Postbank Insurance. After a period of two years as CEO of OHRA, he took up the post of managing director of the commercial division of Delta Lloyd in 2010. In mid-2013, Robert Otto joined Achmea as chairman of the Non-Life division.

Mr Otto is responsible for the Zilveren Kruis division, InShared and the foreign operating companies (OpCos) in Australia, Greece, Turkey, Slovakia and Canada (until the sale of Onlia Canada at the end of April 2024).

Mr Otto is Chair of the Board (non-executive director) of Eureko Sigorta and Interamerican Greece. He is also SOOA (senior officer outside Australia) and Chair of the Board (non-executive director) of Achmea Australia. He is Chair of the Supervisory Board of Union and Chair of the Supervisory Board of InShared. Until the sale of Onlia Canada at the end of April 2024, Mr Otto was a member of the Supervisory Board of Onlia.

In addition, Mr. Otto is a Board member of Thuiswinkel.org and a board member of AMICE, ICMIF and the iFHP and is a member of the Supervisory Board of Thuiswinkel B.V.

LIDWIEN T. SUUR (1974)

Lidwien Suur joined the Executive Board in September 2019. Ms. Suur studied International Business at Maastricht University and started her career in 1998 at ING/Nationale Nederlanden. While there, among other things, she served as Director of Income Protection Insurance and Programme Director Strategy. She held the position of Managing Director of Unigarant and ANWB Verzekeren from the beginning of 2012 and has been a member of the board of ANWB since 2014. In 2016, she was made CFO of the ANWB.

Ms Suur is responsible for the Non-Life, Centraal Beheer, Interpolis, and Distribution, Innovation & Brand divisions.

She is a member of the Management Board of Achmea Schadeverzekeringen N.V. She is also a member of the Supervisory Board of Achmea Reinsurance Company NV, member of the Supervisory Board of InShared, and Chair of the Supervisory Board of N.V. Hagelunie. In addition, she is a Board member for the Achmea Innovation Fund B.V. and Vice-Chair of the Board (non-executive director) of Interamerican Greece.

Ms. Suur is also Chair of the Non-Life Insurance Sector Board of the Dutch Association of Insurers and Chair of the Administrative Consultation between the Dutch Association of Insurers and NVGA. She is also Chair of the Supervisory Board of the Dutch Terrorism Risk Reinsurance Company. She is Vice-Chair of the Board of Guarantee Fund Motor Traffic (Waarborgfonds Motorverkeer) and Vice-Chair of the Netherlands Bureau of Motor Insurers (Nederlands Bureau der Motorrijtuigverzekeraars). As of 1 July 2024, Ms Suur is a member of the Supervisory Board of Paleis Het Loo.

MICHIEL G. DELFOS (1970)

Chief Risk Officer

Michiel Delfos joined the Executive Board as Chief Risk Officer in April 2022.

Mr. Delfos joined Achmea in early 2014 as Director of Property & Casualty insurance and became president of the Non-Life division in October 2015. He previously held various management and executive positions at Delta Lloyd and ABN AMRO Insurance, focusing on Sales, Marketing, Operations, Finance and Legal Affairs. He studied International Economic Law at Leiden University.

Mr. Delfos is responsible for Risk & Management, Compliance & Actuarial, Central Services, Achmea Legal Aid Foundation, Legal Affairs, Governance, Coordination Supervisors and the Achmea Sustainable Together programme.

Mr. Delfos is Chairman of the Supervisory Board of the Netherlands Atomic Energy Pool. He also participates on behalf of Achmea in the CRO Forum, a group of professional risk managers from the European insurance industry dedicated to developing and promoting best practices in Risk Management.

BIOGRAPHIES OF EXECUTIVE AND SUPERVISORY BOARD MEMBERS

Supervisory Board

JAN VAN DEN BERG (1964)

Jan van den Berg is a member of the Supervisory Boards of Achmea B.V., Achmea Schadeverzekeringen N.V. and Achmea Pensioen- & Levensverzekeringen N.V. He is also a member of the Supervisory Boards of Achmea Zorgverzekeringen N.V. and its subsidiaries.

Mr. van den Berg is also Chairman of the Supervisory Board of MyTomorrows and also serves as an advisor to the Ministry of Healthcare (Singapore) and board member of the Oranjefonds and Diabetesfonds. In addition, since 1 January 2024 Mr van den Berg has been serving as Chair of the Advisory Council for Lenard and Lenard, and since 1 September 2024 as Chair of the Supervisory Board of Nictiz.

Mr. Berg has over 20 years' management experience in the international insurance market. He worked at Coopers & Lybrand Corporate Finance, Nationale Nederlanden, AXA and Prudential Financial, where he held the post of Asia President until 2017.

WIM H. DE WEIJER (1953)

Wim de Weijer is Vice-Chair of the Supervisory Board of Achmea B.V. and of the Supervisory Boards of Achmea Schadeverzekeringen N.V. and Achmea Pensioen- en Levensverzekeringen N.V. He is also Chair of the Supervisory Boards of Achmea Zorgverzekeringen N.V. and its subsidiaries. Until 5 April 2024, Mr De Weijer was a Board member of Vereniging Achmea and Stichting Continuïteit Achmea.

During his career, Mr De Weijer has held various positions in large organisations in the health care, housing and pension sectors. Mr De Weijer has considerable experience as a board advisor and supervisory board member. Among other things, he is a former director of health care provider Espria/Evean, Chair/Vice-Chair of the Supervisory Board of PGGM and Chair of the Supervisory Board of Wielco B.V. (Medux, Medipoint, HartingBank). In addition, he is a former member of the Supervisory Board of Het Gastenhuis B.V. Mr De Weijer is owner and director of W. de Weijer Bestuursadviezen B.V. and is Vice-Chair of the Supervisory Board of ADG.

PETRI H.M. HOFSTÉ (1961)

Petri Hofsté is a member of the Supervisory Board of Achmea B.V., Achmea Schadeverzekeringen N.V. and Achmea Pensioen- en Levensverzekeringen N.V., as well as the Supervisory Board of Achmea Investment Management B.V. Since 10 November 2024, she is also a member of the Supervisory Board of Achmea Real Estate B.V. and since 31 December 2024 member of the Supervisory Board of Achmea IM AM B.V. and Achmea IM FM B.V.

Ms Hofsté, a qualified chartered accountant, started her career at KPMG, where she was a partner in the Financial Services Audit practice until 2006. She subsequently held the positions of group controller and Deputy CFO at ABN AMRO Group, Division Director of Banking Regulation at the Dutch Central Bank (DNB) and CFRO at APG.

Ms Hofsté is also a member of the Supervisory Board of Rabobank (until March 3, 2025), Pon Holdings B.V. and Koninklijke FrieslandCampina N.V. and Chairman of the Boards of Stichting Nyenrode, Vereniging Hendrick de Keyser and Stichting Capital Amsterdam. She is also a Board member of Impact Economy Foundation and of Stichting Radix Nederland, a member of the Advisory Board of SER Topvrouwen.nl and member of the Financial Reporting & Accountancy Committee of the AFM.

LEX A.M. KLOOSTERMAN (1956)

Lex Kloosterman is a member of the Supervisory Board of Achmea B.V. He is also a member of the Supervisory Board at Achmea Schadeverzekeringen N.V. and Achmea Pensioen- en Levensverzekeringen N.V. On 16 September 2024, Mr Kloosterman became a member of the Supervisory Board of Achmea Bank N.V. Until 31 October 2024, he was a member of the Supervisory Board of N.V. Hagelunie.

After completing his law studies at Leiden University, he held various (international) positions at ABN AMRO Bank for 20 years in the US, Brazil, Singapore and in Europe. From 2006 to 2008, he was responsible for Asset Management and Private Clients on the Executive Committee of Fortis SA/NV, and from 2009 to 2018 he worked as Director at Rabobank International.

Mr. Kloosterman is Investor Director at Cerberus Global Investments B.V.

BIOGRAPHIES OF EXECUTIVE AND SUPERVISORY BOARD MEMBERS

ROEL TH. WIJMENGA (1957)

Roel Wijmenga is a member of the Supervisory Boards of Achmea B.V., Achmea Pensioen- en LevensverzekeringenN.V., Achmea Schadeverzekeringen N.V. and Achmea Reinsurance Company N.V.

Mr. Wijmenga was CFO of ASR Verzekeringen from February 2009 to May 2014. Prior to this he was a member of Executive Board of Achmea B.V. and of the Board of Directors of Interpolis and a member of the Executive Board of Fortis ASR Verzekeringen. He previously held several business roles in the insurance industry: at AMEV and Fortis. Mr. Wijmenga is currently Chairman of the Philips Pension Fund.

MIRIAM R. VAN DONGEN (1969)

Miriam van Dongen has been a member of the Supervisory Board of Achmea B.V., Achmea Pensioen- en Levensverzekeringen N.V. and Achmea Schadeverzekeringen N.V. She is also a member of the Supervisory Board of Achmea Zorgverzekeringen N.V. and its subsidiaries and a member of the Supervisory Board of Centraal Beheer PPI N.V. Up until 25 September 2024, Ms Van Dongen was a member of the Supervisory Board of Achmea Bank N.V.

Ms Van Dongen started her career at research firm IRIS (Rabobank/Robeco Group) and McKinsey & Company. She has also held various positions at Delta Lloyd N.V., including Finance, Treasury, M&A and CFO of Delta Lloyd Belgium. From 2007 to 2009, she was CFO of Zilveren Kruis Achmea. Since then, Ms Van Dongen has been a professional supervisory board member and has held supervisory positions with organisations such as VIVAT, PGGM and the Dutch Kidney Foundation.

In addition, Ms Van Dongen is currently Vice-Chair of the Supervisory Board of Optiver as well as Vice-Chair of the Supervisory Board of Kadaster and member of the Supervisory Board of Het Balletorkest. She is also Independent Chair Advisory Council at uMunthu Investment Company – Goodwell Investments and senior advisor at BlackFin Capital Partners. Starting on 25 September 2024, Ms Van Dongen is a member of the Supervisory Board of Rabobank, and as of 1 November 2024, a member of the Supervisory Board of TNO. Until 22 February 2024, Ms Van Dongen was a non-executive director of QEV Technologies, and until 15 June 2024, Vice-Chair of the Mollie B.V. Supervisory Board.

TJAHNY R. BERCX (1963)

Tjahny Bercx is a member of the Supervisory Boards of Achmea B.V., Achmea Pensioen- en Levensverzekeringen N.V. and Achmea Schadeverzekeringen N.V. Since 1 November 2024, Mr Bercx has also been a member of the Supervisory Board of N.V. Hagelunie.

In 1980, Mr. Bercx began his career in the Royal Navy. In his last period here he held the position of naval officer psychologist. He made the transition to the corporate world in 1997. He worked successively as Vice President HR at ING Barings (1998) and KLM (2000). In 2005, he joined LeasePlan (LP). Here he worked as CHRO, CEO Brazil, CEO Mexico, CEO USA, among others. In his last position he was a member of the Executive Committee focusing on Chief People & Performance Officer as well as Regional Director USA, Mexico, Brazil, Austria and Switzerland. Following the sale to ALD, Mr. Bercx resigned at his own request effective 22 May 2023. As of 1 July 2024 he has been a member of the NPO board in the position of Personnel and Culture.

Mr Bercx has a Master’s degree in psychology (OU), a Master’s degree in Work & Organisation in Occupational Health (UU/NSPH), has completed an MBA at Keele University (UK) and has written several HR books. He is also Vice-Chair of the Supervisory Board of ProRail and up until April 2024, was a member of the Supervisory Board of the foundation ‘Help Ze Thuiskomen’. Since 1 January 2024, Mr Bercx has been a member of the Supervisory Board of the Prinses Máxima Centrum.

NIENKE MEIJER (1965)

Nienke Meijer is a member of the Supervisory Boards of Achmea B.V., Achmea Schadeverzekeringen N.V., and Achmea Pensioen- en Levensverzekeringen N.V. Since 4 July 2024, Ms Meijer has also been a member of the Board of Directors of Vereniging Achmea.

In addition, Ms Meijer is a member of the PostNL Supervisory Board, Chair of the Board of De Volkskrant Foundation, and co-founder and partner of De Buitenboordmotor Foundation. Since 1 July 2024, Ms Meijer has been Chair of the National Citizens’ Assembly on Climate.

Previously, Ms Meijer was Chair of the Executive Board of Fontys Hogescholen and worked in various commercial and managerial roles at the publishers Wegener and VNU. Nienke Meijer studied Psychology & Marketing at Utrecht University and attended various international courses.

ANTONIO CANO (1963)

Mr Cano was appointed to the Supervisory Board of Achmea B.V. on 5 September 2024. As of 15 September 2024, Mr Cano is also a member of the Supervisory Board at Achmea Schadeverzekeringen N.V. and Achmea Pensioen- en Levensverzekeringen N.V.

Mr Cano has extensive managerial and supervisory experience in the international insurance market. He studied Business Economics at the University of Rotterdam, and completed the Register Controller course at VU Amsterdam. Over the past 35 years, he has occupied national and international executive positions at AMEV, Caifor, AG Insurance and Ageas.

TABLE OF CONTENTS

TABLE OF CONTENTS

CONSOLIDATED FINANCIAL STATEMENTS

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

(BEFORE APPROPRIATION OF RESULT)

(€ MILLION)

	NOTES	31 DECEMBER 2024	31 DECEMBER 2023
Assets			
Intangible assets	13	791	799
Associates and joint ventures	14	50	42
Property for own use and equipment	15	327	327
Investment property	5	717	725
Financial investments	6		
Investments from insurance and other		56,631	54,806
Banking credit portfolio		18,052	15,171
Deferred tax assets	16	727	971
Income tax receivable		3	79
Insurance contract assets	7	15	5
Reinsurance contract assets	7	987	1,093
Receivables and accruals	17	1,807	1,720
Cash and cash equivalents	18	2,131	1,934
Assets classified as 'Held for sale'	21		46
Total assets		**82,238**	**77,718**
Equity			
Equity attributable to holders of equity instruments of the company		9,413	8,978
Non-controlling interest		2	2
Total equity	**19**	**9,415**	**8,980**
Liabilities			
Insurance contract liabilities	7		
Insurance contract liabilities Non-Life		7,150	6,875
Insurance contract liabilities Health		2,444	2,376
Insurance contract liabilities Life		34,272	34,973
Other provisions	20	967	938
Financial liabilities	8	25,549	20,079
Derivatives	6	2,407	3,472
Deferred tax liabilities	16	12	11
Income tax payable		22	14
Total liabilities		**72,823**	**68,738**
Total equity and liabilities		**82,238**	**77,718**

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF PROFIT AND LOSS

(€ MILLION)

	NOTES	2024	2023
Insurance revenue		25,419	22,931
Insurance service expenses		-24,813	-23,050
Net result from reinsurance contracts		-176	429
Insurance service result	**10**	**430**	**310**
Investment return from (re)insurance activities		3,115	3,444
Financial result from insurance contracts		-1,728	-2,833
Financial result from reinsurance contracts		91	151
Net financial result from (re)insurance activities	**11**	**1,478**	**762**
Income from associates and joint ventures		15	-7
Investment income from other activities	12	713	582
Income from service contracts	22	534	513
Other income	22	18	44
Total other income		**1,280**	**1,132**
Other operating expenses	24	865	790
Interest and similar expenses	23	520	364
Other expenses	25	162	96
Total other expenses		**1,547**	**1,250**
Profit before tax		**1,641**	**954**
Income tax	26	338	140
Net result		**1,303**	**814**
Net result attributable to:			
Holders of equity instruments of the company		1,303	814
Non-controlling interest		0	0
Average number of outstanding ordinary shares		389,253,846	375,685,702
Earnings per share (in euro)	27	3.20	2.17

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME

(€ MILLION)

	NOTES	2024	2023
Items that will not be reclassified to the Statement of profit and loss[1]			
Remeasurements of net defined benefit liability[2]		5	-54
Unrealised gains and losses on property for own use[3]		8	-18
Items that may be reclassified to the Statement of profit and loss[1]			
Currency translation differences (including realisations) on subsidiaries, associates, goodwill and joint ventures[4]		7	-9
Share in other comprehensive income associates and joint ventures[3]			2
Net other comprehensive income		**20**	**-79**
Net result		1,303	814
Comprehensive income		**1,323**	**735**
Comprehensive income attributable to:			
Holders of equity instruments of the company		1,323	735
Non-controlling interest		0	0

1 The position (including) taxes is shown within this overview. The footnotes below show the amount of tax on changes accounted in net other comprehensive income.
2 Accounted as part of Retained earnings. An amount of € -2 million (2023: € 19 million) taxes were recognized as part of the revaluations of the net defined benefit liability.
3 Accounted as part of Revaluation reserve. An amount of € 3 million (2023: € 7 million) taxes were recognized in the unrealized gains and losses on property for own use.
4 Accounted as part of Exchange difference reserve. The amount of taxes following this mutation amounts to nil (2023: nil). Within this line item the impact of hyperinflation accounting in Turkey is incorporated. For more information refer tot he general accounting principles.

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF CHANGES IN TOTAL EQUITY

(€ MILLION)

	SHARE CAPITAL	PREMIUM	OWN SHARES	LEGAL RESERVES	REVALUA-TION RESERVES	EXCHANGE DIFFER-ENCE RESERVE	CASHFLOW HEDGES	OTHER RESERVES	RESULT FOR THE YEAR	OTHER EQUITY INSTRU-MENTS	SUBTOTAL EQUITY[1]	NON-CONTROL-LING INTEREST	TOTAL EQUITY
Balance at 1 January 2024	**411**	**10,590**	**-420**	**88**	**518**	**-525**	**-7**	**-3,741**	**814**	**1,250**	**8,978**	**2**	**8,980**
Net other comprehensive income					8	7		5			20		20
Net result									1,303		1,303		1,303
Total result					**8**	**7**		**5**	**1,303**		**1,323**		**1,323**
Appropriations to reserves				13	125			676	-814				
Dividend payments			238					-302			-64		-64
Coupon payments								-74			-74		-74
Issue, sale and purchase of equity instruments										-750	-750		-750
Balance at 31 December 2024	**411**	**10,590**	**-182**	**101**	**651**	**-518**	**-7**	**-3,436**	**1,303**	**500**	**9,413**	**2**	**9,415**

(€ MILLION)

	SHARE CAPITAL	PREMIUM	OWN SHARES	LEGAL RESERVES	REVALUA-TION RESERVES	EXCHANGE DIFFER-ENCE RESERVE	CASHFLOW HEDGES	OTHER RESERVES	RESULT FOR THE YEAR	OTHER EQUITY INSTRU-MENTS	SUBTOTAL EQUITY[1]	NON-CONTROL-LING INTEREST	TOTAL EQUITY
Balance at 1 January 2023	**411**	**10,946**	**-507**	**80**	**667**	**-513**	**-7**	**-2,924**	**-808**	**1,250**	**8,595**	**2**	**8,597**
Net other comprehensive income				6	-18	-33		-34			-79		-79
Net result									814		814		814
Total result				**6**	**-18**	**-33**		**-34**	**814**		**735**		**735**
Appropriations to reserves				2	-131	21		-700	808				
Dividend payments								-30			-30		-30
Coupon payments								-55			-55		-55
Issue, sale and purchase of equity instruments		-356	87					2			-267		-267
Balance at 31 December 2023	**411**	**10,590**	**-420**	**88**	**518**	**-525**	**-7**	**-3,741**	**814**	**1,250**	**8,978**	**2**	**8,980**

[1] Subtotal equity refers to equity attributable to holders of equity instruments of the company.

With regard to the result for 2023, the general meeting decided, at its meeting on 9 April 2024, to pay out a dividend of € 267 million. Of the total amount of € 267 million in dividends, € 203 million was paid out in the form of stock dividend and €64 million in cash. This dividend payment is based on a market-based dividend yield of 7% calculated on Achmea's valuation based on the Achmea Valuation Principles as defined in the All Shareholders Agreement. The shares paid out as stock dividend are shares issued by Achmea B.V. had been purchased (own shares). The stock dividend amounting to € 238 million has been charged to the treasury shares (based on the average price of purchased shares). The remaining amount of € 35 million (negative) is charged to the other reserve.

In 2024, an initial repayment of € 357 million took place on the subordinated Tier 2 perpetual loan of € 750 million. As a result of the repayment of the remaining principal of € 393 million plus accrued interest less costs of € 15 million (coupon of 4.25%) on 4 February 2025, which had been announced on 31 December 2024, the remaining part of this subordinated loan of € 408 million as at 31 December 2024 is presented under financial liabilities - other liabilities instead of under other equity instruments within total equity.

Based on the accounting policies used by Achmea, unrealised gains and losses on Achmea's buildings and land in own use are recognised in the revaluation reserve. In addition, Dutch regulations require Achmea to establish a Revaluation Reserve for all unrealised increases in value for assets not listed on active markets and for which the unrealised fair value changes are recognised in the Statement of profit and loss. The reserve is formed by transferring the required amounts from Other Reserves to the Revaluation Reserve. Neither Revaluation reserves nor Legal reserves are freely distributable.

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF CASH FLOWS

(€ MILLION)

	NOTES	2024	2023
Cash flows from operating activities			
Result before tax		1,641	954
Adjustments of non-cash items and reclassifications:			
Non-cash items included in Insurance service result		-430	-310
Non-cash items included in Investment result from (re)insurance activities		-1,501	-3,521
Non-cash items included in Finance result from insurance contracts		1,658	2,722
Non-cash items included in Finance result from reinsurance contracts held		-25	-34
Non-cash items included in Investment result from other activities		4	-16
Amortisation and impairment on Intangible assets, Property for own use and equipment, and others (including foreign currency results)		98	93
Income from Associates and joint ventures		-15	7
(Accrued) Interest expenses		86	56
Exchange rate differences, including the impact of hyperinflation and other movements		48	102
		-77	**-901**
Changes in operating assets and liabilities:			
Changes in Receivables and accruals, Third-party interests in investment pools and Other liabilities recognised as Financial liabilities		579	-1,426
Changes in Insurance contract liabilities and assets net of Reinsurance contracts held assets and liabilities		-1,459	-1,857
Changes in Other provisions		10	-40
Changes in Financial liabilities (excluding financing activities)		1,561	1,331
Changes in Investment property		111	12
Changes in Financial investments and Derivatives		-3,786	1,976
		-2,984	**-4**
Cash flows operating items not reflected in Result before tax:			
Received Income taxes		104	2
Paid Income taxes		-98	-63
		6	**-61**
Total Cash flow from operating activities		**-1,414**	**-12**
Cash flow from investing activities			
Purchase of Subsidiaries, Associates and joint ventures and other investments (net of cash and cash equivalents)		-27	-3
Purchase of Property for own use and equipment		-40	-39
Investments in Intangible assets		-32	-47
Disposal of Subsidiaries, Associates, joint ventures and other investments (net of cash and cash equivalents)		10	2
Sales and disposal of Property for own use and equipment			5
Divestments of Intangible assets		5	
Dividends received from Associates and joint ventures		7	6
		-77	**-76**

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF CASH FLOWS (CONTINUED)

(€ MILLION)

	NOTES	2024	2023
Cash flow from financing activities			
Redemption of equity instruments		-750	
Repayment of loans and funds drawn down		2,661	235
Coupon payments		-59	-55
Dividends		-64	-30
Interest paid		-77	-56
Paid lease liabilities		-23	-18
		1,688	**76**
Net cash flow		**197**	**-12**
Net cash and cash equivalents at 1 January		1,934	1,946
Net cash and cash equivalents at 31 December	**18**	**2,131**	**1,934**
Cash and cash equivalents include the following items:			
Cash and bank balances		942	1,335
Call deposits		1,189	599
Cash and cash equivalents at 31 December	**18**	**2,131**	**1,934**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

GENERAL

GENERAL DISCLOSURES

Achmea B.V. is a private company with limited liability with its registered office in Zeist, the Netherlands. The company's head office is located at Handelsweg 2 in Zeist, the Netherlands. The Achmea Group (hereinafter referred to as 'Achmea') consists of Achmea B.V. and the entities over which it exercises dominant control ('control'). In its role as a financial service provider, Achmea operates as a non-life, health, income and life insurer. In addition, Achmea conducts banking activities, asset and pension management activities and other activities.

1. GENERAL ACCOUNTING POLICIES

A. APPROVAL OF FINANCIAL STATEMENTS

The Achmea B.V. consolidated financial statements for the year ended 31 December 2024 were authorized for issue in accordance with a resolution of the Executive Board on 12 March 2025. On the same date, the Supervisory Board gave its advice to the General Meeting of Shareholders to adopt the financial statements. The Executive Board may decide to amend the financial statements as long as these have not been adopted by the General Meeting of Shareholders. The General Meeting of Shareholders may decide not to adopt the financial statements, but may not amend these.

B. BASIS OF PRESENTATION

The Consolidated Financial Statements of Achmea B.V. are prepared in accordance with International Financial Reporting Standards as endorsed by the European Union on 31 December 2024 (hereinafter referred to as: EU and EU-IFRS) and are prepared on a going concern basis for at least the next twelve months. The consolidated financial statements of Achmea B.V. satisfy the legal provisions contained in Section 362, subsection 9 of Book 2 of the Netherlands Civil Code. All amounts listed in the consolidated financial statements are in millions of euros, unless stated otherwise. Assets and liabilities in the balance sheet are classified based on liquidity. If references are made to the balance sheet in these consolidated financial statements, this refers to the statement of financial position.

In the primary consolidated statement, items of a similar nature are condensed. In the notes these items are disaggregated as they are of relative importance for Achmea. Relative importance is assessed based on both quantitative and qualitative criteria. Quantitative criteria relate to the totals of the relevant category in the primary consolidated statements and the relative importance of the item in these statements. If the item is of relative importance quantitatively, it is disclosed further (in accordance with the required IFRS disclosures). If the item is not of relative importance quantitatively, Achmea applies qualitative criteria, such as specific importance to a user of the financial statements, to assess if further explanation in notes is required. If an item is of relative importance qualitatively, it is disclosed further in accordance with the IFRS requirements. If an item is not of relative importance, either quantitatively or qualitatively, the notes are as limited as possible in accordance with the Disclosure Initiative principles of the International Accounting Standard Board (IASB) and related materiality principles.

Furthermore Achmea has separated the notes into chapters 'Notes to significant sections Balance Sheet and Statement of profit and loss' and 'Other notes'. The notes concerning the activities of Achmea of an insurance nature are included in 'Notes to significant sections Balance Sheet and Statement of profit and loss'. Other notes are included because they meet the quantitative or qualitative relative importance criteria and are included in the section 'Other notes'.

C. CHANGES TO REPORTING

The following new standards, amendments to standards and interpretations issued by the International Accounting Standard Board (IASB) were adopted as of 1 January 2024. These have no significant impact on Total equity as per 31 December 2024, Net result for 2024 and comparative figures of Achmea B.V.:
- Amendments to IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Non-current, Classification of Liabilities as Current or Non-Current – Deferral of Effective Date, Non-current Liabilities with Covenants;
- Amendments to IFRS 16 Leases: Lease Liability in a Sale and Leaseback;
- Amendments to IAS 7 and IFRS 7: Supplier Finance Arrangements.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

D. CHANGES IN STANDARDS AND AMENDMENTS WITH FUTURE APPLICATION DATE

On 9 April 2024, the IASB issued the new standard IFRS 18: Presentation and Disclosure in Financial Statements with an effective date of 1 January 2027. Among other things, IFRS 18 requires a modified presentation of the statement of profit and loss and statement of cash flows, including prescribed subtotals for operating result and result before financing and income taxes. An explanation must be given of the performance indicators defined by management (management-defined performance measures or MPMs) used in the statement of profit and loss, as well as a numerical reconciliation with the IFRS (sub)totals in the statement of profit and loss.

The impact of this new standard on the presentation and disclosures in Achmea B.V.'s consolidated financial statements will be further investigated.

On 9 May 2024, the IASB issued the new standard IFRS 19: Subsidiaries without Public Accountability: Disclosures with an effective date of 1 January 2027. This standard is aimed at subsidiaries that are not “Public Accountability entities” and offers the possibility to apply the reduced disclosure requirements. Since Achmea B.V. qualifies as the head of the group, this standard cannot be applied to the consolidated financial statements of Achmea B.V.

In addition, the following amendments to standards with a future application date have been issued in recent years. The effective date of these amendments is 1 January 2025 or later and when applied will have no impact on Total equity, Net result and no or limited impact on the presentation and notes of Achmea:
- Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability (effective date 1 January 2025);
- Amendments to the Classification and Measurement of Financial Instruments (Amendments to IFRS 9 and IFRS 7) (effective date 1 January 2026);
- Annual Improvements Volume 11 (effective date 1 January 2026);
- Contracts Referencing Nature-dependent Electricity (Amendments to IFRS 9 and IFRS 7) (effective date 1 January 2026).

Achmea did not apply these changes early.

E. AMENDMENTS RELATED TO ACCOUNTING POLICIES, PRIOR PERIOD CORRECTIONS AND CHANGES IN PRESENTATION

In 2024, a correction has been made in Note 6 Investments – Investments insurance entities and other activities. The adjustment pertains to an increase in investments valued according to the business model “designated as measured at fair value with changes recognized in profit or loss to avoid an accounting mismatch,” which were mistakenly explained in the 2023 financial statements under “managed and performance assessed based on fair value developments.” In Note 6, the comparative figures in the footnote have been adjusted for this reclassification by an amount of € 4,593 million. Additionally, the comparative figures in Note 11 Net Financial Result from (Re)Insurance Activities (breakdown of investment results by portfolio) and Note 30 Credit Quality Rating Assets (credit risk of fixed-income investments designated) have been adjusted accordingly. This change has no impact on the profit before tax, equity, or total assets of Achmea B.V.

In 2024, a presentation change was made whereby interest income and interest expense from banking activities are presented separately in the income statement under "Investment income from non-insurance activities" from € 543 million to € 582 million and "Interest expense and similar charges" from € 11 million to € 50 million. In 2023, these amounts were partially netted. The comparative figures for 2023 have been adjusted by an amount of € 39 million in "Investment result from other activities" and "Interest and similar expenses." This change has no impact on the profit before tax, equity, or total assets of Achmea B.V.

F. CHANGES IN ACCOUNTING ESTIMATES

The preparation of these financial statements involves the use of estimates and assumptions that may differ from the actual outcome. For the regular adjustments of estimates and assumptions, please refer to Note 7 Assets and liabilities related to insurance contracts and share of reinsurers in insurance liabilities and Note 11 Net financial result from (re)insurance activities. In 2024, no further material adjustments regarding estimation methodologies have been made compared to the consolidated financial statements of Achmea B.V. for 2023.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

G. CONSOLIDATION

Basis for consolidation

All of Achmea's subsidiaries, associates and joint ventures are included in the Achmea B.V. consolidated financial statements based on the assumptions indicated below.

Subsidiaries

Subsidiaries are entities over which Achmea has control. Achmea has control over an entity when Achmea is subject to or entitled to variable revenue by virtue of its involvement with the entity and can influence this revenue through its control over the entity. The assessment of control is based on the economic reality of the relationship between Achmea and the entity and takes into account existing and potential practically exercisable voting rights ('substantive rights'). In doing so, Achmea must have the practical ability to exercise its rights. Third-party interests in these entities are presented as Minority interest under Total equity.

The outcome of the assessment of whether there is "(power to) control" depends on the purpose and setup of the entity, what the relevant activities are (which determine the entity's result), how decisions are made and whether Achmea is able to direct the relevant activities. For the purposes of this assessment, Achmea defines the most relevant activity as the ability to determine the entity's strategic policy. The result of the analysis also depends on whether Achmea is exposed to variable returns by virtue of its involvement with the entity and whether Achmea can use its power over the entity to influence returns. If an entity carries out activities for the public benefit and not only for the benefit of Achmea and/or its customers (e.g. foundations in the healthcare sector), it is assumed that Achmea cannot use power over the entity to influence revenues. Other assumptions may lead to a different outcome of the assessment of control.

Investment funds managed by Achmea, in which Achmea has an interest, are consolidated in the consolidated financial statements if Achmea has control. When assessing whether control exists, all interests that Achmea has in the investment fund will be taken into account, regardless of whether the financial risk relating to the investments is borne by Achmea or the policyholders. The exception to this is when the fund meets the definition of a 'silo' (i.e. there are segregated assets, liabilities and/or capital within the relevant entity) or where, under strict conditions and circumstances, a direct link can be assumed between the policyholder and the fund. During consolidation of an investment fund, a liability will be recognised to the extent that Achmea is legally required to redeem third-party participations. The liability is included under Financial Liabilities in the consolidated financial statements. Where this is not the case, the remaining third-party participations are included as Minority Interests. Assets allocated to third-party participations are included as Investments.

Joint ventures

Entities over which Achmea and other entities have joint control based on contractual arrangements are considered joint ventures. Achmea recognises joint ventures based on the equity method.

Associates

Entities over which Achmea exercises significant influence are accounted for using the equity method. Generally, significant influence is deemed to exist when the participation in the ordinary share capital or voting rights (including potential voting rights) is between 20% and 50%.

Intercompany transactions

Intra-group transactions have been eliminated in the consolidated financial statements. Gains and losses on transactions with associates and joint ventures have been eliminated in proportion to the size of Achmea's interest in the associate or joint venture.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

H. ACCOUNTING FRAMEWORK

This section sets out the general accounting policies. Upon initial recognition, all assets and liabilities are measured at fair value applicable at that time. The specific accounting policies applicable to a certain line item in the consolidated financial statements are included in the note to the relevant item.

Consolidated statement of cash flows

The consolidated statement of cash flows has been prepared according to the indirect method with a breakdown into cash flows from operating, investing and financing activities. Cash and cash equivalents comprise cash and bank balances, and call deposits. Bank overdrafts that are repayable on demand and form an integral part of Achmea's cash management processes are recognised as a component of Cash and cash equivalents. In total cash flow from operating activities, Result before tax is adjusted for those items in the Statement of profit and loss, and changes in operating assets and liabilities, which do not result in actual cash flows during the year. Due to the nature of Achmea's activities, cash flows related to Investment properties, Investments and Liabilities related to insurance contracts are presented as part of Total cash flow from operating activities.

Hyperinflation for interests in subsidiaries and associated companies

Achmea applies hyperinflation reporting if the three-year cumulative inflation rate in a country exceeds 100% (based on the purchasing power index CPI) and the country's economic conditions warrant it. Achmea accounts for its interests in the relevant country adjusted for inflation expressed in the purchasing power index on the balance sheet date. In the consolidated financial statements, comparative figures are not adjusted at the balance sheet date because Turkish operations are converted into the currency of a non-hyper inflationary economy.

The main impacts for reporting are:

- Upon initial adoption, the cumulative effects of restating non-monetary provisions to the purchasing power index at the balance sheet date are recognised as part of other comprehensive income and added to the Foreign Currency Differences Reserve.
- In the subsequent measurement, non-monetary provisions are recalculated according to the purchasing power index on the balance sheet date. The purchasing power effect is recognised as part of other comprehensive income and added to the Foreign Currency Differences Reserve.
- The statement of profit and loss is expressed in purchasing power units at the balance sheet date.
- The loss of purchasing power on monetary positions during the reporting period (net monetary result) is recognised in the statement of profit and loss under Other expenses.

Foreign currency differences

The consolidated financial statements are presented in euros, which is Achmea's functional and presentation currency. Items included in the financial statements of Achmea's subsidiaries are valued using the currency of the primary economic environment in which the subsidiary operates (the functional currency).

Upon consolidation, the assets and liabilities of foreign subsidiaries with a functional currency other than the euro are converted into euros at the exchange rate at the end of the financial year.

The revenues and expenses of these subsidiaries are converted at the weighted average exchange rate during the financial year. Conversion differences arising from the application of year-end exchange rates to the opening balance of net assets and goodwill of subsidiaries that do not report in euros, as well as gains and losses in the year under review, are recognised in Total equity as Net other comprehensive income.

The net asset value of associates and joint ventures with a functional currency other than the euro are converted into euros at the exchange rate at the end of the financial year. The results and expenses of these associates and joint ventures are converted at the weighted average exchange rate during the financial year. Conversion differences arising from the application of exchange rates at the balance sheet date to the net asset value at the beginning of the financial year (including goodwill) of associates and joint ventures as well as profits and losses in the year under review are immediately recognised in Total equity under Net other comprehensive income.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Foreign currency differences resulting from the settlement of such transactions and from the conversion at balance sheet exchange rates of monetary assets and liabilities denominated in currencies other than the functional currency are recognised in the statement of profit and loss. Exceptions are foreign currency differences recognised in Total equity as part of qualifying cash flow hedges or qualifying net investments in a foreign entity. Please refer to the accounting policies in the applicable disclosures for more details regarding the accounting of foreign currency differences for specific assets and liabilities.

If subsidiaries and associates have a functional currency of a hyper inflationary economy, their revenues and expenses will be converted into euros at the exchange rate at the end of the financial year.

Offsetting of financial assets and liabilities
Financial assets and liabilities are offset and reported on the balance sheet at the net amount when Achmea:
- Has a current legally enforceable right to offset the recognised amounts; and
- Intends either to settle on a net basis, or to realize the asset and settle the liability simultaneously.

Impairment
For assets other than financial assets, an impairment exists when its carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. At each reporting date, Achmea assesses whether there is an indication that an asset could be impaired and whether it is necessary to recognise an impairment loss. More information is provided in the accounting policies of the relevant asset categories.

For financial assets not measured at fair value through profit or loss, Achmea recognises expected credit losses (Expected Credit Loss, ECL) according to a "Three Stages" model (see Note 6 Investments for more details).

I. OPERATIONAL RESULT

For Achmea, the operational result is an important indicator for assessing its performance. The operational result is equal to the result before tax adjusted for reorganization expenses, transaction results (mergers & acquisitions) and the application of an 'expected return' methodology for the net financial result from (re)insurance activities.

Here, Achmea bases itself on the expected returns at year-end of the most recently closed financial year taking into account expected portfolio developments. For fixed income securities the current market interest rates at that moment are used, while for equities and similar investments the then current market interest rate is increased by a long-term risk premium as used in the internal market risk model under Solvency II (SII). For the expected accretion of insurance liabilities, the IFRS 17 curve at year-end of the most recently closed financial year is also used (See Note 7 Assets and liabilities related to insurance contracts and share of reinsurers in insurance liabilities - assumptions and estimates and accounting policies). This methodology applies to the Dutch insurance business, the Greek insurance business and to the investment portfolio of Achmea B.V. For the other components, no adjustments are made to the operating result for the net financial result from (re)insurance activities.

The deviations from the expected returns are reported as non-operating results. The sum of the operational and non-operational result represents the IFRS result before tax.

The definition has been updated with the 'expected return' methodology to better reflect the new IFRS 9/17 regime. Fluctuations in financial markets can lead to greater volatility in the result under IFRS 9/17. To maintain focus on and control of the underlying development of financial results, the definition has been changed. The operational result accurately reflects Achmea's underlying financial performance (see also Note 4 Segment reporting).

2. CAPITAL AND RISK MANAGEMENT

Effective capital and risk management is essential for Achmea's continuity and long-term relationship with our clients and other stakeholders. Capital management ensures that Achmea and all its supervised entities have sufficient capital to secure the interests of all stakeholders. Risk management involves identifying and assessing risks, determining and implementing risk control measures, monitoring of risks and accounting for these activities through reports. The starting point is making well-informed decisions about the risks to be accepted in realising the business objectives This encompasses both the objectives of Achmea B.V. and the objectives of the individual entities.

Capital and risk management complement each other and require an integrated approach. For instance, the risk profile is quantified using a partial internal model, approved by the external College of Supervisors[3], which is used to calculate the required capital (Total Group Solvency Capital Requirement). In terms of risk, Achmea has defined its risk appetite and statements about the capital are an important part of this. Each year, the risk and solvency position are assessed in conjunction with each other in the Own Risk & Solvency Assessment (ORSA).

This section discusses capital and risk management at Achmea in more detail, using the following components: A. Key Risk Themes in 2024, B. Capital position, C. Risk profile, D Risk Management System, E. Insurance risk, F. Market risk, G. Counterparty risk, H. Liquidity risk, I. Operational risk, J. Compliance risk and K. Capital management.

A. KEY RISK THEMES IN 2024

The Strategic Risk Assessment is a comprehensive assessment of key risk themes carried out by the Executive Board and management boards of the business units annually. The risks in question can have a major impact if they occur without effective control measures. Achmea closely monitors these risk themes as part of the periodic monitoring of the risk profile and the annual ORSA.

The risk management activities are structurally tested internally for approach and effectiveness. Additionally, these activities are monitored by De Nederlandsche Bank, the Autoriteit Financiële Markten and the Nederlandse Zorgautoriteit under the Current Monitoring Methodology and also local supervisors for Achmea's foreign entities. Risks are made transparent and risk control measures are effective enough to reduce residual risks to an acceptable level.

The key strategic risk themes for the upcoming planning period for Achmea are described on the next page.

[3] The external college of supervisors comprises the cooperating supervisors of the countries in which Achmea applies a partial internal model.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

STRATEGIC RISK

Topic	Description	Control Measures
Sustainability	Sustainability risks are related to all ESG (Environmental, Social and Governance) elements and affect Achmea as an insurer, bank, asset manager, investor, and financier, as well as to its own operations. There may be strategic and reputational impacts if Achmea does not act quickly enough in the energy transition, its resilience regarding climate change, and if it is unable to fully achieve its (externally communicated) sustainability objectives and sustainability statements.	Achmea has communicated its climate objectives externally. Based on new internal and external insights, these are periodically refined. The activities aimed at achieving all sustainability targets within Achmea have been brought together in one central programme, 'Achmea Sustainable Together', ensuring completeness and consistency in the measures to be taken, both at Group level and within the business units. The sustainability policy has been specified on various points in 2024 (including an ESG Underwriting policy). In Achmea's regular business activities, attention is being paid to risk control measures regarding sustainability throughout the Group. For our insurance activities, this includes, for example, adjusting the product and service offerings, refining the premium setting and terms, and reinsurance. In its investment and financing activities, Achmea has been working for some time with a Responsible Investment (RI) policy, including an exclusion and engagement policy. Within our own business operations, this involves, among other things, the sustainability of our buildings. Regular risk analyses are updated annually and are deepened in specific areas.
Future earnings model	The future revenue model of Achmea is influenced by various external developments in the market. This includes the introduction of new distribution, product, and/or service models, which intensify competition and can disrupt current business models. Additionally, broader social and economic trends play an important role, such as demographic shifts, changing laws and regulations (e.g., the new pension agreement), and the influence of changing societal views. Macroeconomic factors, such as interest developments, inflation, and economic growth, can also have consequences for Achmea's revenue model. Furthermore, there is a visible trend of consolidation in both the Dutch and European markets, which may affect Achmea's competitive position. Finally, the decreasing size of the service book within Achmea Pensioen- & Levensverzekeringen N.V. has a negative impact on future free cash flows and balance sheet ratios. This requires timely adjustments to products, services, and processes to mitigate the negative effects.	Achmea's revenue model focuses on achieving a strong operating result, with an emphasis on Operational Free Cash Flow (OFCG) to generate resources for investments in growth and innovation. The strategy aims to maintain existing products, supplemented by strategic explorations and collaborations, so that we can adapt our product portfolio and optimally seize new opportunities. To safeguard this revenue model, we have implemented the following control measures: - A clear strategy focused on operational results and OFCG, enabling us to create resources for future investments in growth and innovation. - A cycle for strategic review, in which the effectiveness of the strategy is periodically evaluated and adjusted as necessary. - Active renewal of products, services, and processes to flexibly respond to market and customer needs and strengthen our competitive position. - A completed strategic exploration at Achmea Pensioen- & Levensverzekeringen N.V., resulting in a collaboration agreement with Sixth Street and Lifetri B.V. in the field of pension and life insurance (subject to approval by the works councils and regulators). - Financial and performance management monitors the progress of the strategy and ensures adjustments where necessary.
Geopolitical developments and inflation	Geopolitical developments (such as the war in Ukraine, conflicts in the Middle East, and the new government in the U.S.) and inflation can lead to lower investment returns, higher claims costs, increased personnel expenses, decreasing sales of insurance products, higher lapse rates of insurance policies and mortgages, and increased payment arrears, resulting in a negative impact on the profitability and solvency of Organizations under Supervision. Within Achmea, inflation is primarily reflected in higher wage costs and increased claims costs, deriving from both wage inflation and price inflation. A specific area of concern involves Achmea's activities in Turkey, where inflation has been extremely high for several years.	Achmea is monitoring developments closely. The consequences of inflation are managed by such means as expense measures, premium adjustments and product management. We support our customers wherever possible in preventing and solving payment difficulties, also in collaboration with the other parties involved. The investment portfolio contains natural hedges because of the correlation with interest rates, equities, real estate and commodities. For the Dutch entities, Achmea makes no use of inflation-linked investment instruments due to the substantial basis risk (only partial correlation between the hedged inflation and inflation in our liabilities). However, inflation-linked investment instruments are used for Achmea's activities in Turkey. There is a relation with the risk 'Financial markets' that is described below under Market Risk.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Topic	Description	Control Measures
Distribution partners	Achmea uses various distribution partners for the sale of its products, with Intermediaries and Rabobank being the key strategic distribution partners. There is a risk of Achmea losing market share as a result of a reduced partnership and/or reduced commercial strength. Therefore, Achmea sees this collaboration as an important and integral part of its business model.	Mutual expectations are permanently aligned to successfully work together as parts of the common value chain. The development of products and services that match the desired sales of the distribution partners is actively pursued using modern channels with digital and personal interaction.
Increasing legislative and regulatory requirements and political developments	Achmea has to deal with many laws and regulations. There is a risk that Achmea's business operations, earnings model and more specifically the solvency requirements will be affected by political developments and increasing requirements from laws and regulations, stricter interpretation by supervisors and / or by organizing solidarity in society differently. This risk affects all Achmea product lines. In addition, Achmea is exposed to reputational and financial risks when it fails to comply with laws and regulations in a timely manner.	Since increasing legislative and regulatory requirements are closely monitored, necessary measures can be initiated in time. Among other things, in 2024 attention was paid to the implementation of current and forthcoming legislation and regulations on sustainability (including external reporting such as CSRD), the Future of Pensions Act (Wtp), AI Act and the Digital Operational Resilience Act (DORA).
Tight labour market	Tightness on the labour market is considered to be structural in nature as a results of demographic developments. It has a direct and an indirect impact. The direct impact is the risk of Achmea being unable to attract and retain the talent required for innovation and business continuity. This could disrupt services and lead to Achmea incurring extra expenses. Use of external capacity can only partially absorb the impact. The indirect impact relates to the risk to services provided by other parties in the supply chain, such as a shortage of medical personnel or employees at contractors or repair workshops.	Achmea actively engages with innovative initiatives aimed at shortening the duration of the application process and developing a 'bilingual Achmea' to expand its talent pool. Strategic Workforce Management also focuses on promoting internal mobility and emphasizes upskilling and reskilling. Furthermore, the transformation of the HR organization contributes to efficiency improvements in the processes of recruiting and onboarding new employees at Achmea.
Artificial intelligence	The developments in artificial intelligence (AI) are progressing rapidly and are being increasingly applied within Achmea, for example, in the evaluation of underwriting and claims handling, and to maintain high service levels. The main risks are: - Competitive advantage of other insurers who can apply AI faster and more efficiently, leading to potential loss of market share for Achmea. - Incorrect or unclear analyses by AI systems, which can result in wrong underwriting or claims assessments, negatively impacting customer satisfaction and results. - Ethical risks, such as biases in algorithms that disadvantage certain groups, which could result in reputational damage or fines. - Increased cyber risk.	The risks of AI are managed through: - Investments in AI research and development to stay at the forefront, combined with (strategic) partnerships with technology partners to accelerate AI capabilities and seize new market opportunities. - Development of a company-wide framework for the responsible use of AI ('Responsible AI') under the leadership of Strategy & Transformation. The existing control frameworks for IT, privacy, data governance, and the ethical framework of the Association of Insurers are integrated into this framework. This ensures explainable AI algorithms that provide transparency and enable verifiable results. - Implementation of control measures that ensure AI algorithms are free from biases and operate ethically. This includes control measures on underlying systems, models, and datasets, as well as utilizing experts to identify and eliminate bias.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MARKET RISK

Topic	Description	Control Measures
Financial markets	As a financial services provider, Achmea is significantly exposed to the financial markets, primarily due to its investment and mortgages portfolio. Political and geopolitical instability, global economic developments, and decisions by financial authorities can lead to volatility in the financial markets, which may have consequences for the valuation of our investments and liabilities. In 2024, the market interest rate remains at a higher level compared to previous years but is showing a slight declining trend throughout the year. A higher market interest rate is expected to have a favorable effect on the long-term protection of policyholders; however, in the short term, interest expenses from refinancing are increasing, which may worsen the Fixed Charge Coverage Ratio, potentially impacting the rating. A period of (prolonged) low interest rates remains possible.	This risk is controlled by the risk management measures as described in section F Market Risk.

INSURANCE RISK

Topic	Description	Control Measures
Longevity risk	Achmea is exposed to Longevity Risk due to the long durations of pension and life insurance contracts. Life expectancy has risen over the past few decades, partly due to breakthroughs in medical science and changes in lifestyle. Additionally, since the Covid pandemic, life expectancy has stabilized. This stabilization is evident in the projection table published by the Dutch Society of Actuaries and impacts the future payout pattern of the pension and life insurance activities.	Longevity Risk is managed through regular reassessment and updating of actuarial models and projection tables to respond to changes in life expectancy. This includes monitoring trends such as medical breakthroughs, lifestyle factors, and the impact of events like the Covid pandemic. By continuously aligning payouts and risk profiles with the most current data, Longevity Risk is managed, and payout patterns can be predicted more accurately. See also paragraph E about Life Risk.
Natural Catastrophe	In the non-life portfolio, catastrophic events caused by (extreme) weather conditions can have a significant impact. Due to climate change, the frequency, timing, and intensity of these events may vary. Global climate change trends, combined with inflation and lower investment returns, have led to a hardening of the reinsurance markets in recent years. However, the past year has been characterized by stabilization, with limited consequences for reinsurance premiums, retention, and reinsurance conditions. These developments have implications for the required capital and may increase the volatility of the results.	Control measures include model development, reinsurance and contingency plans. Regarding the non-life portfolio, these risks are taken into account in product development, pricing and conditions. The hardening reinsurance market has led to higher premiums for many products. Achmea works together with the companies that develop catastrophe models, as well as with universities and the Royal Netherlands Meteorological Institute (KNMI). This also ensures that climate change trends are closely monitored, and impacts evaluated. See also Section E on Non-life Risk
Portfolio risk non-life and income	The risk that volatility in underwriting results manifests itself in the Property & Casualty portfolio due to higher than currently expected (injury) claims and/or deviations in estimated disability and rehabilitation probabilities.	Risks in the non-life portfolio are managed by methods such as promoting prevention measures and optimising underwriting guidelines and reinsurance. Specifically for personal injury claims, a claims monitoring system has been set up and prediction models are being further developed. For the income portfolio, explicit attention is paid to reintegration and developments in laws, regulations and case law. Part of the income portfolio is reinsured.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

OPERATIONAL RISK

Topic	Description	Control Measures
Cyber crime	Cybercrime is an important social issue, one that also continues to grow in importance for Achmea. 'Cybercrime' refers to the risk of material damage arising from, for example, loss of data or unauthorised data processing, prolonged disruption of business operations, and hardware disruptions as a result of inadequate security measures. There is also the risk of damage to Achmea's reputation as a result of social media incidents and/or loss or theft of privacy-sensitive data.	Through a specific cyber security maturity model, the level of security is assessed, also involving scenario analyses. For control purposes, an Integral Security Approach has been implemented, with a strong focus on awareness and outsourcing. Achmea's reputation is continuously monitored. In addition, Achmea has taken out its own cyber risk insurance. The main security and privacy risks are managed by means of information security and privacy management measures in the Achmea Control Framework (CFW).
Customer Due Diligence processes	The risk of inadequate internal control of Customer Due Diligence processes and non-compliance with applicable laws and regulations due to capacity and complexity issues. As a result, financial and reputational damage may occur.	Short-cycle monitoring is used to monitor compliance with laws and regulations. Further details are included in section J Compliance Risk.
Duty of care	The risk of Achmea having to pay out or reimburse more due to changing social developments and/or possible liability claims.	Achmea monitors customer feedback, social and legal trends with regard to the duty of care. Key areas of focus in terms of the duty of care are product development, periodic reviews, distribution forms, and advertising and website communications. With regard to the unit-linked insurance claim, Achmea Pensioen- en Levensverzekeringen N.V. has reached an agreement with the interest groups on a final arrangement for customers with unit-linked insurance who are affiliated with one of these parties. The agreement will be final if 90% of the affiliated customers agree.

Emerging risks

Emerging risks are risks that can develop a new or that continue to evolve over time. They are characterized by a high degree of uncertainty in terms of impact (difficult to quantify) and probability. These risks are transversal, meaning they manifest through one or more of the risk types within the risk classification (see also section C. Risk Profile). They can have a substantial potential impact on capital, underwriting, investments, and/or activities of an insurer.

Achmea identifies emerging risks based on the PESTEL[4] framework. Impactful emerging risks include:

- global debt crisis;
- changes in monetary and fiscal policy;
- failure of critical infrastructure (internet, electricity, communication systems);

In fact, all these emerging risks are already somewhat recognized in the key risks for the upcoming planning period. They are therefore not unknown risks for which measures have already been taken in the existing risk management process.

B. CAPITAL POSITION

Capital management at Achmea is based on the legal framework, economic principles and assumptions of rating agencies. The legal framework is determined by EU-IFRS and the Capital Requirements Directive V ('Capital Requirements Directive V', CRD V) and Capital Requirements Regulation ('Capital Requirements Regulation', CRR). Capital Requirements Directive/ Capital Requirements Regulation (CRD/CRR) is a framework specifically aimed at the banking business and the management of investment funds. For investment firms (within Achmea: Achmea Investment Management B.V. (including Blue Sky Group Asset Management B.V. and Blue Sky Group Fund Management B.V. as of December 31, 2024), Achmea Real Estate B.V., Achmea Mortgage Funds B.V., Blue Sky Group Asset Management B.V. and Blue Sky Group Fund Management B.V.), the Investment Firm Directive (IFD) and the Investment Firm Regulation (IFR) are also applicable. For Centraal Beheer PPI N.V., the IORP II directive applies. For Eureko Sigorta A.S., the prudential regime in Turkey applies.

As of 31 December 2024 Achmea and all supervised entities that are part of it are adequately capitalized according to regulatory requirements.

[4] Political, Economical, Societal, Technological, Environmental and Legal.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

SOLVENCY POSITION

Achmea is a Financial Conglomerate that carries out activities subject to supervision for insurers, banks, and investment institutions. Below is an explanation of the solvency of the entire Financial Conglomerate, followed by a breakdown for the entities covered by supervision for insurers, banks, and investment institutions.

SOLVENCY II RATIO ACHMEA

	31 DECEMBER 2024	31 DECEMBER 2023
Eligible Own Funds	10,039	8,848
Solvency Capital Requirement	5,526	4,840
Surplus	4,513	4,008
Solvency Ratio	**182%**	**183%**

The Solvency Ratio of the Financial Conglomerate has decreased by 1%-pt. This decline is the result of a slight decrease in the Solvency Ratio of the insurance sector, a decrease in the capital position in the asset management sector, and a strengthening of the capital position in the banking sector.

As stated in the capital policy, Achmea aims for a target ratio of at least 165% at the group level for the total of its insurance activities (excluding non-insurance entities under supervision).

SOLVENCY-INSURANCE SECTOR AND HOLDING

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Eligible Own funds	8,907	7,885
Solvency Capital Requirement	4,580	4,031
Surplus	**4,327**	**3,854**
Solvency Capital Ratio Insurance sector and Holding (%)	194%	196%

Achmea uses an approved partial internal model to calculate the required capital. For a further explanation of the partial internal model and an overview of the composition of the required capital, please refer to section C Risk profile. The Solvency position of the consolidated insurance entities and holding is determined based on the SII legislation.

The Solvency Ratio of Achmea Group for the total of its insurance activities (excluding non-insurance entities under supervision) has decreased by 2%-pt at the end of 2024 compared to the ratio at the end of 2023.

The Eligible Own Funds have been affected by the issuance of a new Tier 2 capital instrument of € 750 million in May 2024, along with the repurchase of a previously issued instrument for an amount of € 357 million. By the end of December 2024, Achmea communicated that the remaining part of this subordinated loan (€ 393 million) would be repurchased on the call date. As a result, this loan will no longer be accounted for as part of the Eligible Own Funds but as part of the liabilities. The 'foreseeable' cash dividend from the 2024 results and the expected coupon payments on existing financial instruments in 2025 reduce the Eligible Own Funds by € 129 million.

The increase in Eligible Own Funds is driven by rising equity prices and the higher value of fixed-income investments due to lower interest rates and generally lower spreads.

These positive effects on capital were more than sufficient to offset the negative impacts on the Eligible Own Funds caused by the effect on technical provisions from the decline of the risk-free interest rate curve (including Volatility Adjustment), the reduction of the Ultimate Forward Rate (UFR) from 3.45% to 3.30% on January 1, 2024, and the resulting impact on the extrapolation of the risk-free curve.

A negative development and change in the expected result for 2024 at the Dutch healthcare business is partially compensated by a positive expected result for 2025. Positive results in the Dutch non-life portfolios due to a lower-than-expected claims burden led to an increase in Eligible Own Funds.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The SCR has particularly increased due to a higher capital requirement within market risk. The change in the investment mix, along with the higher economic value of equities, led to higher risk capital. In other categories, the higher capital requirement for health risk is notable, resulting from the increase in the number of policyholders, which led to higher premium and reserve risk.

The solvency information from Achmea Bank N.V. is based on the requirements as set out in the CRD and CRR.

SOLVENCY –ACHMEA BANK

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Eligible Own Funds	962	773
Total Risk Weighted Assets	5,043	4,580
Total Capital Ratio	**19.1%**	**16.9%**
SREP-requirement (including 2.5% Combined Buffer Requirement)	14.6%	14.6%
Counter Cyclical Buffer (CCyb)	2.0%	1.0%
Total Solvency capital Requirement	**837**	**715**

The Eligible Own Funds of Achmea Bank N.V. increase by € 189 million, primarily due to the issuance of a Tier 2 bond (with an economic value of € 126 million as of December 31, 2024) and the addition to Own Funds from the profit after dividend payment for 2023 and the profit after the expected dividend for 2024. The increase in risk-weighted assets is largely caused by the transfer of mortgage portfolios from ASR to Achmea Bank and the regular growth of the mortgage portfolio, including through the Munt label. Furthermore, De Nederlandsche Bank increased the Counter Cyclical Buffer (CCyB) to 2% of risk-weighted assets (2023: 1%) in May 2024, which will take effect in 2024.

The solvency for the asset management sector and other supervised entities, including Achmea Investment Management B.V., Blue Sky Group Asset Management B.V., Blue Sky Group Fund Management B.V., Achmea Real Estate B.V., Achmea Mortgage Funds B.V., Centraal Beheer PPI N.V., and Union Zdravotná Poisťovna A.S. (UZP), is determined based on the Capital Requirements Directive (CRD), Capital Requirements Regulation (CRR), Investment Firm Directive (IFD), Investment Firm Regulation (IFR), and local legislation (for UZP).

SOLVENCY - OTHER

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Eligible Own funds	203	208
Solvency Capital Requirement	109	94
Surplus	**94**	**114**
Ratio (%)	186%	221%

The decrease in Eligible Own Funds in 2024 for the other supervised entities is mainly caused by the sale of the stake in Onlia Holding Inc. and a lower result at Achmea Pensioenservices N.V. This decrease is partially offset by the acquisition of Blue Sky Group Asset Management and Blue Sky Group Fund Management, resulting in an increase in Eligible Own Funds and the required capital.

The table below shows the structure of the authorized SII capital. This capital serves as a buffer to absorb risks and financial losses. See section K Capital Management for the capital instruments used.

ELIGIBLE OWN FUNDS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Tier 1	7,899	6,951
Tier 2	1,453	1,292
Tier 3	687	605
Total Eligible Own Funds	**10,039**	**8,848**

Achmea's Tier 3 capital is limited by the so-called Tiering limit. Tier 3 capital may not exceed 15% of the Required Capital (insurance activities and holding). As of December 31, 2024, an amount of € 132 million in Tier 3 capital will not be included in the Eligible Own Funds of Achmea Group (in 2023, this was € 255 million).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The Eligible Own Funds under the SII regulations is not equal to the equity under IFRS. There are valuation differences and the impact of potential restrictions. The reconciliation between Eligible Own Funds under SII and IFRS equity is shown in the following table.

RECONCILIATION BETWEEN IFRS EQUITY AND ELIGIBLE OWN FUNDS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
IFRS Equity	**9,415**	**8,980**
Solvency II valuation and classification differences	1,263	986
Not qualifying Equity and foreseeable dividends	-639	-1,118
Eligible Own Funds	**10,039**	**8,848**

The SII revaluations and reclassifications amount to € 1,263 million (2023: € 986 million). This includes items that are not recognized under SII (such as goodwill, capitalized acquisition costs, and other intangible assets) and items that are valued differently under SII. Additionally, reclassifications of subordinated debt and SII eligible capital are included in this line. The main revaluation concerns the valuation of the technical provisions. The differences between IFRS 17 and SII relate to the definition of the discount rate, the cash flows included, and contract boundaries.

Non-qualifying Equity and expected dividends include changes in the availability of Achmea's Equity in accordance with SII regulations.

Key assumptions and estimates for the SII calculation

For the SII calculation Achmea uses assumptions and estimates with regard to future results or other developments, including the probability, the realisation moment or the number of future transactions or events. An inherent aspect of estimates is that the realisations may differ materially. Part of these assumptions and estimates correspond to the assumptions and estimates mentioned under Note 1 Accounting Policies – section J and the accounting policies as included for the specific items in the Consolidated Financial Statements. For the SII calculation (including SII Eligible Own Funds), several additional estimates are applied additionally or instead.

The most important additional estimates are:

- Application of internal models, approved by the external College of Supervisors, based on underlying assumptions and policy excess assessments.
- Cash flows used for the assessment of the market value of the Liabilities related to insurance contracts and Amounts ceded to reinsurers. Estimates under cash flows include the expected premium income in the year ahead and claims related to this premium income for future years; these expectations are partly based on assumptions regarding mortality, claims, lapse, work disability, costs and interest.
- Economic value of contingent liabilities.
- Projected fiscal results (after shock) and analysis of future results.
- The absorbing capacity of deferred taxes.

The amount of the reported SII figures is still subject to the assessment by De Nederlandsche Bank as part of the supervisory review process and as a result interpretations may change.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

C. RISK PROFILE

In describing Achmea's risk profile and risk management in its capacity as a financial service provider, a risk classification is used which is largely based on the SII risk classification for calculating the solvency capital requirement (insurance risk, market risk, counterparty default risk and operational risk). Compliance risk is distinguished separately in the risk classification. Under SII it is not viewed as a separate risk but included under operational risk. In addition, the listed types of risk include liquidity risk and strategic risk.

Compliance risk	Achmea runs the risk of non-compliance with laws and regulations or failing to implement forthcoming laws and regulations on time, which may result in legal or administrative sanctions that in turn may result in substantial financial loss or reputational damage. Compliance risk is a distinct risk that is differentiated from other kinds of risk as a function in law and practice; as a risk class, it requires its own specific controls. Key compliance risks include the risks related to duty of care, product development, customer due diligence, privacy (compliance with the General Data Protection Regulation), integrity and fraud control, and competition.
Liquidity risk	Achmea is exposed to liquidity risk at group level and within the entities mainly with regard to the insurance and banking activities.
Market risk	As a financial service provider, Achmea is exposed to market risk due to its investment portfolio, mortgage loans, minimum guarantees and profit sharing (life insurance and disability insurance), retail banking products (mortgage loans, deposits, savings accounts and current accounts) and other investments. Market risk encompasses interest rate risk, equity risk, property risk, spread risk, currency risk and market concentration risk.
Operational risk	Achmea runs the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. Key operational risks include risks with respect to information security and cybercrime, risks in outsourcing processes to external parties, risks related to the digitisation of our services, and liability risk for products and services.
Counterparty risk	Achmea is exposed to counterparty risk, as a consequence of unexpected bankruptcy or deterioration of the creditworthiness of counterparties and debtors, in its investments, treasury, reinsurance activities, and in its dealings with healthcare providers, intermediaries and policyholders.
Insurance risk	Achmea is exposed to life, non-life and health risks through its product range as an insurance company, as a consequence of differences between expectations and actual developments or improbable events.
Strategic risk	Strategic risk relates to Achmea's vision of its future business model. Achmea runs the risk that internal and external events may make it difficult , or even impossible, for Achmea to achieve its business objectives and strategic goals.

Achmea also recognises 'transversal' risks. These are risks that manifest themselves through one or more of the risk types in the abovementioned risk classification. The main risks are solvency risk, reputational risk and sustainability risks.

Specifically for sustainability risks, Achmea has defined a separate risk classification comprising Environmental, Social and Governance risks.

Sustainability risk	Achmea is exposed to the risk of current or future negative effects of environmental (E), social (S) or governance (G) incidents or circumstances on Achmea, its counterparties, assets, investments, liabilities and operations.
Environmental risk (E)	Achmea is exposed to the risk of current or future negative effects of environmental factors on its assets, acceptance and activities (including those caused by climate change or loss of biodiversity).
Social risk (S)	Achmea is exposed to the risk of negative social implications in its direct or indirect treatment of different groups of stakeholders (society as a whole, communities and Achmea employees). This can derive from the loss of social capital or product liability or failing to realise Achmea's social sustainability ambitions.
Governance risk (G)	Achmea is exposed to the risk of negative governance effects as a result of the way in which Achmea and its value chain govern through policy, processes and controls, e.g. by failing to monitor sustainability targets properly or not promoting a culture of sustainability.

In risk assessments both the overall risk classification and the specific risk classification for sustainability risk are used. A structural ESG risk assessment has been implemented, supporting our sustainability-related activities.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Quantitative risk profile

The Solvency Capital Requirement provides a quantification of the risk profile. SII forms the basis on which Achmea manages the risks arising from, among other things, financial instruments and insurance contracts. For calculating the capital required Achmea uses a partial internal model, which has been approved by the external College of Supervisors. An internal model provides Achmea with better insight into the risks, enabling improved risk management. The models are periodically evaluated and, where necessary, updated.

Scope partial internal model Insurance and Achmea Group

The scope of the internal model at group level is:

- For non-life risk, the premium and reserve risk of the Greek and Dutch non-life risk activities. No internal model is used for the premium and reserve risk of reinsurance activities,
- For non-life risk, the natural catastrophe risk of the Greek and Dutch non-life activities (excluding incoming reinsurance for third-party contracts (non Achmea)).
- Health risk includes both health Not Similar to Life Techniques (NSLT) and health Similar to Life Techniques (SLT).
    - For NSLT health risk, the premium and reserve risk of the Greek and Dutch non-life activities is included. This particularly encompasses risks related to absenteeism and accidents.
    - The SLT health risk of the Dutch non-life activities includes, among other things, disability risk.
- For market risk, the interest rate risk, equity risk, property risk, and spread risk of the Dutch insurance entities (excluding the Dutch healthcare entities) and Achmea B.V. Inflation risk related to the claims expenses of the non-life entities is included as part of the interest rate risk within the internal model.

The other risks and risk types are calculated using the standard formula. For aggregation Achmea uses a mixture of aggregation techniques and parts of the standard formula.

Internal model Achmea Bank

In September 2023, DNB granted the Advanced Internal Rating-Based (AIRB) status to Achmea Bank N.V. The AIRB status enables Achmea Bank N.V. to use advanced internal models for the calculation of its credit risks. This leads to improved risk management and customer service. Further development of the internal model is still taking place and in the meantime the risk-weighted assets (RWA) will be determined according to the standardised approach or an RWA floor that is at least equal to the standardised approach.

Results partial internal model

The table below gives an overview of Achmea's risk profile based on the capital required results under SII as calculated using the partial internal model.

SOLVENCY CAPITAL REQUIREMENT

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Market risk	2,808	2,039
Counterparty risk	263	249
Life risk	1,325	1,329
Health risk	2,307	2,191
Non-life risk	1,242	1,247
Diversification	-2,834	-2,621
Basic Solvency Capital Requirement	**5,111**	**4,434**
Loss absorbing capacity of Expected Profit (LAC EP)	-573	-487
Loss absorbing capacity of Deferred Tax (LAC DT)	-688	-581
Operational risk	730	666
Solvency Capital Requirement (insurance sector and holding)	**4,580**	**4,032**
SCR Other financial sectors & Other entities	946	808
Solvency Capital Requirement	**5,526**	**4,840**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The Solvency Capital Requirement increased due to a combination of effects.

The equity risk increases due to purchases and value increases in the financial markets. The spread risk has risen due to changes in the portfolio and spread changes. Additionally, the combination of lower spreads, the effect of these spreads on economic value, along with the impact of interest rate movements on economic value, results in a higher spread risk overall. These effects are partially offset by a decrease in required capital due to the annual calibration of the economic scenarios used. The interest rate risk primarily increases due to portfolio changes. The property risk rises due to increased volatility in real estate, which was evident in the annual calibration.

The currency risk increases due to heightened exposures in the Turkish Lira from higher exposures of Eureko Sigorta and from positive returns and purchases of commodities, which also increases the US Dollar risk.

Counterparty risk increases because advances made to pharmaceutical providers are not being settled quickly enough through their claims due to technical system issues at these providers (resulting in outstanding receivables on the balance sheet) and an increased accounts receivable position at the Dutch healthcare and non-life sectors. These effects are partially offset by a lower risk due to decreased cash positions in Turkey, Greece, and the Dutch healthcare sector.

Life risk has decreased due to the impact of non-economic lapse and cost assumptions, the runoff of the service book portfolio, and model changes. These effects are partially offset by the decreased interest rates, which increase the best estimate and therefore the risk.

Non-life risk decreases due to the annual calibration of the risk factors for premium and reserve risk in the Netherlands. This effect is partially offset by higher premium risk in mobility and fire insurance in the Netherlands and Turkey. The reserve risk increases due to higher provisions, particularly for personal injury. Catastrophe risk increases for natural catastrophes due to a higher expected premium for externally reinsured claims, portfolio growth in Australia, Canada, and Turkey, and the recovery of the annual aggregate deductible, resulting in an increase in required capital. This effect is partially offset by a lower man-made risk due to the termination of a large contract in Turkey. The lapse risk has risen due to increased premiums in mobility and fire insurance. A fire occurred on January 21 in Kartalkaya, in northwestern Turkey. The risk bearer for the hotel is our Turkish subsidiary. The investigation into the circumstances is still ongoing.

Health risk primarily increases at the Dutch healthcare business due to higher premium and reserve risk for NSLT. The premium risk increases due to a higher expected premium volume for 2025 caused by cost inflation. The reserve risk increases due to an increase in the number of insured individuals and a rise in healthcare costs per insured in 2024. For income (SLT), the risk rises due to an increased disability risk as a result of the annual calibration and the termination of the WIA reinsurance starting from the claims year 2025.

The increase in the impact of Loss Absorbing Capacity of Deferred Taxes (LAC DT) is caused by the increased impact at the underlying insurance entities due to higher capital requirements.

The impact of the Loss Absorbing Capacity Expected Profits Market Risk (LAC EP MR) has increased due to rising volumes from re-risking and positive returns. The impact of the Loss Absorbing Capacity Expected Profits Underwriting Risk (LAC EP UWR) increases due to volume growth with higher expected profitability, partly due to premium measures.

D. RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

The Integrated Governance, Risk and Compliance system (IGRC) describes the design and implementation of Achmea's risk management and internal control system. The Governance, Risk and Compliance components can be seen as separate components but are only truly effective when developed and applied in conjunction. This section explains this system using the risk strategy, the Three Lines model and an explanation of the IGRC framework.

Achmea's mission, vision and strategy as laid down in the Purpose are translated into a mission and generic principles that are used to implement the risk strategy. Our mission is for Achmea to ensure efficient and integrated risk management and optimization of the risk profile for sustainable value creation. In addition, the following ten principles form the basis for the elaboration and design of the IGRC with respect to the governance, design and implementation of the control measures and Achmea's risk appetite.

1	Achmea conducts its business in a socially responsible manner and endeavours to provide demonstrable sustainable added value. Moreover, Achmea responds adequately to social developments and thus maintains its relevance.
2	Achmea offers secure and transparent solutions to customers that consistently match customer interests, including fair pricing.
3	Risks are identified periodically and when material changes occur, they are assessed, and control measures are implemented as necessary.
4	Achmea aims to achieve the optimal balance between risk and return and long-term and short-term objectives. Decision-making is clear, explicit and in line with strategic objectives and risk appetite. The remuneration policy discourages taking undesirable and irresponsible risks aimed at short-term results and personal gain.
5	Achmea is aware of all current laws and regulations. Laws and regulations are not only assessed along the legal bar of laws and regulations, but also along that of social views and justified customer expectations.
6	Achmea stimulates an open corporate culture in which risks can be discussed and employees feel responsible for sharing knowledge about risks and in which (pro)active risk management is valued. Exemplary behaviour, open discussion of dilemmas, feasibility of policy and transparency are inextricably linked to the open corporate culture.
7	All Achmea employees should work towards an organisation with integrity in which people work, with integrity, for customers with integrity and collaboration partners with integrity. Achmea takes a broad view of integrity. Achmea is aware that compromising its integrity can also pose a risk to the integrity and good name of the financial sector as a whole.
8	Achmea's governance structure is based on the Three Lines model. This structure ensures the independence of the key functions compliance, risk management and actuarial (second line) and internal audit (third line) from the line organisation.
9	Risk management is supported by a single unified risk management and internal control system that ensures consistency and coherence and contributes to: (1) consistent information for decision-making and monitoring, (2) a unified approach, and (3) structuring and prioritizing the activities of the business and key functions.
10	The risk management and internal control system makes optimal use of standardisation and digitisation of IT systems and processes of the business and key functions.

Three Lines model

As mentioned in the Risk Strategy, Achmea's governance structure is based on the Three Lines model, the main features of which are set out in the table below.

FIRST LINE	SECOND LINE	THIRD LINE
IMPLEMENTATION AND MANAGEMENT - Executive Board and risk committees at Group level - Business management and decentralised risk committees within the business units	SUPPORT, MONITORING AND CONTROL - The Compliance, Risk Management and Actuarial departments operate at both group and business unit level. Some entities have their own compliance and risk management department due to different legal requirements, specific knowledge or efficiency.	ASSESSMENT AND REVIEW - The Internal Audit department operates at both group and business unit level.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The Three Lines model is in place for all supervised entities. In this model, Achmea's line organisation is primarily responsible for the IGRC. The Executive Board and business management ensure adequate design and execution of the IGRC. The presence of a Chief Risk Officer on the Executive Board helps ensure a permanent focus on this in our business operations. The Executive Board is accountable to the Supervisory Board and the general meeting of shareholders of Achmea B.V. The first line is supported by the second line, which is responsible for maintaining the IGRC, supporting the execution and monitoring and reporting on implementation by the first line. The third line complements these activities by periodically reviewing and reporting the effectiveness of the entire IGRC.

Risk committees

Achmea has risk committees both at group level and within the business units.

- The Group Risk Committee (GRC) is a framework-setting and advisory committee of the Executive Board. It is a platform for Achmea policymakers and consists of members of the Executive Board, the management of some business units and the compliance, risk management and actuarial key function holders at group level for the management, monitoring and advising with regard to the IGRC.
- The GRC has instituted as subcommittees the Model Approval Committee (MAC), the Privacy Board and the Information Security Board. The MAC has a delegated responsibility for approving risk models.
- The Asset Liability Committee (ALCO) is an executive and advisory committee of the Executive Board. It is a platform for Achmea policymakers and consists of members of the Executive Board, the management of some business units and staff departments for monitoring and optimising the capital- and liquidity position and investments of Achmea within the policy frameworks set by the GRC and the Executive Board.
- Aligned with the GRC at group level, there are Risk Committees within the business units that discuss and manage risks, possibly complemented by specific committees such as the Product Approval and Review Process (PARP) Committees, the Underwriting Committee at Achmea Reinsurance Company N.V. and the Asset & Liability Committee and the Credit Committee at Achmea Bank N.V.

Key functions

In line with legal and regulatory requirements, the compliance function, the risk management function, the actuarial function and the internal audit function have been set up at group level and for the entities under supervision.

- At group level the compliance, risk management and actuarial functions are fulfilled within the Compliance, Risk Management and Actuarial departments. These functions report to the Chief Risk Officer of the Executive Board.
- The internal audit function at group level is fulfilled by the central Internal Audit department. This function reports to the chair of the Executive Board.
- For the entities under supervision these functions are performed by the relevant central staff departments at group level as mentioned above.
- For the entities under supervision, these functions are organized as follows:
  - For the Dutch insurance entities, Zilveren Kruis Zorgkantoor N.V. and Centraal Beheer PPI N.V., these functions are performed by the relevant central staff departments at group level as mentioned above.
  - For Achmea Bank N.V., the required compliance and risk management function is fulfilled within Achmea Bank N.V., and the internal audit function is carried out by the Internal Audit department at group level.
  - For the Otso's Achmea Investment Management B.V. and Achmea Retail Estate B.V. and Achmea Mortgage Funds B.V. the required compliance and risk management functions are executed by the central staff departments mentioned above.
  - The international insurance entities have their own compliance, risk management, actuarial and internal audit functions, with a functional line to the central staff departments at group level.

The functions of the entities as mentioned above report to the statutory boards of the entities.

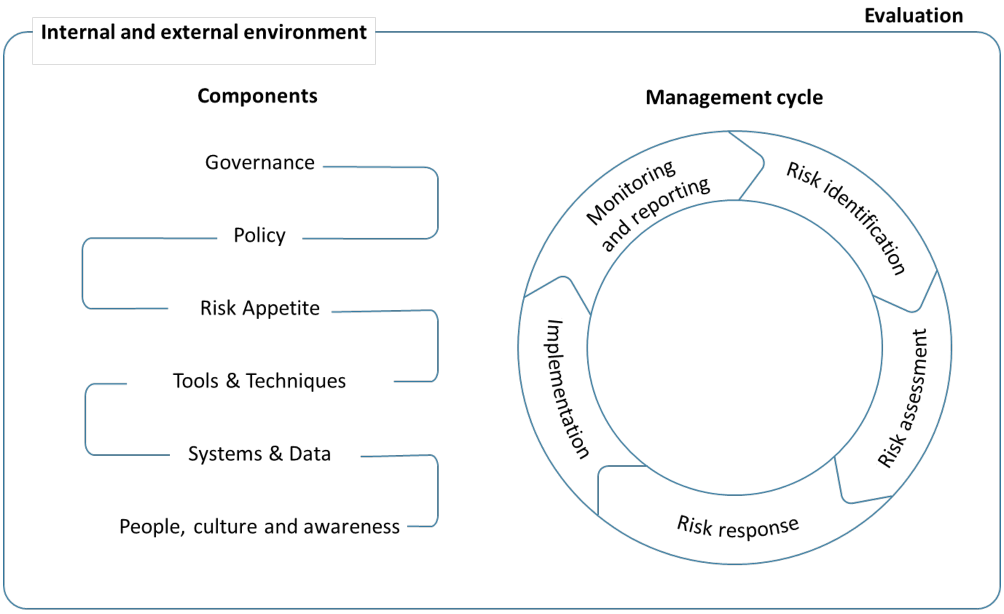
The second and third line group function holders always have access to the chairs of the Executive Board, the A&RC, and the Supervisory Board, respectively. Second line function holders of the entities can always reach out through the group key function holder, or via the chair of the statutory board of the entity in question, and then the supervisory board of the entity. Additionally, key function holders may contact external supervisors and report to them if they deem it necessary.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Framework

As mentioned in the risk strategy, risk management is supported by a single, uniform risk management and internal control system. This has been elaborated in the IGRC framework ensures consistency and coherence, contributing to consistent information for decision-making and monitoring, a unified approach and the structuring and prioritisation of the activities of the business and key functions compliance, risk management, actuarial and internal audit.

The framework as shown in the figure below shows the coherence of the components of the IGRC. Monitoring the internal and external environment is essential for the maintenance and implementation of the IGRC. When going through the management cycle and, in particular, identifying potential risks, knowledge of developments in the internal and external environment is essential. Specific points of attention in the external environment are emerging risks and existing and forthcoming laws and regulations. In the IGRC management cycle, taking developments in the internal and external environment into account, risks are identified, assessed, controlled, monitored and reported through a continuous process. Using the building blocks of the IGRC, the management cycle is applied at different levels (strategic, tactical and operational) and within specific contexts (organisational units, chains, processes, programmes/projects and risk types). For the evaluation of the IGRC, the following evaluations are periodically carried out on (parts of) the IGRC.



The governance is explained in the description of the Three Lines model. Group-wide IGRC policies ensure that the management cycle is carried out consistently throughout the organization. Below is a more detailed explanation of the building blocks, instruments and techniques and the risk appetite of the IGRC.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Tools and techniques

The tools and techniques of the IGRC provide concrete and practical support to implement the management cycle:

1	Risk Self Assessments (RSAs); which identify risks, assess them and determine a risk response.
2	Models and methodologies; specifically for the calculation of the required capital under SII, the 'Solvency Capital Requirement' (SCR), Achmea uses a partial internal model approved by the external College of Supervisors, where some risks are quantified with an internal model and the other risks with the standard SII formula.
3	Scenarios and stress tests, which assess and quantify risks.
4	The Achmea Control Framework (CFW); establishing internal control based on Key Risks/Key Controls.
5	Issue management, which monitors improvements regarding internal control.
6	Incident management, which monitors operational losses due to incidents, and supports a continuous improvement cycle through learning from mistakes.
7	Risk Letters; accepting the potential adverse effects of residual risk for a limited period of time. This does not mean that the qualification of the associated risk will be influenced in a positive manner. The required attention for risk response remains applicable.
8	Periodic reports; providing insight into the risk profile and management of risks.
9	Own Risk & Solvency Assessment (ORSA) / Internal Capital Adequacy Assessment Process and Internal Risk Assessment Process (ICARAP); which identifies the extent to which current and future capital and liquidity positions are considered adequate under normal and extreme conditions.
10	Recovery and resolution; preparing a plan for recovery and/or resolution in circumstances of financial stress.

Periodically, mostly annually, risk analyses are performed regarding strategy, annual plans and at operational level for identifying and assessing risks and determining a risk response. Through regular monitoring and reporting, a reassessment of the risk profile takes place based on key developments in the internal and external environment, with the frequency depending on the type of risk. For the evaluation of the IGRC, periodic reviews take place on (parts of) the IGRC.

A generic control framework is available and integrated into the policy documents of the IGRC and the themes of the Achmea Control Framework (CFW). These complement each other; in general, the controls as laid down in the policy documents of the IGRC are further elaborated in the themes of the CFW. In strategic and tactical risk management, control is further established by defining and monitoring specific control measures.

The development, management and change of models with respect to, amongst other things, risk measurement, financial and business management calculations are subject to strict model governance which ensures that the models are managed properly. The risk profile of models is assessed, and it is compulsory for models with a high/very high gross risk to be periodically validated by the independent model validation function of the Risk Management department and approved by the MAC. Part of the management is that model changes are implemented and approved in accordance with a controlled change procedure.

In addition to approval in the MAC the partial internal model for SII is approved by the Executive Board, the boards of the entities that use the model, the A&RC and the Supervisory Board. After the internal governance is completed newly developed models are submitted for approval to the external College of Supervisors. Following approval by the MAC, major model changes are submitted to the external College of Supervisors for approval and are only used for determining Achmea’s capital position after approval. A similar procedure applies to Achmea Bank's internal model, but the model is not yet used to determine the capital position. Through regular monitoring and reporting, the risk profile is reassessed based on the most important developments in the internal and external environment, with the frequency depending on the type of risk. A similar procedure applies to Achmea Bank's internal model, although the model is not yet used to determine the capital position.

Based on the implemented management cycle, the group-wide ORSA report is prepared annually for the insurance activities. The ORSA determines the extent to which the current and future capital and liquidity positions are considered adequate under normal and extreme conditions. The ORSA also assesses the adequacy of the partial internal model. If an event (internal or external) occurs with a potential significant impact on solvency (prudential and/or economic) and/or liquidity, i.e. where the limits of the risk appetite are (or are in danger of) being breached, Achmea performs an extra ORSA. For the Achmea Investment Management, Achmea Real Estate B.V. and Achmea Bank N.V., ICARAP (Internal Capital Adequacy Assessment Process and Internal Risk Assessment Process) reports are prepared, and for Centraal Beheer PPI N.V. an Own Risk Assessment (ERB). These reports provide insight into and an assessment of the development of the risk profile, solvency and liquidity during the plan period, both under normal conditions (best estimate) and under stress. These reports are provided annually to local regulators whereby Achmea's ORSA report is also shared with the external College of Supervisors.

Under the 'Recovery and Resolution of Insurers' Act, Achmea has a recovery plan - the Preparatory Crisis Plan (VCP) - for both the Group and the Dutch insurance entities, with the aim of being prepared for crisis situations. Additionally, specific recovery plans are drafted for the asset management entities, Achmea Bank N.V. and Centraal Beheer PPI N.V. Internal Control Statements are issued annually by management at the conclusion of the year in which the management of a business unit indicates whether it believes that the reports during the year fairly reflect the effective operation of the business unit's internal control system.

Risk Appetite

The risk appetite describes the maximum level of risk that Achmea is willing to accept in realising its strategy and business and other objectives. Risk appetite consists of a qualitative statement, Key Risk Indicators (KRI) and associated limits and is determined from the strategy, risk strategy and annual objectives.

Below is an overview of the qualitative statements and their translation into KRIs. The sections that follow further explain the management of the risk appetite components.

Financial	**Principles**	**KRI's**
Returns, result and volatility of result	- A result is achieved that is sufficient to meet its interest obligations and the company realises a fixed charge coverage ratio that supports the desired credit rating level.	- Fixed Charge Coverage Ratio
Capital	- The Capital Position matches the required capital according to the risk profile. The capital position covers at least the capital requirements of the Regulator plus a capital buffer above the solvency capital requirement. - We aim for a capital level that supports the credit desired rating. - We also take the economic solvency into account in managing our business. - We strive for adequate financing ratios to support the credit rating and to maintain capital flexibility. flexibility.	- Solvency ratio SII - Capital surplus S&P - Capital surplus Fitch - Economic solvency Achmea Pensioen- en Levensverzekeringen N.V. - Debt ratio - Double leverage ratio
Liquidity	- We maintain sufficient liquidity to be able to meet our current and future liquidity obligations.	- Available liquidity in a going concern situation - Liquidity capacity after a stress situation
Financial Risk Policy	- An adequate market risk policy is pursued whereby an annual market risk budget is approved that matches to the return and risk profile taking into account the capital and liquidity position. - An adequate counterparty policy (including colleteral management) is pursued to prevent undesired concentration in the counterparty risk. - Natural catastrophe risks (Nat. Cat) are assessed for all insurance portfolios based on catasrophe models. An adequate reinsurance policy is implemented to mitigate the gross catastrophe risk and reduce it to an acceptable net risk. The upper limit of the coverage is set at a return period of 200 years or longer. The top of the cover is set at a retun period of 200 years or longer. The own retention will be dtermined by the maximum accepted deviation of the expected annual result as a result of one or more catastrophic events.	- Market risk budget variance - Impact interest rate shock SII - Impact of interest rate on economic solvency of Achmea Pensioen en Levensverzekeringen N.V. - Counterparty limit breaches - Deviation from expected annual result due to catastrophic events

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Non-Financial	Principles	KRI's
Product quality and services	- We are customer-centred and, based on our cooperative background, use cooperation and result focus to be of service to the customer.	- Customer Centricity Score
Operational risk / internal control	- An adequate Operational Risk Policy is pursued to avoid significant financial losses, incidents, issues and reputation damage due to operational, compliance, cyber and integrity risks. Achmea ensures that detected incidents and issues will be solved within the specified time period and that actions are taken to avoid repetition of failure.	- CFW - Reputation score - Financial loss due to operational risks - Very urgent issues - Disruption of business-critical chains
Compliance	- We act in accordance with laws and regulations. Detected violations by Achmea, employees and third parties will be corrected in accordance with the incident management policy. - We implement new or amended laws and regulations on time. Detected violations by Achmea, employees and third parties will be corrected in accordance with the incident management policy. - Achmea employees, third parties, suppliers and customers act with integrity. Employees and external temporary employees act in accordance with the General Code of Conduct of Achmea. Achmea uses a zero-tolerance policy in case of penalising integrity violations. Risk Management aims at avoiding significant integrity violations regarding money laundering, terrorist financing, avoiding sanctions, corruption, conflict of interest, tax fraud, internal fraud, external fraud, market manipulation, cybercrime and socially unacceptable behaviour. Detected integrity violations will be corrected according to the Incident Policy.	- Violations of laws and regulations - Implementation of laws and regulations - Integrity violations
Sustainability	- Achmea pursues an ESG policy aimed at preventing and mitigating material negative (financial and non-financial) impact on the environmental (E), social (S) and governance (G) aspects related to our activities for its stakeholders.	- MSCI ESG rating - Sustainalytics ESG rating

E. INSURANCE RISK

From the perspective of an insurer, insurance risk is the risk of loss, or of adverse change in the value of Liabilities related to insurance contracts, resulting from inadequate pricing and provisioning assumptions, and it encompasses life risk, non-life risk and health risk. For Achmea Pensioen- en Levensverzekeringen N.V., inflation risk related to operational expenses is also included in insurance risk.

The Insurance Risk Policy describes how insurance risks are managed.

Management of insurance risks is explained in more detail below and in the sections on life, non-life and health risks.

Product development and product review
For the introduction of new insurance products and the periodical review of existing insurance products, Achmea has formulated a Product Approval and Review Policy. Achmea wants to offer clients secure and transparent solutions that meet their needs, with a fair pricing policy. Products may not be marketed or distributed without careful consideration of the risks and thorough assessment of other relevant aspects, including the duty of care towards clients. Existing products are also reviewed periodically and dynamically – with a view to societal developments – and any necessary changes are made to ensure that these are still in the interests of customers. In addition, the periodical review focuses on the strategic interest of a product, the business case of a portfolio, premium structure and profitability of the product.

Reinsurance
Achmea has a Reinsurance Policy in which all responsibilities with regard to the reinsurance process are laid down.
Achmea Reinsurance Company N.V. is the reinsurance company of the group and fulfils three roles: advisor, risk carrier and purchaser. Achmea Reinsurance provides reinsurance cover for the Achmea entities. To this end, it enters into reinsurance contracts with the Achmea entities, including the non-Dutch entities. Through retrocession, the contracts are partially placed with external reinsurers. In addition to the group reinsurance programme, Achmea Reinsurance has entered into a reinsurance contract of a financial nature and has concluded a number of incoming life reinsurance contracts for life with strategic partners and other external insurers and reinsurers.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The Underwriting Committee of Achmea Reinsurance Company N.V. decides on the retention within the framework of the reinsurance policy, Achmea's risk appetite and the risk appetite of Achmea Reinsurance Company N.V. After approval by the Executive Board the reinsurance programme is placed in the market.

In the past few years, the reinsurance programmes of the foreign entities have been further integrated . With a limited number of exceptions, the reinsurance programmes of the foreign entities are now integrated into Achmea Group's reinsurance programme. This is achieving cost benefits and improving the assurance of the reinsurance programme.

The reinsurance programme mainly consists of catastrophe excess-of-loss contracts and per risk excess-of-loss contracts. Individual risks that exceed the treaty limit of the 'per risk' programmes are covered on a facultative basis. The reinsurance programme consists of several layers to place the programme as efficiently as possible. The catastrophe programme is the main reinsurance programme. The renewal of this programme takes place on 1 July each year and Achmea includes the intention to extend the programme in its modelling. Furthermore, Achmea Reinsurance Company N.V. uses insurance-linked securities (catastrophe bonds) on a limited scale.

Reserving
In the reserving process the Liabilities related to insurance contracts are determined for the current insurance contracts. The methodology used for this may vary according to the regime: IFRS accounting, including IFRS Liability Adequacy Testing, SII, local accounting standards and local solvency (for the entities not covered by the SII regime). The Liabilities related to insurance contracts are determined at least four times a year. At least twice a year they are also tested for adequacy, and more often if deemed necessary or required by law.

Life risk

Life risk is the risk of loss, or of adverse change in the value of Liabilities related to insurance contracts, resulting from:
- Changes in the level, trend or volatility of the underlying risk drivers (mortality and disability rates, expenses, lapse rates).
- The uncertainty of pricing and provisioning assumptions related to extreme or irregular events. It encompasses Mortality, Longevity, Lapse, Disability/morbidity, Expense and Catastrophe Risk.

Risk profile
In the Netherlands and in Slovakia (Union), Achmea offers Term Life Insurance (ORV) and Individual Pension Annuities/Annuities (DIP/DIL). Achmea is no longer selling group pension contracts in the Netherlands and Slovakia; the Centraal Beheer General Pension Fund (CB APF) and Centraal Beheer PPI N.V. (CB PPI) offer alternatives for this in the Netherlands. In Greece, Achmea (Interamerican) offers unit-linked life insurance and term life insurance.

The Life portfolio consists of life insurance with and without profit participation and unit-linked insurance:
- Life insurances with profit participation comprises traditional life products with profit participations, such as saving products and group contracts.
- Traditional life insurance without profit participation mainly includes term insurance policies, both stand-alone and linked to mortgages.
- For unit-linked insurance, the policyholders bear the investment risks.

The Solvency Capital Requirement under SII provides a quantification of life risk.

LIFE RISK (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Mortality	151	141
Longevity	1,012	991
Disability		2
Lapse	180	193
Expense	476	501
Catastrophe	133	128
Diversification	-627	-627
Solvency Capital Requirement Life risk	**1,325**	**1,329**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The required capital is calculated using the SII standard formula. Life risk has decreased due to the impact of non-economic lapse and cost assumptions, the closed book portfolio, and model changes. These effects are partially offset by the decreased interest rates, which increase the best estimate and thus the risk.

The table below provides insight into various sensitivities relative to the solvency position at year-end.

SOLVENCY II SENSITIVITIES: LIFE

(€ MILLION)

	31 DECEMBER 2024			31 DECEMBER 2023		
	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)
Longevity (-5%)	-205	13	-4%	-203	12	-5%
Expenses (+10%)	-221	23	-5%	-225	23	-6%
Lapse event	17	-9	1%	6	-10	0%

In the longevity scenario, mortality rates for all policyholders are reduced by 5% compared to the base case. The impact of this scenario is stable compared to year-end 2023. In the cost +10% scenario, cost assumptions as part of the best estimates are increased by 10% compared to the base case assumptions. The impact of this scenario is stable compared to year-end 2023. In the lapse scenario, the lapse assumptions used in determining the best estimates for all policyholders are increased by 50% compared to the base case. This scenario has only a limited impact on life risk. In the longevity scenario, mortality rates for all policyholders are reduced by 5% compared to the base case. The impact of this scenario is stable compared to year-end 2023. In the cost +10% scenario, cost assumptions as part of the best estimates are increased by 10% compared to the assumptions in the base case. The impact of this scenario is stable compared to year-end 2023.

Risk response

The PARP policy ensures adequate pricing, accurately reflecting the risks. To manage the risks at individual level, tariffs are differentiated by risk category (for example smoking / non-smoking) and medical examinations are required for life insurance acceptance.

At portfolio level, reinsurance is used, and an 'en bloc' clause can be used which allows the premium to be increased in certain cases. With this instrument, the consequences of adverse mortality and increased expenses can be limited.

The decision to no longer offer group pension contracts has resulted in a decrease in new longevity risk. The expense risk is managed by keeping the expenses in line with the decrease of the portfolio.

Reinsurance is used in life risk to limit mortality and catastrophe risk. This concerns Achmea Pensioen- en Levensverzekeringen N.V. and Interamerican Hellenic Insurance Company S.A. Achmea Reinsurance Company N.V. has a quota-share agreement with Achmea Pensioen- en Levensverzekeringen N.V., part of which is placed externally. In addition, Achmea Pensioen- en Levensverzekeringen N.V. has externally reinsured a portfolio of immediate annuities. The risk of a pandemic is not reinsured by Achmea, but a periodic review is undertaken to assess whether reinsurance would be beneficial.

The mortality tables used in the Netherlands take into account a future increase in life expectancy and are adjusted to the specific character and composition of Achmea's insurance portfolio. In the other countries in which Achmea sells life insurance, the standard mortality tables are adjusted in various ways, such as on the basis of age.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Non-life Risk

Non-life risk is the risk of loss or of adverse change in the value of Liabilities related to insurance contracts resulting from differences between current developments and non-economic assumptions or the occurrence of improbable events. It encompasses premium and reserve risk, lapse risk and catastrophe risk.

Risk profile

The Netherlands is the main market in which Achmea is exposed to non-life risk via a comprehensive range of non-life insurance products. Greece (Interamerican), Turkey (Eureko Sigorta), Slovakia (Union), Australia, Canada and Germany are the non-life markets outside the Netherlands in which Achmea operates. In Australia, products for the agricultural sector are offered. In Germany, Achmea provides property & casualty insurance through its online Inshared brand. In addition, Achmea offers insurance in the greenhouse horticulture sector internationally (Hagelunie).

The risks covered by Achmea are within the typical lines of business, such as motor (hull and liability), transport, fire and natural events, general liability and legal assistance.

The Solvency Capital Requirement under SII provides a quantification of non-life risk.

NON-LIFE RISK

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Lapse	177	170
Premium and reserve	878	897
Catastrophe	668	654
Diversification	-481	-474
Solvency Capital Requirement Non-life risk	**1,242**	**1,247**

The required capital is calculated using an approved partial internal model. Claims risk is decreasing due to the annual calibration of the risk factors for premium and reserve risk in the Netherlands. This effect is partially offset by higher premium risk in mobility and fire insurance due to portfolio growth in the Netherlands and Turkey. Reserve risk is increasing due to higher provisions, particularly for personal injury. Catastrophe risk increases for natural catastrophes due to a higher expected premium for externally reinsured claims and portfolio growth in Australia, Canada, and Turkey, resulting in higher required capital. This effect is partially offset by a lower man-made risk due to the termination of a large contract in Turkey. The lapse risk has risen due to increased premiums in mobility and fire insurance. Changes in the underlying risks have increased the impact of diversification.

Within non-life, catastrophe risk is large. The property and motor hull insurance lines in particular are exposed to catastrophe risk. The predominant risk sources are windstorm and hail risk in the Netherlands and earthquake risk in our entities in Greece and Turkey. Motor hull insurance in the Netherlands includes the risk of flooding.

Non-life concentration risk refers to major claims resulting from the above-mentioned natural disasters and major fires. Due to climate change, the probability of weather-related calamities is expected to increase. Achmea has close ties with the leading organisations developing the catastrophe models, as well as universities and the Royal Netherlands Meteorological Institute (KNMI). In this way Achmea is keeping close track of climate change and evaluating its impact.

SOLVENCY II SENSITIVITIES: NON-LIFE

(€ MILLION)

	31 DECEMBER 2024			31 DECEMBER 2023		
	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)
Combined ratio (+5%)	-98	62	-4%	-96	76	-5%

In the combined ratio +5% scenario, the combined ratio of the non-life business increased by 5% compared to the base case. The impact of this scenario remained stable in 2024.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Risk response
Underwriting guidelines ensure effective risk assessment , underwriting (under conditions when applicable) and premium setting. The underwriting guidelines prescribe that Achmea does not underwrite heavy industrial risks such as airports or power plants. An exception is made in Turkey, where these types of risks are underwritten from a strategic viewpoint. These risks are either 100% reinsured or underwritten with a very minimal retention.

Reinsurance is used to manage exposure to weather-related events, natural disasters, events involving multiple victims, major fires and large claims in general and motor third-party liability. Part of the retention is maintained at Achmea Reinsurance Company N.V.

The reinsurance programme includes the following covers:
- Non-life catastrophe programme: this is an excess-of-loss programme for the cumulated (mainly natural) catastrophe claims of the fire/technical insurance portfolios (residential, commercial, agricultural) greenhouse (horticulture) and motor vehicles (hull – casco). These portfolios are pooled in an external reinsurance programme with different retentions. For the Dutch entities Achmea Reinsurance Company N.V. provides two individual excess-of-loss programmes also with different retentions.
- For the non-Dutch entities Achmea Reinsurance Company N.V. carries the risk in reinsurance programmes for earthquake risk in Greece, Turkey and Slovakia and flood risk in Turkey and Slovakia. Eureko Sigorta A.S. has reinsured its largest catastrophe risk, earthquake risk, partly through the Turkish Catastrophe Insurance Pool and also through regular reinsurance treaties.
- Property: this is an excess-of-loss programme for the individual claims (mainly fire claims) of the relevant portfolios. Achmea Reinsurance Company N.V. maintains a retention on this programme.
- General Liability and Motor Third-Party Liability: this is a reinsurance programme for general and motor liability risks and large personal injury claims.

Developments relating to climate change are being monitored. Climate change is taken into account in setting premiums and in reinsurance. Premiums and the structure and cover of reinsurance programmes can be modified each year. Over the long term we encourage policyholders, in cooperation with municipalities, to take preventive measures. These include the use of hardened glass for greenhouses, the green roofs offered by Interpolis and also Blue Label, which offers municipalities insight into streets or neighbourhoods with a high risk of flooding.

In lines of business such as general liability and motor liability (mainly bodily injury) with long settlements, the claims reserve is exposed to the risk of inflation. This risk is managed as part of market risk, with periodic evaluation of whether this risk should be covered.

Risk profile
The risks of sickness and accident insurance are comparable to non-life risk and are managed accordingly, see the section on non-life risk. Below is more detailed information on medical expenses and disability insurance.

The Netherlands is the main market where Achmea offers health insurance. The health insurance system consists of two components: a basic health insurance system and a supplementary health insurance.
- For basic health insurance, Achmea offers a direct settlement policy (‘natura’), a selective direct settlement policy (‘selectief’) and a combined policy (‘combinatie’). A combined policy is a combination of a natura policy and a direct settlement policy. As of 2024 the refund policy has been replaced by a combined policy.
  Basic health insurance covers standard health care, is mandatory for anyone who lives or works in the Netherlands and must be purchased from a health insurer based in the Netherlands. All health insurers have a duty to accept all applicants. Premiums for basic health insurance are partly influenced by political decision-making. The Dutch government determines the extent of coverage under the basic health insurance package and the conditions applicable to the basic health insurance package, including admission.
- In addition, the government determines the payments health insurers receive from the Healthcare Insurance Equalisation Fund. The compensation paid through the Healthcare Insurance Equalisation Fund is financed by employers, employees and the Dutch government Payments from this fund depend on the risk profile and the portfolio of the health insurance company. Payments related to the statutory emergency scheme (section 33 of the Dutch Health Insurance Act (‘Zorgverzekeringswet’)) are also funded by the Health Insurance Equalisation Fund.
- Supplementary health insurance offers policyholders the opportunity to expand the cover provided by basic health insurance. This insurance is optional and comparable in nature and method to non-life insurance. The cover provided by this insurance is not tied to government stipulations and there is no obligation of acceptance and no risk equalisation system. Achmea offers a variety of dedicated supplementary health insurance packages. Premiums for supplementary health insurance are tailored to the cover offered.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

In the process of estimating Liabilities related to insurance contracts and income from the Health Insurance Equalisation Fund, uncertainties are present due to the timeliness of the processing of invoices from healthcare providers and the restrictions of ex-ante budgeting. The estimated contribution from the Covid-19 catastrophe scheme , which is paid from the Health Insurance Equalisation Fund, is regularly updated based on current Covid-19 developments. Because the uncertainties regarding Covid-19-related healthcare costs are limited, the estimate of the catastrophe scheme contribution is also subject to limited uncertainties. Provisional contributions from the Health Insurance Equalisation Fund were received in the first half of 2022. The final payment is expected in 2025.

For a health insurer, the uncertainties regarding basic health-care mainly arise from political decisions and growing competition. This is because a large part of the activities of the Achmea health insurers are governed by the Dutch Health Insurance Act [‘Zorgverzekeringswet’]. The core of this act is a private-law health insurance system of regulated competition. The market and government are closely intertwined, and efficiency and innovation are partly realised through market forces between parties such as healthcare providers and health insurers. There is also uncertainty related to settlements with Zorginstituut Nederland (ZIN) per occurrence year. The uncertainty of the health-related expenses arises from the dependence on the timely receipt and processing of invoices by health insurers, the settlement of claims and the availability of reliable historical data. In 2023 specific uncertainty have arisen for health insurers with regard to Registration issues of medical support tools and GP rates.

- In 2023, the Dutch Healthcare Authority (NZa) and ZIN initiated an investigation into resource data. This led to the NZa withholding judgment on the national level regarding the 2022 resource data at the end of 2023, and an extension was granted for the submission of the 2023 resource data in 2024.

Disability products cover the risk of a reduction in income resulting from inability to work due to disability (long-term, Health SLT). In the Netherlands, Achmea offers disability products based on local regulatory requirements. In the Dutch regulations there is a distinction between employers (including self-employed) and employees.

In September 2024, the UWV announced that a thorough investigation will be conducted into tens of thousands of possibly incorrectly calculated WIA benefits. This concerns WIA benefits that may have been incorrectly calculated and determined by the UWV during the period from 2020 to 2024. This announcement may also have implications for insurers that supplement the benefits received by policyholders from the UWV up to an insured amount through (supplementary) Sickness Act and WIA insurance. Based on the current insights and available information from the UWV, there is insufficient clarity to assess any potential financial consequences for Achmea. This uncertainty could potentially lead to both an increase and a decrease in the insurance liabilities.

For the self-employed there is no public insurance, and a full private insurance is available. For employees there is public insurance, under the Work and Income (Capacity for Work) Act (Wet werk en inkomen naar arbeidsvermogen, WIA) which consists of two types of covers: the Fully Disabled Persons Income Scheme (Inkomensvoorziening volledig en duurzaam arbeidsongeschikten, IVA) and the Return to Work (Partially Disabled) Regulations (Werkhervatting gedeeltelijk arbeidsgeschikten, WGA).

There are two types of private insurance: supplements to the public insurance and insurance/reinsurance of the WGA, since an employer can choose to bear the WGA risk itself and exit the public insurance. The principal uncertainties in the WGA insurance cover are the inflow and duration of the disability.

Disability insurance risks are changes in legislation, the level of absenteeism due to illness, the frequency and extent to which people are disabled, the rate of recovery from disability, the mortality and the level of interest and inflation rates. A point of attention is the Dutch government’s previously stated intention to introduce mandatory disability insurance for the self-employed; the status and possible consequences are as yet not clear.

The capital requirement under SII provides a quantification of Health risk.

HEALTH RISK

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Health risk SLT	498	450
Health risk NSLT	1,994	1,909
Health catastrophe	81	74
Diversification	-266	-242
Solvency Capital Requirement Health risk	**2,307**	**2,191**

The required capital for income insurance risks (health SLT) and for absence and accident risks (health NSLT) in Greece and the Netherlands is calculated using an approved partial internal model, while other health risks are calculated using the standard SII formula. The underwriting risk for healthcare increases mainly in the Dutch healthcare sector due to higher premium and reserve risk for NSLT. The premium risk increases due to a higher expected premium volume for 2025 resulting from cost inflation. The reserve risk rises due to an increase in the number of insured individuals and a rise in healthcare costs per insured in 2024. This effect is partially offset by an accelerated claims settlement in 2024. In the absence sector, the premium and reserve risk for NSLT increases due to a higher claims burden and higher provisions. For income (SLT), the risk increases due to an increased disability risk as a result of the annual calibration and the termination of WIA reinsurance starting from the claims year 2025. The catastrophe risk increases due to the growth of the underlying portfolios. The increase in underlying risks has heightened the impact of diversification among the risks.

SOLVENCY II SENSITIVITIES: HEALTH

(€ MILLION)

	31 DECEMBER 2024			31 DECEMBER 2023		
	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)
Combined ratio (+2,5%)	-441	5	-8%	-392	5	-8%

In the combined ratio +2.5% scenario, the combined ratio of the Dutch healthcare business increased by 2.5% compared to the base case. The impact of this scenario remained stable in 2024.

Risk response

Achmea has taken a number of measures to mitigate uncertainties with respect to health costs. The Liabilities related to insurance contracts for outstanding claims and receivables from Zorginstituut Nederland are based on best estimates of expected amounts and a provision is made for uncertainties. Claim estimates are generated periodically in order to gain insight into relevant developments and the adequacy of Liabilities related to insurance contracts. In addition to these measures, there is more information available on a national level about the macro claims, which is also used to assess the estimates. Furthermore, Achmea has reduced the upward potential of specialised medical care, mental healthcare and district nursing by agreeing on ceiling arrangements and fixed-sum contracts with healthcare providers. Achmea limits Counterparty Default Risk by periodic monitoring and stopping payments exceeding contractual arrangements.

Within disability, after the initial claims report a customer follows a reintegration programme that assesses whether interventions by external service providers may be valuable. This can be, among other things, a workplace adjustment or waiting list mediation. In the vast majority of the agreements with maturities longer than one year, the premium can be adjusted according to a clause in the policy conditions. The possibility of high claims per single risk for disability is mitigated by limiting the insured income and, in some cases, the use of reinsurance. A reinsurance contract has been agreed for the WGA/WIA product, Achmea Schadeverzekeringen N.V. has concluded a quota share agreement with Achmea Reinsurance for this purpose, fully retroceded to the reinsurance market. In addition to the quota share agreement, Achmea Reinsurance Company N.V. offers stop-loss cover, which is also fully underwritten by the reinsurance market. Finally, additional cover is also provided for high salaries by the WIA supplementary cover product. This reduces the financial consequences and volatility of the work-related disability risk in relation to this portfolio.

F. MARKET RISK

Market risk is the risk of loss or adverse change in the financial situation resulting, directly or indirectly, from fluctuations in market prices of assets, liabilities and financial instruments. It encompasses interest rate risk, equity risk, property risk, spread risk, currency risk and market concentration risk. Inflation risk related to claims within the non-life entities is included in interest rate risk.

An increase in expenses as a result of higher inflation is included in cost risk and is calculated under insurance risk using the standard formula.

Risk profile

As a financial service provider, Achmea is exposed to market risk due to its investment portfolio, insurance products and retail banking products (mortgages, deposits, savings accounts and current accounts). For the composition of the investment portfolio please refer to Note 5 Investment property and Note 6 Investments.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Market risk is reported separately for the banking and the insurance activities. For the insurance activities, Achmea uses an internal model for the calculation of the market risk capital. The table below shows the market risk capital for the insurance activities. For the market risk of Achmea Bank N.V., please refer to the section on interest rate risk later in this section.

MARKET RISK

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Interest rate	321	251
Equity	1,878	1,335
Property	539	478
Spread	878	718
Currency	185	142
Diversification	-993	-885
Solvency Capital Requirement Market risk	**2,808**	**2,039**

Achmea uses a partial internal model to calculate the capital requirements for interest rate, equity, property, and spread risk in one simulation. The results are utilized by the organization. Additionally, Achmea conducts four partial simulations for the individual capital requirements, where the difference from the main simulation is presented as a diversification effect.

The required capital for market risk has increased in 2024 due to interest rate and spread changes. Furthermore, the effect of terminating the swap spread hedge has a positive effect on the required capital. These effects are partially offset by the annual calibration of the economic scenarios used, which leads to a decrease in the required capital.

The re-risking of the equity portfolio, positive returns on equities, real estate, and commodities further increases the required capital. The spread risk has increased due to the combination of the effect of incoming financial spreads and mortgage spreads on economic value, alongside the higher economic value resulting from the decreased market interest rates. The impact of diversification has increased, particularly due to the rise in currency risk and property risk from the recalibration.

The solvency position is sensitive to market fluctuations. The table below provides insight into those sensitivities relative to the year-end solvency position.

SOLVENCY II SENSITIVITIES

(€ MILLION)

	31 DECEMBER 2024			31 DECEMBER 2023		
	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)	IMPACT REQUIRED EQUITY	IMPACT REQUIRED CAPITAL	IMPACT RATIO (%)
Equity -20%	-901	-148	-12%	-631	-99	-10%
Interest -50 basis points	190	53	2%	114	43	1%
Interest +50 basis points	-147	-35	-2%	-85	-42	0%
Property -20%	-346	4	-6%	-328		-7%
Spread -50 basis points	349	15	6%	205	13	4%
Spread +50 basis points	-304	-3	-5%	-178	-23	-3%

In determining the sensitivities to interest rates (-/+ 50 basis points), the UFR is kept the same and not shocked. In determining sensitivities to spread, the Volatility Adjustment is determined based on the changed spreads. The outcomes are related to a changed composition of the balance sheet and cash flows. Achmea applies some simplifications; for example, sensitivities are determined based on size, composition and sensitivity of the portfolios. In addition, the impact is determined on the sensitive assets, liabilities and capital requirement where the risk margin is not redetermined. Sensitivities were calculated using the partial internal market risk model. Sensitivities have been calculated on the balance sheet excluding exposures of banking entities.

The -20% sensitivity of equities is determined by a reduction of 20% in the market value of the shares. The impact of this scenario has increased due to an increase in the equity portfolio in 2024. The interest rate sensitivity -/+ 50% is determined by a shock of -/+ 50 basis points on the interest curves used for the valuation of interest-sensitive investments and best estimate provisions. The UFR remains maintained at 3.3% in these sensitivity analyses and is not shocked. Applying the real estate shock results in a decrease in real estate value. The impact of this sensitivity has remained stable.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The spread sensitivity -/+ 50 basis points is determined by a shock of -/+ 50 basis points on the interest curves used for the valuation of spread-sensitive investments. The applied spread shock of -/+ 50 basis points impacts the best estimate provisions through adjustments to the Volatility Adjustment. In the -50 basis point scenario, the Volatility Adjustment decreases from 23 basis points to 3 basis points, while in the +50 basis point scenario, the Volatility Adjustment increases from 23 basis points to 43 basis points. The spread sensitivity of -/+ 50 basis points has increased in 2024 due to the termination of the swap spread hedge.

Risk response
The market risk policy describes the components of the market risk management process:
- Annually, a limit on market risk is set within the boundaries of the risk appetite as a fixed amount for Achmea and its Dutch and foreign subsidiaries.
- The investment plan then determines an optimal portfolio (the strategic investment mix) that meets the established market risk budget and offers the highest return, given additional restrictions for liquidity and maximum size per investment category. Market risk is monitored periodically, with specific attention to managing interest rate risk and checking whether the current risk profile complies with the established risk appetite.

Interest rate risk

Interest rate risk is the risk of loss resulting from the sensitivity of the values of assets and liabilities to changes in the term structure of interest rates (both nominal and real) or in the volatility of interest rates. Inflation risk related to claims within with non-life entities, expressed as the difference between nominal and real interest rates, is also included in interest rate risk. Inflation and interest rates are positively correlated; rising inflation often leads to higher interest rates.

Insurance activities
The solvency ratio is affected by the interest rate curve used in valuation. When valuing the Liabilities related to insurance contracts, the curve prescribed and published by EIOPAEuropean Insurance and Occupational Pensions Authority (EIOPA) including UFR is used.

The Market Risk Policy describes how this interest rate risk is managed:
- Achmea manages the interest rate risk using different interest rate scenarios. For this assessment, interest rate shocks are applied to the replicating portfolios and the related actual investment portfolios. Achmea Group maintains a limit for the interest rate sensitivity of the solvency ratio at parallel interest rate shocks of 50 basis points. The interest rate sensitivity of the net position is assessed on a monthly basis for the insurance entities.
- The required capital for interest rate risk is determined using a specific yield curve extrapolated from 30 years instead of 20 years (as prescribed for the SII liabilities on the economic balance sheet). This makes it possible to take a more economic hedge position in order to properly manage interest rate risks with a duration exceeding 20 years.
- For the purpose of ensuring that the solvency ratio remains stable over the longer term, the interest rate sensitivity limits of the solvency ratio of Achmea Group and Achmea Pensioen- en Levensverzekeringen N.V. are wider when the solvency ratio is at a higher level. Additionally, the longer-term effects of parallel interest rate movements, changes in the shape of the interest rate curve and sensitivities for interest rate volatility are monitored for Achmea Pensioen- en Levensverzekeringen N.V.
- Achmea's foreign subsidiaries apply a duration matching approach within bandwidths laid down in the local investment plans and monitored locally via committees.
- Achmea recognizes two types of inflation risk: inflation risk in insurance products and in its own operating costs. Achmea does not set specific limits for either type of inflation risk within the market risk policy. Inflation risk in insurance products is managed at the market risk level.
  The inflation risk of its own operating costs is part of the technical insurance risk and is classified according to the standard formula. In 2024, an integrated inflation risk monitoring system has been established to provide insight into the total inflation risks.

Hedging of interest rate risk is done through a periodic interest rate management process that uses interest rate derivatives (swaps and swaptions). The value of the interest rate derivative position is € 1,848 million (2023: € 1,425 million).

Banking activities
The focus of Achmea Bank N.V.'s activities is on retail banking products (mortgages, deposits and savings). The majority of these products or services generate interest rate risk. This risk is managed through the Interest Rate Risk Policy, which mitigates the risk by using derivatives.

SENSITIVITIES BANKING ACTIVITIES

(€ MILLION)

	2024 ACHMEA BANK	2023 ACHMEA BANK
Duration Equity (in years)	1.1	-1.3
Stresstest -200 basis points	-176	-153
Stresstest +200 basis points	-96	-39
Income at Risk -100 basis points	-18	-17
Income at Risk +100 basis points	16	16

The impact of the stress test (-200 basis points) amounts to € -176 million in 2024 (2023: € -153 million) and is caused by significant increases in mortgage repayments. The increased negative impact compared to 2023 is primarily due to a decrease in interest rates, which has led to a higher market value of mortgages and, consequently, a greater modelled market value loss in the event of increased repayments.

The impact of the stress test (+200 basis points) amounts to € -96 million in 2024 (2023: € -39 million). The increased negative impact compared to 2023 is mainly caused by the higher duration of Equity.

In practice, Achmea Bank N.V. adjusts its interest rate risk position in response to changes in interest rates and customer behaviour as part of the regular IRRBB management process. This is not possible in a scenario with an overnight shock. In December 2024, Achmea Bank N.V. revised its stress test scenarios and decided to use gradual shocks of +200 basis points for calculating the Economic Value of Equity (EVE) at risk and the Net Interest Income (NII) at risk for the future. This allows Achmea Bank N.V. to make interim adjustments using interest rate swaps.

As of the end of December, the EVE at risk for the gradual -200 basis points scenario is € -89 million, while the gradual +200 basis points scenario results in an EVE at risk of € -51 million.

Equity risk

Equity risk is the risk of loss resulting from the sensitivity of the values of assets and liabilities to changes in the level of market prices of equities and alternative investments.

For the Dutch insurance entities, the purpose of investing in equities is to cover the average long-term risk premium. Equities offer a higher return potential than fixed-income securities and offer diversification potential. Equities are spread across several asset classes to capitalise on diversification benefits. Derivatives are not used to mitigate equity risk. Achmea does not apply specific limits for equity risk. Equity risk is managed at overall market risk level.

Achmea’s non-Dutch subsidiaries each follow their own specific investment plans based on Achmea Group guidelines and local laws and regulations. As described in the general section on the Market Risk Policy, the general principle with regard to market risk is that this risk should be limited for foreign subsidiaries.

Property risk

Property risk is the risk of loss resulting from the sensitivity of the values of assets and liabilities to changes in the level of market prices of real estate. An overview of the property investment portfolio is given in Note 5 Investment property.

Property is part of the investment mix, taking into account expected return and correlation with other risks. Achmea does not apply specific limits for property risk. Property risk is managed at overall market risk level.

Spread risk

Spread risk is the risk of loss resulting from the sensitivity to changes in the level of credit spreads in interest rates. The credit risk on government bonds and mortgages is also taken into account in calculating the Solvency Capital Requirement under SII.

Achmea is exposed to spread risk in its fixed-income investments. For the composition of the fixed-income investments for the different rating classes please refer to Note 30 Credit quality financial assets. When drawing up the economic balance sheet, Achmea also applies the Volatility Adjustment to many of its insurance entities to value the Liabilities related to insurance contracts. Changes in the spreads lead to changes in the Volatility Adjustment and consequently in the value of the Liabilities related to insurance contracts.

Spread risk is managed and monitored as part of the Counterparty Risk Policy and the Market Risk Policy. Achmea mitigates the spread risk through an investment strategy that balances the exposure types (corporates, financials, covered bonds, government related bonds, mortgages and asset backed securities), the credit rating, the maturity profile and the regional allocation. Based on the approved internal model for market risk the composition of the investment portfolio is further optimised.

For savings mortgages without additional collateral, capital is held in accordance with DNB's Q&A regarding treatment of savings mortgages under SII. Achmea does not apply specific limits for spread risk. Spread risk is managed at overall market risk level.

Achmea does not apply specific limits for spread risk. Spread risk is managed at overall market risk level.

Currency risk

Currency risk is the risk resulting from the sensitivity of the values of assets and liabilities to changes in the level of currency exchange rates.

Achmea is exposed to currency risk, specifically in US dollars, as part of the regular investment portfolio (equities, fixed-income investments and listed real estate) and foreign incoming reinsurance contracts denominated in foreign currencies. Another significant exposure is the Turkish Lira through subsidiary Eureko Sigorta and associate Garanti Emeklilik Ve Hayat AS and associate Garanti BBVA Emeklilik A.S. The Turkish Lira continued to depreciate against the euro during 2024 and as a result, Turkey is considered a hyperinflationary country for accounting purposes. The main effects of this are explained in Note 1 Accounting policies.

The exchange rate risk table shows the total exposure to the major currencies at year end based on the applied stress of the supervisory regime.

CURRENCY RISK NON-EURO EXPOSURE

	ECONOMIC VALUE BEFORE STRESS				ECONOMIC VALUE AFTER STRESS				SCRFX		Δ
	2024		2023		2024		2023		2024	2023	
	ASSETS	LIABILITIES	ASSETS	LIABILITIES	ASSETS	LIABILITIES	ASSETS	LIABILITIES			
USD (downward)	261	29	256	38	196	22	192	29	58	55	3
TRY (downward)	133		67		100		50		33	17	16
AUD (downward)	90	41	72	40	68	31	54	30	12	8	4
GBP (upward)	42	2	5	3	53	3	5	3	10		10
SEK (downward)	25		15		19		11		6	4	2
Total (downward)	759	82	597	79	573	61	451	59	165	126	39
Total (upward)	82	2	72	14	103	3	86	12	20	16	4
Total	**841**	**84**	**669**	**93**	**676**	**64**	**537**	**71**	**185**	**142**	**43**

The stress applied for each currency is 25%, except for the Danish Krone, which is connected to the Euro.The exposure in the investment portfolio is generally hedged with foreign exchange contracts, with the exception of exposure in commodities and emerging markets investments (both fixed income assets and equities) in line with the investment policy.

Achmea Reinsurance Company N.V. hedges the currency risk of the reinsurance and retrocession contracts on an economic basis in line with the investment policy.

The net investment in, or income streams from, non-euro subsidiaries of Achmea are not hedged, because the operations of these subsidiaries are regarded as part of Achmea's long-term strategy. However, dividends declared are hedged.

Market concentration risk

Market concentration risk is the risk of loss resulting from the lack of diversification in investments and liabilities for market risk or due to an increased sensitivity to bankruptcy of an individual counterparty or group of affiliated counterparties, to the extent that this is not expressed under counterparty default risk. The balance sheet of Achmea Group does not comprise any market concentrations that lead to solvency capital requirements under SII.

G. COUNTERPARTY DEFAULT RISK

Counterparty default risk is the risk of loss resulting from unexpected default, or deterioration in the credit standing, of the counterparties and debtors of Achmea.

Risk profile

Achmea is exposed to counterparty default risk related to derivatives, bank balances, retail loans, reinsurance, securities lending, receivables of healthcare providers, intermediaries and policyholders. The credit risk on mortgages and countries is taken into account under spread risk in calculating the Solvency Capital Requirement under SII.

An overview of the financial investments categorised by credit rating, an overview of the assets and liabilities subject to offsetting and similar agreements and an overview of financial assets that are past due or impaired, are included in Note 30 Credit quality financial assets.

The required capital under SII provides quantitative insight into the level of counterparty risk. In 2024, the required capital for counterparty risk increased from € 249 million at year-end 2023 to € 263 million at year-end 2024. The risk increased in particular due to outstanding claims related to the earthquakes in Turkey.

Type 2 risk increases due to an increase in receivables from pharmaceutical providers and a higher accounts receivable position at the Dutch healthcare and non-life sectors. This effect is partially offset by a lower Type 1 risk due to decreased cash positions in Turkey, Greece, and the Dutch healthcare sector. The risk further decreases due to reduced loss given default from securities lending.

Risk response

The counterparty risk group level governance framework is set out in the Counterparty Risk Policy, which describes matters such as the process for initiating transactions with new counterparties, the limits and the limit revision and exposure control process. The main ‘prevention’ objective in managing counterparty risk at group level is to prevent undesired concentrations and ensure that portfolios are well diversified. Additionally, important measures in managing counterparty risk are arranged, for example to ensure proper recovery processes to withstand credit events. For healthcare providers the aim is to prevent negative net positions to limit the counterparty risk.

The limits per rating in the Counterparty Risk Policy are the same as last year and are given in the following table:

MAXIMUM EXPOSURE AT GROUP LEVEL

	(€ MILLION)
AAA	700
AA+, AA, AA-	500
A+, A, A-	400
BBB+	250
BBB	200
BBB-	125
<=BB+ and no rating	Determined case by case

Achmea uses ratings from S&P, Fitch and DBRS as well as AMBest (only for reinsurers). For private placements Achmea uses Scope Ratings, Egan-Jones Ratings and the Kroll Bond Rating Agency. If multiple ratings are available for the same financial instrument, the second-best rating is used. See Note 30 on Credit quality financial assets If no rating is available for ‘private placements’, then an ‘internal’ rating may be generated from the Moody’s RiskCalc model specifically for this class. This model is tested against the guidelines in the Model Management and Validation Policy. For counterparties with a lower rating or no rating, creditworthiness is assessed on an individual basis for each counterparty in order to define the maximum exposure appropriate to the risk profile.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The Counterparty Default Risk Policy also contains limit deviations for specific exposures such as for certain governments and banks. A specific deviation applies regarding exposure limits at group level to exposure to Rabobank Group. This exposure consists mainly of funds linked to capital policies, for which the interest yield is based on the interest paid by the policyholder on their savings mortgage. Additional securities have been agreed upon with Rabobank Group to mitigate this risk. Counterparty default risk only exists for the part of the portfolio for which no collateral has been arranged. This is reflected in the required capital for spread risk in line with DNB's Q&A and Good practices on the treatment of savings mortgages under SII.

Derivatives

Derivative transactions are only initiated with counterparties that meet Achmea's rating requirements and collateral requirements. ISDA (International Swaps and Derivative Association) master agreements are in place between Achmea entities and its derivative counterparties. The Counterparty Default Risk Policy defines collateral requirements that must be specified in the individually negotiated Credit Support Annexes (CSA).

Only 'prime collateral' is accepted, comprised of government bonds issued by highly rated countries and cash collateral in euros, US dollars, British pounds and Swiss francs. Independent valuation of derivatives, daily settlement of collateral and improved valuation adjustments related to the remaining maturity of the collateral received, further reduces the counterparty default risk. In addition, Central Clearing is used for a portion of the derivatives portfolio. Central Clearing is used when entering into new derivatives transactions; the majority of the derivatives portfolio runs through a Central Counterparty (CCP). Achmea uses 'LCH Clearnet' and 'Eurex Clearing' and has set a limit for both to limit the maximum exposure. The CCPs accept only cash collateral and collateral is settled daily. In addition, clearing members must contribute to the CCP's reserves to manage counterparty default risk under stress scenarios.

Reinsurers

Reinsurers are part of the counterparty risk governance framework, which provides guidelines for entering into transactions with new counterparties, limits and allocations per counterparty. At Achmea Reinsurance Company N.V. the Underwriting Committee decides on the composition of the panel of reinsurers. Counterparty risk is monitored quarterly by the Risk Committee of Achmea Reinsurance Company N.V.

Policyholders

The counterparty risk of receivables relating to policyholders is managed by premium collection measures. In the event that the policyholder is in arrears in the payment of premiums for their basic health insurance for more than six months, there is a national regulation in place through Zorginstituut Nederland (ZIN), provided that Achmea has met all relevant conditions. This regulation ensures that all unpaid premiums due for more than six months are compensated. The risk for Achmea is therefore limited to at most six months of unpaid premiums per insured person. For other types of insurance, such as non-life and supplementary health insurance, the cover can be suspended or terminated in the event of default.

Healthcare providers

The counterparty risk related to healthcare providers is mitigated by monitoring the total amount of liabilities less receivables (including advances). When receivables exceed liabilities, there is a negative net position.

Retail loans

Achmea's retail loans are mainly comprised of loans with real estate as collateral (mortgages) and/or with a security deposit as collateral. The counterparty default risk is the risk of payment arrears and impairment resulting from deterioration in the credit standing of the counterparty.

H. LIQUIDITY RISK

Liquidity risk is the risk of loss resulting from the inability to efficiently meet both expected and unexpected current and future cash flows and collateral needs without negatively affecting either daily operations or the financial position of the legal entity.

Risk profile
Achmea is exposed to liquidity risk at Group level and with regard to its insurance and banking activities. The liquidity position of the Group at holding level is affected by the outflow of external dividend, financing charges and other holding company expenses, and the inflow of dividend from subsidiaries. In addition, non-regular transactions, such as external funding, capital injections to subsidiaries and/or associates within the Group or M&A transactions, also impact the holding liquidity position.

From the perspective of the insurance activities, Liquidity Risk is particularly related to stress scenarios such as catastrophes in the form of extreme storms and hail in combination with the reinsurance program or deterioration of payment behaviour in the case of Non-Life insurance or large-scale surrender in the case of the life activities in conjunction with a stress situation in financial markets.

Maturity analyses of the liabilities related to insurance contracts are provided in Note 7 Assets and liabilities related to insurance contracts and share reinsurers in insurance liabilities. On a shorter horizon Liquidity Risk is related to collateral requirements arising from derivative positions mainly held in order to hedge the Interest rate Risk.

For the banking activities, there are liquidity and refinancing risks due to matters such as the difference in maturity of assets and liabilities between mortgages and short-term savings. The following table shows the contractual maturities of the banking operations in 2024 and 2023.

LIQUIDITY RISK EXPOSURE BANKING (€ MILLION)

2024	LESS THAN 3 MONTHS	BETWEEN 3 AND 12 MONTHS	BETWEEN 1 AND 5 YEARS	MORE THAN 5 YEARS	TOTAL
Assets					
Cash and cash equivalents	1,191				1,191
Investments	399	352	1,956	15,346	18,053
Other assets	288	10	1		299
Total assets	**1,878**	**362**	**1,957**	**15,346**	**19,543**
Liabilities					
Derivatives		12	57	347	416
Financial liabilities	7,266	2,597	4,487	3,815	18,165
Other liabilities	91				91
Total liabilities	**7,357**	**2,609**	**4,544**	**4,162**	**18,672**
Net liquidity gap	**-5,479**	**-2,247**	**-2,587**	**11,184**	**871**
2023	LESS THAN 3 MONTHS	BETWEEN 3 AND 12 MONTHS	BETWEEN 1 AND 5 YEARS	MORE THAN 5 YEARS	TOTAL
Assets					
Cash and cash equivalents	618				618
Investments	588	680	3,228	10,656	15,152
Other assets	93				93
Total assets	**1,299**	**680**	**3,228**	**10,656**	**15,863**
Liabilities					
Derivatives	1	18	107	311	437
Financial liabilities	6,688	1,570	3,017	2,651	13,926
Other liabilities	17	12	13	-22	20
Total liabilities	**6,706**	**1,600**	**3,137**	**2,940**	**14,383**
Net liquidity gap	**-5,407**	**-920**	**91**	**7,716**	**1,480**

Risk response

The Liquidity Risk Policy describes how liquidity risk is managed. Achmea has defined metrics for each of its supervised entities as well as the holding company. The metrics provide insight into Achmea's liquidity position and liquidity risk exposure for various time horizons under normal conditions as well as for a range of stress scenarios.

In line with the business plan, liquidity planning takes place at both Achmea B.V. and entity level. In addition, the liquidity contingency plan describes the procedures and measures for arranging liquidity in times of stress. This plan describes possible actions and sources of funds taking into account the behaviour of other counterparties. Each year a Liquidity Risk Assessment (LRA) presents the fullest and most up-to-date picture possible of the liquidity risks of the entities and of the Group. An assessment is also given of the quality of the risk response. The recommendations of the LRA serve as input for changes to policy, risk appetite or regular monitoring and reporting.

The liquidity position of the Achmea B.V. company is managed using a monthly analysis of the liquidity forecast over the entire business planning period in conjunction with the availability of credit facilities. All projected cash flows are included and the impact of a number of relevant scenarios or expected transactions is calculated.

The Liquidity Risk of the insurance entities is managed by the entities. In their liquidity planning, cash inflows and outflows from insurance activities are all taken into account for the Liquidity Risk of the insurance activities. Furthermore, a number of stress scenarios is set up and regularly updated by each legal entity. These stress scenarios consider subjects such as a catastrophe or deterioration of payment behaviour in the case of Non-Life insurance, large-scale lapse in the case of life insurance as well as the possible impact of changes in collateral requirements. Additionally, the impact of a stress situation in financial markets is assessed. The entities report on this matter each quarter. Liquidity Risk within Achmea's insurance operations is mitigated through the availability of cash and a high level of investments in liquid assets.

For the banking activities, Achmea manages its liquidity risk as part of its Internal Capital Adequacy Assessment Process and Internal Risk Assessment Process (ICARAP) at different levels:

- In the short term (overnight to one month), the cash position of Achmea Bank N.V. is managed on a daily basis.
- For the medium term, Achmea manages, among other things, through the survival period. The survival period indicates the moment (in months) when the cumulative liquidity position shifts from a surplus to a deficit, based on the most severe internal liquidity stress scenario.
- For the long term, Achmea Bank N.V. strives for a well-diversified funding composition both in terms of maturity and funding sources. Furthermore, the bank has liquidity contingency plans in place.

Important metrics for Achmea Bank N.V. are the liquidity coverage ratio (LCR), and the net stable funding ratio (NSFR). The LCR is defined as the stock of high-quality liquid assets divided by the net cash outflow over a 30-day period. The NSFR is, defined as the available amount of stable funding divided by the required amount of stable funding.

I. OPERATIONAL RISK

Operational risk is defined as the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. This may result in financial loss, but also in reputational damage. Reputational risk is not considered a separate risk category, but a form of damage that may ensue from the risks Achmea is exposed to.

Risk profile

The main operational risks include risks related to information security and cybercrime, risks related to outsourcing, risks related to digitising our services and liability risks from products and services. Cybercrime risks are high, due to malware and ransomware attacks using evolving techniques. Risks around website security and privacy-sensitive information also remain high due to the digitisation of our services involving changes to our websites and IT environment. As a result of the rapid developments related to Artificial Intelligence (AI), the operational risks associated with its use by both employees and third parties are also increasing. Important risks related to outsourcing are concentration risks and subcontracting risks.

The required capital under SII provides quantitative insight into the magnitude of operational risk. In 2024, the required capital for operational risk increased from € 666 million at year-end 2023 to € 729 million at year-end 2024 due to higher premiums in the Dutch healthcare and non-life business.

Risk response

The IGRC describes how operational risk is managed. Additional policies and procedures apply to specific risk events, such as information security, business continuity and outsourcing:

- Information security: all activities towards the realisation of a continuously optimal level of availability, integrity and confidentiality of information and information systems to ensure business continuity, protect customers' interest, prevent financial loss and reputational damage and comply with laws and regulations. The CFW includes control measures focusing on cyber security, IT architecture, business continuity, data governance, physical security, IT operations, logical access security, programmes, projects and/or transitions and also change management;
- Business Continuity Management (BCM): this concerns identifying threats and their potential impact, determining the minimum service level required for customers and other stakeholders, and implementing and testing measures to prevent major disruptions of business-critical chains to mitigate the impact of the disruptions to an acceptable level. The CFW includes control measures focusing on the prevention of system downtime and the back-up and recovery of data and systems;
- Outsourcing: outsourcing processes must be managed carefully, based on a risk/return evaluation, sustainability assessment including an ESG rating by Ecovadis and written documentation of reciprocal obligations. The CFW includes control measures focusing on contracting, compliance with Service Level Agreements and registration of outsourcing.

In line with the IGRC, risk analyses are performed periodically to identify the operational risks within Achmea and appropriate control measures. Furthermore, risk analyses are conducted at various levels and on various topics, e.g. in the form of scenario analyses. Recently, scenario analyses have been carried out with regard to rogue trading (unauthorized trading), mandate management, IT disruption and cybercrime. In the past the cyber-scenario led, among other things, to the purchase of cyber risk insurance. Risk analyses also focus on innovations that impact operations and control such as the application of AI.

For identified risks and control measures, an Internal Control Framework is used that is based on the COSO model and common market standards and uses key risks and key controls. Annually, after the risk analyses have been performed, the framework's key risks and key controls are updated. The framework is subsequently used to systematically monitor the effectiveness of control measures throughout the organisation. Cross-references to information security of DNB and SII are included in the framework. In addition, an organisation-wide systematic issue and incident management process has been set up.

J. COMPLIANCE RISK

Compliance risk is the risk of diminishing reputation or current or future threats to the capital or result of an organisation as a result of a failure to comply with laws and regulations, and insufficient adherence to values, norms and supervisory and other rules. Failure to comply may result in legal or regulatory sanctions, material financial loss, or reputational damage. The Compliance Policy describes how compliance risk is managed. Additional policies and regulations are available covering specific compliance topics such as CDD, Privacy, Competition, Digital Operational Resilience Act (DORA), Whistle Blower regulations and Insider regulations.

Risk profile

Key compliance risks include the risks associated with Duty of care, Product development, CDD, Privacy (compliance with the General Data Protection Regulation), Outsourcing, Cyber, Integrity, Fraud, and Competition. In delivering our services, it is important that the main focus is on customers' interests, with attention being paid to providing clear and timely product information to customers and to opportunities for improving the suitability of the sold product and the distribution process.

Risk response

Achmea's Laws & Regulation Committee identifies new legislation and forthcoming amendments and determines the impact on the organisation. Management is responsible for demonstrably correct and complete implementation. In case of profound impact on Achmea, the committee will advise the Executive Board to start an implementation project. Current examples include the new Pension Act, Financial Data Access regulation (FIDA - Open Finance), Artificial Intelligence Act, European Accessibility Act, CSRD and DORA. In the implementation project groups, Compliance and Risk Management participate alongside management and the line organisation. Periodic reports are made to the Executive Board on the progress of implementation, risks and corrective measures regarding these types of projects. Achmea ensures detection of developments in laws and regulations through a specific module in the CFW and monitors proper and timely implementation.

Regulatory investigations have a major impact on business activities. The investigations arise not only from local regulations, but also from international legislation such as EU legislation on Duty of Care, Outsourcing, Cyber AI, CDD and Sustainability. The contribution made to supervisory investigations requires a lot of effort and this is coordinated by the Supervisory Committee.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Risk analyses are performed annually to identify risks within Achmea. Important risk analyses performed by Compliance are the Gross Net Risk Analysis (BNRA) and the annual Systematic Integrity Risk Analysis (SIRA). Risk analyses are also conducted at various levels and on various topics during the year. With regard to compliance with laws, regulations and internal rules of conduct, the most important legal provisions are translated into risks. For the internal control of the identified risks, the Control Framework uses issue and incident management to continuously learn and improve. Effectiveness of controls, issues and incidents are reported in relation to the risk appetite on a quarterly basis.

Compliance is closely involved in monitoring compliance with the Money Laundering and Terrorist Financing (Prevention) Act (Wwft), the Sanctions Act 1977, Privacy dilemmas and compliance with the General Data Protection Regulation (GDPR), including big data initiatives and ethical issues associated with artificial intelligence. Issues that concern all of Achmea are discussed periodically in the Ethics Committee, involving the CRO, the Compliance director, HR, employees from the various divisions and an external specialist. In 2024, the committee devoted time and attention to topics submitted by Achmea employees, both within the ethics committee and beyond. This includes advice on a study regarding inclusion, diversity, and equality within Achmea. Another topic discussed was the duty of care for the group of sovereigns and autonomous individuals. Additionally, ethical dilemmas in the application of AI were addressed. The committee also organized a workshop on how to deal with ethical dilemmas in the workplace. The integrity risk as part of compliance risk is set out in the Achmea Code of Conduct and the Integrity & Fraud Policy. This code of conduct states the core values, core qualities and rules of conduct of Achmea, and applies to all Achmea employees. The Integrity & Fraud Policy contains the principles highlighting the integrity risks in operational management, such as: anti-corruption, gifts, side-line activities, contracting third parties and execution of the SIRA. In 2024, the SIRA was also executed for each supervised entity, with input from staff departments. Ongoing attention is paid to integrity risks by assessing the effectiveness of fraud control measures on a quarterly basis using the CFW.

CDD, Duty of Care, Cybersecurity, AI and DORA were the main focus areas for the compliance function within Achmea for 2024. Short-cycle monitoring is used to monitor compliance with laws and regulations. Where appropriate, proactive coordination is sought with supervisory authorities. Any compliance issues identified by this monitoring are addressed by the responsible management, ensuring handling within the established frameworks for the defined compliance and integrity risk appetite. Additionally, for CDD and DORA, further governance has been established in the form of a Task Force with members from the Executive Board and chairs of divisional directors. In these Task Forces, the approach to cross-divisional issues or issues with IT dependencies is coordinated to achieve additional progress.

<u>Evaluation of the compliance function</u>
In 2024, the functioning of the key compliance function for the Dutch insurance entities was assessed on-site with the DNB, focusing on Achmea's Dutch insurance entities. The results were received and discussed with DNB. The supervisor noted that Achmea has set up and executes the key compliance function in a professional manner.

<u>Non- compliance</u>
Short-cycle monitoring is used to ensure compliance with laws and regulations, and instances of non-compliance may occur. The monitoring revealed areas of concern in the areas of CDD, Privacy, Cyber security, Duty of Care and Outsourcing.

Customer Due Diligence (CDD
CDD remains a top priority within Achmea. The focus in 2024 was on further improving control. This involves continuous learning from developments in the business units, from second- and third-line monitoring and audits, outcomes of on-site investigations by supervisors in the business units, fines imposed on other companies, and reports from regulators or court rulings. In addition to control from the supervised business units, there is also additional control from the central CDD Task Force.

Similar to 2023, progress is monitored based on defined outstanding actions from 2024 with realistic deadlines. Throughout 2024, efforts were directed towards the integration of CDD processes into the Know Your Customer Centre, which was established in July 2023. All operational CDD activities are being centralized here, with the aim of making operations more uniform in the future and pooling and increasing expertise within Achmea. In 2024 nearly all CDD processes have been incorporated into the KYC Centre. The execution of CDD processes is supported by a generic CDD IT platform, which will be further developed throughout 2025. During 2024, the focus was primarily on the implementation of support for transaction monitoring. In 2025, the priority shifts to screening during both onboarding and ongoing processes, as well as maintaining CDD files.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The AFM conducted two investigations at Syntrus Achmea Real Estate & Finance B.V. (SAREF) regarding the Wwft and the Sanctions Act. The first investigation focuses on reports of unusual transactions made by SAREF to the Financial Intelligence Unit (FIU) over the period 2018-2022. The AFM informed SAREF in June 2024 that, based on the findings from this investigation, it intends to initiate a penalty process, as in some cases reports were not made in a timely manner or insufficient investigation was conducted. SAREF submitted its oral opinion in mid-October 2024 and is awaiting the definitive decision from the AFM. In January 2025, the AFM communicated that it has decided to partially refrain from imposing fines. The part related to the alleged violations of the Wwft, in the capacity of an investment firm, is thus dismissed. The AFM has not yet made a decision regarding the part in the capacity of manager of investment institutions. The outcome will be announced by the AFM once all related procedural steps have been completed. Based on recent discussions with the AFM, we expect a potential fine, with the maximum amount estimated at € 2 million. Given the size of the potential fine, no material effect on the balance sheet position and the results of Achmea B.V. is expected. Therefore, the anticipated impact is not reflected in the 2024 financial statements of Achmea B.V.

The second investigation broadly concerns compliance with the Wwft and the Sanctions Act. The AFM informed SAREF in September 2024 that it is not currently imposing any formal measures but is issuing an informal warning. Furthermore, the AFM expects SAREF to ensure remediation on several points. To this end, Achmea Real Estate B.V. and Achmea Mortgage Funds B.V. (formerly: SAREF) has prepared a plan of action and submitted it to the AFM at the end of November. Both entities have started following up on the improvement measures as per the action plan.

Privacy
Achmea attaches great importance to Privacy compliance. Throughout the organization, improvements are continuously identified regarding compliance with the General Data Protection Regulation (GDPR)/Privacy legislation. Internal control was further improved in certain areas during 2024. Various improvement projects are currently underway. One of the improvement projects focuses on 'Unstructured Data,' where a core team is actively working to implement digital solutions for data retention in unstructured environments. The improvements will continue into 2025. The majority of reported data breaches were related to incidents involving a limited number of data subjects. Mitigating measures have been taken to prevent such incidents in the future.

Cyber security
Geopolitical and technological developments have resulted in an unchanged high cyber security risk in 2024. The threat of attacks by 'nation-state actors' and ‘non-state actors’ remains structurally high. The Executive Board continues to regard the further development of cyber resilience as a strategic priority. This is why Achmea invested last year in simulating advanced cyberattacks and in measures to further increase resilience against (ransomware) attacks. In 2024, Achmea underwent an Advanced Red Team test conducted by an external partner to assess its resilience. There were no major incidents in 2024.

The implementation of DORA legislation has led to several further enhancements in cyber resilience and a higher degree of demonstrability in risk management in 2024. These enhancements include not only an update of policies and processes but also the establishment of extensive technical measures. Driven by the DORA implementation, further steps have been taken in the area of third-party risk over the past year. Agreements with critical suppliers regarding cyber resilience have been tightened, and contracts have been aligned with DORA requirements.

For now, the geopolitical and technological developments do not indicate a reduction in cyber security risk, keeping this risk high on the management agenda for 2025.

Duty of care
As a broad financial services provider, the Duty of Care theme applies to all Achmea business units. This includes careful treatment of customers throughout the entire duration of products and services. Achmea sees it as its duty to inform customers as adequately as possible to ensure they make the right choices. Additionally, Achmea's Guiding Principles provide annual fulfilment of the statutory duty of care, responding to widely held societal viewpoints. The implementation of the settlement agreement for investment insurance concluded in 2024 is proceeding as planned.

In response to rulings from the KiFid (Financial Services Complaints Tribunal) regarding appropriate communication of changes in policy conditions, adjustments were made in 2023 to the communication processes within the Non-Life and Income division. Follow-up on this will continue into 2025.

Outsourcing
Achmea has developed its outsourcing policy in accordance with the requirements of applicable laws and regulations, including EBA, EIOPA, and ESMA. Outsourcing contracts are recorded in a central contract administration managed by Procurement. Outsourcing is divided into the following four phases: 1. Analysis, 2. Initiation, 3. Management, and 4. Evaluation. For each phase, checklists, standard documents, and templates are used to enable uniform documentation. These documents are prepared by Legal, Procurement, Supplier & Contract Management, and Compliance. Examples include standard contracts, general purchasing conditions, a decision tree for the qualification of outsourcing, processing agreements, security agreements, risk assessment of service providers, and assessment assurance statements.

DORA legislation is effective as of January 17, 2025; from this date, policies, processes, control measures, and reports have been adapted to DORA and rolled out within Achmea. The implementation, which started at the end of 2023, is now largely completed. Currently, not all Regulatory Technical Standards (RTS) have been definitively approved by the European Commission, which means that the implementation will continue into 2025. This particularly concerns the pillar 'Third Party Risk'. Discussions with suppliers regarding the necessary adjustments to contracts and associated accountabilities are ongoing and will continue into 2025.

Over the past year, there have been no significant instances of non-compliance with laws and regulations.

Update on legal proceedings
Achmea B.V., its subsidiaries and participating interests are involved in a number of legal and arbitration proceedings. These proceedings relate to claims filed arising from regular business activities.

In October 2023, the Stichting Compensatie Zwitserse Frank Leningen (“Stichting CZFL”) initiated legal proceedings against Achmea Bank N.V. at the District Court of The Hague. This procedure concerns mortgage loans denominated in Swiss Francs (CHF) originally provided by Staalbankiers N.V. (which loans have been transferred to Achmea Bank N.V.) to several of its private banking clients. In the proceedings, Stichting CZFL, acting as a claims foundation, holds Achmea Bank N.V. liable for any loss that clients with a CHF loan have suffered or may suffer as a result of (unforeseen) EUR/CHF exchange rate developments. Achmea Bank N.V. has thoroughly contested the claim in writing at the District Court of The Hague in 2024. An oral hearing is scheduled for March 2025. It is uncertain what developments will follow after the oral hearing. In earlier proceedings against Staalbankiers N.V. and Achmea Bank N.V., initiated by individual clients with a CHF loan, the court ruled in favour of Achmea Bank N.V. Given the assessment of the complaints and claims based on the grounds stated in CZFL's summons, no collective claim provision has been made.

K. CAPITAL MANAGEMENT

The objective of capital management is to ensure that all entities within the Achmea Group are always adequately funded to secure the interests of all stakeholders in the short and long term.

Capital position
Section B Capital position explains the solvency ratio under SII and the composition of the Eligible Own Funds under SII. This section provides more information on the capital instruments used, the development of the liquidity position of the holding company and the credit ratings assigned by rating agencies.

CAPITAL INSTRUMENTS

(€ MILLION)

INTEREST RATE	NOTIONAL	YEAR OF ISSUE	DUE DATE	FIRST CALL DATE	OWN FUNDS TIER	SOLVENCY II VALUE 31 DECEMBER 2024	SOLVENCY II VALUE 31 DECEMBER 2023
Achmea B.V.							
5.625%	750	2024	11/2/2044	5/2/2034	Tier 2	780	
6.75%	300	2023	12/26/2043	6/26/2033	Tier 2	321	315
4.625%	500	2019	Perpetual	3/24/2029	Restricted Tier 1	470	456
2.5%	250	2019	9/24/2039	6/24/2029	Tier 2	228	219
4.25%	750	2015	Perpetual	04-02-2025[1]	Tier 2	408	758
Achmea Bank N.V.							
5.875%	125	2024	11/6/2036	11/6/2031	Tier 2	126	

1 On December 31 2024, it was communicated that the remaining amount at the of 2024 will be repaid to the holders of the capital instrument on February 4 2025. The remaining amount is presented under Other Liabilities. The impact of this on the group solvency is -5%.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Both Achmea Bank N.V. and Achmea B.V. provide access to the capital and money markets. The holding company finances the insurance entities in the form of capital payments.

Rating agencies use their own methodologies to assess the creditworthiness of a company. The ratings assigned by rating agencies to the Achmea entities are set out below.

RATINGS

ENTITY	TYPE	S&P[1]	FITCH[2]
Holding			
Achmea B.V.	ICR/IDR	BBB+	A
Insurance entities			
Achmea Schadeverzekeringen N.V.	FSR/IFS	A	A+
Achmea Zorgverzekeringen N.V.	FSR/IFS	A	A+
Achmea Pensioen- en Levensverzekeringen N.V.	FSR/IFS	A	A+
Achmea Reinsurance Company N.V.	FSR	A-	
Banking entity			
Achmea Bank N.V.	Long term	A-	A
	Short term	A-2	F1
	Soft Bullet Covered Bond Program	AAA	

1 S&P definitions: ICR means Issuer Credit Rating, FSR means Financial Strenght Rating.
2 Fith definitions: IDR means Issuer Default Rating, IFRS means Insurer Financial Strenght.

Achmea, in addition to the statutory frameworks for IFRS, Solvency II (SII), the Capital Requirements Directive V (CRD V), and the Capital Requirements Regulation (CRR), also focuses on the capital surplus (according to the capital models of S&P and Fitch), the debt leverage ratio, the fixed charge coverage ratio, and the double leverage ratio. The debt leverage ratio increased to 26.3% in 2024 (2023: 25.9%) due to a temporary higher debt position resulting from pre-financing for the calling of €393 million in Tier 2 capital in February 2025, alongside a significant increase in equity. The fixed charge coverage ratio based on the operating result came to 7.7 (2023: 6.2) due to a higher result for 2024. The double leverage ratio at the end of 2024 is 111%, remaining the same as the level at the end of 2023.

Capital Policy
In the Capital Policy, the risk appetite is elaborated in greater detail, based on internal capital standards as well as limits related to leverage and return.

- The principal premise of the capital policy is that all entities must be adequately capitalized, maintaining a buffer at the entity level that is above the statutory minimum and sufficient to absorb setbacks.
- Additionally, a buffer is held at the Group level to absorb any capital shortfall at the entities.
- The capital policy also includes an overview of the measures to be taken if internal limits are exceeded, including risk reduction to decrease capital requirements.

The capital position of the Achmea Group and its entities is managed by monitoring the current capital position and projecting and analysing the future capital position, including calculating the effects of scenarios and stress tests and distributing capital within the Achmea Group.

Achmea's funding strategy is based on assuring access to international capital and credit markets at low cost, with good credit ratings being important. Access to the capital and money markets is arranged both at Achmea Bank and holding level:

- Financing at the holding level may come from dividends from subsidiaries and the issuance of capital instruments. Additionally, Achmea maintains a credit facility with a dozen international banks. The committed credit facility of € 1 billion was not utilized in 2024.
- If necessary, Achmea B.V. can make capital contributions to subsidiaries.
- The main funding sources for Achmea Bank N.V. are covered bonds, unsecured funding and retail funding (deposits and savings accounts). Achmea strives to maintain a balance between continuity of funding and flexibility through the use of liabilities with a range of maturities.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Dividend and coupon payments
In preparing the financial statements the Executive Board proposes an appropriation of the Net result to the General Meeting of Shareholders, as explained in Achmea B.V.'s company financial statements 2024, Note 20 Proposed appropriation of the Net result.

The Executive Board proposes to the General Meeting to distribute a dividend of € 334,909,155.73 on ordinary shares for the financial year 2024. This amount is equal to 7.0% of the value of Achmea as of year-end 2024, as determined based on the Achmea Valuation Principles defined in the All Shareholders Agreement. The Executive Board may give shareholders the choice between a (partial or full) dividend in cash or in the form of ordinary shares of Achmea.

In compliance with the capital policy, it is stated that the group solvency, excluding non-insurance entities after the distribution of dividends – based on the partial internal model – is above 130% and is also expected to remain above 130% in the next 12 months. Additionally, an assessment is made of whether the solvency ratio remains above the target ratio of 165%. Developments regarding solvency levels at the legal entities within the Group are also tested. The proposal is based on the Group's long-term financial outlook, taking into account the interests of the Achmea stakeholders. This includes, among other things, legal reserve restrictions, capital and liquidity development over the planning period, the outcome of scenario and stress tests and various ratios from a rating agency perspective, such as the S&P and Fitch capital position, the debt leverage ratio and the fixed-charge coverage ratio.

The resolution to distribute dividends is passed by the General Meeting of Achmea B.V. The General Meeting is authorised to resolve on a different dividend distribution than the distribution proposed in the financial statements. Distributions may only be made to shareholders and other persons entitled to distributable profits to the extent that Equity exceeds the reserves to be maintained pursuant to the law. The resolution of the General Meeting to distribute dividends must be approved by the Executive Board. The Executive Board will only withhold its approval if it is aware, or should reasonably be able to anticipate that, Achmea B.V., upon payment, will not be able to continue paying its due and debts.

Coupon payments on Other Equity Instruments are subject to the restrictions described in the relevant prospectuses. The prospectuses are available on the Achmea website (https://www.achmea.nl/investors/schuldpapier). These coupon payments are part of the Group liquidity forecast prepared in line with the liquidity policy (for more information refer to the liquidity risk section). Achmea B.V. has several options to generate cash, to be able to pay dividends and the above-mentioned coupons. Examples include credit facilities, dividends paid by group companies with sufficient financial scope, disposal of assets and attracting additional funding. The group companies' financial scope for dividend payments is determined based on similar criteria to those mentioned above. Depending on the activities of the group company, different percentages and ratios apply.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

3. CHANGES IN THE COMPOSITION OF THE GROUP

Blue Sky Group Asset Management B.V.

Achmea B.V. acquired all the shares of Blue Sky Group Asset Management BV (hereinafter BSG AM) and Blue Sky Group Fund Management BV (hereinafter BSG FM) from Blue Sky Group Holding BV on 31 December 2024. BSG AM is licensed to carry out asset management under the Markets in Financial Instruments Directive (MiFID) and BSG FM is licensed to manage investment funds under the Alternative Investment Fund Managers Directive (AIFMD). These acquisitions fit into Achmea's strategy for retirement provision with the transition to a new pension system and strengthening Achmea's position in asset management.

Through the acquisition of these asset managers, Achmea obtains an extension of client contracts for the asset management of a number of pension funds, mainly three KLM pension funds, and the execution organisation including approximately 35 employees. Achmea expects to achieve significant synergy benefits in the execution of asset management through this acquisition. The acquisition price of the asset managers amounts to € 36 million. Besides acquired working capital of the participations, approximately € 21.8 million, the value of the customer base is the most important asset estimated at € 14.2 million. The assets under management of both entities amount to around € 25 billion.

Final valuation of the acquired entities will take place during 2025 as more information becomes available. The acquisition date is 31 December 2024 so no 2024 results have been recognised after the acquisition. The acquisition will be allocated to the retirement segment.

Lifetri Groep B.V.

On 28 November 2024 Achmea Pension & Life Insurance N.V., Achmea B.V. and ELG Group Limited have reached an agreement on a strategic partnership in the field of pension and life insurance. Achmea B.V. and Lifetri Groep B.V. are merging their pension and life portfolios into Achmea Pension & Life Insurance N.V. to create a top three player, serving over 2.1 million customers.

ELG Group Limited, the principal shareholder of Lifetri Groep B.V., will acquire 19,9% of the shares of Achmea Pension & Life Insurance N.V. by contributing Lifetri Groep B.V. and paying € 445 million to Achmea B.V.. Achmea B.V. will keep holding 80,1% of the shares of Achmea Pension & Life Insurance N.V.

The transaction is not accounted for in the 2024 consolidated financial statements of Achmea as not all closing conditions are met. The transaction is subject to completing the works councils advisory process and regulatory approval(s), which are expected in the second half of 2025. At that time Achmea will gain control over Lifetri Groep B.V. and the transaction will be accounted for in the consolidated financial statements of Achmea B.V. and Achmea Pension & Life Insurance N.V.

Onlia Holding Inc.

Achmea B.V. has sold its 50% stake in Onlia Holding Inc. with effect from 1 May 2024. This step is part of the broader strategy to focus on our core activities and the further development of our business portfolio.

4. SEGMENT REPORTING

Achmea's activities are divided into segments. The segments draw up strategic, commercial and financial policies within the overall strategy, performance targets and risk appetite set by the Executive Board. All reported segment revenues, except internal reinsurance contracts, relate to external customers. The operational result is equal to the result before tax adjusted for reorganisation expenses, results from mergers & acquisitions and application of an expected return method for the net financial result from (re)insurance activities. Achmea is divided into the following segments:

Non-life Netherlands

Consists of non-life insurance business in the Netherlands to cover customers' risks related mainly to motor vehicles, property, general liability, occupational health and accident, including disability and short-term sickness.

Health Netherlands

Covers basic and supplementary health insurance and health services in the Netherlands.

Pension & Life Netherlands

Covers pension and life business in the Netherlands, including unit-linked insurance (investment insurance).

Retirement Services Netherlands

Covers asset management and pension management activities in the Netherlands. Furthermore, this segment includes the activities of Achmea Bank focused on providing residential mortgage loans, saving accounts and investment funds in the Netherlands to individuals.

International activities

Contains activities outside the Netherlands. Segment International activities operates actively in the countries Australia, Greece, Slovakia and Turkey. The international activities consist primarily of insurance activities. Insurance activities relate to the provision of Non-life, Health and Life insurance policies, including the provision of investment contracts containing no or insignificant insurance risk. Furthermore, associates are included within this segment.

Other activities

Includes Achmea Reinsurance and a wide range of other services that individually do not meet the quantitative requirements for separate reporting. Furthermore, investments not related to the abovementioned segments, Shared Service Centres and staff departments, net of their recharges to the above segments, are included in this segment.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

SEGMENT CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2024

(€ MILLION)

	NON-LIFE NETHERLANDS	HEALTH NETHERLANDS	PENSION & LIFE NETHERLANDS	RETIREMENT SERVICES NETHERLANDS	INTER-NATIONAL ACTIVITIES	OTHER ACTIVITIES	INTER-SEGMENT ELIMINATIONS	TOTAL
Assets								
Intangible assets	664			27	76	24		791
Associates and joint ventures	118	25	51		19	34	-197	50
Property for own use and equipment	1	2			63	261		327
Investment property			705		4	8		717
Financial investments								
Investments from insurance and other activities	7,267	5,863	41,840		1,348	1,483	-1,170	56,631
Banking credit portfolio				18,052				18,052
Deferred tax assets			316	7	69	352	-17	727
Income tax receivable			34	26	8		-65	3
Insurance contract assets					15			15
Reinsurance contracts held assets	589		24		423	414	-463	987
Receivables and accruals	452	934	345	360	105	109	-498	1,807
Cash and cash equivalents	132	169	199	1,372	185	98	-24	2,131
Total assets	**9,223**	**6,993**	**43,514**	**19,844**	**2,315**	**2,783**	**-2,434**	**82,238**
Equity								
Equity attributable to holders of equity instruments of the company	2,357	4,156	4,016	940	422	-2,478		9,413
Non-controlling interest			1			1		2
Total equity	**2,357**	**4,156**	**4,017**	**940**	**422**	**-2,477**		**9,415**
Liabilities								
Insurance contract liabilities								
Non-Life	5,996				982	541	-369	7,150
Health		2,258			186			2,444
Life			33,909		348	31	-16	34,272
Other provisions	11			24	31	901		967
Financial liabilities	825	568	3,625	18,464	305	3,729	-1,967	25,549
Derivatives	12	10	1,963	416		6		2,407
Deferred tax liabilities	9				20		-17	12
Income tax payable	13	1			21	52	-65	22
Total liabilities	**6,866**	**2,837**	**39,497**	**18,904**	**1,893**	**5,260**	**-2,434**	**72,823**
Total equity and liabilities	**9,223**	**6,993**	**43,514**	**19,844**	**2,315**	**2,783**	**-2,434**	**82,238**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

SEGMENT CONSOLIDATED STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2023

(€ MILLION)

	NON-LIFE NETHERLANDS	HEALTH NETHERLANDS	PENSION & LIFE NETHERLANDS	RETIREMENT SERVICES NETHERLANDS	INTER-NATIONAL ACTIVITIES	OTHER ACTIVITIES	INTER-SEGMENT ELIMINATIONS	TOTAL
Assets								
Intangible assets	661			54	68	16		799
Associates and joint ventures	101	20	50		9	29	-167	42
Property for own use and equipment	1	2			56	268		327
Investment property			716		4	5		725
Financial investments								
Investments from insurance and other activities	7,121	4,997	41,409		1,118	1,437	-1,276	54,806
Banking credit portfolio				15,171				15,171
Deferred tax assets	10		477	7	47	430		971
Income tax receivable			515	2	6		-444	79
Insurance contract assets					5			5
Reinsurance contracts held assets	459		26		701	304	-397	1,093
Receivables and accruals	98	871	552	212	83	72	-168	1,720
Cash and cash equivalents	129	380	382	728	263	77	-25	1,934
Assets classified as 'Held for sale'					9	37		46
Total assets	**8,580**	**6,270**	**44,127**	**16,174**	**2,369**	**2,675**	**-2,477**	**77,718**
Equity								
Equity attributable to holders of equity instruments of the company	2,151	3,839	3,376	893	381	-1,662		8,978
Non-controlling interest			1			1		2
Total equity	**2,151**	**3,839**	**3,377**	**893**	**381**	**-1,661**		**8,980**
Liabilities								
Insurance contract liabilities								
Non-Life	5,653				1,136	499	-413	6,875
Health		2,187			189			2,376
Life			34,595		340	22	16	34,973
Other provisions	11			2	15	910		938
Financial liabilities	454	237	3,141	14,842	280	2,761	-1,636	20,079
Derivatives	13	6	3,014	437		2		3,472
Deferred tax liabilities					2	9		11
Income tax payable	298	1			26	133	-444	14
Total liabilities	**6,429**	**2,431**	**40,750**	**15,281**	**1,988**	**4,336**	**-2,477**	**68,738**
Total equity and liabilities	**8,580**	**6,270**	**44,127**	**16,174**	**2,369**	**2,675**	**-2,477**	**77,718**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF PROFIT AND LOSS PER SEGMENT 2024

(€ MILLION)

	NON-LIFE NETHERLANDS	HEALTH NETHERLANDS	PENSION & LIFE NETHERLANDS	RETIREMENT SERVICES NETHERLANDS	INTER-NATIONAL ACTIVITIES	OTHER ACTIVITIES	INTER-SEGMENT ELIMINATIONS	TOTAL
Insurance revenue	4,321	17,649	1,534		1,864	309	-258	25,419
Insurance service expenses	-4,070	-17,620	-1,408		-1,641	-251	194	-24,796
Net insurance service result from reinsurance contracts held	-28	-1			-192	-19	64	-176
Insurance service result	**223**	**28**	**126**		**31**	**39**		**447**
Investment result from (re)insurance activities	302	214	970		94	3	-20	1,563
Finance result from insurance contracts	-213	-11	-726		-109	-9	4	-1,064
Finance result from reinsurance contracts held	5		1		81	8	-4	91
Net financial result from (re)insurance activities	**94**	**203**	**245**		**66**	**2**	**-20**	**590**
Income from associates and joint ventures	7	2	-4		15	-5		15
Investment result from other activities				682	1	39	-9	713
Income from service contracts	4	171		315	39	48	-43	534
Other income		2		5	9	2		18
Total other income	**11**	**175**	**-4**	**1,002**	**64**	**84**	**-52**	**1,280**
Other operating expenses	4	155	2	493	75	96		825
Interest and similar expenses	15	3	11	456	1	106	-72	520
Other expenses	9	7		21	38	52		127
Total other expenses	**28**	**165**	**13**	**970**	**114**	**254**	**-72**	**1,472**
Operational result[1]	**300**	**241**	**354**	**32**	**47**	**-129**		**845**
Non-operational result	133	77	639	-30	-3	-20		796
Profit before tax	**433**	**318**	**993**	**2**	**44**	**-149**		**1,641**
Income tax	108	2	251	5	16	-44		338
Net result	**325**	**316**	**742**	**-3**	**28**	**-105**		**1,303**
Expense ratio[2]	23.7%	2.1%			11.6%			
Claims ratio[2]	71.1%	97.7%			85.3%			
Combined ratio[2]	94.8%	99.8%			96.9%			
Amortisation charges	9	1		1	18	39		68
Impairment losses		-1		27				26

1 The operational result consists of the result before tax of € 1,641 million adjusted for the expected return method of € 892 million, transaction results from mergers and acquisitions, including goodwill impairments of € 70 million, and reorganisation costs primarily related to housing provisions of € 26 million. For a detailed explanation of the operational result, please refer to chapter 1 Accounting policies.
2 The ratios of the International activities segment relate to both Non-Life and Health Insurance. The reported ratios are after reinsurance.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CONSOLIDATED STATEMENT OF PROFIT AND LOSS PER SEGMENT 2023

(€ MILLION)

	NON-LIFE NETHERLANDS	HEALTH NETHERLANDS	PENSION & LIFE NETHERLANDS	RETIREMENT SERVICES NETHERLANDS	INTER-NATIONAL ACTIVITIES	OTHER ACTIVITIES	INTER-SEGMENT ELIMINATIONS	TOTAL
Insurance revenue	4,034	15,553	1,679		1,564	321	-220	22,931
Insurance service expenses	-3,620	-15,520	-1,665		-2,153	-204	121	-23,041
Net insurance service result from reinsurance contracts held	-167	-1			582	-84	99	429
Insurance service result	**247**	**32**	**14**		**-7**	**33**		**319**
Investment result from (re)insurance activities	240	159	826		64	-6	-46	1,237
Finance result from insurance contracts	-193	-12	-627		-128	-11	8	-963
Finance result from reinsurance contracts held	27		2		116	14	-8	151
Net financial result from (re)insurance activities	**74**	**147**	**201**		**52**	**-3**	**-46**	**425**
Income from associates and joint ventures	4	-1	7		-7	-10		-7
Investment result from other activities				522		34	26	582
Income from service contracts	19	152		288	37	59	-42	513
Other income		6		4	32	2		44
Total other income	**23**	**157**	**7**	**814**	**62**	**85**	**-16**	**1,132**
Other operating expenses	11	142	2	441	66	130		792
Interest and similar expenses	13		12	324	1	76	-62	364
Other expenses	11	7		2	34	38		92
Total other expenses	**35**	**149**	**14**	**767**	**101**	**244**	**-62**	**1,248**
Operational result[1]	**309**	**187**	**208**	**47**	**6**	**-129**		**628**
Non-operational result	95	94	104	-5	17	21		326
Profit before tax	**404**	**281**	**312**	**42**	**23**	**-108**		**954**
Income tax	103	1	77	11	-13	-39		140
Net result	**301**	**280**	**235**	**31**	**36**	**-69**		**814**
Expense ratio[2]	24.3%	2.2%			31.6%			
Claims ratio[2]	69.6%	97.5%			176.8%			
Combined ratio[2]	93.9%	99.7%			208.4%			
Amortisation charges	7	1		3	23	45		79
Impairment losses				2	6			8

1 The operational result consists of the result before tax of € 954 million adjusted for the expected return method of € 334 million, reorganisation costs of € 14 million and transaction results from mergers and acquisitions, including goodwill impairments of € 4 million. For more information on the definition of the operational result, please refer to Chapter 1 Accounting policies.
2 The ratios of the International activities segment relate to both Non-Life and Health Insurance. The reported ratios are after reinsurance.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

GEOGRAPHICAL SEGMENT REPORTING, INCLUDING INTERGROUP ADJUSTMENTS

(€ MILLION)

	NETHERLANDS	TURKEY	GREECE	SLOVAKIA	OTHER[1]	TOTAL 2024	TOTAL 2023
Insurance revenue	23,555	463	449	878	74	25,419	22,931
Insurance service expenses	-23,155	-320	-387	-882	-52	-24,796	-23,041
Net expenses from reinsurance contracts	16	-145	-37		-10	-176	429
Insurance service result	**416**	**-2**	**25**	**-4**	**12**	**447**	**319**
Total assets	79,923	638	1,227	321	129	82,238	77,718
Non-current assets	66,273	642	861	151		67,927	64,348

1 Other includes Australia and Canada.

NOTES TO SIGNFICANT BALANCE SHEET AND STATEMENT OF PROFIT AND LOSS

5. INVESTMENT PROPERTY

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Balance at 1 January	725	850
Acquisitions	14	8
Disposals	-112	-20
Fair value changes recognised in profit or loss	52	-101
Changes due to reclassification	38	-12
Balance at 31 December	**717**	**725**

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Residential	700	630
Retail	5	11
Offices	12	82
Other		2
Total	**717**	**725**

Achmea’s contractual liabilities for maintenance of investment property are € 1 million at year-end 2024 (31 December 2023: € 1 million).

Investment property is leased under operating lease contracts, in general with fixed monthly lease payments which may be amended at contractually agreed times. The decline of rental income is primarily due to the sale of office buildings in Amsterdam, Rotterdam and Amersfoort. Minimal rental income under operating lease contracts, not cancellable without penalty, for this investment property is as follows:

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Less than 1 year	1	8
1 - 5 years	3	23
Over 5 years	1	23
Total	**5**	**54**

KEY ESTIMATES TO DETERMINE THE VALUE OF INVESTMENT PROPERTY

The methods used to determine the revalued amount for Property for own use and fair value of Investment property are described in Note 9 Fair value hierarchy. The assumptions used in applying some of these methods are supported by the terms of any existing lease and other relevant contracts and by external evidence such as recent and expected general economic trends, current market rents for similar properties in the same location and condition. Various assumptions should be made and techniques applied in valuing property whereby these assumptions and techniques, may have significant consequences for the valuation. Sufficient reference transactions in an effective market are available for the valuation as of 31 December 2024. Achmea sees no reason to adjust the valuations of the external appraisers.

ACCOUNTING POLICIES INVESTMENT PROPERTY

Investments property is measured at fair value. All changes in fair values and rental income from Investment Properties are recognised as Investment Income in the Statement of profit and loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

6. INVESTMENTS

INVESTMENTS CLASSIFIED BY NATURE

(€MILLION)

FINANCIAL ASSETS	FAIR VALUE WITH CHANGES IN FAIR VALUE RECOGNISED IN THE STATEMENT OF PROFIT AND LOSS[1]		AMORTISED COST		TOTAL	
	31 DECEMBER 2024	31 DECEMBER 2023	31 DECEMBER 2024	31 DECEMBER 2023	31 DECEMBER 2024	31 DECEMBER 2023
Investments from insurance and other activities						
Equities & similar investments	10,151	8,656			10,151	8,656
Fixed income investments						
Bonds from or guaranteed by Governments	10,150	10,570			10,150	10,570
Securitised bonds[2]	1,766	1,074			1,766	1,074
Corporate bonds	14,334	13,484			14,334	13,484
Convertible bonds	428	400			428	400
Loans secured by mortgages	8,461	8,315			8,461	8,315
Loans and deposits with credit institutions	310	212	3	6	313	218
Other	1,782	1,697	5	5	1,787	1,702
Total fixed income investments	**37,231**	**35,752**	**8**	**11**	**37,239**	**35,763**
Derivatives	3,864	4,680			3,864	4,680
Other financial investments	5,377	5,707			5,377	5,707
Total investments from insurance and other activities	**56,623**	**54,795**	**8**	**11**	**56,631**	**54,806**
Banking credit portfolio[3]						
Fixed income investments						
Loans secured by mortgages			17,160	14,151	17,160	14,151
Loans and deposits with credit institutions			485	555	485	555
Other				31		31
Total fixed income investments			**17,645**	**14,737**	**17,645**	**14,737**
Derivatives	327	371			327	371
Other financial investments			80	63	80	63
Total banking credit portfolio	**327**	**371**	**17,725**	**14,800**	**18,052**	**15,171**
Total investments	**56,950**	**55,166**	**17,733**	**14,811**	**74,683**	**69,977**

1 Investments measured at fair value with changes in fair value recognised in the Statement of profit and loss totalling € 56,950 million relates for € 5,043 million (31 December: 2023 € 5,385 million) to Investments designated measured at fair value with changes in fair value recognised in the Statement of profit and loss. Refer to note 30 Credit quality of financial assets for more details on the impact of Expected Credit Loss (ECL).
2 Securitised bonds consist of € 256 million (31 December 2023: € 245 million) in asset-backed bonds.
3 The Banking Credit Portfolio includes a provision relating to credit losses (ECL). Additions and withdrawals to provisions during 2024 were equal to € 4 million (2023: € 7 million). Note 30 Credit quality of financial assets further analyses this provision.

Insurance business and other investments in equity and similar investments with a total of € 10,151 million (31 December 2023: € 8,656 million) concern listed ordinary shares of € 6,259 million (31 December 2023: € 5,011 million), alternative investments of € 907 million (31 December 2023: € 777 million), investments in real estate funds of € 939 million (31 December 2023: € 801 million), investments in fixed income funds of € 1,927 million (31 December 2023: € 1,948 million) and other investments of € 119 million (31 December 2023: € 119 million).

The category Investments from insurance and other activities contains all investments covering the insurance contracts with direct participation features. These investments consist of equity & similar investments € 5,330 million (31 December 2023: € 5,126 million), fixed income investments € 2,528 million (31 December 2023: € 2,507 million), derivatives € 195 million (31 December 2023: € 198 million) and other financial investments € 334 million (31 December 2023: € 322 million).

The vast majority of the insurance business and other investments are measured at fair value with changes in fair value recognised in the statement profit and loss. Derivatives are used for interest rate risk mitigation (see Note 2 Capital and risk management and Note 28 Hedge accounting). Other financial insurance business and other investments classified as Loans and receivables mainly concern balances linked to capital policies held at Rabobank Group, the interest income from which is based on the interest paid by the policyholder on their savings mortgage.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS INVESTMENTS

(€ MILLION)

	INVESTMENTS INSURANCE ENTITIES AND OTHER ACTIVITIES		BANKING CREDIT PORTFOLIO[1]		TOTAL	
	2024	2023	2024	2023	2024	2023
Balance at 1 January	**54,806**	**55,977**	**15,171**	**12,911**	**69,977**	**68,888**
Change of composition of the Group[2]	-3	-2,284	56	-32	53	-2,316
Investments and loans granted	52,270	51,832	4,447	3,531	56,717	55,363
Divestments and disposals	-51,521	-52,351	-1,879	-1,532	-53,400	-53,883
Fair value changes	458	1,639	-66	-181	392	1,458
Change in value due to fair value hedge accounting			107	318	107	318
Foreign currency differences including effects hyperinflation current year	361	25	-6	22	355	47
Accrued interest and rental	22	150	-29	-2	-7	148
Cash movements	111	-181			111	-181
Changes due to reclassification	11	-14			11	-14
Other changes	116	13	251	136	367	149
Balance at 31 December	**56,631**	**54,806**	**18,052**	**15,171**	**74,683**	**69,977**

1 The Banking Credit Portfolio includes a provision relating to credit losses (ECL) under Other changes. Additions and withdrawals to provisions during 2023 are € 4 million (2023: € 7 million). Note 30 Credit quality of financial assets further analyses this provision.

2 The changes in composition of the group under investments insurance entities and other activities relate to fund investments, where the third-party share is no longer consolidated as Achmea no longer has control in these funds. Third-party debt is reduced for the same amount (see Note 8 Financial liabilities)

Insurance business and other investments

The insurance business and other investments increased by € 1,825 million in 2024 compared to 2023. The main developments underlying this increase are a positive balance from investments and divestments and positive revaluations due to favourable market developments.

Based on the contractual maturity, an amount of € 33,659 million (31 December 2023: € 34,125 million) of fixed income investments and other fixed income investments and other financial investments is expected to be realised after 12 months from the balance sheet date. All assets without contractual maturity date are assumed to be realised after 12 months from the balance sheet date.

Banking credit portfolio

The banking credit portfolio amounts to € 18,052 million (31 December 2023: € 15,171 million). Of this, € 17,725 million (31 December 2023: € 14,800 million) is valued at amortised cost. The banking credit portfolio increased by € 2,881 million compared to 2023. The main development in the banking credit portfolio in 2024 concerns the € 2,873 million increase in the mortgage portfolio due to increase in the regular production and acquisition of third-party mortgage portfolios.

As of 31 December 2023, the banking credit portfolio includes a provision of € 24 million (31 December 2023: € 29 million) relating to credit losses (ECL). The ECL is explained in more detail in Note 30 Credit quality financial assets.

The mark-up in the interest rate on mortgage-backed loans that is directly received or included as a surcharge for the interest averaging is allocated to the remaining (shorter) term of the old loan.

Achmea Bank N.V. has no more securitisation transactions at the end of 2024. The part of the portfolio pledged as collateral and not payable on demand in respect of securitisation transactions has been reduced to nil (31 December 2023: €1,365 million).

An amount of € 16,956 million (31 December 2023: € 13,289 million) of the Banking credit portfolio, excluding derivatives, is expected to be recovered after 12 months from the balance sheet date.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Investments in unconsolidated structured entities

Achmea's investments in unconsolidated structured entities suc4 as mortgage-backed bonds and other asset-backed securities are included in Investments - *Secured bonds*. When viewed in terms of individual value per entity, the composition of the portfolios of Achmea's interests in structured entities is very diverse. For the most part, Achmea invests in senior-rated, asset-backed securities, limiting potential credit losses. For the main unconsolidated structured entities, the table below shows the maximum exposure to loss for Achmea as at 31 December 2024, which is equal to the carrying amount of the securities as at that date. In addition, the table shows a comparison of Achmea's interest with the total amount of Notes (securities) issued by the structured entity. The amount displayed for the total value of securities issued on issue date is based on the size of the transaction when the securities were issued.

INVESTMENTS IN NON-CONSOLIDATED STRUCTURED ENTITIES (€ MILLION)

	31 DECEMBER 2024		31 DECEMBER 2023	
	MAXIMUM EXPOSURE ON LOSS	TOTAL VALUE OF SECURITIES ISSUED ON ISSUE DATE	MAXIMUM EXPOSURE ON LOSS	TOTAL VALUE OF SECURITIES ISSUED ON ISSUE DATE
Effects on mortgage collateral	140	6,459	149	6,110
Effect on Vehicle Lease Receivables collateral	79	6,175	85	4,813
Other effects	37	3,313	11	633
Carrying amount in structured entity as at 31 December	**256**	**15,947**	**245**	**11,556**

Derivatives

The following tables present information on derivatives. Achmea uses all of the derivatives for risk management purposes. Some derivatives are used for hedge accounting purposes (see Note 28 Hedge accounting).

DERIVATIVES CLASSIFIED BY NATURE (€ MILLION)

			31 DECMBER 2024
	ASSETS	LIABILITIES	BALANCE
Interest rate derivatives	3,984	2,225	1,759
Currency derivatives	16	179	-163
Equity derivatives	188	1	187
Other derivatives	3	2	1
Total	**4,191**	**2,407**	**1,784**

DERIVATIVES CLASSIFIED BY NATURE (€ MILLION)

			31 DECMBER 2023
	ASSETS	LIABILITIES	BALANCE
Interest rate derivatives	4,813	3,388	1,425
Currency derivatives	86	75	11
Equity derivatives	152		152
Other derivatives		9	-9
Total	**5,051**	**3,472**	**1,579**

EXPECTED TIME TO EXPIRY DATE OF UNDISCOUNTED CASH FLOWS (€ MILLION)

	LESS THAN 1 YEAR	1-3 YEARS	3-5 YEARS	> 5 YEAR	TOTAL
31 DECEMBER 2024					
Interest rate derivatives	230	405	368	1,614	2,617
Currency derivatives	155	6	6	46	213
Equity derivatives	1				1
Other derivatives	2				2
	388	**411**	**374**	**1,660**	**2,833**
31 DECEMBER 2023					
Interest rate derivatives	531	484	429	2,766	4,210
Currency derivatives	38	6	6	46	96
Other derivatives	9				9
	578	**490**	**435**	**2,812**	**4,315**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

ANALYSIS OF NOTIONAL AND FAIR VALUE FOR INTEREST AND CURRENCY DERIVATIVES OWN RISK

(€ MILLION)

			31 DECEMBER 2024			31 DECEMBER 2023
	NOMINAL VALUE	FAIR VALUE ASSETS	FAIR VALUE LIABILITIES	NOMINAL VALUE	FAIR VALUE ASSETS	FAIR VALUE LIABILITIES
Interest derivatives	68,786	3,983	2,223	65,170	4,811	3,387
Forward exchange contracts	2,591	10	78	2,089	41	26
Cross-currency interest rate swaps	110		28	170		41
Total	**71,487**	**3,993**	**2,329**	**67,429**	**4,852**	**3,454**

Market concentration by investment portfolio

Achmea has no material market concentration in its investment portfolio. Market concentration risk is further explained in Note 2 capital and risk management, in the 'market risk' section.

KEY ASSUMPTIONS AND ESTIMATES WHEN ASSESSING THE VALUATION OF INVESTMENTS

Assessment of expected credit losses on investments

Upon recognition in the balance sheet and at each balance sheet date, Achmea assesses expected credit losses on investments: fixed income securities valued at amortised cost. This assessment is further explained under accounting policy investments – impairments.

Fair value of investments determined using valuation techniques

In the absence of an active market, the fair value of non-quoted investments is estimated by using present value of cash flows or other valuation techniques. Reference is made to Note 9, Fair value hierarchy, for a detailed description of the methods used.

ACCOUNTING POLICIES FOR INVESTMENTS

Measurement and initial recognition in the balance sheet

The initial measurement of investments takes place at the moment Achmea becomes a party to a financial instrument, on the transaction date. Initial measurement is done at fair value excluding transaction costs. For investments recognised at amortised cost initial fair value is increased with transaction costs. Subsequent measurement depends on the classification of the investment.

The determination of the fair value is further explained in Note 9 Fair value hierarchie.

Classification and subsequent measurement

Classification

Upon initial recognition, an investment is classified as measured at amortised cost, fair value with changes in fair value recognised in the net other comprehensive income or fair value with changes in fair value recognised in the Statement of profit and loss. The classification that determines the subsequent measurement is based on the business model of the investment portfolio and the SPPI test (Solely Payments of Principal and Interest).

Investments are not reclassified after initial recognition unless Achmea changes its business model for these investments. In that case, all affected investments are accounted for according to the new classification in the reporting period in which the business model was changed.

An investment is measured at amortised cost if it meets the following requirements:
- The investment falls within a business model that aims to receive contractual cash flows; and
- The contractual features lead to predetermined times when cash flows are received (SPPI test).

An investment is measured at fair value with changes in fair value recognised in the net other comprehensive income when it meets the following requirements:
- The investment falls within a business model that aims to both receive contractual cash flows and be able to sell the investments; and
- The contractual features lead to predetermined times when cash flows are received (Solely Payments of Principal and Interest (SPPI) test).

Shares and derivatives do not satisfy the SPPI test and are mandatorily measured at fair value with changes in fair value recognised in the statement of profit and loss (Achmea does not use the option to measure shares at fair value through net other comprehensive income).

Business model assessment

For each investment portfolio, Achmea determines the purpose of the business model that represents how the portfolio is managed and reported to management. The business model is based on the formal terms and objectives of the investment portfolio, how the returns and risks of the portfolios that determine the performance of the business model are managed, how management is assessed and rewarded and the level of sales in the portfolio.

SPPI test for contractual cash flows

The SPPI test determines whether the contractual cash flows represent only the repayment of principal and interest on the outstanding balance of the loan ('solely payments of principle and interest'). Achmea tests whether there are contractual provisions in the loan that could change the timing and size of the contractual cash flow, making it no longer compliant with the conditions of the SPPI test.

An early repayment option meets the SPPI conditions if it consists mainly of repayment of the principal and interest on this principal as well as reasonable compensation for early termination of the contract.

The majority of the investment portfolio of the insurance business is managed and performance is assessed based on fair value developments. Within this model, underlying investments are actively traded with the aim of maximising the results. These investment portfolios do not meet the requirements for the business model aimed at both receiving and being able to sell contractual cash flows and are therefore mandatorily measured at fair value (excluding transaction costs) with changes in fair value recognised in the Statement of profit and loss.

To avoid an accounting mismatch, a smaller part of the investment portfolio of the insurance business, such as savings mortgages, is designated as measured at fair value with changes in fair value recognised in the Statement of profit and loss.

The fixed income investments of the banking business and a minor part of the investments of the insurance business meet the requirements for valuation at amortised cost.

Subsequent measurement and processing of gains and losses

Investments are measured at fair value with changes in fair value recognised in the Statement of profit and loss..
Investments measured at fair value with changes in fair value recognised in the Statement of profit and loss (FVPL or 'fair value through profit or loss') are measured at fair value. Changes in fair value, including interest or dividend income and foreign currency differences are recognised in the Statement of profit and loss, unless they are changes in value from derivatives used to hedge investment risks to which hedge accounting is applied.

Investments at amortised cost
These investments are measured at amortised cost (including transaction costs) applying the effective interest method. Interest income, foreign currency differences and impairments are recognised in the Statement of profit and loss. Realised gains and losses at derecognition of an investment are also recognised in the Statement of profit and loss.

The following paragraphs on expected credit losses and impairments apply to investments measured at amortised cost. This largely applies to the loans on Achmea Bank's balance sheet.

Non-impaired investments at initial recognition
If an investment is not impaired (no stage 3 ECL), interest income on the carrying amount of the investment is recognised based on the effective interest method. To determine the interest rate, Achmea takes into account all future cash flows subject to the contract terms of the investment, excluding expected credit losses (ECL).

If an investment is impaired (stage 3 ECL) after initial recognition, interest income on the amortised cost (gross amortised cost adjusted for impairment) of the investment is recalculated based on the effective interest rate. If the impairment no longer applies, interest is calculated again on the gross amortised cost of the investment (without adjustment for the impairment).

Impaired investment at initial recognition
Interest income is calculated on the amortised cost of the investment by applying the effective interest rate adjusted for creditworthiness. This adjusted effective interest rate is calculated based on future cash flows including ECL. If the creditworthiness of the investment improves, this effective interest rate will no longer be calculated on an amortised cost basis.

Derivatives, including those forming part of other financial liabilities
Derivatives, including those forming part of other financial liabilities that are separated from the main contract, are classified as held for trading unless they are part of a hedge relationship. Derivatives are measured at fair value with changes in fair value recognised in the Statement of profit and loss.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Impairments

Achmea accounts for expected credit losses (ECL) on investments and loans valued at amortised cost using a 'Three-stages' model:

- Stage 1 (12-month ECL) for expected defaults on loans arising within 12 months of the balance sheet date. This relates to loans with a low credit risk and exposure to banks with an investment-grade credit rating.
- Stage 2 (total term ECL) for expected default during the total term in the event of a significant increase in credit risk since initial recognition, but for which there is no indication of impaired creditworthiness yet. If there is a payment delay of at least 30 days, there is a presumption that a deterioration in creditworthiness has occurred. This can still be deviated from (qualitatively substantiated).
- Stage 3 (total term ECL) for loans for which there is an indication of impaired creditworthiness. This involves an impairment.

Information on the ECL is provided in Note 30 Credit quality financial assets. Transition to Stage 3 applies if there is a payment delay of at least 90 days. In addition, indicators such as loan restructuring, debtor bankruptcy, fraud, insufficient income and special management are relevant. The effects of the triggers will be adopted unless Achmea deviates (qualitatively substantiated).

Determining the ECL

Credit losses are determined based on the present value of all contractual cash flows that Achmea no longer expects to receive. The ECL is determined by three generally used underlying models: Probability of Default (PD), Loss Given Default (LGD), Exposure at Default (EAD).

Presentation of credit losses in the balance sheet

Credit loss for ECL of investments and loans valued at amortised cost is deducted from the carrying amount of the asset at the expense of Investment result from insurance/reinsurance activities (for insurance business investments) or Investment result from non-insurance activities (Banking credit portfolio).

Write-off

The carrying amount of a financial asset is reduced when Achmea expects that all or part of the financial asset will not be received. This assessment is carried out at the individual active level.

Derecognition and Offsetting

A financial asset (or part of a financial asset) is derecognised when the contractual rights to receive cash flows from the financial asset have expired or when Achmea has transferred substantially all risks and rewards associated with the asset and if Achmea did not retain control of the asset.

In transfers to a third party where control over specific assets is retained, Achmea continues to recognise the asset to the extent of its continuing involvement. The extent of continuing involvement is determined by the extent to which Achmea is exposed to changes in the value of the asset. Upon the transfer, the difference between the disposal proceeds and the carrying amount is recognised in the Statement of profit and loss as a realised gain or loss.

Achmea uses the average cost price method for financial assets and liabilities that are no longer included in the balance sheet.

7. ASSETS AND LIABILITIES RELATED TO INSURANCE CONTRACTS AND SHARE OF REINSURERS IN INSURANCE LIABILITIES

ANALYSIS OF ASSETS AND LIABILITIES RELATED TO (RE)INSURANCE CONTRACTS

(€ MILLION)

			31 DECEMBER 2024			31 DECEMBER 2023
	(RE)INSURANCE ASSETS	(RE)INSURANCE LIABILITIES	TOTAL	(RE)INSURANCE ASSETS	(RE)INSURANCE LIABILITIES	TOTAL
Insurance contracts						
Non-life						
General model		969	969		1,039	1,039
Premium allocation approach		6,181	6,181	1	5,836	5,835
Subtotal		**7,150**	**7,150**	**1**	**6,875**	**6,874**
Health						
General model		37	37		40	40
Premium allocation approach	2	2,407	2,405	2	2,336	2,334
Subtotal	**2**	**2,444**	**2,442**	**2**	**2,376**	**2,374**
Life						
General model	13	23,635	23,622	2	24,295	24,293
Variable fee approach		10,637	10,637		10,667	10,667
Assets for insurance acquisition cash flows					11	11
Subtotal	**13**	**34,272**	**34,259**	**2**	**34,973**	**34,971**
Total insurance contracts	**15**	**43,866**	**43,851**	**5**	**44,224**	**44,219**
Outward reinsurance contracts held						
Non-life						
Premium allocation approach	957		957	1,064		1,064
Health						
Premium allocation approach	3		3	2		2
Life						
General model	27		27	27		27
Total outward reinsurance contracts held	**987**		**987**	**1,093**		**1,093**

The movements in insurance and reinsurance contracts are described in more detail per portfolio in this chapter.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

CSM maturity overview

The following tables show the expected realization in favor of the income statement of the remaining Contractual Service Margin (CSM) after the balance sheet date.

(€ MILLION)

					31 DECEMBER 2024
	LESS THAN 1 YEAR	BETWEEN 1 AND 5 YEARS	BETWEEN 5 AND 15 YEARS	OVER 15 YEARS	TOTAL
Non-life					
Insurance contracts	12	36	42	18	108
Health					
Insurance contracts	1	4	4	1	10
Life					
Insurance contracts	50	176	323	478	1,027
Reinsurance contracts held	1				1

(€ MILLION)

					31 DECEMBER 2023
	LESS THAN 1 YEAR	BETWEEN 1 AND 5 YEARS	BETWEEN 5 AND 15 YEARS	OVER 15 YEARS	TOTAL
Non-life					
Insurance contracts	16	51	60	26	153
Health					
Insurance contracts	2	5	5	2	14
Life					
Insurance contracts	64	178	327	507	1,076
Reinsurance contracts held	1				1

For the insurance contracts with direct participation features for which the interest rate risk of guarantees provided is mitigated through interest rate derivatives, the change in value of the CSM due to Achmea's share in the change in value of the underlying financial instruments is recognised in the Statement of profit and loss. The effect of risk mitigation in the Statement of profit and loss on the CSM amounts to € 38 million for 2024 (2023: € -31 million).

Maturity overview of present value of future cash flows

The following tables show the expected outcome of the present value of future cash flows. These tables do not include the Risk Adjustment and the CSM. This table must be viewed in conjunction with the Capital and risk management section - H liquidity risk.

(€ MILLION)

									31 DECEMBER 2024
	LESS THAN 12 MONTHS	BETWEEN 1 AND 2 YEARS	BETWEEN 2 AND 3 YEARS	BETWEEN 3 AND 4 YEARS	BETWEEN 4 AND 5 YEARS	BETWEEN 5 AND 10 YEARS	BETWEEN 10 AND 15 YEARS	MORE THAN 15 YEARS	TOTAL
Insurance contract liabilities									
Non-life	2,433	1,063	719	510	533	923	358	296	6,835
Health	1,916	95	300	-7	2	6	1	1	2,314
Life	3,212	2,483	2,231	2,020	1,868	7,424	4,910	8,401	32,549
Total	**7,561**	**3,641**	**3,250**	**2,523**	**2,403**	**8,353**	**5,269**	**8,698**	**41,698**

Amounts payable on demand are included as part of the cash flows of the liabilities related to insurance contracts. The amounts of (re)insurance liabilities payable on demand is € 9,629 million (31 December 2023: € 10,366 million).

(€ MILLION)

									31 DECEMBER 2023
	LESS THAN 12 MONTHS	BETWEEN 1 AND 2 YEARS	BETWEEN 2 AND 3 YEARS	BETWEEN 3 AND 4 YEARS	BETWEEN 4 AND 5 YEARS	BETWEEN 5 AND 10 YEARS	BETWEEN 10 AND 15 YEARS	MORE THAN 15 YEARS	TOTAL
Insurance contract liabilities									
Non-life	2,158	1,060	717	513	392	1,011	383	290	6,524
Health	1,619	246	123	248	2	6	2	1	2,247
Life	3,189	2,387	2,233	2,050	1,887	7,485	5,165	8,782	33,178
Total	**6,966**	**3,693**	**3,073**	**2,811**	**2,281**	**8,502**	**5,550**	**9,073**	**41,949**

7.1 Non-Life

Analysis of insurance contracts by insurance unit

The tables below provide insight into the insurance contracts per insurance sector (Non-life, Healthcare and Life) and reinsurance contracts. An overview of the categories of insurance obligations is provided for each insurance sector prior to the explanations per sector.

ANALYSIS INSURANCE CONTRACTS NON LIFE

(€ MILLION)

	31 DECEMBER 2024		31 DECEMBER 2023	
	LIABILITIES RELATED TO INSURANCE CONTRACTS	%	LIABILITIES RELATED TO INSURANCE CONTRACTS	%
Income protection and accident	2,344	33%	2,593	38%
Motor liability	2,401	34%	2,024	28%
Motor hull	321	4%	194	3%
Transport / avation liability	74	1%	36	1%
Fire, building and contents	1,176	16%	1,142	17%
General liability	650	9%	831	12%
Legal assistance	184	3%	55	1%
Total	**7,150**	**100%**	**6,875**	**100%**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - NON-LIFE 2024

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE		LIABILITIES FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	**TOTAL 2024**
Insurance contracts assets	-1					-1
Insurance contracts liabilities	248	36	1,192	5,279	120	6,875
Balance at 1 January	**247**	**36**	**1,192**	**5,279**	**120**	**6,874**
Revenue from contracts under the Fair value approach	-172					-172
Revenue from regular contracts	-5,061					-5,061
Insurance service revenue	**-5,233**					**-5,233**
Incurred benefits & claims and other insurance service expenses			174	3,989	39	4,202
Amortisation of insurance acquisition cash flows	552					552
Adjustments to liabilities for incurred claims				21	-38	-17
Losses and reversal of losses on onerous contracts		43				43
Insurance service expenses	**552**	**43**	**174**	**4,010**	**1**	**4,780**
Insurance service result	**-4,681**	**43**	**174**	**4,010**	**1**	**-453**
Financial income and expenses	11	2	14	218	6	251
Effect of changes in exchange rates	-6	-2		-60	-5	-73
Total changes in the Statement of profit and loss and other comprehensive income	**-4,676**	**43**	**188**	**4,168**	**2**	**-275**
Premiums received	5,156					5,156
Claims, investment components and other insurance service expenses paid			-134	-3,919		-4,053
Insurance acquisition cash flows	-552					-552
Cash flows	**4,604**		**-134**	**-3,919**		**551**
Balance at 31 December	**175**	**79**	**1,246**	**5,528**	**122**	**7,150**
Insurance contracts assets						
Insurance contracts liabilities	175	79	1,246	5,528	122	7,150

The total insurance contracts of the Non-life insurance sector amounts to € 7,150 million as of 31 December 2024 (31 December 2023: € 6,874 million). The increase is mainly due to additional provisions for personal injury claims as a result of inflation (see line Incurred benefits & claims and other insurance service expenses). The insurance liabilities for incurred claims have been increased due to expected inflation effects. The insurance liabilities also rise due to premium measures aimed at restoring profitability and maintaining profitability (see line Premiums received).

The income and expenses from insurance-related services are further explained in Note 10 Insurance service result.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - NON-LIFE 2023

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE		LIABILITIES FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	TOTAL 2023
Insurance contracts assets	-8			4		-4
Insurance contracts liabilities	98	45	1,234	4,800	105	6,282
Balance at 1 January	**90**	**45**	**1,234**	**4,804**	**105**	**6,278**
Revenue from contracts under the Fair value approach	-187					-187
Revenue from regular contracts	-4,608					-4,608
Insurance service revenue	**-4,795**					**-4,795**
Incurred benefits & claims and other insurance service expenses			173	3,952	-6	4,119
Amortisation of insurance acquisition cash flows	457					457
Adjustments to liabilities for incurred claims			5	379	16	400
Losses and reversal of losses on onerous contracts		-12				-12
Insurance service expenses	**457**	**-12**	**178**	**4,331**	**10**	**4,964**
Insurance service result	**-4,338**	**-12**	**178**	**4,331**	**10**	**169**
Financial income and expenses	35	6	3	302	10	356
Effect of changes in exchange rates	-18	-5		-83	-7	-113
Total changes in the Statement of profit and loss and other comprehensive income	**-4,321**	**-11**	**181**	**4,550**	**13**	**412**
Premiums received	4,932					4,932
Claims, investment components and other insurance service expenses paid			-224	-4,075		-4,299
Insurance acquisition cash flows	-457					-457
Cash flows	**4,475**		**-224**	**-4,075**		**176**
Other changes	3	2	1		2	8
Balance at 31 December	**247**	**36**	**1,192**	**5,279**	**120**	**6,874**
Insurance contracts assets	-1					-1
Insurance contracts liabilities	248	36	1,192	5,279	120	6,875

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN INSURANCE CONTRACTS MEASURED AT GMM - NON-LIFE 2024

(€ MILLION)

			CONTRACTUAL SERVICE MARGIN			
	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	CONTRACTS UNDER FAIR VALUE APPROACH	OTHER CONTRACTS	TOTAL CSM	**TOTAL**
Insurance contracts assets						
Insurance contracts liabilities	811	75	137	16	153	1,039
Balance at 1 January	**811**	**75**	**137**	**16**	**153**	**1,039**
Changes in the statement of profit or loss and other comprehensive income						
Changes that relate to current services	**3**	**-5**	**-13**		**-13**	**-15**
CSM recognised for services provided			-13		-13	-13
Change in the risk adjustment for non-financial risk		-5				-5
Experience adjustments	3					3
Changes that relate to future services	**66**	**9**	**-21**	**-11**	**-32**	**43**
Contracts initially recognised	-20	13	7		7	
Changes in estimates that adjust the CSM	43	-4	-28	-11	-39	
Changes in estimates on onerous contracts	43					43
Changes that relate to past services						
Adjustments to liabilities for incurred claims						
Insurance service result	**69**	**4**	**-34**	**-11**	**-45**	**28**
Financial income and expenses	17	2				19
Total changes in the Statement of profit and loss and other comprehensive income	**86**	**6**	**-34**	**-11**	**-45**	**47**
Premiums received	87					87
Claims, benefits and other insurance service expenses paid	-204					-204
Cash flows	**-117**					**-117**
Balance at 31 December	**780**	**81**	**103**	**5**	**108**	**969**
Insurance contracts assets						
Insurance contracts liabilities	780	81	103	5	108	969

The insurance contracts measured at GMM of the Non-life insurance sector amounts to € 969 million as of 31 December 2024 (31 December 2023: € 1,039 million). The CSM decreases mainly due to the improved occupational classification in the income protection portfolio and due to updates of assumptions.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN INSURANCE CONTRACTS MEASURED AT GMM - NON-LIFE 2023

(€ MILLION)

			CONTRACTUAL SERVICE MARGIN			
	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	CONTRACTS UNDER FAIR VALUE APPROACH	OTHER CONTRACTS	TOTAL CSM	**TOTAL**
Insurance contracts assets						
Insurance contracts liabilities	894	73	131		131	1,098
Balance at 1 January	**894**	**73**	**131**		**131**	**1,098**
Changes in the statement of profit or loss and other comprehensive income						
Changes that relate to current services	**-8**	**-9**	**-17**	**-1**	**-18**	**-35**
CSM recognised for services provided			-17	-1	-18	-18
Change in the risk adjustment for non-financial risk		-9				-9
Experience adjustments	-8					-8
Changes that relate to future services	**-57**	**6**	**23**	**17**	**40**	**-11**
Contracts initially recognised	-20	9		11	11	
Changes in estimates that adjust the CSM	-26	-3	23	6	29	
Changes in estimates on onerous contracts	-11					-11
Changes that relate to past services	**10**	**-4**				**6**
Adjustments to liabilities for incurred claims	10	-4				6
Insurance service result	**-55**	**-7**	**6**	**16**	**22**	**-40**
Financial income and expenses	28	9				37
Total changes in the Statement of profit and loss and other comprehensive income	**-27**	**2**	**6**	**16**	**22**	**-3**
Premiums received	168					168
Claims, benefits and other insurance service expenses paid	-224					-224
Cash flows	**-56**					**-56**
Balance at 31 December	**811**	**75**	**137**	**16**	**153**	**1,039**
Insurance contracts assets						
Insurance contracts liabilities	811	75	137	16	153	1,039

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Analysis insurance business: claims development before reinsurance and net of reinsurance

The tables below show the gross claims development as well the net claims development (after reinsurance).

CLAIMS DEVELOPMENT TABLE FOR NON-LIFE

(€ MILLION)

(BEFORE REINSURANCE)	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015	TOTAL
Estimate of cumulative claims											
At the end of underwriting year	3,085	3,513	2,930	2,711	2,696	2,734	2,805	2,737	2,930	2,594	
One year later		2,862	2,874	2,530	2,657	2,643	2,744	2,645	2,909	2,622	
Two years later			2,662	2,801	2,477	2,734	2,704	2,611	2,814	2,658	
Three years later				3,167	2,472	2,626	2,844	2,558	2,815	2,597	
Four years later					2,561	2,584	2,659	2,564	2,785	2,564	
Five years later						2,678	2,625	2,535	2,767	2,513	
Six years later							2,696	2,438	2,672	2,530	
Seven years later								2,477	2,706	2,543	
Eight years later									2,765	2,392	
Nine years later										2,434	
Estimate of cumulative claims	**3,085**	**2,862**	**2,662**	**3,167**	**2,561**	**2,678**	**2,696**	**2,477**	**2,765**	**2,434**	**27,387**
Cumulative payments	1,222	1,699	1,903	2,342	2,107	2,252	2,357	2,187	2,481	2,236	20,786
Insurance liabilities claims prior years (< 2015)											1,086
Risk Adjustment											125
Effect of discounting											-916
Outstanding claims at 31 december 2024											**6,896**

CLAIMS DEVELOPMENT TABLE FOR NON-LIFE

(€ MILLION)

(NET OF REINSURANCE)	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015	TOTAL
Estimate of cumulative claims											
At the end of underwriting year	2,861	2,960	2,545	2,577	2,540	2,594	2,668	2,616	2,653	2,477	
One year later		2,667	2,488	2,433	2,485	2,509	2,628	2,574	2,696	2,555	
Two years later			2,559	2,635	2,338	2,616	2,598	2,540	2,606	2,602	
Three years later				3,005	2,339	2,499	2,762	2,492	2,619	2,528	
Four years later					2,433	2,467	2,568	2,506	2,590	2,506	
Five years later						2,533	2,545	2,480	2,576	2,454	
Six years later							2,568	2,388	2,479	2,478	
Seven years later								2,392	2,513	2,488	
Eight years later									2,489	2,342	
Nine years later										2,371	
Estimate of cumulative claims	**2,861**	**2,667**	**2,559**	**3,005**	**2,433**	**2,533**	**2,568**	**2,392**	**2,489**	**2,371**	**25,878**
Cumulative payments	1,181	1,660	2,007	2,451	2,055	2,193	2,261	2,141	2,227	2,187	20,363
Insurance liabilities claims prior years (< 2015)											1,015
Risk Adjustment											104
Effect of discounting											-718
Outstanding claims at 31 december 2024											**5,916**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

7.2 Health

ANALYSIS INSURANCE CONTRACTS HEALTH

(€ MILLION)

	31 DECEMBER 2024		31 DECEMBER 2023	
	LIABILITIES RELATED TO INSURANCE CONTRACTS	%	LIABILITIES RELATED TO INSURANCE CONTRACTS	%
Basic Health Insurance	2,131	87%	1,878	79%
Supplementary Health Insurance	208	9%	396	17%
Other	105	4%	102	4%
Total	**2,444**	**100%**	**2,376**	**100%**

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - HEALTH 2024

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE		LIABILITIES FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	TOTAL
Insurance contracts assets				-2		-2
Insurance contracts liabilities	-723	21	3	3,045	30	2,376
Balance at 1 January	**-723**	**21**	**3**	**3,043**	**30**	**2,374**
Revenue from contracts under the Full retrospective approach	-9					-9
Revenue from regular contracts	-18,547					-18,547
Insurance service revenue	**-18,556**					**-18,556**
Incurred benefits & claims and other insurance service expenses			9	18,430	142	18,581
Amortisation of insurance acquisition cash flows	55			2		57
Adjustments to liabilities for incurred claims			-1	-80	-142	-223
Losses and reversal of losses on onerous contracts		121				121
Investment components and premium refunds	-1		1			
Insurance service expenses	**54**	**121**	**9**	**18,352**		**18,536**
Insurance service result	**-18,502**	**121**	**9**	**18,352**		**-20**
Financial income and expenses	11			5		16
Effect of changes in exchange rates						
Total changes in the Statement of profit and loss and other comprehensive income	**-18,491**	**121**	**9**	**18,357**		**-4**
Premiums received	18,382					18,382
Claims, investment components and other insurance service expenses paid			-8	-18,245		-18,253
Insurance acquisition cash flows	-55			-2		-57
Cash flows	**18,327**		**-8**	**-18,247**		**72**
Other changes	1			-1		
Balance at 31 December	**-886**	**142**	**4**	**3,152**	**30**	**2,442**
Insurance contracts assets				-2		-2
Insurance contracts liabilities	-886	142	4	3,154	30	2,444

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Assets and liabilities related to insurance contracts increased by € 68 million to € 2,422 million (2023: € 2,374 million).

The insurance liabilities for remaining coverage in future periods (excluding the loss component) decreased to € -886 million (2023: € -723 million), mainly due to a higher claim against ZIN. The claim against ZIN relates to the expected contribution for the current and previous insurance years less the provisions received. The increase is due to a higher expected ZIN contribution as a result of the increase in the number of policyholders.

At 1 January 2023 there was a limited loss component of € 5 million related to some supplementary health insurance packages. At year-end 2023, a limited loss component of € 21 million was included for 2024 related to the basic insurance portfolio of Zilveren Kruis Zorgverzekeringen N.V., some supplementary health insurance packages and part of Greece's portfolio. At year-end 2024, a loss component of € 142 million was included for the loss-making premiums 2025 related to the basic insurance portfolio of Zilveren Kruis Zorgverzekeringen N.V., some supplementary health insurance packages and a part of Slovakia's health portfolio.

The insurance liabilities for incurred claims increased to € 3,158 million (2023: € 3,048 million). The increase is mainly due to the decrease in receivables from healthcare providers due to settlements based on contractual agreements. The booking of the Risk adjustment of the insurance liabilities for incurred claims is related to the estimation of the cash flows of the expected claims at the beginning of the year. The release of the Risk adjustment results from the settlement of claims from the current and previous years.

Income and expenses from insurance-related services are further disclosed in Note 10 Income from (re)insurance-related services.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - HEALTH 2023

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE		LIABILITIES FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	TOTAL
Insurance contracts assets				-3		-3
Insurance contracts liabilities	-765	5	2	3,535	31	2,808
Balance at 1 January	**-765**	**5**	**2**	**3,532**	**31**	**2,805**
Revenue from contracts under the Full retrospective approach	-9					-9
Revenue from regular contracts	-16,361					-16,361
Insurance service revenue	**-16,370**					**-16,370**
Incurred benefits & claims and other insurance service expenses			15	15,728	122	15,865
Amortisation of insurance acquisition cash flows	45					45
Adjustments to liabilities for incurred claims			-8	543	-123	412
Losses and reversal of losses on onerous contracts		16		2		18
Investment components and premium refunds	-1		1			
Insurance service expenses	**44**	**16**	**8**	**16,273**	**-1**	**16,340**
Insurance service result	**-16,326**	**16**	**8**	**16,273**	**-1**	**-30**
Financial income and expenses	14			3		17
Effect of changes in exchange rates	1			-1		
Total changes in the Statement of profit and loss and other comprehensive income	**-16,311**	**16**	**8**	**16,275**	**-1**	**-13**
Premiums received	16,375					16,375
Claims, investment components and other insurance service expenses paid			-7	-16,764		-16,771
Insurance acquisition cash flows	-22					-22
Cash flows	**16,353**		**-7**	**-16,764**		**-418**
Balance at 31 December	**-723**	**21**	**3**	**3,043**	**30**	**2,374**
Insurance contracts assets				-2		-2
Insurance contracts liabilities	-723	21	3	3,045	30	2,376

Insurance business analysis: claims development before and after deducting reinsurance Health

The table below on the claims development for Health is presented only before reinsurance, as a claims development table after reinsurance would give the same picture.

CLAIMS DEVELOPMENT TABLE FOR HEALTH

(BEFORE REINSURANCE)	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015	TOTAL
Estimate of cumulative claims											
At the end of underwriting year	18,236	16,309	15,620	14,022	14,153	14,041	13,954	13,873	13,458	13,105	
One year later		16,395	15,653	13,731	14,118	13,911	13,856	13,663	13,229	12,897	
Two years later			15,691	13,694	13,763	13,852	13,817	13,624	13,218	12,844	
Three years later				13,704	13,742	13,734	13,843	13,618	13,243	12,885	
Four years later					13,740	13,732	13,777	13,618	13,252	12,960	
Five years later						13,732	13,774	13,516	13,252	12,954	
Six years later							13,774	13,516	13,171	12,954	
Seven years later								13,516	13,170	12,861	
Eight years later									13,170	12,860	
Nine years later										12,860	
Estimate of cumulative claims	**18,236**	**16,395**	**15,691**	**13,704**	**13,740**	**13,732**	**13,774**	**13,516**	**13,170**	**12,860**	**144,818**
Cumulative payments	15,139	16,338	15,682	13,703	13,740	13,732	13,774	13,516	13,170	12,860	141,654
	3,097	**57**	**9**	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**3,164**
Insurance liabilities claims prior years (<2015)											7
Risk adjustment											30
Effect of discounting											-15
Outstanding claims at 31 December 2024											**3,186**

7.3 Life

ANALYSIS INSURANCE CONTRACTS LIFE

(€ MILLION)

	31 DECEMBER 2024		31 DECEMBER 2023	
	LIABILITIES RELATED TO INSURANCE CONTRACTS	%	LIABILITIES RELATED TO INSURANCE CONTRACTS	%
Life insurance with guarantees on investment income	15,865	46%	17,558	50%
Immediate pensions – annuities	2,340	7%	2,303	7%
Term life insurances	171	1%	136	0%
Other Life insurances	15,896	46%	14,976	43%
Total	**34,272**	**100%**	**34,973**	**100%**

The category Other life insurances refers mainly to unit-linked Savings and products valued according to the VFA approach.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - LIFE - 2024

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE			
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	LIABILITIES FOR INCURRED CLAIMS	TOTAL 2024
Insurance contracts assets	-3		1	-2
Insurance contracts liabilities	34,414	55	493	34,962
Balance at 1 January	**34,411**	**55**	**494**	**34,960**
Revenue from contracts under the Full retrospective approach	-36			-36
Revenue from contracts under the Fair value approach	-1,415			-1,415
Revenue from regular contracts	-171	-8		-179
Insurance service revenue	**-1,622**	**-8**		**-1,630**
Incurred benefits & claims and other insurance service expenses			1,446	1,446
Amortisation of insurance acquisition cash flows	11			11
Adjustments to liabilities for incurred claims			-5	-5
Losses and reversal of losses on onerous contracts		45		45
Investment components and premium refunds	-1,320		1,320	
Insurance service expenses	**-1,309**	**45**	**2,761**	**1,497**
Insurance service result	**-2,931**	**37**	**2,761**	**-133**
Financial income and expenses	1,446	1	14	1,461
Total changes in the Statement of profit and loss and other comprehensive income	**-1,485**	**38**	**2,775**	**1,328**
Premiums received	735			735
Claims, investment components and other insurance service expenses paid[1]	1		-2,763	-2,762
Insurance acquisition cash flows	-11			-11
Cash flows	**725**		**-2,763**	**-2,038**
Other changes	-181	4	186	9
Balance at 31 December[1]	**33,470**	**97**	**692**	**34,259**
Insurance contracts assets	-15		2	-13
Insurance contracts liabilities	33,485	97	690	34,272

1 Including Investment components and premium refunds.

Assets and liabilities related to insurance contracts decreased with € 701 million to € 34,259 million (2023: € 34,960 million). The decrease is mainly due to portfolio developments (balance of premiums and benefits) of € 2.0 billion. This is offset by developments in the financial markets of € 1.5 billion, which includes the gain for adjusting the parameters for the illiquidity premium of € 0.2 billion. The decrease of insurance service revenues and expenses is in line with expectations and is the result of natural portfolio run-off.

Insurance service revenues and expenses are further disclosed in Note 10 Insurance service results.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN TOTAL INSURANCE CONTRACTS - LIFE - 2023

(€ MILLION)

	LIABILITIES FOR REMAINING COVERAGE			
	EXCLUDING LOSS COMPONENT	LOSS COMPONENT	LIABILITIES FOR INCURRED CLAIMS	TOTAL 2023
Insurance contracts assets	-4			-4
Insurance contracts liabilities	33,954	43	335	34,332
Balance at 1 January	**33,950**	**43**	**335**	**34,328**
Revenue from contracts under the Full retrospective approach	-36			-36
Revenue from contracts under the Fair value approach	-1,565			-1,565
Revenue from regular contracts	-165			-165
Insurance service revenue	**-1,766**			**-1,766**
Incurred benefits & claims and other insurance service expenses		-15	1,779	1,764
Amortisation of insurance acquisition cash flows	10			10
Adjustments to liabilities for incurred claims			-58	-58
Losses and reversal of losses on onerous contracts		30		30
Investment components and premium refunds	-912		912	
Insurance service expenses	**-902**	**15**	**2,633**	**1,746**
Insurance service result	**-2,668**	**15**	**2,633**	**-20**
Financial income and expenses	2,398	-3	65	2,460
Total changes in the Statement of profit and loss and other comprehensive income	**-270**	**12**	**2,698**	**2,440**
Premiums received	771			771
Claims, investment components and other insurance service expenses paid[1]			-2,568	-2,568
Insurance acquisition cash flows	-7			-7
Cash flows	**764**		**-2,568**	**-1,804**
Other changes	-33		29	-4
Balance at 31 December[2]	**34,411**	**55**	**494**	**34,960**
Insurance contracts assets	-3		1	-2
Insurance contracts liabilities	34,414	55	493	34,962

1 Including Investment components and premium refunds.
2 The summary of movements does not include mutations on Assets for insurance acquisition cash flows.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN INSURANCE CONTRACTS VALUED AT GMM AND VFA - LIFE - 2024

(€ MILLION)

			CONTRACTUAL SERVICE MARGIN			
	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	CONTRACTS UNDER FAIR VALUE APPROACH	OTHER CONTRACTS	TOTAL CSM	**TOTAL**
Insurance contracts assets	-3	1				-2
Insurance contracts liabilities	33,167	719	1,037	39	1,076	34,962
Balance at 1 January	**33,164**	**720**	**1,037**	**39**	**1,076**	**34,960**
Changes in the statement of profit or loss and other comprehensive income						
Changes that relate to current services	**-47**	**-71**	**-51**	**-7**	**-58**	**-176**
CSM recognised for services provided			-51	-7	-58	-58
Change in the risk adjustment for non-financial risk		-71				-71
Experience adjustments	-47					-47
Changes that relate to future services	**6**	**31**	**-32**	**41**	**9**	**46**
Contracts initially recognised		-4	4	10	14	10
Changes in estimates that adjust the CSM	-35	33	-31	33	2	
Changes in estimates on onerous contracts	41	2	-5	-2	-7	36
Changes that relate to past services	**-3**					**-3**
Adjustments to liabilities for incurred claims	-3					-3
Insurance service result	**-44**	**-40**	**-83**	**34**	**-49**	**-133**
Financial income and expenses and foreign currency differences	1,439	16	5	1	6	1,461
Total changes in the Statement of profit and loss and other comprehensive income	**1,395**	**-24**	**-78**	**35**	**-43**	**1,328**
Premiums received	735					735
Claims, benefits and other insurance service expenses paid[1]	-2,762					-2,762
Insurance acquisition cash flows	-11					-11
Cash flows	**-2,038**					**-2,038**
Other movements	9	1	2	-3	-1	9
Balance at 31 December	**32,530**	**697**	**961**	**71**	**1,032**	**34,259**
Insurance contracts assets	-19	1	5		5	-13
Insurance contracts liabilities	32,549	696	956	71	1,027	34,272

[1] Including Investment components and premium refunds.

There is a slight increase in CSM due to new contracts (2024: € 14 million; 2023: € 12 million) and therefore this impact is not disclosed. The experience adjustments amounted to € 47 million negative (2023: € 143 million), the decrease is due to one-time refinements to the processing methodology of costs assumptions for future periods. Changes in estimates that effect the CSM of the total CSM are € 2 million (2023: € 28 million)

For further information on the movements in insurance contracts valued at GMM and VFA – Life 2024 please refer to the disclosure of the Movements in total insurance contracts – Life 2024.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS IN INSURANCE CONTRACTS VALUED AT GMM AND VFA - LIFE - 2023

(€ MILLION)

			CONTRACTUAL SERVICE MARGIN			
	ESTIMATES OF PRESENT VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	CONTRACTS UNDER FAIR VALUE APPROACH	OTHER CONTRACTS	TOTAL CSM	**TOTAL**
Insurance contracts assets	-4					-4
Insurance contracts liabilities	32,516	716	1,061	39	1,100	34,332
Balance at 1 January	**32,512**	**716**	**1,061**	**39**	**1,100**	**34,328**
Changes in the statement of profit or loss and other comprehensive income						
Changes that relate to current services	**135**	**-65**	**-55**	**-6**	**-61**	**9**
CSM recognised for services provided	-2	1	-55	-6	-61	-62
Change in the risk adjustment for non-financial risk		-72				-72
Experience adjustments	137	6				143
Changes that relate to future services	**-66**	**64**	**26**	**6**	**32**	**30**
Contracts initially recognised	-3	1	3	9	12	10
Changes in estimates that adjust the CSM	-88	60	30	-2	28	
Changes in estimates on onerous contracts	25	3	-7	-1	-8	20
Changes that relate to past services	**-59**					**-59**
Adjustments to liabilities for incurred claims	-59					-59
Insurance service result	**10**	**-1**	**-29**		**-29**	**-20**
Financial income and expenses and foreign currency differences	2,451	4	6		6	2,461
Total changes in the Statement of profit and loss and other comprehensive income	**2,461**	**3**	**-23**		**-23**	**2,441**
Premiums received	771					771
Claims, benefits and other insurance service expenses paid[1]	-2,568					-2,568
Insurance acquisition cash flows	-7					-7
Cash flows	**-1,804**					**-1,804**
Other movements	-5	1	-1		-1	-5
Balance at 30 June / 31 December1	**33,164**	**720**	**1,037**	**39**	**1,076**	**34,960**
Insurance contracts assets	-3	1				-2
Insurance contracts liabilities	33,167	719	1,037	39	1,076	34,962

[1] Including Investment components and premium refunds.
[2] The summary of movements does not include mutations on Assets for insurance acquisition cash flows.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

7.4 Reinsurance

Analysis of Outward reinsurance contracts held
The table below shows the total of the reinsurance contracts.

For an explanation of exposure to credit risk, see Note 30 Credit Quality of Financial Assets.

MOVEMENTS OF TOTAL OUTWARD REINSURANCE CONTRACTS HELD ASSETS 2024

(€ MILLION)

	REINSURANCE ASSETS FOR REMAINING COVERAGE		REINSURANCE ASSETS FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS-RECOVERY COMPONENT	LOSS-RECOVERY COMPONENT	ESTIMATES OF PRESENT OF VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT OF VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	TOTAL
Reinsurance contracts held assets	33	6	-6	1,021	39	1,093
Balance at 1 January	**33**	**6**	**-6**	**1,021**	**39**	**1,093**
Changes in the Statement of profit and loss and other comprehensive income						
Recoveries of incurred claims and other income from reinsurance services	2	2	21	302	-18	309
Premiums and other charges from reinsurance services	-485					-485
Net result from reinsurance contracts	**-483**	**2**	**21**	**302**	**-18**	**-176**
Financial income and expenses and foreign currency differences	7			79	5	91
Effect of changes in exchange rates		-1		-55	-4	-60
Total changes in the Statement of profit and loss and other comprehensive income	**-476**	**1**	**21**	**326**	**-17**	**-145**
Premiums	443					443
Claims, investment components and other reinsurance service expenses			-12	-389		-401
Cash flows	**443**		**-12**	**-389**		**42**
Transfer to other items in the statement of financial position	-2			-2		-4
Other changes	3	-1	-3	3	-1	1
Balance at 31 December	**1**	**6**		**959**	**21**	**987**
Reinsurance contracts held assets	1	6		959	21	987

The total outgoing reinsurance contracts amounts to € 987 million as of 31 December 2024 (31 December 2023: € 1,093 million). The decrease is mainly due to the amounts received from recovered claims related to the reinsured earthquake damage in Turkey. In the financing income and expenses, there is a positive currency result on contracts concluded in Turkey.

The CSM for the Life portfolio for total outgoing reinsurance contracts amounts to € 1 million as of year-end 2024 (2023: € 1 million).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENTS OF TOTAL OUTWARD REINSURANCE CONTRACTS HELD ASSETS 2023

(€ MILLION)

	REINSURANCE ASSETS FOR REMAINING COVERAGE		REINSURANCE ASSETS FOR INCURRED CLAIMS			
			GMM	PAA		
	EXCLUDING LOSS COMPONENT	LOSS-RECOVERY COMPONENT	ESTIMATES OF PRESENT OF VALUE OF FUTURE CASH FLOWS	ESTIMATES OF PRESENT OF VALUE OF FUTURE CASH FLOWS	RISK ADJUSTMENT	TOTAL
Reinsurance contracts held assets	26	4	22	716	12	780
Balance at 1 January	**26**	**4**	**22**	**716**	**12**	**780**
Changes in the Statement of profit and loss and other comprehensive income						
Recoveries of incurred claims and other income from reinsurance services		3	19	784	21	827
Premiums and other charges from reinsurance services	-398					-398
Net result from reinsurance contracts	**-398**	**3**	**19**	**784**	**21**	**429**
Financial income and expenses and foreign currency differences	2	1		139	10	152
Effect of changes in non-performance risk of reinsurers				-1		-1
Effect of changes in exchange rates	-7	-2		-85	-6	-100
Total changes in the Statement of profit and loss and other comprehensive income	**-403**	**2**	**19**	**837**	**25**	**480**
Premiums	395					395
Claims, investment components and other reinsurance service expenses			-35	-531		-566
Cash flows	**395**		**-35**	**-531**		**-171**
Transfer to other items in the statement of financial position	15		-12	-1	2	4
Balance at 31 December	**33**	**6**	**-6**	**1,021**	**39**	**1,093**
Reinsurance contracts held assets	33	6	-6	1,021	39	1,093

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

KEY ASSUMPTIONS AND ESTIMATES WHEN ASSESSING THE MEASUREMENT OF LIABILITIES AND ASSETS RELATED TO INSURANCE/REINSURANCE CONTRACTS

Where possible, Achmea uses observable market variables and models/techniques which are commonly used in the industry. The assumptions for non-observable market variables used are based on a combination of experiences within Achmea and market benchmarks, such as those supplied by the statistics department of the Dutch Association of Insurers, the Dutch Society of Actuaries and comparable institutions in Europe.

Insurance contracts are valued based on the following building blocks which are explained below in the following sections:
I Estimate of future cash flows
II Discount curve for present value calculation
III Risk Adjustment
IV Contractual Service Margin (CSM)

The fulfilment cash flows consist of building blocks I to III and represent the settlement of the obligations from the insurance contract with the policyholder. Building block IV, the CSM, represents Achmea's future service fee from the insurance contract. See accounting policies liabilities and assets related to insurance/reinsurance contracts.

I Estimates of future cash flows

General

When estimating future cash flows at balance sheet date, Achmea uses all information available without undue cost or effort up to the date of preparation of the financial statements. The information used includes both internal and external historical data on claims and other experiences to determine expectations about future events. Achmea primarily uses deterministic (fixed outcomes) modelling techniques that are used for cash flows with limited complexity without options, guarantees or non-linear relationships.

Achmea also uses stochastic (variable outcomes) modelling techniques to estimate the expected value of insurance liabilities. The input is a large number of scenarios with various market variables such as interest rates and investment income, and underwriting variables such as cash flows and interdependencies between cash flows. The cash flows associated with each scenario are discounted and weighted by their estimated probabilities.

Cash flows within insurance contract boundaries relate directly to the settlement of insurance contracts, including cash flows where Achmea can determine the amount or timing. These directly attributable cash flows are allocated to the groups of insurance contracts to which they relate. If the cash flows are not directly attributable to groups of insurance contracts, they are allocated to the relevant groups using activity-based costing and scaling techniques.

In general, Achmea allocates cash flows for sales and acquisitions to groups of contracts based on the total premiums for each group. Claims handling costs are allocated based on the number of claims for each group and maintenance and administration costs are allocated based on the number of current contracts within each group.

Achmea assesses the extent and completeness of recognised loss liabilities and claims from reinsurance and recourse using a range of loss reserving techniques – for example, the chain ladder and Bornhuetter-Ferguson methods. These techniques assume that Achmea's own claims experience is indicative of future claims development patterns and thus ultimate claims costs.

Reinsurance contracts

Achmea enters into both outward and inbound reinsurance contracts. For inbound reinsurance contracts, the general assumptions for estimating cash flows for insurance contracts apply. This section only explains the assumptions for outward reinsurance contracts.

For outward reinsurance contracts, reinsurance cash flows are determined based on modelling of expected cash flows in underlying insurance contracts based on cover issued during the coverage period of the reinsurance contract. The renewal of the majority of mainly non-proportional outward reinsurance contracts takes place annually. During this renewal, new reinsurance contracts are drawn up (separate from the previous contract), with new terms for reinsurance programs, premiums and clauses.

Life

Expected cash flows include estimates of expected premium income and claims, morbidity and mortality, policyholder behaviour, lapse, expenses, inflation and interest.

Mortality tables

In determining fulfilment cash flows, Achmea uses the most recent population mortality tables (AG2024), adjusted for the specific nature and composition of Achmea's insurance base. For products with longevity risk, a percentage adjustment is made to population mortality that is gender- and age-dependent. There are separate tables for pensions and annuities. Short-life risk products use selection factors that are maturity dependent. In addition, a distinction is made between smokers and non-smokers for term-life insurance policies.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Costs and inflation
Cost assumptions are based on expected salary increases and available internal budget information including cost allocation. For the periods for which budgets are not yet available, costs are extrapolated taking scalability into account. The inflation curve is based on a European price inflation curve with an adjustment for the difference with Dutch price inflation and an adjustment related to expected labour productivity growth. For the period of 10 to 20 years, a conversion is made to the ECB's long-term target of 2%.

Lapse rates Life business Netherlands
Policyholder behaviour, including lapse and buy out, is a key assumption when valuing life insurance products. The following table shows the minimum and maximum lapse rates used in the lapse assumptions.

31 DECEMBER 2024	LAPSE %
	MINIMUM - MAXIMUM
Life Netherlands - GMA	0.0 - 12.5
Life Netherlands - VFA	0.0 - 12.5

31 DECEMBER 2023	
	MINIMUM - MAXIMUM
Life Netherlands - GMA	0.0 - 13.0
Life Netherlands - VFA	0.0 - 13.0

Non-life
Achmea bases the liability for incurred claims on estimates of expected claims payments, taking into account the claims history and claims development.

Expected cash flows for disability insurance include estimates of expected premium income and claims, morbidity and mortality, policyholder behaviour, lapse, expenses, inflation and interest. The future cash flows are taken into account in the determination of a potential loss component. In determining disability insurance liabilities, recovery probabilities based on averages are taken into account and waiting periods are included.

For some risks, no adequate statistical data are available, such as environmental and asbestos damage claims and large-scale individual claims, because some aspects of these types of claims are still evolving. Liabilities recognised in the balance sheet for such claims have been determined based on a portfolio analysis. In determining the liability for claims incurred, the costs of handling the claim and proceeds from expected recovery rights are taken into account.

Health
Achmea bases the liability for incurred claims on estimates of expected claims payments, taking into account the claims history and claims development.

The private health insurance system in the Netherlands consists of two components: basic health insurance and supplementary health insurance. Coverage within the basic health insurance system is determined by the government and is influenced by political processes. The basic health insurance system includes (inherent) uncertainties due to the calculation methods used. In the Netherlands, a system of risk mitigating factors is in place to reduce the uncertainties arising from the system. Estimate of the cash flows from the Health Insurance Fund is an inherently uncertain process, based on assumptions for national health costs and the allocation of health costs to budget parameters. The contribution from the Health Insurance Fund (including standard nominal premium) and the level of claims are provisional in nature and are likely to change over a number of years and result in a shift between insurers. For more details on the uncertainties and risk mitigating factors for health insurance, please refer to Note 2 Capital and risk management. Any changes in assumptions may affect the settlement with the Dutch government.

For Health insurance liabilities, the simplified measurement model (premium allocation approach, PAA) is applied because the coverage period of these insurance contracts is one year.

Insurance liabilities for coverage in future periods (LFRC)
The insurance liabilities for coverage in future periods include the receivable from the Health Insurance Fund, receivables from direct insurance, accounts receivable provisions, premiums received in advance and the loss component. The receivable from the Health Insurance Fund is estimated on a best estimate basis and is predominantly short-term in nature. This receivable has been valued on the basis of the risk equalization model applicable to the relevant claim year and the statutory percentages of equalization and subsequent calculation.

Receivables from direct insurance and premiums received in advance are valued at amortized cost, which is usually equal to the nominal value, less any provisions deemed necessary for possible uncollectability, taking into account the effects of the Structural Measures Act. The loss component is calculated on the basis of estimates of cash flows for future claims, costs directly attibutable to Health claims and premiums to be earned (including contributions from the Health Insurance Fund). For the basic insurance this is done per legal entity and for the supplementary insurance this is determined per package (group).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Insurance liabilities for incurred losses (LFIC)
Insurance liabilities for incurred claims include the provision for claims payable, advances provided to healthcare providers and the provision for claims handling expenses. The valuation of liabilities for incurred claims related to insurance contracts is an inherently uncertain process that includes assumptions for changes in legislation, social, economic and demographic trends, policyholder behavior and other factors. In particular, the assumptions related to these aspects include data on declared periods and experience by health care provider or group of health care providers for the current fiscal year and prior fiscal years. Where possible, Achmea uses observable market variables and models/techniques commonly used in the market. Achmea annually assesses the provisions per claim year per type of care, which consists of the best possible estimate of the (future) cash flows related to the reimbursements to be paid out for treatments of insured parties, which started before the balance sheet date. The expected future cash flows per care type are estimated on the basis of the most recent information at claims level, taking into account, among other things, contractual agreements made with care providers. The advances to healthcare providers relate to short-term advances made to hospitals and mental health providers in particular for treatments already provided but not declared. These have been netted against the provision for still to be received declarations to the extent that there is a strong intention to net them against still to be received claims. The provision for claims handling expenses is made for the costs to be incurred in processing claims pending as of the end of the fiscal year for past and prior years and is determined based on a percentage of the insurance liability for claims incurred.

Cash flows in fair value method at transition date
The fair value of insurance contracts has been determined as the sum of the present value of the net cash flows expected to be generated by the contracts in a discounted cash flow model. The discounted cash flows in this model mostly correspond to the cash flows and contract boundaries applied in the regular measurement of insurance liabilities under IFRS 17. In some parts, a higher cost level has been taken into account from the perspective of a market participant.

II Discount curve for present value calculation

With the exception of the short-term premium provisions, fulfilment cash flows of incurred claims with an expected settlement period of less than 12 months of Health Netherlands and the short-term premium provisions of Non-life Netherlands, all cash flows are discounted. Based on the product portfolio and the settlement patterns of Health Netherlands, it is expected that the outstanding claims as of December 31, 2024 will be paid within one year after arising, which means that there will be no discounting at the end of 2024.

Achmea’s discount curve is composed bottom-up, consisting of a risk-free rate plus an illiquidity spread that is specific for each product group of insurance contracts based on the investment portfolio of the life and pension business. Insurance illiquidity premiums are derived from the spreads that can be earned on Achmea’s illiquid, fixed income investments. For insurance contracts (in euros) with a remaining maturity of less than 30 years, the risk-free rate is based on the risk-free swap curve from which a Credit Risk Adjustment in accordance with SII of 10 bps is deducted over the entire curve. For maturities of 30 years and longer, the risk-free curve is determined by extrapolating to an Ultimate Forward Rate (UFR), which as of 31 December 2024 is 2.3% (year-end 2023: 2.4%), from which a Credit Risk Adjustment is deducted. The UFR reflects long-term real interest rate and inflation expectations and is based on historical data. In addition, the ECB’s 2% target inflation rate is taken into account. The UFR is reviewed periodically, and it is expected to decrease further given constant interest rates and inflation. The following table shows the minimum and maximum of the discount curve used to discount cash flows in the currencies most important to Achmea.

MINIMUM AND MAXIMUM YIELD CURVE USED TO DISCOUNT THE CASH FLOWS OF THE MAJOR CURRENCIES (%)

31 DECEMBER 2024							SPOT RATES (%)
	1 YEAR	5 YEARS	10 JAAR	15 YEARS	20 YEARS	30 YEARS	50 YEARS
Non-life - PAA[1]							
Euro	2.82 - 3.33	2.70 - 2.72	2.75 - 2.77	2.77 - 2.78	2.63 - 2.66		
Turkish Lira	40.10 - 47.65	28.22 - 39.56	23.34 - 28.11	20.25 - 23.27			
Non-Life GMA							
Euro	2.82 - 3.33	2.70 - 2.72	2.75 - 2.77	2.77 - 2.78	2.63 - 2.66	2.31 - 2.33	2.12 - 2.12
Health - PAA[2]							
Euro							
Life Netherlands - General model							
Euro	2.23 - 3.01	2.14 - 2.92	2.27 - 2.94	2.33 - 2.92	2.26 - 2.76	2.00 - 2.41	1.86 - 2.21
Life Netherlands - Variable fee approach							
Euro	2.23 - 3.01	2.14 - 2.92	2.27 - 2.94	2.33 - 2.92	2.26 - 2.76	2.00 - 2.41	1.86 - 2.21

1 Due to the shorter maturities of insurance contracts accounted for under the PAA, the yield curve of Non-life Insurance is included up to 20 years.
2 Nearly the entire portfolio of Health consists of Health Netherlands. As of 2024, Health Netherland does not discount its cash flows.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MINIMUM AND MAXIMUM YIELD CURVE USED TO DISCOUNT THE CASH FLOWS OF THE MAJOR CURRENCIES (%)

31 DECEMBER 2023							SPOT RATES (%)
	1 YEAR	5 YEARS	10 JAAR	15 YEARS	20 YEARS	30 YEARS	50 YEARS
Non-life - PAA[1]							
Euro	3.72 – 4.18	2.67 – 2.70	2,71 - 2,73	2.75 – 2.76	2.67 – 2.69		
Turkish Lira	42.50 – 45.90	24.15 – 41.97	20,46 – 24,03	18.76 – 20.43	17.15 – 18.73		
Non-Life GMA							
Euro	3.72 – 4.18	2.67 – 2.70	2,71 - 2,73	2.75 – 2.76	2.67 – 2.69	2.25 – 2.26	2.24 – 2.24
Zorg - PAA[1]							
Euro		1,82 - 2,82					
Life Netherlands - General model							
Euro	3.36 – 3.84	2,32 - 2,79	2.39 – 2.84	2.47 – 2.85	2.42 – 2.75	2.19 – 2.48	2.05 – 2.31
Life Netherlands - Variable fee approach							
Euro	3.36 – 3.84	2,32 - 2,79	2.39 – 2.84	2.47 – 2.85	2.42 – 2.75	2.19 – 2.48	2.05 – 2.31

1 Because of the shorter maturities of Non-life insurance contracts accounted for under the PAA, the minimum and maximum yield curves of Health insurance are included up to 2 to 5 years (1 year is not discounted) and the yield curve of Non-life insurance is included up to 20 years.

Cash flows based on the proceeds of the underlying financial instruments are adjusted to match the fluctuations of those instruments. This is done using risk-neutral valuation techniques and the discount is applied at a risk-free discount rate increased by an illiquidity premium. When the cash flow is estimated using a stochastic model (variable outcomes), that cash flow is discounted at discount rates corresponding to the scenarios computed in the model. Those resulting discount rates are on average equal to interest rate shocks of the risk-free yield plus the illiquidity premium.

III Risk Adjustment

The Risk Adjustment is the allowance for the non-financial risks associated with insurance/reinsurance contracts. This compensation for the uncertainty about size and timing of non-financial cash flows is determined separately for each (re)insurance entity.

The Risk Adjustment of insurance contracts issued is determined both gross before and net after reinsurance using the cost of capital method. Risk drivers and time diversification are also taken into account. Time diversification refers to a factor applied in the calculation of the Risk Adjustment that ensures that the further into the future, the less influence the risks have. By this means, the independence of risks from one year to the next is taken into account. Time diversification is used for long term Dutch non-life-, life- and pension insurance. The Risk Adjustment of outbound reinsurance contracts is equal to the difference between the calculated gross Risk Adjustment of the issued insurance contracts before reinsurance and net after reinsurance.

Under the cost of capital method, Achmea determines a cost of capital percentage over the capital required over each report, adjusted for discounting and a surcharge for illiquidity. The solvency capital requirement is calculated with the SII methodology by determining the probability distribution of the present value of cash flows from insurance contracts on each balance sheet date and calculating the capital required for Achmea to meet its obligations from insurance contracts with 99.5% reliability with a 1-year horizon. The SII correlation matrix is used for this. The cost of capital reflects the additional remuneration for non-financial risks. The applied cost of capital is 4.5%.

The Risk Adjustment for non-financial risk is allocated to the groups of (re)insurance contracts based on an analysis of the groups' risk profiles. In determining Risk Adjustment, diversification benefits from providing different insurance contracts are taken into account in a manner consistent with the compensation required, the risk appetite. The effects of benefits are determined by using a correlation matrix technique, taking into account the effects of reinsurance.

Risk Adjustment in fair value method at transition date.
The determination of fair value includes a surcharge for risk premium demanded by market participants for the uncertainty inherent in the cash flows and profit margin of the contracts. This mark-up resulted in a different cost of capital rate of 6% compared to a rate of 4.5% applied in the regular Risk Adjustment. In determining the risk premium, a number of additional risks are taken into account, for example with respect to general operational risk, and time diversification is not taken into account.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The table below shows the confidence levels on a 1-year basis corresponding to the Risk Adjustments as calculated using the cost of capital method.

NON-LIFE

(%)

	31 DECEMBER 2024	31 DECEMBER 2023
The Netherlands	72.4	72.1
Turkey	75.0	75.0
Slovakia	67.6	71.7
Greece	64.0	57.0

LIFE

(%)

	31 DECEMBER 2024	31 DECEMBER 2023
The Netherlands	89.6	89.7
Slovakia	67.6	71.7
Greece	64.0	79.1

HEALTH

(%)

	31 DECEMBER 2024	31 DECEMBER 2023
The Netherlands	55.6	55.3
Slovakia	67.6	71.7

IV Contractual Service Margin (CSM)

The CSM recognised on the balance sheet represents the unearned consideration of groups of insurance contracts realised with future services. The CSM is recognised in the Statement of profit and loss during the coverage period of the insurance contracts, based on the defined coverage units representing the scope of service. Coverage units are assessed and revised annually.

PRODUCT	BASIS ON WHICH THE AMOUNT OF SERVICES PROVIDED ARE DETERMINED
Insurance:	
Death risk insurance	Insured risk capital
Immediate annuities	Insured benefit
Pensions	Insured claims
Traditional savings and life insurance	Insured capital
Collective pension contracts	Insured claims
Disability insurance	Insured claims
Reinsurance:	
Savings insurance	Insured benefit
Immediate annuities	Insured benefit
Quota share	Insured risk capital

ACCOUNTING POLICIES LIABILITIES AND ASSETS RELATED TO (RE)INSURANCE CONTRACTS

Insurance risk (re)insurance contracts

Insurance contracts are defined as contracts that transfer existing significant insurance risk, where the policyholder is compensated for the loss suffered as a result of the insured event. Lapse and expense risks associated with insurance contracts do not constitute insurance risk.

Investment contracts

Some contracts entered into by Achmea have the legal form of insurance/reinsurance contracts, but do not carry significant insurance risk. With these contracts, Achmea only accepts a financial risk. These contracts are classified as financial liabilities and under ‘Investment contracts’.

Applied measurement model insurance/reinsurance contracts

Insurance contracts are divided into product categories Life, Health, Non-life and reinsurance contracts (outward). Within these, a further subdivision is made according to the measurement model applied:

- General measurement model (GMM);
- Variable fee approach (VFA), application of general measurement model for contracts with direct participation features;
- Premium allocation approach (PAA), or simplified measurement model.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The VFA is applied to contracts that meet the following conditions upon initial recognition:
- the contractual terms stipulate that the policyholder participates in a clearly identified pool of underlying investments;
- Achmea expects to pay the policyholder an amount equal to a substantial part of the fair value of the proceeds of the underlying investments;
- Achmea expects that a significant portion of any change in the amounts payable to policyholders will vary according to the change in underlying investments.

See also IV Valuation of contracts according to GMM and VFA.

The simplified measurement model PAA is applied for the insurance contracts where:
- the group's coverage period is one year or less; or
- application of the simplified measurement model (PAA) does not result in a materially different valuation than under the application of the general measurement model.

See also V Valuation – contracts valued under the PAA.

I Separation of components of insurance and reinsurance contracts

On initial recognition of an insurance or reinsurance contract, Achmea separated the following components and accounts for them as stand-alone financial instruments to which IFRS 9 applies:
- embedded derivatives whose economic characteristics and risks are not closely related to those of the insurance contract and whose contract terms would not meet the definition of an insurance or reinsurance contract if it were a stand-alone contract; and
- separate investment components that are not highly interrelated with the insurance components and for which contracts with equivalent terms can be sold separately in the same market.

Separated investment contracts are presented in Note 8 “Financial liabilities”

<u>Investment components not separated (NDIC of non-distinct investment component)</u>
Non-distinct investment component is the amount that is paid or repaid to the policyholder in all circumstances and is independent of the occurrence of an insured event. It applies to unit-linked products, mortgage insurance, segregated investment deposit contracts, guarantee insurance and funeral insurance. The investment component that is not separated is part of the measurement of the insurance contract and results are part of financial result from insurance contracts in profit and loss. The investment component is determined based on scenario analysis as the surrender value as contractually defined, less any expenses that can be offset and any surrender charges.

II Grouping of insurance and reinsurance contracts

<u>Insurance contracts</u>
Upon initial recognition, insurance contracts are aggregated into portfolios of insurance contracts with similar risk profiles, which are managed together. The grouping of insurance contracts follows the classification under SII as far as possible. Subsequently each portfolio is recognised upon initial recognition in annual cohorts (by year of issue), later divided into the following three groups based on expected profitability which are not adjusted during the life of the insurance contracts in the group:
- contracts that are loss-making at initial recognition;
- contracts that have no significant probability of becoming loss-making at initial recognition; and
- any remaining contracts in the annual cohort.

Groups of insurance contracts are determined upon initial recognition and their composition is not subsequently revised.

Contracts for basic health insurance in the Netherlands are included in the same group.

An insurance contract will be recognised in a group from the first of the following moments:
- start of the coverage period of the group of contracts;
- when the first payment from the policyholder becomes due or, if there is no contractual due date, the date when the premium is received from the policyholder; and
- when facts and circumstances indicate that the group of contracts is onerous and Achmea is bound by a contract.

The (re)insurance contracts, acquired as part of a business combination are recognised at the date on which control was acquired (see Chapter 1 General accounting policies, section H Consolidation). This also applies to insurance contracts acquired in the context of a transfer of contracts.

<u>Reinsurance contracts</u>
Grouping of outward insurance contracts also follows the classification under SII as far as possible. Some reinsurance contracts provide cover for underlying insurance contracts included in different groups. In that case, the reinsurance group may consist of a single contract.

A group of outward reinsurance contracts is recognised from the first of the following moments.
- Reinsurance contracts providing proportionate coverage: the date on which an underlying insurance contract is first recognised in the balance sheet. This applies to quota share reinsurance contracts;
- Other outward reinsurance contract: the start of the coverage period of the reinsurance contract.

If Achmea identifies an onerous group of underlying insurance contracts at an earlier date and the related reinsurance contract has already been entered into before that earlier date, the reinsurance contract will be recognised at that earlier date (see the section Reinsurance of onerous underlying insurance contracts in Chapter IV Valuation of contracts according to GMM and VFA) and section V Valuation – contracts measured according to the PAA section Reinsurance.

III Contract boundary

Insurance contracts and reinsurance contracts

Cash flows are within the contract boundary if they arise from material rights and obligations existing during the reporting period in which Achmea can require the policyholder to pay premiums or in which Achmea has a material obligation to provide services under insurance contracts to the policyholder. These provisions apply by analogy to reinsurance contracts for the premium payable by Achmea to the reinsurer and the substantive rights to receive services from the reinsurer.

A material obligation to provide services ends when:

- Achmea has the practical ability to reassess the risks of the relevant policyholder and can set a premium or benefit level that fully reflects the risks of the reassessment; or
- Achmea has the practical ability to reassess the risks of the portfolio in which the contract is included and can adjust the premium or insurance terms accordingly. This does not take into account risks relating to periods after this reassessment date.

A contract modification may result in termination of the existing insurance contract and recognition of a new contract (see below Chapter VI Derecognition and changes in the insurance/reinsurance contract).

For most Non-life insurance contracts, Achmea can reset the premium or adjust insurance conditions each year when contracts are issued, based on the risks in the specific insurance contracts or insurance portfolios based on assessment of claims experience and expectations regarding development of the relevant risks.

For individual disability insurances, the premiums cannot be unilaterally adjusted annually, nor can the contract be terminated by Achmea. These contracts are considered long-term.

Several Life Insurance contracts contain a guaranteed annuity option, where Achmea does not have the right to reset a price for the ingoing annuity with associated risks when the annuity takes effect. This option gives the policyholder the right to receive an annuity at a predetermined rate on the due date of the specified term. The contract boundary of these contracts is defined as the total term of the contract, including the term of the option on the annuity. As a result, the cash flows from the guaranteed annuity option fall within the boundary of the current contract.

IV Measurement of contracts according to GMM and VFA.

Insurance contracts – measurement at initial recognition

At initial recognition, Achmea values a group of insurance contracts as the total of:

(a) the fulfilment cash flows or the expected value of insurance liabilities determined as the present value of expected future cash flows, including allocated costs, required to settle an insurance contract increased by a Risk Adjustment for non-financial risks; and

(b) the 'Contractual Service Margin' (CSM) or unearned compensation for future insurance services.

The Risk Adjustment represents compensation for uncertainty regarding the amount and timing of estimated cash flows arising from non-financial risk.

Services in insurance contracts include insurance coverage and, for policies with direct participation features, investment services to manage the underlying investment portfolio on behalf of policyholders. In addition, Life contracts without direct participation features may also have investment services associated with them. This applies to contracts where:

- there is a non-disaggregated investment component or the policyholder has the right to withdraw an amount (for example, the policyholder's right to receive a surrender value upon cancellation of a contract);
- the investment component or amount that can be withdrawn is expected to include an investment return; and
- Achmea conducts investment activities to generate investment returns.

Refer to 'Key assumptions and estimates' for more information about 'Estimations of future cash flows', 'Discounting', 'Risk adjustment' and 'Contractual Service Margin'

The fulfilment cash flows are adjusted by any cash flows arising at the date of initial recognition of the group and recognition of amounts previously recognised on the balance sheet in advance of the group's initial recognition, including prepaid acquisition costs. The locked-in discount rate of the CSM is fixed after the annual cohort is closed.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Cash flows for sales and acquisitions made before the recognition of related insurance contracts are presented as accrued assets. The recoverability of these assets is assessed periodically. Any impairment charges are presented in the income statement as part of the insurance service result. At the initial recognition of the group of insurance contracts, that are related to these assets, these assets are included in the fulfillment cash flows and are no longer presented as accrued assets.

For groups of insurance contracts acquired as part of a contract transfer or business combination, the compensation received is included in the fulfilment cash flows as premium at the acquisition date. In a business combination, the consideration received is equal to the fair value of the contracts at that date.

Premium payments by policyholders are recognised as premiums received if they are actually received by Achmea. Receipts by intermediaries are not presented as premiums received.

Onerous contract
If the total fulfilment cash flows of the group of insurance contracts upon initial recognition in the balance sheet is a net cash outflow, the group is onerous. In this case, the amount of net cash outflow is recognised as a loss in the Statement of profit and loss. This loss component is recognised as a separate part of insurance liabilities and within 'Losses and reversal of losses on onerous contracts' as a part of insurance service expenses. Subsequenly the loss component is recognized within this item in the Statement of profit and loss over the life of the contract. In subsequent valuations, losses and reversals of these losses are also recognized under this presentation in the income statement. This also applies if the contracts were acquired in a business combination, as an adjustment to goodwill or in the Statement of profit and loss when there is negative goodwill.

Insurance contracts – subsequent measurement
The carrying amount of a group of insurance contracts is determined at each reporting date and equals the sum of 'insurance liabilities for remaining coverage' and 'insurance liabilities for incurred claims'.

The insurance liabilities for remaining coverage include
(a) the fulfilment cash flows relating to insurance services to be provided based on the insurance contracts in future periods and
(b) any remaining 'Contractual Service Margin' (CSM) at that date.

The insurance liabilities for incurred claims include cash flows for claims incurred and related expenses not yet paid, including claims that have occurred but have not yet been reported (IBN(E)R claims).

The measurement of the insurance liabilities flows of a group of insurance contracts at the balance sheet date is based on current estimates of future cash flows, current discount rates and current estimates of the Risk Adjustment for non-financial risk. For measurement of the CSM of GMM contracts included under insurance liabilities for remaining coverage, the historical discount rate (locked-in) is applied per group of insurance contracts.

Changes in fulfilment cash flows are recognised as follows:
- changes in cash flows and Risk Adjustment relating to future services are adjusted to the credit or debit of the CSM (or recognised in the insurance service expenses if the group of insurance contracts is onerous);
- changes relating to current service or service from previous years are included in insurance service expenses in the Statement of profit and loss;
- losses on onerous contracts and reversals of those losses during the term of the contract are recognized as part of 'insurance service expenses' in profit and loss;
- effects of discounting or changes in the discount rate on estimated future cash flows and Risk Adjustment are recognised within finance result from insurance contracts in the Statement of profit and loss.

Insurance revenue – contracts valued under the GMM and VFA
Insurance revenues are realised to the extent that services arising from the insurance contracts are met. For contracts that are valued under the GMM and VFA, insurance revenue from insurance services provided represents the total of the changes in insurance liabilities for coverage in future periods. This comprises:
- a release of the CSM, determined based on allocated coverage unit;
- changes in the Risk Adjustment for non-financial risk relating to the current period;
- the release from insurance liabilities for coverage in future periods for claims, benefits and other insurance costs expected at the beginning of the year.

In addition, Achmea allocates – systematically, based on the passage of time – premiums to cover acquisition costs allocated to insurance liabilities for coverage in future periods. The amount allocated, discounted with the determined discount curve on initial recognition of the group of contracts, as insurance service income in profit and loss and an equal amount under insurance-related amortisation of acquisition costs.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The CSM of a group of insurance contracts is recognised in the Statement of profit and loss as insurance revenue during the coverage period of the insurance contracts. The allocation by period is based on the defined coverage units representing the scope of service. The allocation method is further detailed in Assumption and estimates IV Contractual Service Margin (CSM).

Investment components are excluded from the insurance revenue and insurance service expenses.

Insurance-related costs

Insurance-related costs arising from insurance contracts are generally recognised in the Statement of profit and loss when incurred. Insurance-related costs include:

- claims incurred and other insurance service costs – for some life contracts, claims incurred include premiums waived, for example, in the event of disability or incapacity;
- amortisation of acquisition cash flows: this amount is equal to the allocated amount recognised as part of insurance revenue;
- losses on onerous contracts and reversals of these losses;
- adjustments to liabilities for incurred claims that do not result from the effects of discounting and changes in the discount curve;
- impairment losses on assets from insurance acquisition cash flows and reversals of these losses.

The possible movements of the CSM by type of insurance contract during the year are explained below.

Insurance contracts without direct participation features

The carrying amount of the CSM at each balance sheet date is equal to the carrying amount at the beginning of the year, adjusted for:

- the CSM of new insurance contracts added to the group of insurance contracts in the year;
- the unwinding of discount of the CSM during the year, at the fixed discount rate per group determined on initial recognition;
- changes in fulfilled cash flows relating to future services, except for creation, recalculation or reversal of a loss component. These changes are:
  - o adjustments, arising from premiums received in the year, relating to cash flows related to future services, discounted at the discount rates determined at initial recognition;
  - o changes in estimates of the present value of future cash flows in insurance liabilities for cover in future periods, discounted at the discount rates determined upon initial recognition of the CSM;
  - o differences between an investment component that is not separated and not expected to be payable in the year and the actual amount payable in the year;
  - o differences between a loan to a policyholder expected to be repaid in the year and the actual amount to be repaid in the year; and
  - o changes in the Risk Adjustment for non-financial risks related to future services. Achmea separates the discounting effect and experience changes in the Risk Adjustment, with the discounting effect recognised in the financial result.
- the effect of any exchange rate differences on the CSM; and
- the amount recognized as insurance revenue in the income statement for insurance services provided during the year.

Changes in cash flows associated with changes in discretionary commitments are deemed to relate to future service and adjust the CSM accordingly.

Unwinding of discount of insurance liabilities for cover in future periods, changes in discount rate and other financial risk and changes in the effect of time value of money of future financial options and guarantees are not recognised in the CSM, but in the Statement of profit and loss as part of financial result from insurance-related services.

Insurance contracts with direct participation features (Variable fee approach)

Insurance contracts with direct participation features are contracts for which Achmea’s obligation to the policyholder is the balance of:

- the obligation to pay the policyholder an amount equal to the fair value of the underlying investment portfolio; and
- a variable fee for future services included under CSM. The variable remuneration comprises Achmea’s share of the fair value of the underlying investment portfolio less the fulfilment cash flows that do not vary based on returns from the underlying investment portfolio, such as options and guarantees issued by Achmea. The service fee is both for insurance cover and a fee for investment portfolio management.

Liabilities to policyholders are adjusted for changes in the fair value of the underlying investment portfolio. These adjustments are recognized in the profit and loss as financial result from insurance-related services.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The carrying amount of the CSM at each balance sheet date is the carrying amount at the beginning of the year, adjusted for:
- the CSM of new contracts added to the group in the year;
- the change in the amount of Achmea's share of the fair value of the underlying investment portfolio less costs for options and guarantees issued that relate to future services;
- the changes in the fulfilment cash flows relating to future services, except to the extent that:
  a) Achmea has applied the risk mitigation option in which changes in the effect of financial risk on the amount of its share in the underlying investment portfolio or fulfilment cash flows are not adjusted on the CSM (see section Risk mitigation below);
  b) decrease in Achmea's share of the fair value of the underlying investment portfolio, or an increase in fulfilment cash flows relating to future services, exceeds the carrying amount of the CSM, resulting in a loss on the income statement being recognised in costs from insurance-related services and creating a loss component;
  c) an increase in the amount of Achmea's share of the fair value of the underlying investment portfolio, or a decrease in cash flows in the fulfilment cash flows relating to future services, which is allocated to the loss component, reversing losses previously recognised in the Statement of profit and loss (in the costs of insurance-related services);
  d) the effect of any exchange rate differences on the CSM; and
  e) the amount recognised as revenue from insurance-related services for services rendered in the year.

Risk mitigation

Achmea uses derivatives to mitigate interest rate risk arising from interest rate guarantees in its life and pension products. This aligns the resulting interest rate risk with the interest rate risk mitigation objective described in Note 3 Capital and risk management – Market risk. A hedging relationship exists between the insurance contracts and the risk-mitigating instruments. For the insurance contracts under the Variable fee approach for which the interest rate risk is mitigated through interest rate derivatives, the change in value of Achmea's share of the change in value of the underlying financial instruments or the fulfilment cash flows that do not vary based on returns from the underlying investment portfolio are recognised in the Statement of profit and loss and not in the CSM.

Reinsurance contracts

For the valuation of reinsurance contracts, Achmea applies the same accounting policies as for insurance contracts without direct participation features, together with the following adjustments.

The carrying amount of a group of reinsurance contracts at each balance sheet date is the sum of assets from reinsurance contracts covering future claims and assets from reinsurance contracts covering incurred claims. Assets from reinsurance contracts to cover future claims include the reinsurer's share presented under (a) the fulfilment cash flows related to services to be received in future periods and (b) any remaining CSM at that date.

Achmea values estimates of the present value of future cash flows based on assumptions that are consistent with the estimates used to determine the present value of future cash flows of the underlying insurance contracts, with an adjustment for the credit risk of the reinsurer not fulfilling its obligations. The credit risk of a reinsurer and the effect of changes to it are recognised in the Statement of profit and loss at each balance sheet date under 'Finance result from reinsurance contracts held'.

The Risk Adjustment represents the extent of non-financial risk transferred by Achmea to the reinsurer. Achmea separates the changes in Risk Adjustment for non-financial risk between Insurance result and Net financial result from (re)insurance activities.

On initial recognition, the CSM of a group of reinsurance contracts is equal to the net cost or net income on the reinsurance purchased (if the underlying insurance contracts are not onerous) valued as the total of:
- the fulfilment cash flows;
- amounts previously recognised relating to the group of reinsurance contracts;
- any cash flows arising at that time; and
- any income recognised in the Statement of profit and loss as a result of onerous underlying contracts recognised at that date (see 'Reinsurance of onerous underlying insurance contracts' below).

If the net costs of the reinsurance contract relate to an insured event that occurred prior to the starting date of the group of reinsurance contracts, these insurance costs will be recognised in the Statement of profit and loss, unless the reinsurance contract covers uncertainty regarding the financial settlement of an event that has already occurred.

The carrying amount of the CSM at each balance sheet date is the carrying amount at the beginning of the year adjusted for:
- the CSM of new contracts added to the group in the year;
- interest added to the carrying amount of the CSM during the year, discounted at the discount rates on nominal cash flows determined at initial recognition;
- revenue recognised in the Statement of profit and loss in the year on initial recognition of onerous underlying contracts (see below);
- reversals of the loss component insofar as there are no changes in the fulfilment cash flows of the group of reinsurance contracts (see below);
- changes in the fulfilment cash flows relating to future service provision discounted at the discount rates determined at initial recognition. This does not apply if the changes result from changes in the fulfilment cash flows of onerous underlying contracts (which do not adjust the CSM) that have been recognised in the Statement of profit and loss and create or adjust a loss component;
- the effect of any exchange rate differences on the CSM; and
- the amount recognised in the Statement of profit and loss due to services received in the year.

<u>Net result from reinsurance-related contracts</u>
The expected net cost of reinsurance contracts includes an allocation of reinsurance premiums paid less the pre-estimated compensation recoverable from reinsurers.

Achmea recognises allocated reinsurance premiums in the statement of profit and loss in proportion to the expected receipts of services arising from reinsurance contracts.

For a group of reinsurance contracts that compensate loss-making underlying insurance contracts, Achmea recognises a gain for the compensation Achmea expects to receive from the reinsurer for the insured loss component of the underlying insurance contract:
- on initial recognition of the onerous underlying contracts, if the reinsurance contract relating to those underlying contracts was entered into before or at the same time as those underlying contracts are recognised; and
- in the event of changes in the fulfilment cash flows of the group of reinsurance contracts that relate to future services, leading to changes in the fulfilment cash flows of underlying onerous contracts.

If a reinsurance contract covers only part of the insurance contracts included in an onerous group of contracts, Achmea uses a systematic and rational method to determine the portion of losses recognised on the onerous group that relates to underlying contracts covered by the reinsurance contract.

V Valuation of contracts according to the PAA

For Health and Non-Life insurance (excluding individual disability insurance), Achmea applies the PAA method to simplify the valuation of groups of insurance contracts as the following criteria are met upon recognition in the balance sheet.

For insurance contracts:
- the group's coverage period is one year or less; or
- application of the simplified measurement model (PAA) does not result in a materially different valuation than under the application of the general measurement model.

For the reinsurance contracts, the following applies:
- The coverage period of each contract is one year or less. This applies to loss-occurring reinsurance;
- Application of the simplified measurement model (for risk attaching reinsurance contracts) does not result in a materially different valuation than under application of the general measurementn model. When comparing different measurement methods, Achmea considers the impact of the different release patterns of reinsurance contracts for covering future claims and the impact of discounting. If significant variability is expected in fulfilment cash flows before a claim is filed, this criterion is not met.

Initial recognition and subsequent measurement
Upon initial recognition of each group of insurance contracts, the carrying amount of the insurance liabilities for coverage in future periods is equal to the premiums received upon initial recognition less any cash flows arising from acquisition costs (unless these are recognised directly in result), and adjusted for acquisition cash flows that occurred in previous periods and are attributable to that group. If the premium is not timely received, a contract asset is recognised. Achmea allocates the expected premium income to each period based on the passage of time. Some reinsurance contracts related to Catastrophe have a seasonal pattern. For these contracts, the premium income is allocated to the period according to this seasonal pattern

Cash flows for sales and acquisitions made before the recognition of related insurance contracts are part of prepaid assets. The recoverability of these assets is assessed periodically.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

These assets are then included in the related group of insurance contracts within 'Insurance liabilities for remaining coverage' and are recognised in the Statement of profit and loss over the coverage period in line with insurance revenues of the related group of insurance contracts. The exception to this are acquisition costs related to short-term contracts in Greece, which are charged directly to the income statement.

If the estimate of the total cash flows of the group of insurance contracts at initial recognition in the balance sheet is a net outgoing cash flow, then the group is on a loss-making basis. In this case, the amount of the net outgoing cash flow is recognized as a loss in the income statement. This loss component is presented as a separate component of the insurance contracts and recognized under "Change in provision for loss components" as part of expenses from insurance-related services. In subsequent measurement, losses and reversals of these losses are also recognized under this presentation in the income statement.

In subsequent measurement the carrying amount of the insurance liabilities for coverage in future periods is then increased by premiums received and with amortisation of acquisition cash flows recognised as expenses. This amortisation and any additional cash flows for insurance acquisitions allocated after initial recognition reduce future insurance revenue for services rendered.

If, at any time during the coverage period, facts and circumstances show that a group of insurance contracts is onerous, then a loss component is recognised within 'Losses and reversal of losses on onerous contracts' as a part of 'Insurance service expenses' increasing the insurance liabilities for remaining coverage to the level of estimate of the fulfilment cash flows of the insurance liabilities. If it is later found that the group of contracts is no longer loss-making, the loss component is reversed through the same components. This estimate is based on changed facts and circumstances that occur during the reporting period that are reported in the internal management reports. Important indicators are deviations from the internal budget and new estimates regarding expected claims, development and composition of the policyholder portfolio.

Achmea recognises insurance liabilities for claims incurred from a group of insurance contracts against fulfilment cash flows in respect of claims incurred. The liability relates to estimates for future cash flows due to reported claims and additional (allocated) costs of claims handling. In addition, an estimate is made for claims incurred at the balance sheet date that have not yet been reported (IBN(E)R).

For Non-life insurance, future cash flows are discounted at the discount rate at the end of the reporting period. With the exception of the short-term premium liabilities of the cash flows of Health Netherlands and the short-term premium provisions of Non-life Netherlands, all cash flows are discounted. For the Health component, the fulfilment cash flows of the incurred claims are not discounted due to the short settlement period, unless the expected settlement period exceeds 12 months.

Recognition of and changes in insurance liabilities for claims incurred are recognized under 'Insurance service expenses' in profit and loss. The effects of discounting or changes in the discount rate on estimated future cash flows and Risk Adjustment are recognized under 'Financial result from insurance-related services' in profit and loss.

<u>Insurance-related costs</u>
Insurance-related costs, which arise from insurance contracts, are generally recognized in the income statement as incurred. Insurance-related costs include:

- claims incurred and additional (allocated) costs of claims handling;
- amortization of acquisition cash flows;
- losses on onerous contracts and reversals of these losses;
- adjustments to liabilities for incurred claims and additional costs;
- losses on assets of insurance acquisition cash flows and reversals of these losses.

Reinsurance contracts
Achmea applies the same accounting policies for the valuation of groups of reinsurance contracts, adjusted where necessary to reflect differences relative to insurance contracts and with an adjustment for credit risk to the reinsurer.

The reinsurer's credit risk and the effect of changes in it are assessed at each balance sheet date and recognized in the income statement under Financial result from reinsurance contracts.

If a loss recovery component is recognised for a group of reinsurance contracts valued under the PAA, Achmea adjusts the carrying amount of assets from reinsurance contracts to cover future claims. See the section Reinsurance of loss-making underlying insurance contracts under Chapter IV Valuation of contracts according to GMM and VFA.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

VI Derecognition and changes in the insurance/reinsurance contract

Achmea derecognises a contract when the contract expires, all obligations have been met or when the contract has been terminated.

Achmea also derecognises a contract if the terms change in such a way that recognition in the balance sheet and income statement would have been significantly different than if the new terms had always existed. In that case, a new contract based on the changed terms is recognised in the balance sheet. Significant changes include a change in scope, separating into components of an insurance/reinsurance contract, change in the contract boundary or grouping of insurance contracts. If a contract change does not result in a removal from the balance sheet, Achmea accounts for the change in cash flows as a change in estimates of fulfilment cash flows.

Upon derecognition of a contract in a group of contracts that is valued at GMM or VFA:
- the fulfilment cash flows allocated to the contracts are adjusted to remove the cash flows of the derecognised rights and obligations;
- the CSM of the group of insurance contracts is adjusted for the change in fulfilment cash flows, except when the changes are attributed to a loss component; and
- the number of coverage units for expected remaining insurance services is adjusted for coverage units that are no longer included in the group of insurance contracts.

If a contract is derecognised because the contract is transferred to a third party, the CSM is also adjusted for the premium charged by the third party, unless the group of insurance contracts is on an onerous basis.

If a contract is no longer included because its terms are changed, the CSM is also adjusted to the premium that would have been charged if Achmea had entered into a contract with the terms of the new contract on the date of change, less any additional premiums charged before the change. The newly included contract is valued on the assumption that, on the date of change, Achmea received the premium it would have charged for a contract with similar terms, less the additional premium charged before the change.

VII Transition to IFRS17

In the transition to IFRS 17 this accounting standard has been applied retrospectively to the following insurance portfolios:
- All insurance portfolios of Health;
- All insurance portfolios of Reinsurance, with the exception of some Life portfolios closed before January 1, 2020;
- Insurance contracts in the open book portfolio within the Pension and Life business closed after January 1, 2020;
- All insurance portfolios within the Non-life business, with the exception of the individual disability portfolio closed before January 1, 2022.

For a large part of the insurance portfolios within the Pension and Life business and for some specific portfolios within the Non-life business (individual disability portfolio), the information required for retrospective application was not sufficiently available and reproducible due to system and data conversions. Determined the value of the related insurance liabilities on the transition balance sheet using the fair value approach. Key assumptions at transition date related to cash flows and Risk Adjustment are disclosed in section 'Key assumptions and estimates'.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

8. FINANCIAL LIABILITIES

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Investment contracts	153	151
Banking customer accounts	10,301	8,734
Loans and borrowings	9,890	7,045
Operational leases	118	126
Third-party interests in investment pools[1]	1,408	1,289
Other liabilities[1]	3,679	2,734
Total financial liabilities	**25,549**	**20,079**

[1] Third-party interests in investment pools have been presented separately since reporting year 2024 and is therefore no longer reported under Other liabilities within Financial liabilities. The comparative figures have been adjusted accordingly.

The tables below showing contractual time remaining to maturity should be viewed in conjunction with the Capital and Risk Management section - H liquidity risk.

Investment contracts

Contracts with non-significant insurance risk are presented as investment contracts.

MOVEMENT TABLE INVESTMENT CONTRACTS (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Balance at 1 January	151	138
Consideration received	21	48
Consideration paid	-18	-55
Effect of fair value changes related to financial assets	8	10
Changes due to reclassification[1]	-9	10
Balance at 31 December	**153**	**151**

[2] Changes due to reclassifications concern reclassifications from Liabilities related to insurance contracts.

ANALYSIS BY CONTRACTUAL REMAINING TIME TO MATURITY INVESTMENT CONTRACTS (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Within 1 year	39	40
1-5 years	2	7
5-15 years	1	1
Over 15 years	111	103
	153	**151**

Banking customer accounts

The banking customer accounts increased due to the expansion of the savings portfolio.

ANALYSIS BY CONTRACTUAL REMAINING TIME TO MATURITY (INCLUDING ACCRUED INTEREST) (€ MILLION)

	BANKING CUSTOMER ACCOUNTS	INTEREST PAYMENTS	TOTAL 31 DECEMBER 2024	BANKING CUSTOMER ACCOUNTS	INTEREST PAYMENTS	TOTAL 31 DECEMBER 2023
Less than 3 months	6,378	47	6,425	5,723		5,723
3-12 months	888	7	895	593	2	595
1-5 years	1,557	12	1,569	1,126	31	1,157
More than 5 years	1,478	11	1,489	1,292	17	1,309
	10,301	**77**	**10,378**	**8,734**	**50**	**8,784**

The fair value of banking customer accounts valued at amortised cost as at the balance sheet date is € 10,267 million (2023: € 8,532 million). The fair value assessment is mainly based on input from observable market data.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Loans and Borrowings

LOANS AND BORROWINGS CLASSIFIED BY FINANCING ACTIVITY

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Deposits from credit institutions	388	360
Secured bank loans[1]	4,600	3,341
Unsecured loans[1]	3,553	2,737
Subordinated loans	1,289	547
Others	60	60
Total loans and borrowings classified by financing activity	**9,890**	**7,045**

1 Secured and unsecured loans have been reclassified in 2023 for €585 million for comparison purposes.

The fair value of loans and borrowings valued at amortised cost as at the balance sheet date is € 9,901 million (31 December 2023: € 7,013 million).

The nominal value of loans measured at fair value amounts to nil (31 December 2023: € 1 million). The fair value is also nil (31 December 2023: € 1 million).

MOVEMENT TABLE LOANS AND BORROWINGS 2024[1]

(€ MILLION)

8.F	DEPOSITS FROM CREDIT INSTITUTIONS	SECURED BANK LOANS	UNSECURED LOANS	SUBORDINATED LOANS	OTHER	TOTAL 2024
Balance at 1 January	360	3,341	2,737	547	60	7,045
Money deposited	396	1,636	1,851	741	133	4,757
Money withdrawn	-360	-533	-1,072		-131	-2,096
Amortisation		5	29	1		35
Foreign currency differences			-4			-4
Change in value due to fair value hedge accounting		103	8			111
Other changes	-8	48	4		-2	42
Balance at 31 December	**388**	**4,600**	**3,553**	**1,289**	**60**	**9,890**

1 Loans and borrowings include all capital and financing arrangements related to banking activities.

MOVEMENT TABLE LOANS AND BORROWINGS 2023[1]

(€ MILLION)

	DEPOSITS FROM CREDIT INSTITUTIONS	SECURED BANK LOANS	UNSECURED LOANS	SUBORDINATED LOANS	OTHER	TOTAL 2023
Balance at 1 January	1,139	2,210	2,468	749	59	6,625
Money deposited	372	1,581	497	298	1	2,749
Money withdrawn	-1,139	-590	-282	-500	-3	-2,514
Amortisation		5	20			25
Foreign currency differences			20			20
Change in value due to fair value hedge accounting		135	14			149
Other changes	-12				3	-9
Balance at 31 December	**360**	**3,341**	**2,737**	**547**	**60**	**7,045**

1 Loans and borrowings include all capital and financing arrangements related to banking activities.

ANALYSIS BY CONTRACTUAL REMAINING TIME TO MATURITY

(€ MILLION)

	LOANS AND BORROWINGS	INTEREST	TOTAL 31 DECEMBER 2024	LOANS AND BORROWINGS	INTEREST	REVISED TOTAL 31 DECEMBER 2023
Less than 3 months	1,087	3	1,090	688	1	689
3-12 months	1,662	19	1,681	1,051	3	1,054
1-5 years	3,597	33	3,630	3,252	86	3,338
More than 5 years	3,544	26	3,570	2,054	195	2,249
	9,890	**81**	**9,971**	**7,045**	**285**	**7,330**

Secured loans Achmea Bank N.V.

The banking activities of Achmea are partly funded by loans secured by pledged mortgage receivables. Achmea Bank N.V. does this through an Soft Bullet Covered Bond (SBCB) program. Under the Soft Bullet Covered Bond program which is limited to a maximum of € 10 billion, Achmea Bank issues bonds backed by residential mortgages. In addition, in April 2024, Achmea Bank N.V. established a Retained Soft Bullet Covered Bond (SBCB2). Under this program Achmea Bank N.V. can issue up to € 5 billion in mortgage-backed bonds, which it will hold on its own balance sheet.

All bonds are issued in euros. Achmea Bank also has a trust agreement, whereby mortgage receivables are pledged to Stichting Trustee Achmea Bank as collateral for a number of bank liabilities. The carrying amount of mortgage receivables pledged as security is € 10.4 billion at 31 December 2024 (31 December 2023: € 6.96 billion).

In February 2024, Achmea Bank N.V. placed € 500 million of Soft Bullet Covered Bonds with a maturity of 10 years, a coupon rate of 3.0% and with a maturity date of February 7, 2034. In June 2034, Achmea Bank N.V. placed another € 500 million of Soft Bullet Covered Bonds with a maturity of 12 year, a coupon rate of 3.125% and with a maturity date of June 11, 2036. In October 2024 Achema Bank N.V. placed a € 650 million Soft Bullet Covered Bonds with a maturity of 3 years, a coupon rate of 2.625% and with a maturity date of 15 October 2027. These bonds are listed on the Euronext Amsterdam, The Netherlands.

Unsecured loans and subordinated loans

(€ MILLION)

	31 DECEMBER 2024	HERZIEN 31 DECEMBER 2023
Senior Unsecured Bond Achmea Bank N.V.	1,293	670
Commercial Paper	1,013	822
Senior Unsecured Notes Achmea B.V.	1,247	1,245
Subordinated Loans Achmea B.V.	1,289	547
Total	**4,842**	**3,284**

Achmea Bank N.V.

In October 2012, Achmea Bank N.V. constructed an Euro Medium Term Note (EMTN) programme of € 10 billion. At year-end 2024 the total outstanding amount is € 1,150 million, of which € 322 million Private Placements (31 December 2023: € 660 million). The total net decrease in unsecured loans within the EMTN in 2024 is € 9 million.

In 2013, Achmea Bank N.V. also set up a € 1.5 billion French commercial paper programme. With this programme Achmea Bank N.V is able to access the international money markets to further diversify its funding mix. At the end of 2024 the total outstanding amount is € 1,013 million (31 December 2023: € 822 million).

Achmea B.V.

Achmea B.V. has a € 5 billion Debt Issuance Program, under which Achmea B.V. has issued several unsecured, listed senior and subordinated Tier 2 bonds in recent years. On a stand-alone basis, in September 2019, Achmea B.V. issued an unsecured, listed 4.625% Perpetual Restricted Tier 1 bond with a face value of € 500 million and a first call date in March 2029. At year-end 2024 the total amount outstanding was € 3,050 million (December 31, 2023: € 3,050 million), of which Achmea B.V. accounted for € 1,250 million under Unsecured Unsubordinated Loans, € 500 million under Equity (Perpetuals), and € 1,300 million under Subordinated Loans. On May 4, 2024, Achmea B.V. issued a subordinated Tier 2 bond, listed at 5.625% with a face value of € 750 million and a first call date between May 2, 2034 and November 2, 2034. The maturity of this loan is 20.5 years. This loan is listed on Euronext Dublin, Ireland. Achmea B.V. syndicated credit facility with a syndicate of twelve international banks that amounts to € 1 billion. This facility has a term of five years and can be extended twice by one year. The 2019 credit facility, which also had a maximum of € 1 billion, was terminated in July 2024 and replaced by a new facility that can continue until 2031 at the latest. In both 2024 and 2023, the allocated lines of credit were not drawn.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Lease liabilities

The term of the Lease liabilities is as follows:

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Shorter than 1 year	22	24
Between 1 and 5 years	87	80
More than 5 years	9	22
Balance at 31 December	**118**	**126**

The valuation of the Lease liabilities does not include non-lease (e.g. service charges) components amounting to € 6 million (2023: € 8 million).

Third-party interests in investment pools

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
As at January 2024	1,289	2,464
Movements	119	-1,175
Balance at 31 December	**1,408**	**1,289**

Third party interests in investment pools refers to third party interests in investment pools that are consolidated by Achmea B.V. consolidated. Third-party interests in investment pools are assumed to be expected to be realized after twelve months after balance sheet date.

Other liabilities

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Obligation from received collateral in the form of cash[1]	1,352	1,420
Investment liabilities	1,318	377
Subordinated Tier 2 perpetual loan	408	
Taxes and social security premiums	114	105
Creditors	126	151
Post-employment benefits	58	69
Accruals and deferred income	103	81
Prepaid premiums	15	3
Other	185	528
	3,679	**2,734**

1 Obligation from received collateral in the form of cash relates to cash collateral amounts received by Achmea depending on the current value of the derivative. Achmea uses the cash received for investments.

An amount of € 68 million (31 December 2023: € 51 million) of the Other liabilities is expected to be settled more than twelve months after reporting date.

The remaining debt of the subordinated Tier 2 perpetual loan including accrued interest of € 408 million that was repaid on February 4, 2025 is presented under other financial liabilities as of December 31, 2024. Previously, this perpetual loan was included under other equity instruments in the amount of € 393 million.

KEY ASSUMPTIONS AND ESTIMATES TO DETERMINE THE FAIR VALUE OF FINANCIAL LIABILITIES

In the absence of an active market, the fair value of non-quoted financial liabilities is estimated by using the present value or other valuation techniques. Reference is made to Note 9, Fair value hierarchy, for a detailed description of the methods used. Valuation techniques are subjective in nature and can have a significant impact on the determination of fair values for certain financial liabilities. Valuation techniques involve various assumptions on the pricing factors. The application of different valuation techniques and assumptions can have an effect on the fair value.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

ACCOUNTING POLICIES FOR FINANCIAL LIABILITIES

A financial liability is recognized when Achmea becomes a party to a financial instrument, i.e. at fair value on the transaction date. Specific measurement is explained below.

Financial liability is derecognized when the liability is extinguished, in other words, when the obligation specified in the contract is fulfilled, dissolved or expires. Achmea uses the average cost method for derecognition of financial assets and liabilities.

Offsetting of financial assets and liabilities and net presentation of revenues and expenses is explained in I. Reporting framework in the consolidated financial statements of Achmea B.V.

Investment contracts
Financial instruments that grant an investor the contractual right to receive a share of the proceeds of a particular investment pool with no or negligible insurance risk are accounted for as Investment Contracts, under Financial Liabilities.

Some of the investment contracts of Achmea Greece that have discretionary participation features are accounted for in accordance with regular insurance contracts under IFRS 17 (see Note 7). The linked investments are accounted for as part of Investments insurance business.

Investment contracts are measured at fair value through profit or loss. These agreements are classified as 'At fair value through profit or loss' because, together with the investments covering the related liabilities, they are managed as a group. The fair value of investment contracts is the higher of the fair value of the financial instruments linked to the investment contracts, the surrender value (adjusted for surrender penalties) and the discounted terminal value (at a risk-free interest rate). The fair value for non-linked investment contracts is the higher of the discounted exit value based on a risk-free interest-rate shock and the surrender value (adjusted for surrender penalties).

Banking customer accounts and Loans and borrowings
Banking customer accounts is valued at amortized cost. Loans and borrowings relates to all loans from external parties to Achmea and finance lease obligations. These consist of deposits from banks, secured bank loans, unsecured bank loans and subordinated loans. These liabilities are valued at amortized cost. Collateral obtained from borrowers, to the extent that it is invested within the securities lending program, is recognized as a financial liability as there is an obligation to repay the cash received as collateral. These liabilities are measured at amortized cost. Since no premium or discount is received on the collateral, the amortized cost is equal to the face value. Fair value hedge accounting is applied to some loans when consistent with financial risk management policies. Some financial liabilities are classified as "At fair value through profit or loss" when these liabilities are recognized due to the termination of insurance contracts and the future sale of related financial assets to reduce measurement inconsistencies.

Lease Liabilities
Upon initial recognition the lease liabilities are valued based on the present value of the lease payments that have not yet been paid upon commencement of the lease. The discount rate is either the interest percentage implicit in the lease or, if this cannot be readily determined, the incremental borrowing rate. The incremental borrowing rate is based on a risk-free curve and if applicable a premium is added for creditworthiness and lease-specific aspects.

Lease payments related to short-term leases for equipment and vehicles and all leases for low-value assets are recognised as expenses in the statement of profit and loss on a straight-line basis. Short-term leases are leases with a lease term of 12 months or less. Low-value assets include IT equipment and office furniture.

Lease payments that are taken into account in valuing lease liabilities are comprised of fixed lease payments, variable lease payments (for example dependent on an index), liabilities for the residual value of guarantees, the expected value of the exercise of purchase options and any penalties for early termination.

The lease liabilities are valued at amortised cost using the effective interest method. The value of the lease liability is remeasured in the event of changes in the future lease payments. If the right-of-use asset still has a carrying amount at the time of revaluation, a corresponding adjustment will be made to the carrying amount of the right-of-use asset. If the carrying amount is already zero, the revaluation will be recognised in the statement of profit and loss.

Minority interests in investment pools
Third party interests in investment pools refers to third party interests in investment pools consolidated by Achmea B.V. This interest is valued at the fair value of the investment pools based on the fair value of the underlying investments.

Other liabilities
Other liabilities are measured at amortised cost. Unless otherwise stated, other payables are settled within 1 year.

9. FAIR VALUE HIERARCHY

Fair value hierarchy and fair value assessment

This note provides an analysis of assets and liabilities that are measured subsequently to initial recognition at fair value. These assets and liabilities are classified into three levels (fair value hierarchy) based on the significance of the inputs used in making the fair value assessment. The levels are defined as follows:

- Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities.
- Level 2: Valuation techniques based on observable inputs, either directly (i.e. as prices) or indirectly (i.e. derived from prices). This category includes assets and liabilities valued using quoted prices in active markets for similar assets and liabilities, quoted prices for identical or similar assets and liabilities in markets that are considered less active or valuation techniques where all significant inputs are directly or indirectly observable from market data.
- Level 3: Valuation techniques using significant non-observable inputs. This category includes all assets and liabilities for which the valuation technique includes inputs that are not based on observable data and where the unobservable inputs have a significant effect on the valuation of the assets and liabilities, such as investments in real estate, venture capital and private equity, consumer loans and mortgage loans and advances that are part of the Banking credit portfolio.

Cash and cash equivalents are classified as level 1 when not subject to restrictions. Commercial papers, part of deposits with credit institutions, are classified as level 1 due to the fact that they are traded on money markets. Other deposits with credit institutions are generally classified as level 2 because they are not traded and are subject to restrictions.

FINANCIAL INSTRUMENTS MEASURED AT FAIR VALUE ON A RECURRING BASIS AS AT 31 DECEMBER 2024 (€ MILLION)

	LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
Assets				
Recurring fair value measurement				
Investment property			717	717
Investments				
Equities and similar investments	6,545	2,347	1,259	10,151
Fixed income investments	24,872	3,885	8,474	37,231
Derivatives	7	4,184		4,191
Other financial investments	163	5,214		5,377
Cash and cash equivalents	2,131			2,131
Total assets measured at fair value on a recurring basis	**33,718**	**15,630**	**10,450**	**59,798**
Non-recurring fair value measurements				
Property for own use and equipment			327	327
Total assets measured at fair value on a non-recurring basis			**327**	**327**
Liabilities				
Recurring fair value measurement				
Financial liabilities				
Investment contracts		153		153
Loans and borrowings				
Third party interests in investment pools		1,408		1,408
Derivatives	7	2,400		2,407
Total liabilities measured at fair value on a recurring basis	**7**	**3,961**		**3,968**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

FINANCIAL INSTRUMENTS MEASURED AT FAIR VALUE ON A RECURRING BASIS AS AT 31 DECEMBER 2023 (€ MILLION)

	LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
Assets				
Recurring fair value measurement				
Investment property			725	725
Investments				
Equities and similar investments	5,865	1,679	1,112	8,656
Fixed income investments	22,337	5,081	8,334	35,752
Derivatives	16	5,035		5,051
Other financial investments	144	5,563		5,707
Cash and cash equivalents	1,934			1,934
Total assets measured at fair value on a recurring basis	**30,296**	**17,358**	**10,171**	**57,825**
Non-recurring fair value measurements				
Property for own use and equipment			327	327
Total assets measured at fair value on a non-recurring basis			**327**	**327**
Liabilities				
Recurring fair value measurement				
Financial liabilities				
Investment contracts		151		151
Loans and borrowings		1		1
Third party interests in investment pools		1,289		1,289
Derivatives	100	3,372		3,472
Total liabilities measured at fair value on a recurring basis	**100**	**4,813**		**4,913**

Main changes in the fair value hierarchy in 2024

At each reporting date, Achmea assesses the classification of assets and liabilities measured at fair value. The assessment of the classification in the fair value hierarchy requires substantial estimates, for example the importance of (un)observable inputs used in determining the fair value or with respect to activity of the market. In case of inactive markets, judgement is required on the valuation techniques used in order to determine the fair value as well as the interpretation of the level of the market and other data used. As a result, the outcome of the classification process may differ between reporting periods. Achmea's policy is to incorporate transfers into and out of categories within the fair value hierarchy in the balance sheet at the beginning of the reporting period. In 2024 no significant changes were applied in the categorisation between levels 1 and 2 for recurring valuations at fair value during the year. See the table below for transfers from and to level 3 valuations.

Valuation techniques used and valuation processes within Achmea for level 2 and 3 valuations.
Depending on the financial instruments, Achmea has set valuation policies and procedures for determining the fair value.

MOVEMENT SCHEDULE FOR LEVEL 3 ASSETS AND LIABILITIES MEASURED AT FAIR VALUE ON A RECURRING BASIS 2024 (€ MILLION)

	INVESTMENT PROPERTY	EQUITIES AND SIMILAR INVESTMENTS	FIXED INCOME INVESTMENTS	ASSETS TOTAL	DERIVATIVES	LIABILITIES TOTAL
Balance at 1 January	**725**	**1,112**	**8,334**	**10,171**		
Investments and loans granted	14	138	1,370	1,522		
Divestments and disposals	-112	-20	-1,560	-1,692		
Fair value changes included in Statement of profit and loss	52	28	325	405		
Changes due to reclassification	38	-17		21		
Changes in fair value hierarchy (transfers to Level 3)		18	5	23		
Balance as at 31 December	**717**	**1,259**	**8,474**	**10,450**		

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENT SCHEDULE FOR LEVEL 3 ASSETS AND LIABILITIES MEASURED AT FAIR VALUE ON A RECURRING BASIS 2023

(€ MILLION)

	INVESTMENT PROPERTY	EQUITIES AND SIMILAR INVESTMENTS	FIXED INCOME INVESTMENTS	ASSETS TOTAL	DERIVATIVES	LIABILITIES TOTAL
Balance at 1 January	**850**	**1,234**	**7,650**	**9,734**		
Investments and loans granted	8	414	1,341	1,763		
Divestments and disposals	-20	-22	-863	-905		
Fair value changes included in Statement of profit and loss	-101	-78	208	29		
Changes due to reclassification	-12	-8		-20		
Changes in fair value hierarchy (transfers from Level 3)		-428	-2	-430		
Balance as at 31 December	**725**	**1,112**	**8,334**	**10,171**		

The changes in the fair value hierarchy from level 3 to levels 1 and 2 in 2023 and from levels 1 and 2 to level 3 in 2024 are mainly due to the reclassification of investment funds. Changes in fair value relating to Equities and similar investments and Fixed income investments recognised in the Statement of profit and loss are presented as part of the Investment result from insurance/reinsurance activities.

SIGNIFICANT UNOBSERVABLE INPUTS FOR FINANCIAL INSTRUMENTS MEASURED AT FAIR VALUE CLASSIFIED AS CATEGORY 3 ON 31 DECEMBER 2024

DESCRIPTION	FAIR VALUE IN MILLIONS	VALUATION TECHNIQUE USED	UNOBSERVABLE INPUTS	RANGE (WEIGHTED AVERAGE)	RELATIONSHIP OF UNOBSERVABLE INPUTS WITH FAIR VALUE
Investment property	717	Market-rent-capitali-sation-method	Gross Initial Yield	4.1 - 9.5 (4.9) (%)	Increase (decrease) will result in a decrease (increase) in value and has a negative (positive) impact on the Statement of profit and loss.
Investments					
Equities and similar investments	1,259	Net Asset Value	N/A	N/A	N/A
Fixed income investments					
Investments insurance business	8,474	Discounted cash flows	Total spread	73 - 244 (bp)	Increase (decrease) will result in a decrease (increase) in value and has a negative (positive) impact on the Statement of profit and loss.

SIGNIFICANT UNOBSERVABLE INPUTS FOR FINANCIAL INSTRUMENTS MEASURED AT FAIR VALUE CLASSIFIED AS CATEGORY 3 ON 31 DECEMBER 2023

DESCRIPTION	FAIR VALUE IN MILLIONS	VALUATION TECHNIQUE USED	UNOBSERVABLE INPUTS	RANGE (WEIGHTED AVERAGE)	RELATIONSHIP OF UNOBSERVABLE INPUTS WITH FAIR VALUE
Investment property	725	Market-rent-capitali-sation-method	Gross Initial Yield	4.3 - 16.4 (5.4) (%)	Increase (decrease) will result in a decrease (increase) in value and has a negative (positive) impact on the Statement of profit and loss.
Investments					
Equities and similar investments	1,112	Net Asset Value	N/A	N/A	N/A
Fixed income investments					
Investments insurance business	8,334	Discounted cash flows	Total spread	86 - 191 (bp)	Increase (decrease) will result in a decrease (increase) in value and has a negative (positive) impact on the Statement of profit and loss.

Equities and similar investments consist mainly of investments in private equity, amounting to € 180 million (31 December 2023: € 202 million), real estate funds amounting to € 861 million (31 December 2023: € 725 million) and Infrastructure funds amounting to € 174 million (31 December 2023: € 163 million). The private equity investments are of a highly diversified nature in terms of sector, geographical region and type of investment. Because for the majority of these investments their fair value is determined using the intrinsic value (net asset value) as reported by the fund manager or the general partner, there is no significant unobservable input or combination of inputs that can be used to carry out a sensitivity analysis for this portfolio.

VALUATION TECHNIQUES USED AND VALUATION PROCESSES WITHIN ACHMEA FOR LEVEL 2 AND 3 VALUATIONS.

Depending on the specific assets and liabilities, Achmea has set valuation policies and procedures for determining the fair value. For each type of asset or liability, a summary is provided of the valuation process, a description of the technique used and the relevant inputs.

Real estate investments

Investment properties include commercial and residential real estate. The fair value is based on prices in an active market, adjusted as necessary for differences in the nature, location or condition of the specific asset. All real estate is valued quarterly. The valuations are carried out by external independent accredited assessors with relevant professional qualifications. All valuations are carried out according to industry-standard valuation guidelines.

The level 3 investment properties within Investments are located in the Netherlands. The fair value of these investment properties is determined using the income capitalisation method and also tested using the discounted cash flow (DCF) method. Under the income capitalisation method, the fair value of a property is estimated based on the normalised rental income divided by the discounted rate of return for the property (the market yield). For the difference between gross and net rental income, the same cost categories apply as in the DCF method, except that certain costs are not allocated to the cash flow period, but the average costs over the lease term are included in the normalised rental income.

In the case of the DCF method, the fair value of investment properties is determined based on estimates of future cash flows, using a discount rate that reflects the current market uncertainties of the value and timing of the cash flows. Transactions of real estate sold in the Netherlands cannot be easily compared due to the lack of publicly available information. As a result, the valuation of an investment property has a higher degree of uncertainty compared to a more active market environment in which comparable, current transactions are used to validate the valuation process. The assumptions when applying the aforementioned valuation methods are supported by leases and other relevant agreements and by external evidence such as recent and expected general economic trends and current rental prices in the market for similar properties in the same region and condition. Regular costs and liabilities related to investment properties such as vacancy, rent-free periods, maintenance and repairs, as well as any liabilities that limit the feasibility of the income and proceeds when the real estate is sold, have been taken into account in the DCF method. Rental increase rates are based on general economic trends taking into account the specific characteristics of the real estate being valued. Under the DCF method, projections of cash flows are made for at least 10 years.

The discount rate used depends on both the type of real estate being valued (i.e. commercial and residential real estate) and the specific characteristics of the real estate being valued. Due to the characteristics of the inputs for both valuation methods, all investment properties in the Netherlands are classified as level 3.

Investments – Equities and similar investments

When available, Achmea uses quoted market prices in active markets to determine the fair value of its equities and similar investments. The fair values of investments held in non-quoted investment funds are determined by management after taking into consideration information provided by the fund managers. If no market prices are available, internal models are used to determine fair value.

Equities and similar investments classified as level 2 are mainly Investments backing linked liabilities, consisting mainly of investments in unit-linked funds. Investments backing linked liabilities are investments related to insurance contracts where the policyholder bears investment risks. These investments are classified as ‘At fair value through the Statement of profit and loss’ The fair value of investments in unit-linked funds is Achmea’s share in the Net Asset Value of these funds. These unit-linked funds invest mainly in listed securities and hence the net asset value of the fund is derived from observable inputs (including quoted prices for these securities in active markets).

The remaining Equities and similar investments classified as level 2 comprise Commodities and Real estate funds. The fair value of Commodities, classified as 'At fair value through the Statement of profit and loss’, represents amounts estimated to be received from or paid to a third party in settlement of these instruments. These instruments are valued by the broker based upon market prices, if available. The fair value of real estate funds, classified as ‘Available for sale’, represents the net asset value of funds managed by Achmea. Achmea assesses the fair values and performs analytical procedures to ensure the fair values are appropriate.

The Equities and similar investments classified as level 3 comprise private equity and alternative investments which are mainly classified as ‘Available for Sale’ investments. The private equity investment portfolio mainly consists of investments with a highly diversified nature in terms of sector, geographical region and type of investment. The alternative investment portfolio, classified as ‘Available for Sale’, mainly consists of infrastructure related investments. The fair value of these portfolios is determined using the net asset value as reported by the fund manager or general partner. This is considered to be the best proxy for the fair value of the investment. If an adjustment needs to be recorded in the reported net asset value, this is reflected in the fair value. Part of the private equity investment portfolio is related to Achmea's venture capital and is classified as ‘At fair value in the Statement of profit and loss’. The pricing models are based on models as recommended in the International Private Equity and Venture Capital Valuation Guidelines. Achmea assesses the valuations and performs analytical procedures to ensure the fair values are appropriate.

Investments – Fixed income investments

In general, the fair value of these fixed income investments is determined by means of a net present value methodology using estimated future cash flows, taking into account current interest rate shocks applicable to financial instruments with similar yield, credit quality and maturity characteristics.

The Loans and mortgages classified as level 2 comprise mainly investment loans. The fair value of these investment loans is determined by means of a net present value methodology using an internally calculated yield taking into account current interest rate shocks applicable to financial instruments with similar yield, credit quality and maturity characteristics.

The Loans and mortgages classified as level 3 comprise mainly mortgage loans in the insurance sector. The fair value of these mortgages is determined using valuation models based on the discounted value of estimated future cash flows using current interest rate shocks. The interest rate used is based on rates in the consumers market adjusted for spreads for the price risk during the offering period. Part of the assumptions used in determining the fair value are unobservable.

The fair value derived by the pricing model is back tested with market information derived from recent market transactions for similar mortgages (where available) and/or internal prices used when issuing mortgage loans.

The Deposits with credit institutions classified as level 2 comprise short-term deposits with banks with a fixed maturity. These deposits are not tradable and subject to restrictions due to their fixed maturity. The fair value of these deposits is in general equal to the nominal value, taking into account the time value of money where material. Cash and cash equivalents and other financial investments classified as level 2 mainly consist of savings accounts, part of Investments backing linked liabilities. The fair value is determined by means of a net present value methodology using estimated future cash flows over the interest rate period, taking into account current interest rate shocks applicable to financial instruments with similar yield, credit quality and maturity characteristics.

The Banking credit portfolio classified as level 3 mainly comprises loans to the retail sector, which are classified as 'At fair value through the Statement of profit and loss'. The fair value of these loans is determined using valuation models based on the present value of estimated future cash flows using current interest rate shocks. The interest rate is based on consumer market rates, adjusted for things such as price risk during the offering period. Some assumptions used in determining fair value are unobservable. The fair value obtained by the valuation model is benchmarked against market information derived from recent market transactions for equivalent mortgages (if available) and/or the internal prices used when issuing mortgage loans.

Investments – Derivatives (assets and liabilities)

The level 2 classified derivatives comprise Interest rate derivatives (including swaptions), currency derivatives and equity derivatives. Where quoted market prices are not available, other valuation techniques, such as option pricing or stochastic modelling, are applied. The valuation is performed by a data vendor. The valuation techniques incorporate all factors that a market participant would consider and are based on observable market data when available. Fair values of interest rate derivatives (including swaptions), equity derivatives and currency derivatives represent amounts estimated to be received from or paid to a third party upon settlement of these instruments. These derivatives are valued using directly observable prices of exchange-traded derivatives or external pricing services or, if not available, using valuation models based on the net present value method using estimated future cash flows. The pricing models which are used are standard industry valuation models (like the Black-Scholes model) and make use of current market data. The market data for interest rate derivatives and cross currency interest rate derivatives consist mainly of the swap curve of the related interest period and currency, where applicable adjusted for contract fees and margin (when part of the contractual cash flows of the derivative). Achmea normally mitigates counterparty default risk in derivative contracts by entering collateral agreements into the contracts where possible.

Investments – Other financial investments

Other financial investments classified as level 2 mainly consist of savings accounts, part of Investments backing linked liabilities. The fair value is determined by means of a net present value methodology using estimated future cash flows, taking into account current interest rate shocks and the counterparty credit surcharge in the discount curve. The counterparty credit surcharge is based on the bad debt risk taking into account the cash flow characteristics of the savings deposits. Depending on these cash flow characteristics and the collateral obtained, the counterparty credit surcharge is determined. For the savings for which no collateral is obtained, the counterparty credit surcharge is based on the bad debt risk of similar financial instruments issued by the party where the savings account is held.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Property for own use

The fair value of Property for own use is based entirely on valuation by independent qualified appraisers. The valuation is based on market observations and various calculation methods, such as the 'Discounted cash flow' method. In line with the economic climate and market conditions in recent years, the number of property transactions has declined. The 'Discounted Cash Flow' method is therefore usually used for valuation. Under this method, fair value is determined based on the rental income of the real estate. The appraisers apply a market-based discount rate adjusted for the age, location and remaining term of the lease. Due to the lack of actual market transactions that can be used to validate this valuation process, the value of the Property for own use has a high degree of uncertainty. By 31 December 2024, Achmea has had almost all her property for own use valuated by external valuers and adjusted the balance sheet value accordingly.

Financial liabilities – Investment contracts

Investment contracts classified as level 2 consist of investment-linked and non-linked investment contracts. The fair value of the investment contracts linked to investments is the higher of the fair value of the financial instruments linked to the investment contracts, the surrender value (adjusted for surrender penalties) and the discounted terminal value. The fair value for non-linked investment contracts is the higher of the surrender value (adjusted for surrender penalties) and discounted exit value (based on a risk-free interest rate).

Financial liabilities – Loans and funds drawn down

Loans and funds drawn down classified as level 2 are loans related to transfers of assets. The fair value of these loans is determined using valuation models in which the contractual future cash flows are discounted using current interest rate shocks based on the swap curve, including a credit spread. Changes in fair value relating to Investment property and Equity and similar investments recognised in the Statement of profit and loss are presented as part of Realised and unrealised changes in value; changes in fair value relating to Fixed income investments recognised in the Statement of profit and loss are presented as part of Investment income.

Changes in fair value included in Other comprehensive income with respect to Equities and similar investments and Loans and mortgages are presented as part of the Changes in the revaluation reserve. Changes due to reclassification are reclassifications between Investment Properties and Property for own use due to changes in use.

The tables below provide an overview of all assets and liabilities that are not measured at fair value, but for which the fair value is disclosed in the notes.

FAIR VALUE (HIERARCHY) ASSETS AND LIABILITIES NOT MEASURED AT FAIR VALUE

(€ MILLION)

	CARRYING AMOUNT AS AT 31 DECEMBER 2024				FAIR VALUE AS AT 31 DECEMBER 2024
		QUOTED PRICES IN ACTIVE MARKETS FOR IDENTICAL INSTRUMENTS	SIGNIFICANT OTHER OBSERVABLE INPUTS	SIGNIFICANT UNOBSERVABLE INPUTS	
		LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
Assets					
Investments					
Fixed income investments	17,653		509	17,111	17,620
Other financial investments	80		80		80
Receivables	1,807		1,794		1,794
Liabilities					
Banking customer accounts	10,301		10,267		10,267
Loans and borrowings	9,890	2,535	7,366		9,901
Other liabilities	3,679		3,679		3,679

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

FAIR VALUE (HIERARCHY) ASSETS AND LIABILITIES NOT MEASURED AT FAIR VALUE

(€ MILLION)

	CARRYING AMOUNT AS AT 31 DECEMBER 2023				FAIR VALUE AS AT 31 DECEMBER 2023
		QUOTED PRICES IN ACTIVE MARKETS FOR IDENTICAL INSTRUMENTS	SIGNIFICANT OTHER OBSERVABLE INPUTS	SIGNIFICANT UNOBSERVABLE INPUTS	
		LEVEL 1	LEVEL 2	LEVEL 3	TOTAL
Assets					
Investments					
Fixed income investments	14,748		584	13,751	14,335
Other financial investments	63		63		63
Receivables	1,720		1,709		1,709
Liabilities					
Banking customer accounts	8,734		8,639		8,639
Loans and borrowings	7,044	1,792	5,189		6,981
Other liabilities	2,734		2,738		2,738

VALUATION TECHNIQUES USED AND VALUATION PROCESSES WITHIN ACHMEA FOR LEVEL 2 AND 3 VALUATIONS.

Depending on the specific assets and liabilities, Achmea has set valuation policies and procedures for determining the fair value. For each type of asset or liability, a summary is provided of the valuation process, a description of the technique used and the relevant inputs.

Investments – Fixed income investments

The fair value of loans to credit institutions classified as level 2 is equal to the net present value of estimated future cash flows, taking into account current interest rate shocks applicable to financial instruments with similar yield, credit quality and maturity characteristics.

The Banking credit portfolio classified as category 3 mainly comprises loans to and receivables from the private sector. These loans are classified as ‘Loans and receivables’ and are measured at amortised cost less accumulated impairment losses. The fair value of these loans is determined based on estimated future cash flows discounted at current interest rate shocks. The interest rate is based on consumer market rates adjusted for matters such as spreads for price risk during the offering period. Some assumptions used in determining fair value are non-observable.

Deposits with reinsurers classified as category 3, as part of fixed income investments, consist of accounts in which premiums and expected claims payments are recognised in respect of a specific risk insurance programme over which an agreed interest rate is earned. The non-observable inputs include models used to determine incurred but not yet reported losses related to the insurance contract.

Investments classified as level 2 consist mainly of savings accounts, part of Investments. The fair value is determined by means of a net present value methodology using estimated future cash flows, taking into account current interest rate shocks and the counterparty credit surcharge in the discount curve. The counterparty credit surcharge is based on the bad debt risk taking into account the cash flow characteristics of the savings deposits. Depending on these cash flow characteristics and the collateral obtained, the counterparty credit surcharge is determined. For the savings for which no collateral is obtained, the counterparty credit surcharge is based on the bad debt risk of similar financial instruments issued by the party where the savings account is held.

Accounts receivable

Receivables are in general classified as level 2, due to the fact that the amount deducted from the fair value for counterparty default risk is insignificant as compared to the fair value of the nominal cash flows of these receivables. If the amount deducted for counterparty default risk is not insignificant, these assets are classified as level 3.

The level 2 and 3 classified Receivables comprise mainly short-term amounts due that are related to Achmea’s ordinary operating activities. These receivables are measured at amortised cost less accumulated impairment losses.

The fair value of these receivables is determined based on discounted value of the expected cash flows, taking into accounted expected credit losses. The valuation models are based on current market data, such as the Euro Swap Curve. Besides the swap curve, there are also non-observable market inputs. The non-observable market inputs may include spreads embedded in the discount curve. For receivables expected to be recovered within twelve months after the balance sheet date, the carrying amount is a reasonable approximation of the fair value.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Financial liabilities

The fair value of Banking customer accounts classified as level 2 consist of savings accounts and deposits. Fair value is based on the discounted present value of expected future cash outflows, using current market interest rates.

The majority of the total Loans and funds drawn down are not measured at fair value.

The fair value of level 2 loans is determined using valuation models based on the present value of estimated future cash flows. The valuation models are based on current market data, such as the Euro Swap Curve. Besides the swap curve, there are also non-observable market inputs. The non-observable market inputs may include spreads embedded in the discount curve.

Other liabilities

Other liabilities, except for liabilities to credit institutions, are classified as level 2 due to the fact that there is no active market for these financial instruments. Cash liabilities are classified as level 1. The level 2 classified Other liabilities comprise mainly short-term amounts payable related to the ordinary operating activities of Achmea. These other liabilities are measured at amortised cost. The fair value of these liabilities is determined based on discounted value of the expected cash flows. For Other liabilities expected to be settled within twelve months after the balance sheet date, the carrying amount is a reasonable approximation of the fair value.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

10. INSURANCE SERVICE RESULT

INSURANCE SERVICE RESULT

(€ MILLION)

				2024
	NON-LIFE	HEALTH	LIFE	TOTAL
Insurance revenue	5,233	18,556	1,630	25,419
Insurance service expenses	-4,780	-18,536	-1,497	-24,813
Net result from reinsurance contracts	-174	-3	1	-176
Total insurance service result	**279**	**17**	**134**	**430**

(€ MILLION)

				2023
	NON-LIFE	HEALTH	LIFE	TOTAL
Insurance revenue	4,795	16,370	1,766	22,931
Insurance service expenses	-4,964	-16,340	-1,746	-23,050
Net result from reinsurance contracts	438	-9		429
Total insurance service result	**269**	**21**	**20**	**310**

Non-life

The insurance service result Non-life is € 10 million higher compared to 2023. The claims expenses were higher in 2023 due to the earthquake damages in Turkey and the claims of storm "Daniel" in Greece. This did not occur in 2024, which has a positive effect on the insurance service result. In the Netherlands, the insurance service result is lower compared to 2023 due to inflation and increased inflow of the absence and income protection portfolios. On the other hand, there are less large fire damages and an increase in total premiums due to higher premiums.

Health

The Insurance service result Health is € 4 million lower than in 2023 due to higher healthcare costs caused by price effects such as healthcare cost inflation and the higher number of policyholders. Additionally, at year-end 2024, a loss component (including risk adjustment) of € 142 million was formed for the 2025 premiums (year-end 2023: € 21 million). This increase is partly offset by a higher premium income due to higher premiums from policyholders and a higher contribution from the Health Insurance Fund.

Life

The Life Insurance service result is € 114 million higher than in 2023 due to the one-off contribution to the investment insurance in 2023 and portfolio developments.

INSURANCE SERVICE REVENUE

(€ MILLION)

				2024
	NON-LIFE	HEALTH	LIFE	TOTAL
Contracts under the GMM or VFA				
CSM recognised for services provided	13	1	58	72
Change Risk Adjustment for the period	5		71	76
Release of expected claims and other costs related to insurance services	165	7	1,481	1,653
Adjustments to premiums and sales and insurance acquisition cash flows ("experience adjustment")	-3		9	6
Amortisation of insurance acquisition costs from premiums			11	11
Contracts under the GMM or VFA	**180**	**8**	**1,630**	**1,818**
Contracts under the PAA	**5,053**	**18,548**		**23,601**
Total insurance service revenue	**5,233**	**18,556**	**1,630**	**25,419**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

INSURANCE SERVICE REVENUE

(€ MILLION)

				2023
	NON-LIFE	HEALTH	LIFE	TOTAL
Contracts under the GMM or VFA				
CSM recognised for services provided	18	2	62	82
Change Risk Adjustment for the period	9		72	81
Release of expected claims and other costs related to insurance services	174	7	1,605	1,786
Adjustments to premiums and sales and insurance acquisition cash flows ("experience adjustment")	8		11	19
Amortisation of insurance acquisition costs from premiums			16	16
Contracts under the GMM or VFA	**209**	**9**	**1,766**	**1,984**
Contracts under the PAA	**4,586**	**16,361**		**20,947**
Total insurance service revenue	**4,795**	**16,370**	**1,766**	**22,931**

For a breakdown of Revenues from insurance contracts by transition method for Non-life, Healthcare and Life, please refer to the statements of changes in insurance assets and liabilities broken down by insurance business in Note 7 Assets and liabilities related to insurance contracts and share of reinsurers in insurance liabilities.

INSURANCE SERVICE EXPENSES

(€ MILLION)

				2024
	NON-LIFE	HEALTH	LIFE	TOTAL
Claims and related costs incurred in the previous and current periods	4,185	18,410	1,441	24,036
Amortisation of acquisition costs	552	57	11	620
Losses and reversal of losses on onerous contracts	43	69	45	157
Total insurance service expenses	**4,780**	**18,536**	**1,497**	**24,813**

(€ MILLION)

				2023
	NON-LIFE	HEALTH	LIFE	TOTAL
Claims and related costs incurred in the previous and current periods	4,518	16,277	1,706	22,501
Amortisation of acquisition costs	458	45	10	513
Losses and reversal of losses on onerous contracts	-12	18	30	36
Total insurance service expenses	**4,964**	**16,340**	**1,746**	**23,050**

Expenses from insurance-related services for Non-Life, Health and Life include allocated Operating expenses, further explanation to these are presented in Note 24 Operating expenses.

ACCOUNTING POLICIES FOR INSURANCE REVENUES AND EXPENSES

For the accounting policies for insurance revenues and expenses, please refer to the accounting policies described in Note 7 Accounting policies for liabilities and assets related to insurance contracts.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

11. NET FINANCIAL RESULT FROM (RE)INSURANCE ACTIVITIES

NET FINANCE RESULT FROM (RE)INSURANCE ACTIVITIES

(€ MILLION)

				2024
	NON-LIFE	HEALTH	LIFE	TOTAL
Investment result from (re)insurance activities				
Interest income / expenses on financial assets not measured at FVTPL			5	5
Investment expenses financial assets	-10	-3	-25	-38
Investment expenses property			-10	-10
Impairment losses				
Other investment results[1]	511	299	2,348	3,158
Total investment result from (re)insurance activities	**501**	**296**	**2,318**	**3,115**
Finance income and expense from insurance contracts				
Changes in fair value of financial investments of insurance contracts where policyholders bear the investment risk			-449	-449
Interest accreted on insurance contracts	-99	-17	-1,204	-1,320
Effect of changes in discount rate and other financial assumptions[2]	-69	1	194	126
Foreign exchange loss	-70			-70
Other	-13		-2	-15
Total finance result from insurance contracts	**-251**	**-16**	**-1,461**	**-1,728**
Finance income and expense from reinsurance contracts				
Interest accreted on reinsurance contracts held	25		1	26
Effect of changes in non-performance risk of reinsurers	1			1
Other	64			64
Total finance result from reinsurance contracts held	**90**		**1**	**91**
Net finance result from (re)insurance activities	**340**	**280**	**858**	**1,478**

1 The other investment results mainly concerns realised/unrealised results on investments valued at FVPL. This relates for € 2,949 million to investments that are mandatory FVPL and for € 208 million to investments that are designated FVPL to avoid an accounting mismatch. The realised and unrealised results from investments valued at FVPL also include investment income from investment properties.

2 The effect of changes in the discount curve and other financial assumptions also includes the effect of risk mitigation. The effect is described in greater detail in Chapter 6.7 Accounting policies - IV Valuation of contracts according to GMM and VFA.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

NET FINANCE RESULT FROM (RE)INSURANCE ACTIVITIES

(€ MILLION)

				2023
	NON-LIFE	HEALTH	LIFE	TOTAL
Investment result from (re)insurance activities				
Interest income / expenses on financial assets not measured at FVTPL		1		1
Investment expenses financial assets	-12	-3	-36	-51
Investment expenses property			-13	-13
Impairment losses				
Other investment results[1]	477	249	2,781	3,507
Total investment result from (re)insurance activities	**465**	**247**	**2,732**	**3,444**
Finance income and expense from insurance contracts				
Changes in fair value of financial investments of insurance contracts where policyholders bear the investment risk[2]			-686	-686
Interest accreted on insurance contracts	-28	-16	-1,108	-1,152
Effect of changes in discount rate and other financial assumptions[2 3]	-215	-1	-669	-885
Foreign exchange loss	-113			-113
Other			3	3
Total finance result from insurance contracts	**-356**	**-17**	**-2,460**	**-2,833**
Finance income and expense from reinsurance contracts				
Interest accreted on reinsurance contracts held	7		1	8
Effect of changes in non-performance risk of reinsurers	-1			-1
Other	143		1	144
Total finance result from reinsurance contracts held	**149**		**2**	**151**
Net finance result from (re)insurance activities	**258**	**230**	**274**	**762**

1 The other investment results mainly concerns realised/unrealised results on investments valued at FVPL. This relates for € 3,078 million to investments that are mandatory FVPL and for € 429 million to investments that are designated FVPL to avoid an accounting mismatch. The realised and unrealised results from investments valued at FVPL also include investment income from investment properties.
2 For comparative purposes an amount of € 573 million has been reclassified from "Effect of changes in discount rate and other financial assumptions" to "Changes in fair value of financial investments of insurance contracts where policyholders bear the investment risk"
3 The effect of changes in the discount curve and other financial assumptions also includes the effect of risk mitigation. The effect is described in greater detail in Chapter 6.7 Accounting policies - IV Valuation of contracts according to GMM and VFA.

The years 2023 and 2024 were both characterised by increased equity markets, decreased swap rates and incoming spreads, offset by an increase in government bond yields in 2024 where they have decreased in 2023. On balance, these movements resulted in a positive result on investments for both years with the result in 2024 being € 0.3 billion lower. The total finance result from insurance contracts in both years is a charge as a result of these movements, with the finance result, read charge from insurance contracts being € 1.1 billion lower in 2024. This lower charge includes gains in 2024 due to the dismantled swap spread hedge of € 113 million and the adjustment of ILP parameters of € 167 million. These opposing effects do not cancel each other out because interest rate risk management is mainly aimed at limiting the impact of interest rate and spread developments on the Solvency II ratio.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

OTHER INVESTMENT RESULTS- INSURANCE RELATED

(€ MILLION)

	2024	2023
Net gains on fin. instruments measured at FVTPL		
Equities and similar investments	1,114	585
Fixed income investments		
Government bonds and government guaranteed	-91	595
Asset backed securities (collateralised)	4	9
Corporate bonds	142	503
Convertible bonds	46	18
Mortgage backed loans	321	193
Other	-3	68
Total fixed income investments	**419**	**1,386**
Income from derivatives	-100	-58
Income other financial investments	39	261
Income from investment property	49	-114
Total realised/unrealised results on investments valued at FVTPL	**1,521**	**2,060**
Direct income FVTPL	1,636	1,447
Other income not FVTPL	1	
Other investment results	**3,158**	**3,507**

The (un)realised results from investments valued at FVPL decreased in 2024 compared to 2023. This is mainly explained by developments in the financial markets. In 2024, we see a lower (un)realised result for fixed income than in 2023 this is mainly due to the increased interest rate on government bonds in 2024 where it decreased in 2023. In 2024 and 2023, equity prices increased at about the same rate but due to additional investments in equities, the (un)realised result is higher in 2024. For investment property, we see a higher result due to positive market sentiment.

Direct investment income is part of the Interest income/expenses on financial assets not measured at FVTPL and Other investment results as presented in the table Net finance result from (re)insurance activities.

DIRECT INVESTMENT INCOME

(€ MILLION)

	2024	2023
Direct investment income by type		
Dividends	142	195
Rental income from investment property	33	37
Interest on fixed income investments	1,466	1,216
Total	**1,641**	**1,448**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

12. INVESTMENT RESULT FROM OTHER ACTIVITIES

INVESTMENT RESULT FROM OTHER ACTIVITIES

(€ MILLION)

	INVESTMENTS RELATED TO:			2024	INVESTMENTS RELATED TO:			2023
	BANKING ACTIVITIES	INVESTMENT CONTRACTS	OTHER NON-INSURANCE ACTIVITES	TOTAL	BANKING ACTIVITIES[1]	INVESTMENT CONTRACTS	OTHER NON-INSURANCE ACTIVITES	TOTAL
Investment property								
Rental income			1	1			1	1
Subtotal	**0**	**0**	**0**		**0**	**0**	**1**	**1**
Financial investments mandatorily valued at FVTPL								
Interest on fixed-income securities			33	33			27	27
Interest on derivatives	161			161	150			150
Value changes in the result		4		4		4	10	14
Subtotal	**161**	**4**	**34**	**199**	**150**	**4**	**37**	**191**
Financial investments measured at amortized cost								
Interest income calculated using the effective interest method	525	-7		518	408	-10		398
Effect of applying hedge accounting	-4			-4	-8			-8
Subtotal	**521**	**-7**	**0**	**514**	**400**	**-10**	**0**	**390**
Total investment result from other activities	**682**	**-3**	**34**	**713**	**550**	**-6**	**38**	**582**

1 In 2023, Interest income and interest expenses of Achmea Bank were partly offset. This methodology is adjusted in 2024. As a result, the comparitive figures for 'Investment result from other activities' and 'Interest and similar expenses' are adjusted with € 39 million

ACCOUNTING POLICIES FOR INVESTMENT INCOME

The accounting policies for investment income are closely related to the accounting principles for real estate investments and other investments. See Note 5 and 6 for further explanation.

OTHER NOTES

13. INTANGIBLE ASSETS

(€ MILLION)

	GOODWILL	SOFTWARE[1]	BRAND NAME	DISTRIBUTION NETWORKS	OTHER INTANGIBLE ASSETS	TOTAL 2024
Cost						
Balance at 1 January	711	275	3	116	16	1,121
Change in composition of the Group	2				14	16
Internally developed		9			4	13
Sale, disposals and decommissioning		-2			-3	-5
Purchases and acquisitions		19				19
Changes due to reclassification and other movements		1		-8	6	-1
Foreign currency differences		-1				-1
Balance at 31 December	**713**	**301**	**3**	**108**	**37**	**1,162**
Amortisation and impairment losses						
Balance at 1 January	33	199		86	4	322
Sale, disposals and decommissioning					-3	-3
Amortisation charge for the year		17		6	4	27
Impairment loss recognised in income statement	18			7	1	26
Changes due to reclassification and other movements				-1		-1
Balance at 31 December	**51**	**216**		**98**	**6**	**371**
Carrying amount						
At 1 January	678	76	3	30	12	799
At 31 December	**662**	**85**	**3**	**10**	**31**	**791**

1 In the category Software at year-end 2024 an amount of € 39 million is included for internally developed software.

2 This is particularly related to the acquisition of BSG Asset Management B.V. and BSG Fund Management B.V. For more information, please refer to note 3 Changes in the composition of the group.

An amount of € 782 million (31 December 2023: € 779 million) of the Intangible assets is expected to be recovered more than twelve months after the reporting date.

There is an impairment of the goodwill that is related to Centraal Beheer PPI N.V. for the amount of € 18 million.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

(€ MILLION)

	GOODWILL	SOFTWARE[1]	BRAND NAME	DISTRIBUTION NETWORKS	OTHER INTANGIBLE ASSETS	TOTAL 2023
Cost						
Balance at 1 January	711	259	3	138	3	1,114
Internally developed		9			7	16
Sale, disposals and decommissioning		-7				-7
Purchases and acquisitions		19			12	31
Changes due to reclassification and other movements				-22	-6	-28
Foreign currency differences		-5				-5
Balance at 31 December	**711**	**275**	**3**	**116**	**16**	**1,121**
Amortisation and impairment losses						
Balance at 1 January	29	191		107		327
Sale, disposals and decommissioning		-7			1	-6
Amortisation charge for the year		17		7	3	27
Impairment loss recognised in income statement	4	2				6
Changes due to reclassification and other movements				-28		-28
Foreign currency differences		-4				-4
Balance at 31 December	**33**	**199**		**86**	**4**	**322**
Carrying amount						
At 1 January	682	68	3	31	3	787
At 31 December	**678**	**76**	**3**	**30**	**12**	**799**

1 In the category Software at year-end 2023 an amount of € 35 million is included for internally developed software.

The joint venture Onlia Holding Inc. meets the criteria for 'Held for Sale' as of 31 December 31 2023, and is consequently classified as 'Held for Sale' in the balance sheet. As a result, in 2023, the previously recognized goodwill of € 4 million for the joint venture Onlia Holding Inc. has been fully impaired. Additionally, software at Union Zdravotná Poist’ovna A.S. has been impaired by € 2 million. This leads to a total impairment loss of € 6 million.

GOODWILL BY CASH GENERATING UNIT

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Non-life Netherlands	617	617
Retirement Services Netherlands[1]	27	45
Other	18	16
Total	**662**	**678**

1 Within Retirement Services Netherlands an amount of nil (2023: € 18 million) relates to the acquisition of Centraal Beheer PPI N.V. For more information refer to Note 32 Interests in subsidiaries.

Goodwill is mainly related to Achmea's Dutch operations.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The key assumptions in calculating the value-in-use of Non-Life Netherlands in the annual impairment test are:

NON-LIFE NETHERLANDS

	2024	2023
Average annual insurance revenue growth rate	3.4%	3.9%
Average combined ratio[1]	93.9%	93.9%
Terminal value growth	2.0%	2.0%
Discount rate	7.4%	7.3%

[1] The average loss ratio and average expense ratio are no longer reported separately but are presented as the average combined ratio (COR).

The surplus, being the positive difference between the recoverable amount and carrying amount, for Non-life Netherlands amounts to € 1.666 million (2023: € 395 million). This increase is due to the lower capital ratio of 137,5% in the calculation of the surplus as compared to 2023 (185%). The recoverable amount for the cash generating unit Non-life Netherlands is sensitive for deviations within key assumptions.

EFFECTS OF CHANGE IN ASSUMPTIONS NON-LIFE

(€ MILLION)

2024	CHANGE OF RATIO WITH	Δ SURPLUS
Average annual premium/sales growth rate	-0.5%	-122
Average combined ratio[1]	0.5%	-56
Terminal value growth	-0.5%	-157
Discount rate	0.5%	-344

[1] The average loss ratio and average expense ratio are no longer reported separately but are presented as the average combined ratio (COR).

The key assumptions in calculating the value-in-use of Retirement Services Netherlands in the annual impairment test are:

ACHMEA INVESTMENT MANAGEMENT B.V.

	2024	2023
Average annual revenue growth rate	6.0%	3.1%
Terminal value growth	2.0%	2.0%
Discount rate	9.1%	9.2%

CENTRAAL BEHEER PPI N.V.

	2024	2023
Average annual revenue growth rate	13.1%	8.4%
Terminal value growth	2.0%	2.0%
Discount rate	8.6%	9.2%

The surplus, being the positive difference between the recoverable amount and carrying amount, for cash generating units within Retirement Services Netherlands amounts to € 84 million (2023: € 30 million). For the cash flow generating unit Centraal Beheer PPI N.V., the realizable value as of December 31, 2024 is lower than the book value due to a decrease in the (expected) result due to higher costs. The goodwill of € 18 million held for this cash flow generating unit has therefore been fully written off through an impairment. The realizable value for Achmea Investment Management B.V. is sensitive to deviations within important assumptions.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

EFFECTS OF CHANGE IN ASSUMPTIONS RETIREMENT SERVICES NETHERLANDS

(€ MILLION)

2024	CHANGE OF RATIO WITH	Δ SURPLUS
Average annual premium/sales growth rate	-0.5%	-14
Average combined ratio[1]	0.5%	-8
Terminal value growth	-0.5%	-10
Discount rate	0.5%	-15

[1] The average loss ratio and average expense ratio are no longer reported separately but are presented as the average combined ratio (COR).

ACCOUNTING POLICIES FOR INTANGIBLE ASSETS

Below, the specific initial accounting policy is described for each category of intangible assets. Based on management expectations, Achmea assesses whether the useful life is limited (usually not more than 20 years) or indefinite. Unless another method is more appropriate, assets with a finite useful life are depreciated using the straight-line method after initial measurement (less impairment losses, if any). Assets with an indefinite useful life are tested annually for impairment. Expenditures on internally generated goodwill, brand names, research costs and service costs are recognised as expenses in the Statement of profit and loss as they are incurred.

Goodwill
Goodwill arising on a business combination represents the excess of the consideration transferred to acquire the business over the fair value of the net identifiable assets, liabilities and contingent liabilities acquired at acquisition date. Goodwill is stated at cost less accumulated impairment losses. Recognised goodwill is subject to an impairment test at least annually. Achmea has allocated the acquired goodwill due to business combinations to cash generating units (CGUs) that are expected to benefit from the business combination. This is done on the basis of synergies expected to be realised by the combination. Goodwill is monitored at business unit level, being an aggregation of products or group of products with the same risk characteristics and at which level risks are managed and capital is allocated. Any excess of the carrying amount of the domain over its recoverable amount will firstly be allocated to goodwill. Impairment tests at CGU level are performed at a fixed time every year and more frequently if triggering events occur. If an impairment loss occurs, it will be allocated to the relevant CGU. An impairment recognised for goodwill is not subject to reversal in a subsequent period.

Software
Externally acquired and internally developed software is recognised at cost (including borrowing cost incurred). The maximum useful life of software is five years or ten years when related to insurance policy systems. Software that is an integral part of a computer or a computer-controlled tool and in which that tool or computer does not work without the software (e.g. operating system software), is classified as equipment.

Brand name
Purchased brand name are recognised as an intangible asset. The initial measurement of a brand name is based on the application of the 'relief from royalty method', with the use of market observable variables and when not available management expectations that are presumed to be representative of assumptions market participants would use.

Distribution networks
When Achmea enters into a business combination it recognises distribution networks as an intangible asset. The initial measurement of this intangible asset is based on the application of the 'multi-period excess earnings method', with the use of market observable variables and management expectations. The valuation techniques used are commonly applied within the industry.

Other intangible assets
Other intangible assets acquired by Achmea are stated at cost less accumulated amortisation and impairment losses. Other intangible assets are capitalised and amortised over their expected useful lives, which on average are between 5 and 20 years.

Impairment
At each reporting date, Achmea assesses whether an indication of an impairment exists for intangible assets with a finite useful economic life. Various indicators are used, such as whether the intangible asset is abandoned, readily obtainable in the market, or the cost to maintain the intangible asset is significantly higher than expected. An impairment on Intangible assets is recognised as Other expenses in the Statement of profit and loss. In addition, Achmea assesses at each reporting date whether there is any indication that an impairment loss recognised in a prior period for intangible assets may no longer exist or may have decreased. Achmea considers the various indicators, such as: whether the asset's market value has increased significantly during the period; whether significant changes (technological, market, economic or legal environment) with a favourable effect on Achmea have taken place during the period; whether market interest rates have decreased and are likely to affect the discount rate used in calculating value in use and increase recoverable amount materially. If this is the case, the carrying amount of the intangible asset is increased to its recoverable amount. An increase in the carrying amount of the asset due to the reversal of the impairment may not exceed the carrying amount if no impairment loss would have been recognised in the prior period. A reversal of an impairment on Intangible assets is recognised as Other expenses in the Statement of profit and loss.

14. ASSOCIATES AND JOINT VENTURES

Although Achmea holds less than 20% of the shares of Garanti Emeklilik ve Hayat A.S., Achmea exercises significant influence thanks to its strategic interest, close cooperation with Eureko Sigorta and the contractual right to appoint a Board member.

During the fiscal years 2023 and 2024, Turkey was classified as a hyperinflationary country. Achmea applied hyperinflation accounting for its interest in the Turkish subsidiary Garanti Emeklilik ve Hayat A.S., as described in the general accounting policies.

The carrying amount of associates and joint ventures is determined based on the IFRS financial statements of the same financial year of those entities (which accounting policies do not significantly differ from Achmea's accounting policies) to the extent available. If this is not available, Achmea bases the carrying amount on provisional, unaudited figures, derived from the associate or joint venture. Achmea has determined that, in the past, there were no material differences between those preliminary, unaudited figures and the IFRS financial statements of the associate or joint venture in question.

(€ MILLION)

NAME OF THE COMPANY	COUNTRY	DESCRIPTION OF BUSINESS	DATE OF ACQUISITION / STARTING DATE	% OWNERSHIP 2024	% OWNERSHIP 2023	NET ASSET VALUE 2024	NET ASSET VALUE 2023	**BOOK VALUE 31 DECEMBER 2024**	BOOK VALUE 31 DECEMBER 2023
Garanti Emeklilik ve Hayat A.S.	Turkey	Life insurance	2007	15%	15%	25	15	25	15
Wagenplan B.V.	The Netherlands	Leasing	2001	40%	40%	7	7	7	7
De Vereende N.V.	The Netherlands	Non-life insurance	2020	20%	20%	8	7	8	7
Other						10	13	10	13
								50	**42**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

15. PROPERTY FOR OWN USE AND EQUIPMENT

(€ MILLION)

	31 DECEMEMBER 2024	31 DECEMBER 2023
Property for own use		
In use	183	175
In development		
Equipment		
Software	1	2
Hardware	21	23
Office furniture	9	6
Other	21	19
Right of use of property and equipment		
Property Own Use	76	88
Equipment	16	14
	327	**327**

On 31 December 2024, Achmea had nearly all of its property for own use valued by external appraisers and adjusted the balance sheet value accordingly.

During 2024, the carrying amount of the right of use of € 102 million decreased by € 10 million, consisting of a decrease due to depreciation of capitalised rights of use (€ 14 million) and an increase in new leases (€ 4 million).

KEY ASSUMPTIONS TO DETERMINE THE FAIR VALUE OF PROPERTY FOR OWN USE

Various assumptions should be made and techniques applied in valuing property whereby these assumptions and techniques, may have significant consequences for the valuation. The methods used to determine the revalued amount for Property for own use and fair value of Investment property are described in Note 9 Fair value hierarchy. The assumptions used in applying some of these methods are supported by the terms of any existing lease and other relevant contracts and by external evidence such as recent and expected general economic trends, current market rents for similar properties in the same region and condition. Components of assets and related liabilities are classified as 'Held for sale' when it is highly probable that the carrying amount will be recovered principally through a sale transaction rather than through continuing use.

ACCOUNTING POLICIES PROPERTY FOR OWN USE AND EQUIPMENT

Property for own use

Property for own use is measured at fair value at the date of revaluation less any (subsequent) accumulated depreciation and any (subsequent) accumulated impairment losses. Property for own use that is under construction or in development is stated at cost until its fair value can be reliably determined. Changes in the carrying amount resulting from revaluations of Property for own use are recorded in the Revaluation reserve, part of Total equity net of deferred taxes. A decrease in the carrying amount due to revaluation is recognised in the Revaluation reserve, part of Total equity, to the extent of any credit balance existing in the revaluation reserve in respect of that asset and for the remaining part in the Statement of profit and loss. A revaluation decrease will be reversed through the Statement of profit and loss in subsequent years if the revalued amount is higher than the carrying amount, but not higher than the cost minus accumulated depreciation. When Property for own use is derecognised, revaluations included in the Revaluation reserve will be transferred directly to Retained earnings and not through the Statement of profit and loss. If Property for own use comprises major components with a different useful life, they are accounted for as separate items

Depreciation on Property for own use is charged to the Income Statement on a straight-line basis over the estimated useful economic life, generally not exceeding fifty years. The depreciation method and useful economic life are reviewed annually and adjusted if circumstances or expectations have changed significantly. Land is not depreciated. When Property for own use or its separate items accounted for is revalued, the cumulative depreciation is eliminated against the gross carrying amount of that item of Property for own use.

Equipment
Equipment consists of software, hardware, office furniture and other equipment. Other equipment includes periodic maintenance and investments aiding business operations. Equipment is measured at cost (including borrowing costs incurred) less accumulated depreciation and impairment losses until completely amortised. If equipment comprises major components with a different useful life these are accounted for as separate items. Depreciation is charged to the Income Statement on a straight-line basis. The estimated useful life for the equipment is: software three to five years, hardware three to four years, office furniture (including components) three to six years and other equipment three to six years. The depreciation method and useful life of equipment is reviewed annually and altered prospectively if circumstances or expectations have changed significantly.

Right-of-use asset for property for own use and equipment
Achmea makes use of the option not to recognise right-of-use assets and lease liabilities in the balance sheet for short-term leases (12 months or less) or leases of low-value assets (USD 5,000 or less). The right-of-use asset related to the leases is depreciated and recognised in the Statement of profit and loss during the term of the lease applying the straight-line method.

Achmea recognises a right of use in the balance sheet on the effective date, which is the date on which the lessor makes the underlying asset available for use. The right-of-use asset is valued at cost minus cumulative depreciation. Upon initial recognition, cost is equal to the amount of the lease liability plus lease payments that preceded the commencement period of the lease, plus initial direct costs, taking into account any costs of dismantling, removing or restoring the underlying asset and minus any lease incentives received.

Right-of-use assets are then depreciated on a straight-line basis over the duration of the lease, unless the economic life is shorter, in which case this is taken as the depreciation period. In addition, where applicable, the right-of-use asset is periodically reduced by impairment losses and, where applicable, adjusted for remeasurements of the lease liabilities.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

16. DEFERRED TAX ASSETS AND LIABILITIES

Changes in deferred tax assets and liabilities during the financial year can be specified as follows:

(€ MILLION)

	BALANCE AT 1 JANUARY 2024	RECOGNISED IN INCOME	RECOGNISED IN EQUITY	BALANCE AT 31 DECEMBER 2024
Intangible assets	-4	3		-1
Investments	-233	-145		-378
Re-insurance	4	8	-1	11
Other assets	397	-16		381
Insurance liabilities	1,051	-27	-4	1,020
Employee benefits	26	-1	3	28
Other provisions	-23	10	-1	-14
Other liabilities	-445	2		-443
Right of use assets	-23	4		-19
Right of use liabilities	27			27
Tax losses	193	-70		123
Amortisation and equalisation reserve	-10	-10		-20
	960	**-242**	**-3**	**715**
Includes:				
Deferred tax assets				727
Deferred tax liabilities				12

(€ MILLION)

	BALANCE AT 1 JANUARY 2023	RECOGNISED IN INCOME	RECOGNISED IN EQUITY	BALANCE AT 31 DECEMBER 2023
Intangible assets	-6	2		-4
Investments	293	-533	7	-233
Re-insurance	7	-3		4
Other assets	431	-34		397
Insurance liabilities	596	455		1,051
Employee benefits	3	4	19	26
Other provisions	-29	6		-23
Other liabilities	-514	69		-445
Right of use assets	-23			-23
Right of use liabilities	29	-2		27
Tax losses	227	-34		193
Amortisation	-9	-1		-10
	1,005	**-71**	**26**	**960**
Includes:				
Deferred tax assets				971
Deferred tax liabilities				11

The tax rates used to calculate deferred tax assets and liabilities vary by tax jurisdiction and were between 10% and 36% in both 2024 and 2023. The tax jurisdiction with the largest result and tax share is the Netherlands.

The Achmea B.V. fiscal unit can offset € 91 million in losses in the 2024 corporate income tax return.

An amount of € 715 million (2023: € 960 million) of the Deferred tax assets and liabilities is expected to be recovered, to a large extent, more than twelve months after reporting date. Recognition of these Deferred tax assets is underpinned by the presence of sufficient annual taxable profit capacity during the reversal period. This substantiation is analysed for the Dutch entities that are part of the fiscal unit at the fiscal unit level. In addition, various scenarios are analysed for Achmea Pensioen- en Levensverzekeringen N.V. regarding lower and higher equity positions and interest rates. For the remaining entities, the presence of sufficient tax earning capacity is analysed at the single level.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

An amount of € 60 million (2023: € 58 million) of deferred tax assets due to tax losses from previous years has not been recognised. This amount relates to an amount of tax losses in Australia (€ 31 million), Canada (€ 19 million) and Greece (€ 10 million). For these losses, it is unlikely that future taxable profits will be available against which the temporary difference can be offset. The recognised deferred tax assets relating to prior years' deductible losses have been valued based on the legislation in force.

Results within the Dutch Health Insurance business are reported as non-taxable results, based on the current tax laws. The tax exemption is applicable as far as these results are not distributed. When results are partly or fully distributed, the annual results of the Dutch Health Insurance Framework will no longer be exempted from corporate tax. The annual results will then be taxable against the then current corporate tax rate.

On 31 December 31 2023 the Minimum Tax Rate Act 2024 entered into force. This legislation implements EU Directive 2022/2023 and is the result of the agreements made within the OECD context on the introduction of a minimum effective profit tax rate of 15% (Pillar 2). The law applies to multinationals and domestic groups with an annual revenue of at least € 750 million. In May 2023, the IASB included in IAS 12 a mandatory temporary exception for recognition and disclosure of deferred taxes arising from the implementation of the Pillar 2 model rules. Achmea has applied this mandatory exception.

KEY ASSUMPTIONS AND ESTIMATES TO DETERMINE THE DEFERRED TAX ASSETS

Deferred tax assets are established for the tax benefit related to deductible temporary differences, carry forwards of unused tax losses and carry forwards of unused tax credits when, in the judgement of management, it is likely that Achmea will receive the tax benefits. The assumptions and estimates used in, for example, capital planning and future profit forecasts are applied. A change in accounting estimate could have a substantial effect on the value of the deferred tax asset. In determining the tax position, Achmea has taken into account its estimate of the associated future expenses. Furthermore, management considers tax planning strategies to increase the likelihood that the tax assets will be realised.

ACCOUNTING POLICIES FOR DEFERRED TAX ASSETS AND LIABILITIES

Deferred tax liabilities are calculated based on the 'liabilities' method for temporary discrepancies between the carrying amount for financial reporting purposes of assets and liabilities and the fiscal carrying amount of these assets and liabilities. The amount of deferred tax provided for is based on the expected manner of realisation or settlement of the carrying amount of assets and liabilities. To determine future profits, the capital planning Solvency II assumptions, like expected return on investments and (parts of) the run-off of the liabilities, Risk Margin, UFR-drag and results on (fixed income) investments, are used for Achmea Pensioen- en Levensverzekeringen N.V. In addition, for Achmea Pensioen- en Levensverzekeringen N.V., there is an assumption that annual dividend payments will be maximized based on internal policy. Since this capital planning is used to substantiate the deferred tax assets under IFRS, a scaling factor is applied. For the other components, the assumptions include future profits forecasts. The profit forecast is based on the most recent Rolling Forecast. All tax result forecast have a long-term horizon in line with the duration of the run-off of the Achmea Pensioen- en Levensverzekeringen N.V.'s liability book. A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the unused tax losses and credits can be utilised. Deferred tax assets are reduced to the extent that it is no longer probable that the related tax benefit will be realised.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

17. RECEIVABLES AND ACCRUALS

RECEIVABLES AND ACCRUALS

(€ MILLION)

	2024	2023
Receivable from provided collateral in the form of cash[1]	151	325
Investment receivables	120	115
Debtors non-insurance	273	140
Taxes and social security premiums	99	105
Contributions from Dutch Health Insurance Fund		19
Undue payments to Dutch hospitals	861	768
Prepayments and accrued income[2]	160	139
Other receivables	143	109
Balance at 31 December	**1,807**	**1,720**

1 Receivable from provided collateral in the form of cash relates to cash collateral amounts provided by Achmea depending on the current value of the derivative.
2 Including impact of hyperinflation in Turkey. For more information on hyperinflation refer to the Accounting Policies.

An amount of € 85 million (31 December 2023: € 87 million) of the Receivables and accruals is expected to be recovered after twelve months after reporting date. For receivables expected to be recovered within twelve months after reporting date, the carrying amount is a reasonable approximation of the fair value. Impairment losses recognised in 2024 related to Receivables and accruals amounted to nil (31 December 2023: € 1 million) and are included in Other expenses.

ACCOUNTING POLICIES FOR RECEIVABLES AND ACCRUALS

Receivables and accruals are measured at amortised cost, which usually equals the nominal value, adjusted for accumulated impairment losses.

18. CASH AND CASH EQUIVALENTS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Cash and bank balances	942	1,335
Call deposits	1,189	599
Balance at 31 December	**2,131**	**1,934**

The increase in cash and cash equivalents is mainly caused by the growth of the savings portfolio and is dampened by the growth in the mortgage portfolio.

Cash and cash equivalents subject to restrictions amount to € 11 million (31 December 2023: € 9 million).

ACCOUNTING POLICIES FOR CASH AND CASH EQUIVALENTS

Cash and cash equivalents comprise cash, bank balances and call deposits and are measured at fair value. The fair value is in line with the nominal value.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

19. EQUITY

Changes in Equity are specified in the Consolidated statement of changes in equity.

OVERVIEW SHARE CAPITAL

	NUMBER OF ORDINARY SHARES	NOMINAL VALUE ORDINARY SHARES	NUMBER OF PREFERENCE SHARES	NOMINAL VALUE PREFERENCE SHARES	NUMBER OF A-SHARES	NOMINAL VALUE A-SHARES
	(PAR VALUE € 1 PER SHARE)	(€ MILLION)	(PAR VALUE € 1 PER SHARE)	(€ MILLION)	(PAR VALUE € 1 PER SHARE)	(€ MILLION)
Authorised	2,103,943,009	2,104	60,000,000	60	1	0
Shares issued 1 January 2023	410,820,173	411	23,904,060	24	1	0
Shares converted in 2023		0	-23,904,060	-24		
Shares issued 31 December 2023[1]	**410,820,173**	**411**			**1**	**0**
Shares issued 1 January 2024	410,820,173	411			1	0
Shares converted in 2024		0		0		
Shares issued 31 December 2024[1]	**410,820,173**	**411**			**1**	**0**

[1] All issues shares are fully paid up, Achmea B.V. itself is the shareholder of part of the shares. For more information refer to the paragraph 'Own Shares'. For a specification of other shareholders, see Other information, Shareholders of Achmea B.V. at 31 December 2024.

Share premium

An amount of € 10,590 million has been paid by shareholders as share premium. This share premium reserve comprises share premium paid in by holders of ordinary shares. In 2024, there were no movements in the share premium reserve.

Share rights, preferential rights and restrictions

Each share entitles the holder to cast one vote at the General Meeting. Stichting Administratiekantoor Achmea holds the A share. Special rights apply to the A share. Many decisions of the General Meeting of Achmea B.V. can only be taken with the approval of the A-share holder. The General Meeting decides whether or not to pay dividends to the holders of preference and ordinary shares.

When an external dividend is to be distributed, an assessment is made of whether the distribution is responsible by testing against the risk appetite. A key factor in this assessment is holding company liquidity. The holding company liquidity depends on the amounts distributed to Achmea B.V. by the legal entities – mainly Achmea Pensioen- en Levensverzekeringen N.V. and Achmea Schadeverzekeringen N.V. The level of interest for discounting the insurance liabilities has a major impact on the amounts that can be distributed to Achmea B.V. from the aforementioned insurance entities and therefore on holding liquidity.

An overview of the shareholders of Achmea B.V. as at 31 December 2024 is presented under Other information.

Own shares

The item 'Own shares' consists of the ordinary shares purchased by Achmea B.V. Previously, the item 'Own shares' also included the interest that Achmea B.V. had indirectly as holder of the depositary receipts on the preference shares. In 2024, part of the dividend was paid out as stock dividend. This distributed stock dividend was financed for € 238 million from the treasury shares.

The own shares held by Achmea B.V. do not carry voting rights and no dividends are paid on them.

Legal reserve

A legal reserve must be maintained for the retained earnings with regard to associates and joint ventures, internally developed capitalised software and healthcare offices.

An amount of € 101 million (31 December 2023: € 87 million) of Total equity end of year 2024 is related to a number of subsidiaries subject to regulatory restrictions. Amounts included in the legal reserve cannot be distributed to shareholders. In addition to this Legal Reserve, there are other restricted reserves that may not be distributed to shareholders, as explained below. Further reference is made to Note 2 Capital and Risk Management where restrictions under the SII legislation are explained.

Revaluation reserve

Based on the accounting policies used by Achmea, a revaluation reserve is formed. In addition, Dutch regulations require Achmea to establish a legal reserve for all positive unrealised fair value changes for assets not listed on active markets and for which the unrealised fair value changes are recognised in the Statement of profit and loss. In determining the revaluation reserve the unrealised fair value changes of insurance contracts are taken into account in accordance with RJ 240. The reserve is formed by transferring the required amounts from Other reserves to the Revaluation Reserve. Both, the Revaluation reserve as well the Legal reserve are not freely distributable.

Part of the Revaluation Reserve relates to property for own use. The surplus in the revaluation reserve for property for own use stands at € 25 million at the end of 2024 (2023: € 17 million).

Foreign currency differences reserve

Assets and liabilities of foreign subsidiaries with a functional currency other than the euro are translated into euros at the exchange rate on the balance sheet date. The revenues and expenses of these subsidiaries are converted at the average exchange rate for the financial year. Conversion differences arising from the application of exchange rates at the balance sheet date to the opening balance sheet of net assets and goodwill of subsidiaries, as well as conversion gains and losses for the year under review, are recognised under Foreign Currency Differences Reserve. Amounts included in the Foreign Currency Differences Reserve cannot be distributed to shareholders. Most of the foreign currency business is conducted in Turkish lira at the subsidiary Eureko Sigorta and the associate Garanti Emeklilik ve Hayat A.S.

Hedging reserve

The amounts included in the Hedging reserve from the hedge accounting cash flow cannot be distributed to shareholders. When determining non-distributable amounts under Dutch law, these positions cannot be offset. As a result, in relation to the Hedging reserve, an amount of € 7 million (2023: € 7 million) cannot be distributed to shareholders. When the hedge relationship is terminated, Achmea amortises the related fair value adjustment over the remaining term of the hedged position.

Other reserves

Results within the Dutch Health Insurance business are reported as non-taxable results, based on the current tax laws. In addition, the results are excluded from the calculation of the minimum tax payable by Achmea following the Wet minimumbelasting 2024. The above-mentioned exemptions apply if these results are not distributed by Achmea Zorgverzekeringen N.V. When results are partly or fully distributed, the annual results will no longer be exempted from corporate tax and are part of the minimum tax to be calculated by Achmea. The annual results will then be taxable against the then current corporate tax rate.

The Other reserves include an negative amount of € 150 million relating to defined benefit liability (December 2023: € 155 million negative). The movement in the related liabilities relating to Achmea's defined benefit liability are included in Net other comprehensive income.

The proposal regarding the appropriation of profit is included in Achmea B.V.'s separate financial statements for 2024, Note 20 Proposed appropriation of profit.

Other equity instruments

Achmea holds an Other Equity Instrument to support the financing of the organisation. This Other equity instrument concerns a € 500 million hybrid loan of Restricted Tier 1 Perpetual Capital Securities with a coupon of 4.625%. At the start of 2024, Achmea held a second Other Equity Instrument. This was a hybrid Tier 2 bond of € 750 million with a coupon of 4.25%. During 2024, € 357 million was repaid on this loan. Of the remaining part of the € 393 million loan, Achmea stated in a press release on 31 December 2024 that it would repay it by 4 February 2025. Meanwhile, this repayment has actually taken place. Consequently, the remaining part of this loan has been transferred to current liabilities under the note Other liabilities at balance sheet date.

This equity instrument qualifies as Other Equity Security and serves to support the financing of the organisation. This Perpetual Capital Security qualifies as Restricted Tier 1 note.

This hybrid loan, listed on the Irish Stock Exchange, has a very long maturity period. The contractual terms are such that the payment/pay out of coupon and redemption is at the disposal of the company and no pre-agreed payment obligations apply. As a result, the loans qualify as Equity under IFRS.

Coupon payments on Other equity instruments are determined by Achmea and subject to the limitations described in the prospectus. The coupon payments will be charged to Other reserves, part of Total equity.

ACCOUNTING POLICIES FOR EQUITY

Achmea B.V. shares held by the company (own shares) are deducted from the Total equity at the time of acquisition by Achmea or its subsidiaries on the basis of the purchase price paid. Results after the subsequent sale of these treasury shares are recognised directly within Total equity.

Minority interest

Each minority interest in subsidiaries is presented as a separate component within Total equity and is equal to the minority interest in the subsidiary's equity based on Achmea's accounting policies.

20. OTHER PROVISIONS

(€ MILLION)

	2024	2023
Pensions	831	848
Other provisions	136	90
Balance at 31 December	**967**	**938**

PENSIONS

(€ MILLION)

31 DECEMBER 2024	THE NETHERLANDS	OTHER COUNTRIES	TOTAL
Present value of defined benefit obligation	828	3	831
Fair value of total investments backing defined benefit obligation	-637		-637
Fair value of non-qualifying investments backing defined benefit obligation	637		637
Unfunded status	**828**	**3**	**831**
Effect of asset ceiling			
Net defined benefit liability	**828**	**3**	**831**

(€ MILLION)

31 DECEMBER 2022	THE NETHERLANDS	OTHER COUNTRIES	TOTAL
Present value of defined benefit obligation	845	3	848
Fair value of total investments backing defined benefit obligation	-647		-647
Fair value of non-qualifying investments backing defined benefit obligation	647		647
Unfunded status	**845**	**3**	**848**
Effect of asset ceiling			
Net defined benefit liability	**845**	**3**	**848**

Achmea has a pension scheme for the majority of its employees. The pension scheme administered by Stichting Pensioenfonds Achmea, applies to the majority of the more than 12,000 employees in the Netherlands and is a so-called collective defined contribution (CDC) scheme. Achmea's obligation is limited to paying the agreed upon premium for the current service year. Contributions paid to the collective defined contribution scheme amounted to € 212 million in 2024 (2023: € 198 million). The contribution is equal to the actuarially required premium for the purchase price for the pension accrual to be acquired in that year, taking into account the current interest rate.

In 2024, the Transition Plan WTP (after voting among employees) was signed by the trade unions (FNV Finance, CNV and De Unie) and Achmea. The expected transition date is 1 July 2027. The Achmea pension fund has been asked to implement the new pension scheme as laid down in the transition plan. The Achmea Pension Fund will still assess this for legal requirements, feasibility and balance.

Achmea's defined benefit liability is largely related to accrued rights related to former defined benefit obligations of a number of former employees. This defined benefit liability applies in the Netherlands and for a limited amount in Greece.

The accrued rights of the former defined benefit liability in the Netherlands of a number of (former) employees are insured with Achmea Pensioen- en Levensverzekeringen NV, with Achmea retaining the financial and actuarial risks, and Aegon Levensverzekering N.V.

For the accrued rights of the former defined benefit pension schemes of a number of (former) employees in the Netherlands that are insured with Achmea Pensioen- en Levensverzekeringen N.V. and Stichting Bedrijfstakpensioenfonds Zorgverzekeraars, an indexation of pension rights applies that is administered by Stichting Pensioenfonds Achmea on the basis of the administration agreement, which risk will be borne by Achmea from 2025 onwards.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

MOVEMENT TABLE PENSIONS 2024

(€ MILLION)

	DEFINED BENEFIT OBLIGATION	FAIR VALUE OF INVESTMENTS BACKING DEFINED BENEFIT OBLIGATION	NET PENSIONS
Balance at 1 January	848		848
Net interest expense on net defined benefit liability	26		26
Remeasurement of net defined benefit liability			
Actuarial gains and losses arising from changes in financial assumptions	-28		-28
Experience gains and losses	21		21
Benefits paid by the plan			
Benefits paid	-36		-36
Balance at 31 December	**831**		**831**

MOVEMENT TABLE PENSIONS 2023

(€ MILLION)

	DEFINED BENEFIT OBLIGATION	FAIR VALUE OF INVESTMENTS BACKING DEFINED BENEFIT OBLIGATION	NET PENSIONS
Balance at 1 january	780		780
Net interest expense on net defined benefit liability	29		29
Remeasurement of net defined benefit liability			
Actuarial gains and losses arising from changes in financial assumptions	60		60
Experience gains and losses	13		13
Benefits paid by the plan			
Benefits paid	-34		-34
Balance at 31 December	**848**		**848**

SIGNIFICANT ACTUARIAL ASSUMPTIONS AT BALANCE SHEET DATE (EXPRESSED AS WEIGHTED AVERAGE ASSUMPTIONS)

	2024		2023	
	NETHERLANDS	OTHER COUNTRIES	NETHERLANDS	OTHER COUNTRIES
Discount rate	3.40	1.50	3.20	2.44
Future salary increases[1]		1.46		2.73
Future pension increases for current benefits	1.00		0.99	
Staff turnover ratio[1]		0.48		4.59

[1] In the Netherlands, there are no longer any active members with DB schemes. For this reason, these actuarial assumptions are no longer presented.

The weighted average duration of the Defined benefit liability is 13 years (2023: 14 years). The term of the expected undiscounted cash flows relating to the defined benefit liability is less than 10 years for an amount of € 422 million (31 December 2023: € 404 million).

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

OTHER PROVISIONS

(€ MILLION)

2024	RESTRUCTURING	LEGAL CLAIMS	EMPLOYEE BENEFITS (EXCLUDING PENSIONS)	OTHER	TOTAL
Balance at 1 January	12	4	46	28	90
Additions	29	11	17	22	79
Usage	-13	-1	-10	-2	-26
Released	-2		-3	-2	-7
Foreign currency differences					
Balance at 31 December	**26**	**14**	**50**	**46**	**136**
Current	13	12	14	5	44
Non-current	13	2	36	41	92
Balance at 31 December	**26**	**14**	**50**	**46**	**136**

(€ MILLION)

2023	RESTRUCTURING	LEGAL CLAIMS	EMPLOYEE BENEFITS (EXCLUDING PENSIONS)	OTHER	TOTAL
Balance at 1 January	12	8	44	32	96
Additions	18		13		31
Usage	-15	-2	-7	-3	-27
Released	-3	-2	-3	-1	-9
Foreign currency differences			-1		-1
Balance at 31 December	**12**	**4**	**46**	**28**	**90**
Current	8	1	12	9	30
Non-current	4	3	34	19	60
Balance at 31 December	**12**	**4**	**46**	**28**	**90**

Restructuring

In the context of restructuring programmes announced earlier, a provision was accounted for an amount of € 26 million as of 31 December 2024 (31 December 2023: € 12 million). The most important assumptions used in determining this restructuring provision relate to the average salary, the reassignment period and the probability of a reassignment to another position within Achmea or elsewhere.

Juridische claims

Legal claims include provisions relating to legal claims and potential compensation relating to Achmea's insurance and non-insurance activities. Due to the nature of these provisions, the expected term is uncertain, but most claims are expected to have a term longer than 12 months after balance sheet date. The value of legal claims is determined based on management judgement, external professional assessment and experience. In the Income Statement, the costs related to this provision are presented as the amount net of estimated refunds. The total amount charged to legal claims in 2024 has a minor impact on net income.

Employee benefits (excluding pensions)

Provisions for employee benefits relate to employee benefits including provisions for long-service awards. These provisions differ in expected settlement date. The value of provisions for employee benefits is determined based on management judgement, external professional assessment and experience.

Other

Other provisions consist of liabilities related to operating activities and miscellaneous other liabilities. These liabilities differ in expected settlement date.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

KEY ASSUMPTIONS AND ESTIMATES OF OTHER PROVISIONS

Pensions

The determination of the provision for the defined benefit liability scheme is based on actuarial models and calculations based on the projected unit credit method. Inherent in these actuarial models are assumptions for discount rates, rates of increase for future salary and benefit levels, mortality rates, expected increases in healthcare costs and the consumer price index. The assumptions are based on available market data and are updated annually. The discount rate for the defined benefit liability is determined using market yields on corporate bonds with a high credit rating (AA rating or better). Achmea uses the Towers Watson Rate: Link curve. Assumptions regarding future mortality rates are determined based on actuarial advice in line with published statistics and experience in each country. To determine the defined benefit liability, the prognosis table 'AG2024, including fund-specific experience mortality' is applied in the Netherlands. Actuarial assumptions may differ from actual results due to changed market conditions, economic trends, mortality rates and other assumptions. Any changes in assumptions may affect the valuation of defined benefit liability plans.

Other provisions

Determining provisions is an inherently uncertain process that involves estimates regarding amounts and timing of cash flows.

ACCOUNTING POLICY FOR OTHER PROVISIONS

Pensions

Contributions payable under defined benefit liability schemes are recognised as expenses in the statement of profit and loss as they are incurred. The net liability with regard to defined benefit liability schemes is calculated separately for each scheme using the projected unit credit method. Under this method, future benefits attributable to employment in the current and prior periods are estimated. The percentages used for wage developments, discounting and other adjustments reflect the specific circumstances of each country. The liability is discounted to determine the present value. The fair value of the plan pension investments is then deducted to calculate the Net defined benefit liability/assets.

The accrual costs for the current service year and net interest on the Net defined benefit liability/assets, based on assumptions at the beginning of the reporting period, are recognised in the statement of profit and loss. The revaluations of the Net defined benefit liability are included in the consolidated statement of comprehensive income.

Achmea recognises service costs for past employment as an expense, at the first moment of:

- a change to the pension scheme or a curtailment thereof; and
- when it recognises related service charges or severance payments.

Achmea recognises a gain or loss that occurs on the settlement of a defined benefit liability plan at the time of settlement. The present value of defined benefit liability on the balance sheet date is recognised up to the amount of the economic benefit available to Achmea in the form of a refund from the plan or future contribution reductions. Where Achmea is not unconditionally entitled to the excess within the pension scheme, the excess is not included as a receivable in the Statement of financial position.

Other provisions

Other provisions are recognised when a legal or constructive obligation exists that arises from a past event, and it is probable that an outflow of economic benefits will be required to settle the obligation and can be reliably estimated. If the provision is to be used over a period longer than one year, the expected cash flows are discounted.

A restructuring provision is recognised when management has approved a detailed and formal restructuring plan and the restructuring has either commenced before the reporting date or the main features of the plan have been announced to the parties involved. No provision is made for costs relating to Achmea's ongoing operations. Achmea's net liability in respect of long-term employee benefits, other than a pension plan, represents the amount for future benefits earned by employees by virtue of their service in the current and prior periods. The liability is calculated using the projected unit credit method and is discounted. The fair value of assets held in respect of this liability is deducted.

21. ASSETS AND LIABILITIES HELD FOR SALE AND DIVESTMENTS

Assets held for sale

Achmea has an investment property portfolio of which nil as at 31 December 2024 (2023: € 46 million) meets the criteria for 'Held for sale'. A decrease of €38 million is explained by the sale of the premises in The Hague by Achmea Interne Diensten. A decrease of €8 million is explained by the sale of the Onlia Insurance joint venture.

ACCOUNTING POLICY FOR ASSETS AND LIABILITIES HELD FOR SALE

Assets or components of assets and related liabilities are classified as 'Held for sale' if it is highly probable that the carrying amount will be realised primarily through sale rather than through continued use.

The sale of an asset or a related set of assets is highly probable if:

- Achmea is committed to a plan to sell these assets and has initiated activities to find a buyer;
- There is a sales effort to dispose of the assets at a price reasonably related to the current fair value;
- The sale is expected to take place within one year from the date of the 'Held for sale'classification

Assets and liabilities classified as 'Held for sale' are measured at the lower of carrying amount or fair value less costs to sell and are presented separately in the Statement of financial position.

If a loss occurs when the assets and liabilities are classified as 'Held for sale', this loss will be recognized in the statement of profit and loss under Other expenses.

22. INCOME FROM SERVICE CONTRACTS & OTHER INCOME

The other income relates in particular to fees for property development, asset management and fees for pension administration for affiliated pension funds. This revenue is largely earned during the contract period (continuous service) and mainly in the Netherlands.

INCOME FROM SERVICE CONTRACTS & OTHER INCOME (€ MILLION)

	2024	2023
Fee income from trust and other fiduciary activities	344	324
Revenue from service contracts	187	186
Revenue from subleasing a right of use	3	3
Total income from service contracts	**534**	**513**
Other income	18	44
Total	**552**	**557**

ACCOUNTING POLICIES INCOME FROM SERVICE CONTRACTS & OTHER INCOME

There are two categories of other income to be distinguished. First, revenue from a one-off performance that is accounted for in the period in which the performance is delivered. Secondly, revenues from continuous service over a period. If the result of such transaction can be estimated reliably, the proceeds relating to that transaction are accounted for in proportion to the performance performed. The result of a transaction can be estimated reliably when the size of the returns can be measured reliably, the economic benefits are likely to flow to Achmea, the degree of completion of the transaction at the end of the fiscal year can be reliably measured and the transaction costs and transaction completion costs can be measured reliably. If the result of a transaction involving continuous services cannot be estimated reliably, only returns are accounted for the amount of costs recovered ("zero profit method"). Revenues are valued at the fair value of the consideration received or on which entitlement is obtained.

Revenue is accounted for on the basis of progress, with progress being dependent on the nature of the agreement. If an agreement mainly relates to the provision of services, revenue is accounted for to the extent that the services are delivered to a certain date as a percentage of the total services to be provided. If the service includes a certain amount of transactions within a specific period, revenue is linearly accounted for.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

23. INTEREST AND SIMILAR EXPENSES

INTEREST EXPENSES AND SIMILAR EXPENSES

(€ MILLION)

	2024	2023[1]
Interest charges:		
Funds entrusted	197	120
Debt securities issued	210	117
Derivatives held for risk management	109	83
Deposits	7	
Interest lease liabilities	2	2
Other interest expenses	-6	46
Other bank charges	1	-4
Total	**520**	**364**

1 In 2023 interest income and interest expenses of Achmea Bank were partially offset. This approach was adjusted in 2024. As a result, the comparative figures for 'Investment result from non isurance activities' and 'Interest expenses and similar charges' have been adjusted by € 39 million.

Interest expense and similar expenses amounted to € 520 million and increased by € 156 million due to higher financing expenses and higher interest paid on savings at Achmea Bank.

BASIS OF MEASUREMENT INTEREST AND SIMILAR EXPENSES

Interest and similar expenses consist mainly of interest paid by Achmea Bank N.V. to customers, as well as interest on subordinated loans issued by Achmea B.V. Interest expenses are determined in the income statement using the effective interest method.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

24. OPERATING EXPENSES

OPERATING EXPENSES

(€ MILLION)

	2024	2023
Salaries	1,068	992
Social security charges	110	95
Pensions	208	192
Other	141	145
External staff costs	269	262
Total staff cost	**1,796**	**1,686**
Marketing and advertising expenses	106	93
Housing expenses	5	5
Office expenses	48	48
IT-expenses	260	248
Consultancy expenses	109	83
Other expenses	155	161
General expenses	**683**	**638**
Deprecation Property Own Use and equipment	46	51
Depreciation	**46**	**51**
Sales and acquisition costs	208	179
Total	2,733	2,554
Less: allocated Claims handling expenses	-1,868	-1,764
Total	**865**	**790**

Operating expenses that meet the definition of claims handling expenses and investment expenses respectively are presented as part of Net expense from insurance contracts and Investment income respectively. For further information on Pensions see Note 20 Other provisions.

The number of internal employees mentioned below refers to employees with whom Achmea has an employment contract. An FTE is based on the locally applied definition since 2024. For comparison purposes, the previous year's figures have also been adjusted in accordance with the same definition as in 2024. For the majority of the Netherlands, a full working week of 34 hours applies.

NUMBER OF EMPLOYEES (AT THE END OF THE YEAR BASED ON FTE)

	ACHMEA NETHERLANDS	EUREKO SIGORTA	UNION POISTOVNA	INTERAMERICAN GREECE	OTHER	TOTAL 2024
Internal FTE's	12,415	666	709	1,401	127	15,318
External FTE's	1,843	96	32	55	16	2,042
Total	**14,258**	**762**	**741**	**1,456**	**143**	**17,360**

	ACHMEA NETHERLANDS	EUREKO SIGORTA	UNION POISTOVNA	INTERAMERICAN GREECE	OTHER	TOTAL 2023
Internal FTE's	12,209	690	675	1,309	126	15,009
External FTE's	1,782	89	31	75	4	1,981
Total	**13,991**	**779**	**706**	**1,384**	**130**	**16,990**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

General expenses include costs relating to the audit of the financial statements of Achmea B.V. and its subsidiaries. The following table shows the costs relating to the audit.

Ernst & Young Accountants LLP has been appointed as Achmea's independent external auditor with effect from 2021. The amounts included, under 'Audit of financial statements' in the table are based on the costs related to the audit of the financial statements of the relevant financial year, regardless of whether the services of the independent external auditor and audit firm have already been provided in that financial year. The costs include VAT.

EXPENSES RELATED TO THE AUDIT

(€ MILLION)

	ACHMEA NETHERLANDS	OTHER COUNTRIES	TOTAL 2024	ACHMEA NETHERLANDS	OTHER COUNTRIES	TOTAL 2023
Audit financial statements	6	1	7	7	1	8
Other audit services	2		2	1		1
Total	**8**	**1**	**9**	**8**	**1**	**9**

The other audit activities carried out by the independent external auditor are 1) the legal tasks: this is the audit of other financial statements and the audit of supervisory reports under the Financial Supervision Act, and 2) the non-statutory tasks: the audit of specific processes in the internal control environment, audit of the recognition of commissions and subsidies; audit of external accounts under the Healthcare Insurance Act (ZvW) and the Long-Term Care Act (WLZ) for the benefit of supervisors; audit of Solvency II statements for group supervision; specifically agreed upon procedures for third parties; audit of prospectuses and comfort letters; assurance procedures in relation to data conversion; audit of a single financial statement, or an audit of a specific element, account or item of a financial statement; assurance procedures other than audits or reviews of historical financial information; assurance work in relation to the annual report; assurance procedures in relation to cost models.

Costs for accountancy firms other than Ernst & Young Accountants LLP are: other audit services nil (2023: nil), other non-audit services € 22 million (2023: € 12 million), mainly related to advisory and consultancy services.

25. OTHER EXPENSES

OTHER EXPENSES

(€ MILLION)

	2024	2023
Amortisation charges on Intangible assets	22	27
Impairments on Intangible Assets	26	6
Impairments on cash and cash equivalents, receivables and accrued income		2
Other expenses[1]	114	61
Total	**162**	**96**

1 Including € 9 million (2023: € 12 million) of hyperinflationary effects on monetary items and the restatement of income statement items. For more information on hyperinflation refer to General accounting policies.

The Impairments on Intangible assets include impairment related to Centraal Beheer PPI N.V. of approximately € 26 million. Other expenses mainly consist of changes in other provisions, the sale of joint venture Onlia Holding Inc., donations and hyperinflationary effects on monetary items and the restatement of income statement items.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

26. CORPORATE TAX

RECONCILIATION OF EFFECTIVE TAX AMOUNT

(€ MILLION)

	2024	2023
Result before tax	1,641	954
	25.8%	25.8%
Local corporation tax	423	246
Foreign corporation tax		-2
Tax effect on:		
Non-deductible expenses	15	1
Tax exempt revenues	-81	-71
Change in tax rate	-4	
Participation exemption	-11	-2
Non-deductible losses	1	4
Perpetuals	-15	-14
Other movements	8	-26
Over/(under) provided in prior years[1]	2	4
Regular (temporary) differences	**-85**	**-104**
Effective tax amount	**338**	**140**

[1] In 2023, over/(under)provided in prior years were presented under other movements, this has been adjusted in the comparative figures.

The effective tax rate is equal to the tax payable in the income statement expressed as a percentage of commercial profit before tax. This percentage generally differs from the nominal percentage (25.8% in the Netherlands). An important cause of the difference is that the commercial profit is determined based on different rules than the taxable profit in the corporate income tax return. As a result, the commercial profit may contain components that are exempt from tax according to the local profit tax or vice versa. It also happens that components are not recognized commercially in the profit and loss account, but through equity, while these components are included in the fiscal result (so-called permanent differences). Other causes through which differences may arise include tax adjustments in prior years or adjustments to the valuation of the deferred tax position due to changes in rates.

The net result in 2024 amounted to € 1,303 million (2023: € 814 million). The effective tax expense and effective tax rate in 2024 were € 338 million and 20.6% respectively (2023: € 140 million and 14.7%). The effective tax expense is lower than the nominal tax rate, mainly due to the deduction of interest payments on perpetual loans, which are recognized in equity, and the tax-exempt results from Health.

SPECIFICATION OF THE CURRENT AND THE DEFERRED INCOME TAX

(€ MILLION)

	2024	2023
Current income tax		
Current year	94	65
Under/(over) provided in prior years	2	4
Deferred income tax		
Origination and reversal of timing differences	172	37
Tax losses utilised	70	34
Total income tax expense in Income Statement	**338**	**140**

Deferred tax of € 242 million is detailed in Note 16 Deferred Tax Assets and Liabilities.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

OVERVIEW INCOME TAX ACHMEA PER SEGMENT

(€ MILLION)

	INSURANE SERVICE RESULT 2024[1]	INSURANCE SERVICE RESULT 2023[1]	RESULT BEFORE TAX 2024	RESULT BEFORE TAX 2023	INCOME TAX 2024	INCOME TAX 2023
Taxable activities per segment						
Non-Life Netherlands	223	247	433	404	108	103
Pension & Life Netherlands	126	14	993	312	251	77
Retirement Services Netherlands			2	42	5	11
International activities	31	-7	44	23	16	-13
Other activities	39	33	-149	-108	-44	-39
	419	**287**	**1,323**	**673**	**336**	**139**
Dutch non-taxable activities per segment						
Health Netherlands[2]	28	32	318	281	2	1
Intersegment eliminations						
Total activities	**447**	**319**	**1,641**	**954**	**338**	**140**
International activities						
Turkey	-2	-19	36	-1	13	3
Slovakia	-4	10	-16	15		4
Griekenland	25	9	24	24	3	-20
Other	12	-7		-15		
Total	**31**	**-7**	**44**	**23**	**16**	**-13**

1 Insurance service result according to the definition of operating result.
2 Achmea's healthcare insurance companies are exempt from corporate taxes (Article 5, paragraph 1, letter e, Corporate Tax Act 1969). Achmea meets the condition that the profits can only be used for the benefit of public health institutions.

As of 31 December 2023, the Minimum Tax Rate Act 2024 (Pillar 2) has come into effect. From 1 January 2024, similar legislation will apply in almost all countries where Achmea operates, with the exception of Suriname.

From the simplified calculation based on the applicable safe harbor test, it follows that Achmea is not liable for any additional contributions in most countries for 2024. Only in Australia and Greece does this simplified calculation not meet the required threshold. Since Achmea does not appear to pass the simplified short calculation, the full comprehensive Pillar 2 calculation will likely need to be prepared for these jurisdictions. Based on a shortened comprehensive calculation, Achmea meets the required threshold in these jurisdictions and will therefore not owe any additional contributions in 2024 in any country.

Achmea continues to closely monitor developments in this area both domestically and internationally. This enables the potential future Pillar 2 impact on results and financial position to be evaluated in a timely manner.

ACCOUNTING POLICIES FOR CORPORATE TAX

Corporate tax on the profit or loss for the year comprises current and deferred tax. Corporate tax is recognised in the Income Statement except to the extent that it relates to items recognised in Total equity, in which case these items are recognised in Total equity net of taxes. Expected tax receivables or payables are based on the taxable profit or loss for the year using tax rates enacted or substantially enacted at reporting date, and any adjustment to corporate tax receivable or payable in respect of previous years. The measurement of the current corporate tax position takes into account uncertainties regarding collectability.

27. RESULT PER SHARE

(€ MILLION)

	2024	2023
Net result	1,303	814
Net result	**1,303**	**814**

The result per share is calculated as the net result for the financial year and the weighted average number of ordinary shares excluding the ordinary shares held by Achmea. The current calculation of earnings per share no longer includes dividends on preference shares and coupon payments on equity instruments as the dividend is determined based on Achmea's valuation. Diluted earnings per share is equal to the earnings per share from continuing operations.

WEIGHTED AVERAGE NUMBER OF ORDINARY SHARES

	2024	2023
Issued ordinary shares at 1 January	375,685,702	375,685,702
Issued ordinary shares at 31 December	395,629,239	375,685,702
Weighted average number of ordinary shares	**389,253,846**	**375,685,702**

The weighted average number of ordinary shares changed in 2024 due to the payment of stock dividends.

EARNINGS PER SHARE

	2024	2023
Earnings per share for continuing operations (in euros per ordinary share)	3.14	2.17
Earnings per weighted average ordinary share (in euros per share)	3.20	2.17

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

28. HEDGE ACCOUNTING

QUANTITATIVE INFORMATION DESCRIBING THE TERMS AND CONDITIONS OF HEDGING INSTRUMENTS

Achmea applies fair value hedge accounting to the interest rate risk connected with banking. The fair value of the interest rate derivatives of the banking activities designated as hedging instruments for hedge accounting purposes as at 31 December 2024 was € -163 million (31 December 2023: € -168 million). Fair value hedge accounting means that the fair value movements of the hedging instrument and the movements in the fair value of the hedged item attributable to hedging risks are recognised in the Statement of profit and loss. The interest rate derivatives of the banking activities consist of interest rate derivatives as hedging instruments related to the Banking credit portfolio as well as interest rate derivatives as hedging instruments for financing transactions.

The fair value of derivatives designated as hedging instruments relating to the Banking credit portfolio amounted to € -119 million as at 31 December 2024 (31 December 2023: € 3 million). In accordance with hedge accounting guidelines, the hedge relationship is determined by Achmea each month. The change in fair value of the Banking credit portfolio designated as a hedged item is recognised as part of the Banking credit portfolio and subsequently amortised as a gain or loss for the remaining term of the hedging instrument. The fair value of derivatives designated as hedging instruments in relation to the financing transactions of the banking business amounted to € -44 million as at 31 December 2024 (31 December 2023: € -171 million). In accordance with hedge accounting guidelines, Achmea will establish the hedge relationship for the period that the hedging instrument runs. The change in fair value of financing transactions designated as a hedged item is recognised as part of the Financial liabilities and subsequently amortised as gain or loss for the remaining term of the hedging instrument.

The results of fair value hedge accounting for banking can be summarised as follows:

(€ MILLION)

	GAINS	LOSSES	TOTAL 2024	GAINS	LOSSES	TOTAL 2023
Fair value changes of the hedged item attributable to the hedged risk	594	-594		634	-442	192
Fair value changes of the related derivatives (including discontinuation)	601	-593	8	444	-623	-179
Fair value changes of the hedging instrument - ineffective portion	1,195	-1,187	8	1,078	-1,065	13

ACCOUNTING POLICIES FOR HEDGE ACCOUNTING

Achmea applies ‘fair value hedge accounting’ for its banking operations, liquidity management and for certain investment portfolios. When Achmea applies ‘Fair value hedge accounting’, a fair value change of the hedged position is recognised in the Statement of profit and loss associated with the hedged risk. Achmea assesses the effectiveness of the hedge relationship at each reporting date. When the hedge relationship is terminated, Achmea amortises the related fair value adjustment over the remaining term of the hedged position. When Achmea applies Cash flow hedge accounting or applies hedge accounting for a net investment in a foreign entity, the net fair value changes of the hedging instruments, for the effective part of the hedge relationship, are recognised under Hedging reserve, as part of Total equity. Fair value changes due to hedge relationship ineffectiveness are recognised in the Statement of profit and loss. Amounts recognised in Total equity are transferred to the Income Statement in the same periods in which the hedged position is recognised in the Net Result.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

29. CONTINGENCIES

Legal procedures

Achmea B.V. and the companies that are part of Achmea are involved in lawsuits and arbitration proceedings. These proceedings relate to claims instituted by and against these companies arising from ordinary business operations, including the activities carried out in the capacity as insurer, credit provider, service provider, employer, investor and tax payer. Although it is not possible to predict or determine the outcomes of pending or imminent legal proceedings, the Executive Board believes that it is unlikely that the outcomes of the actions will have a material, negative impact on the financial position of Achmea B.V.

Contingent liabilities

Achmea B.V. has issued guarantees on behalf of subsidiaries that relate to the activities of these subsidiaries, carried out in their capacity as insurer, credit provider, service provider, employer, investor and tax payer. Achmea B.V. also issued guarantees for third parties in connection with sales transactions.

CONTINGENT LIABILITIES (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Guarantees	99	107
Total	**99**	**107**

The Netherlands-based insurance companies of Achmea provided guarantees to Nederlandse Herverzekeringsmaatschappij voor Terrorismeschaden N.V. up to a maximum of € 37 million (2023: € 36 million).
Nederlandse Herverzekeringsmaatschappij voor Terrorismeschaden N.V. is a company in which the participating insurance companies pool the claims and risks related to terrorism.

Achmea B.V. has provided Vereniging Achmea and Rabobank with an indemnity for amounts imposed by the Australian regulator related to the activities of the Australian branch of Achmea Schadeverzekeringen N.V. in case the Australian regulator will impose on Vereniging Achmea and Rabobank as shareholder of the ultimate parent of Achmea Schadeverzekeringen N.V. additional obligations and responsibilities relating to these Australian activities. No material losses are expected in relation to this indemnity. Due to its nature, this indemnity cannot to be quantified.

UNRECOGNIZED CONTRACTUAL COMMITMENTS (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Commitments related to investments	3,347	2,042
Total	**3,347**	**2,042**

At year-end 2024, Achmea has contractual liabilities in connection with credit facilities provided to customers that are part of building account agreements. If the customers meet the conditions, Achmea is obliged to provide credits in the amount of € 286 million (2023: € 208 million).

Achmea provides mortgage loans for its own account and for the account and risk of its customers (pension funds). In this capacity Achmea has commitments arising from issued mortgage loan offers. If the customers accept the offers Achmea is obliged to provide mortgage loans in the amount of € 2.0 billion (2023: € 1.2 billion). This commitment is offset by a received guarantee of € 350 million (2023: € 220 million).

Contingent liabilities in respect of shares subject to a put option agreement

Under the terms of the Assignment of Put Option Agreements concluded on 30 May 2005, as changed on 21 December 2023, a number of minority shareholders of Achmea B.V. (then known as Eureko B.V.), upon exercise of their put option, have the right to sell all or part of their shares to a third party. In this way, Achmea B.V.'s contractual obligation to repurchase the shares, in case of exercise of a put option by a minority shareholder, has been taken over by the relevant third party.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

When a put option is subsequently exercised and the offered shares are transferred to this third party, a group company designated by Achmea B.V. (‘Achmea entity’) has the obligation to enter into a derivative transaction with that third party. Upon entering into this transaction, the Achmea entity pays to that third party as buyer of the shares an upfront amount that is equal to the purchase price owed by this buyer to the selling shareholder under the put option in question and that is determined in the manner stipulated in the contract. The value of the outstanding put options will be determined between buyer and seller upon exercise or transfer and cannot be accurately determined as at the balance sheet date. Based on the number of outstanding put options, the value of the upfront amount is expected to be in the range of € 75 million to € 85 million.

As a result of the derivative transaction, part of the risk associated with changes in the value of the shares is transferred to the Achmea entity from the third party.

NUMBER OF OUTSTANDING OPTIONS

	31 DECEMBER 2024	31 DECEMBER 2023
Schweizerische Mobiliar Versicherungsgesellschaft A.G.	2,769,246	2,769,246
Gothaer Allgemeine Versicherung AG	1,849,108	1,849,108
Barmenia.Gothaer Finanzholding AG	2,206,482	2,206,482
Total	**6,824,836**	**6,824,836**

Contingent assets

Conflict between the Slovak government and Achmea B.V.

In violation of an agreement to encourage investments between Slovakia and the Netherlands, the Slovak government imposed a ban on profit distribution on Slovak health insurers, including Union Zdravotná Poist’ovna A.S., a Slovak subsidiary of Achmea, in the period from 2007 until August 2011.

Achmea sought compensation for the incurred loss and statutory interest paid through an international arbitration tribunal. In December 2012 the arbitration tribunal decided in favour of Achmea. Based on this ruling, the Slovak government is required to compensate Achmea for damages incurred and the statutory interest paid. The compensation amounted to approximately € 25 million. The Slovak government has publicly stated that it will not pay the amounts awarded to Achmea and has submitted the arbitration verdict for annulment to a German court. In the first court hearing the annulment request of Slovakia was rejected. Slovakia appealed against this ruling to the Bundesgerichtshof in Karlsruhe. The Bundesgerichtshof raised some legal issues with the European Court of Justice. In March 2018 the European Court of Justice ruled that the arbitration clause in the bilateral investment treaty on which the arbitration proceedings were based was invalid. Partly based on this ruling by the European Court of Justice, the Bundesgerichtshof annulled the arbitration verdict. In 2018, Achmea filed a final legal remedy with the German Constitutional Court and submitted a claim for damages in Slovakia. In September 2024, it became clear that Achmea's constitutional complaints were rejected, exhausting Achmea's legal options in Germany, and now Achmea is focusing on the lawsuit in Slovakia. In light of the lawsuit in Slovakia, Achmea does not consider the receivable amounts as sufficiently certain to recognise them as an asset.

30. CREDIT QUALITY RATING ASSETS

The table below provides an overview of the credit quality of the financial assets based on external rating information. It also shows for which part of the financial assets no external rating is available.

EXTERNAL CREDIT RATING ASSETS

(€ MILLION)

31 DECEMBER 2024	AAA SOVEREIGN	AAA	AA	A	BBB	BELOW BBB	NO RATING	TOTAL
Financial investments								
Fixed income investments[1]	3,492	3,410	4,579	7,839	7,605	706	27,253	54,884
Derivatives		6	36	3,486	21		642	4,191
Other financial investments		80		5,364	2		11	5,457
Reinsurance contract assets			376	459	7	3	142	987
Insurance contract assets							15	15
Receivables			35	1			1,771	1,807
Cash & Cash equivalents		1,191	279	604	1	33	23	2,131

[1] Unrated fixed income investments € 6,447 million relate to mortgages issued with NHG.

EXTERNAL CREDIT RATING ASSETS

(€ MILLION)

31 DECEMBER 2023	AAA SOVEREIGN	AAA	AA	A	BBB	BELOW BBB	NO RATING	TOTAL
Financial investments								
Fixed income investments[1]	3,737	3,018	5,406	7,480	6,399	613	23,847	50,500
Derivatives		10	3,724	653	20		644	5,051
Other financial investments		63	26	5,668	2		11	5,770
Reinsurance contract assets			410	380	6		297	1,093
Insurance contract assets							5	5
Receivables			37	99	1		1,583	1,720
Cash & Cash equivalents		599	322	975		22	16	1,934

[1] Unrated fixed income investments € 4,098 million relate to mortgages issued with NHG.

The tables above include the rating of the financial instruments. Several external rating agencies are used to determine the rating of these financial instruments. If there are multiple ratings available for the same financial instrument, the second best rating is used. If an instrument does not have an external rating, the rating of the issuing party is considered to be an appropriate rating of the financial instruments. However, if the instrument is guaranteed by a third party or the issuing party itself does not have a rating, the rating of the party guarantying the financial instrument is used. In all other cases, the instruments included in the table above/below are assessed as not rated.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Credit risk analysis of credit rating financial instruments

The table below presents the value of investments valued at amortized cost segregated into credit ratings from Achmea's internal control system and the expected loss provision (ECL).

CREDIT QUALITY ANALYSIS (€ MILLION)

				31 DECEMBER 2024
	STAGE 1	STAGE 2	STAGE 3	TOTAL
Investments at amortized cost				
AAA Sovereign				
AAA	81			81
AA	133			133
A	168			168
BBB				
Under BBB	2			2
Not rated	16,852	409	112	17,373
Expected loss provision	-0	-16	-8	-24
Carrying amount	**17,236**	**393**	**104**	**17,733**

CREDIT QUALITY ANALYSIS (€ MILLION)

				31 DECEMBER 2023
	STAGE 1	STAGE 2	STAGE 3	TOTAL
Investments at amortized cost				
AAA Sovereign				
AAA	103			103
AA	237	5		242
A	204			204
BBB	4			4
Under BBB	3	1		4
Not rated	13,713	501	68	14,282
Expected loss provision	-2	-19	-7	-28
Carrying amount	**14,262**	**488**	**61**	**14,811**

Included in the Investments at amortised cost is a provision relating to credit losses (ECL). Additions to and withdrawals from provisions during 2024 were equal to € -4 million (2023: € 6 million). Achmea does not have significant financial assets that are impaired at the recognition date. Furthermore, Achmea has no significant financial assets that are in scope of the simplified approach to determine the expected credit loss provision.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

Credit risk analysis of ECL

The following tables provide insight into the movement of ECL by means of a reconciliation between the opening and closing balance of the loss provision for each category of fixed-income financial instruments. For a further explanation, please refer to the policies included in Note 6 Investments.

EXPECTED CREDIT LOSS PROVISION OF FINANCIAL ASSETS MEASURED AT AMORTIZED COST (€ MILLION)

				2024
	STAGE 1	STAGE 2	STAGE 3	TOTAL
Investments at amortized cost				
Balance at 1 January	2	19	7	28
Transfer to Stage 1		-1		-1
Transfer to Stage 2		1		1
Transfer to Stage 3			2	2
Other movements	-1	-6		-7
Management overlay	-1	3	-1	1
Balance at 31 December	**0**	**16**	**8**	**24**

EXPECTED CREDIT LOSS PROVISION OF FINANCIAL ASSETS MEASURED AT AMORTIZED COST (€ MILLION)

				2023
	STAGE 1	STAGE 2	STAGE 3	TOTAL
Investments at amortized cost				
Balance at 1 January	4	10	8	22
Transfer to Stage 1		-1		-1
Transfer to Stage 2		1	-2	-1
Transfer to Stage 3			1	1
Other movements		7	1	8
Management overlay	-2	2	-1	-1
Balance at 31 December	**2**	**19**	**7**	**28**

Credit risk of fixed income investments designated against FVPL

The following table summarises the credit risk of fixed income securities designated to be valued at FVPL.

CREDIT RISK OF FIXED INCOME INVESTMENTS AT FAIR VALUE THROUGH P&L (€ MILLION)

		31 DECEMBER 2024		31 DECEMBER 2023
	CURRENT PERIOD	CUMULATIVE	CURRENT PERIOD	CUMULATIVE
Investments valued at FVTPL: Movement in fair value as result of credit risk	8	40	-6	32

KEY ASSUMPTIONS AND ESTIMATES WHEN ASSESSING THE CREDIT QUALITY OF FINANCIAL ASSETS

For the key assumptions for determining expected credit losses (ECL), please refer to Note 6 Investments. As a result of the reclassification of the savings mortgages as investments designated at fair value with changes in fair value recognised in the statement of profit and loss to avoid an accounting mismatch, the credit risk amount for 2023 of €3 million has been adjusted.

31. TRANSFER OF FINANCIAL ASSETS AND COLLATERAL

Achmea transfers financial assets when it transfers the contractual rights to receive cash flows from the financial asset. In addition, Achmea transfers financial assets when it retains the aforementioned contractual rights, but enters into a contractual obligation to pay the received cash flows to one or more third parties. Achmea distinguishes the following transactions in the context of the transfer of rights (assets and securities):

- Transferred financial assets not (fully) derecognised in the event of securities lending. With these transactions Achmea transfers the legal ownership (but not the beneficial ownership) of assets and receives collateral in the form of cash or cash equivalents or other investments. The transferred assets are still recognised in the Statement of Financial Position;
- Transferred financial assets which are fully derecognised and over which Achmea no longer has control (regular sale);
- Providing mortgage receivables as collateral when raising loans for the banking business; and
- Receiving or providing collateral in the event of derivatives transactions. Received collateral in the form of cash or cash equivalents is recognised in the Statement of Financial Position with simultaneous recognition of a repayment obligation in the Statement of Financial Position.

Received collateral in the form of cash or cash equivalents is normally invested in designated high quality, liquid investments. Provided collateral in the form of cash or cash equivalents is no longer recognised in the Statement of Financial Position. For the right to receive the collateral back a receivable is recognised in the Statement of Financial Position. Received collateral in the form of investments is not recognised in the Statement of Financial Position, provided collateral in the form of investments are still recognised in the Statement of Financial Position.

The following notes provide further information on the transferred financial assets not or not (fully) derecognised and on collateral received or provided as security.

SECURITIES LENDING ACTIVITIES

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Carrying amount of transferred financial assets in the balance sheet	1,964	1,716
Fair value of non-cash collateral received not in the balance sheet	2,051	1,822
Net exposure	**-87**	**-106**

Achmea lends bonds and receives a fee for this (also called securities lending). The process of securities lending is facilitated by a lending agent, who receives a fee for its intermediary services between Achmea and the borrower. Securities lending involves transfer of the legal ownership to the borrower, whereas the beneficial ownership remains with Achmea. The securities lent are therefore still recognised in the Statement of Financial Position.

As security for performance of the obligation to return the borrowed securities, the borrower provides collateral in the form of other high quality liquid securities. The value of the borrowed securities and the related collateral is determined daily by means of so-called ‘margin calls’. The collateral may consist of bonds or shares. Legal ownership of this collateral is transferred to Achmea, but beneficial ownership remains with the borrower. Therefore the collateral is not recognised in the Statement of Financial Position. The value of the collateral is at least 2-7% higher (so-called haircut) than the value of the securities lent. For collateral in the form of shares Achmea requires a higher haircut, given the higher volatility of shares. If a borrower fails to return the securities lent, the lending agent will liquidate the collateral and subsequently purchase the same securities as lent by Achmea and return these to Achmea. Any losses are not for the account of Achmea. If the lending agent is unable to return the same securities, Achmea will receive the market value of the securities lent in cash. The received collateral is not freely disposable and may not serve as collateral in other transactions.

Loans part of banking credit portfolio collateralised by mortgages

To finance the loans raised for its banking activities, Achmea has issued several funding instruments, secured by collateralised mortgage receivables part of the investments of the banking business. Due to these collaterals part of the mortgage receivables is not freely disposable.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

LOANS PART OF BANKING CREDIT PORTFOLIO COLLATERALISED BY MORTGAGES

(€ MILLION)

	CARRYING AMOUNT	CARRYING AMOUNT	FAIR VALUE	FAIR VALUE
	31 DECEMBER 2024	31 DECEMBER 2023	31 DECEMBER 2024	31 DECEMBER 2023
Mortgages banking credit portfolio	17,160	14,151	17,112	13,666
Secured loans and borrowings[1]	4,600	3,341	4,606	3,339
Net position	**12,560**	**10,810**	**12,506**	**10,327**

1 The carrying amount for Secured loans and borrowings is for comparative purposes in 2023 reduced with € 7 million.

MORTGAGES HELD AS COLLATERAL

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Collateral provided for trust arrangements	81	85
Collateral provided for covered bonds	10,361	5,510
Collateral provided for securitisation		1,365
	10,442	**6,960**

Collaterals provided for trust arrangements

Achmea Bank N.V. periodically pledges mortgage receivables to a Trustee as security for designated liabilities. In the event of default by Achmea Bank N.V., investors can recover the debt from the mortgage receivables given as collateral.

Collaterals provided for covered bonds

Achmea Bank N.V. has two covered bonds programmes under which it can issue covered bonds: the Soft Bullet Covered Bond (SBCB) Programme and the Retained Soft Bullet Covered Bond Programme (RSBCB). The payment of the principal of interest on the bonds issued is guaranteed by a bankruptcy remote 'Special Purpose Vehicle' (SPV). The guarantee provided by this entity is supported by mortgage receivables, given as collateral by Achmea Bank N.V. to this entity. The outstanding amount of these transferred mortgage receivables will at all times be at least 5% higher than the bonds issued under the programme. In the event of default by Achmea Bank N.V., an investor has recourse on the SPV and the underlying mortgage portfolio. Under the RSBCB Programme, Achmea Bank N.V. holds the issued bonds on its own book.

Collaterals provided for securitisation

Achmea Bank N.V. used securitisation as a funding source until 2024. In all these securitisation transactions, Achmea Bank N.V. assigns a portfolio of mortgage receivables to a SPV which issues notes on the capital markets. with the received interest on the mortgage receivables the SPV can pay the interest on the notes. The maximum loss for Achmea on the transferred assets and liabilities is nil as at 31 December 2024 (31 December 2023: € 1,317 million) and has been determined based on the notes of the SPV's which are held by Achmea and the Deferred Purchase Price (excess margin).

Collateral investments in the context of derivative transactions

RECEIVED OR DEPOSITED COLLATERAL INVESTMENTS IN THE CONTEXT OF DERIVATIVE TRANSACTIONS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Net position of assets and liabilities derivatives	1,784	1,579
Covered by securities in collateral	-490	60
Liquid funds received in collateral	1,829	1,169
Net position	**445**	**350**

In the event of collateral these arrangements are recorded in so-called ISDA Credit Support Annex agreements. These also stipulate the conditions – the so-called 'default events' – under which the party may use the cash collateral to reduce possible losses. Transfer of collateral in the form of securities takes place by 'transfer of title', meaning the legal ownership is transferred to the recipient of the collateral. The economic benefits, such as interest income, do not transfer to the receiver of the collateral. In most cases the received collateral consists of liquid investments, mostly liquid assets such as government bonds and cash or cash equivalents.

Bilateral agreements were reached with the various counterparties on collateral to be received or deposited. The net position of the derivatives is taken as the starting point when determining the collateral to be received from or deposited with the relevant counterparty. The difference between the derivatives and the collateral (the net position) is in line with the contractual agreements on the initial margin and obligations to deposit additional collateral.

In most cases there is a central clearing of derivative positions, whereby an initial margin is always paid by Achmea. The initial margin is supplemented by a variation margin to be deposited or received that depends on the combined position of assets and liabilities derivatives with the relevant clearing partner. The total value of the collateral held at year-end 2024 also includes collateral deposited for cleared derivatives positions, the initial margin, of € 437 million (31 December 2023: € 527 million). For all derivatives where there is central clearing, the net position of assets and liabilities related to derivatives per individual counterparty is fully covered by collateral.

Master netting agreements

The table below provides an overview of assets and liabilities subject to offsetting, enforceable Master Netting Agreements and similar agreements.

FINANCIAL ASSETS AND LIABILITIES SUBJECT TO OFFSETTING, ENFORCABLE MASTER NETTING ARRANGEMENTS AND SIMILAR AGREEMENTS

(€ MILLION)

31 DECEMBER 2024	GROSS AMOUNTS OF RECOGNIZED FINANCIAL ASSETS	GROSS AMOUNTS OF RECOGNIZED FINANCIAL LIABILITIES	NET AMOUNTS OF FINANCIAL ASSETS/ LIABILITIES PRESENTED IN THE STATEMENT OF FINANCIAL POSITION[1]	BALANCE OF THE FINANCIAL ASSETS/LIABILITIES PRESENTED IN THE STATEMENT OF FINANCIAL POSITION	FINANCIAL INSTRUMENTS RECEIVED	CASH COLLATERAL RECEIVED (EXCLUDING SURPLUS COLLATERAL)	NET AMOUNT
Derivatives assets	4,004		4,004				
Derivatives liabilities		2,407	2,407				
				1,597	-490	1,829	258
Cash and cash equivalents	3,428	2,851	577	577			577
31 DECEMBER 2023							
Derivatives assets	4,898		4,898				
Derivatives liabilities		3,472	3,472				
				1,426	60	1,169	197
Cash and cash equivalents	8,836	7,572	1,264	1,264			1,264

1 The net amounts for the derivatives do not equal the provisions for both assets and liabilities. At 31 December 2024, the difference for assets is € 187 million (2023: € 153 million) due to equity derivatives without a netting agreement.

32. INTERESTS IN SUBSIDIARIES

The following overview shows Achmea's main subsidiaries as at 31 December 2024. Unless otherwise indicated, these are the subsidiaries that are directly or indirectly wholly owned and involved in insurance or reinsurance activities, banking activities, asset management or services related to these activities. The included Dutch subsidiaries fall into the medium or large business class. The overview includes the parent companies, and if there is no parent company, then all companies are included. Achmea's voting rights in these subsidiaries are in line with share ownership. The country of incorporation or establishment is also mainly where business activities take place. The overview classifies Achmea B.V.'s subsidiaries geographically.

	CORPORATE SEAT	% OF OWNERSHIP HELD BY THE GROUP
NETHERLANDS		
Achmea Bank N.V.	The Hague	100%
Achmea Interne Diensten N.V.	Zeist	100%
Achmea Investment Management B.V.	Zeist	100%
Achmea Mortgage Funds B.V.	Amsterdam	100%
Achmea Pensioen- en Levensverzekeringen N.V.	Apeldoorn	100%
Achmea Pensioenservices N.V.	Zeist	100%
Achmea Reinsurance Company N.V.	Tilburg	100%
Achmea Schadeverzekeringen N.V.	Apeldoorn	100%
Achmea Services N.V.	Zeist	100%
Achmea Zilveren Kruis Zorgverzekeringen N.V.	Utrecht	100%
Centraal Beheer PPI N.V.	Amsterdam	100%
InShared Holding B.V.	Hoevelaken	100%
N.V. Hagelunie	Den Haag	100%
Achmea Real Estate B.V.	Amsterdam	100%
Zilveren Kruis Health Services N.V.	Leiden	100%
GREECE		
Interamerican Hellenic Insurance Company S.A.	Athens	99.89%
TURKEY		
Eureko Sigorta A.S.	Istanbul	100%
SLOVAKIA		
Union Poist'ovna A.S.	Bratislava	100%
Union Zdravotná Poist'ovna A.S.	Bratislava	100%

The activities in Australia are set up as a branche office of Achmea Schadeverzekeringen N.V.

The full list of participating interests as referred to in Sections 2:379 and 2:414 of the Netherlands Civil Code has been filed with the Trade Register of the Chamber of Commerce.

Consolidated structured entities
Achmea Bank N.V. uses securitizations as a source of financing. In all these securitization transactions, Achmea Bank N.V. allocates a portfolio of mortgage receivables to a Special Purpose Vehicle (SPV) that issues Notes in the capital markets. With the proceeds from the bonds, the SPV can finance the allocated mortgage receivables, and with the interest received on the mortgage receivables, the SPV can pay the interest on the bonds. Achmea Bank has repaid all the notes of the SPVs as of year-end 2024, and the legal entities are being liquidated.

Important restrictions relating to subsidiaries
A number of Achmea's subsidiaries, mainly insurance companies, are subject to restrictions on the cash they may distribute in the form of cash dividends or otherwise to their parent companies. For more information on these subsidiaries, please refer to Note 19 Equity.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

33. RELATED PARTY TRANSACTIONS

Nature of related-party transactions
Parties are considered to be related if one party has the ability to control or exercise significant influence over the other party (e.g. a subsidiary) in making financial or operating decisions. In the normal course of business, Achmea has various types of relationships (particularly in the areas of insurance, banking and asset management) with related companies and parties with whom regular transactions are entered into.

Achmea also considers its defined benefit pension plan (Stichting Pensioenfonds Achmea) as a related party. Members of the Executive Board, the Supervisory Board and their close family members are also considered related parties to Achmea.

In addition, related party transactions include transactions with related parties, associates, joint ventures, key management personnel and close relatives of related parties. Transactions with those parties are not considered material to Achmea, either individually or for the group as a whole. An overview of Achmea’s main subsidiaries is included in Note 32 Interests in subsidiaries.

Achmea can enter into economic transactions with entities controlled by the Executive and Supervisory Boards or their immediate families. There were no such transactions or related parties in 2024 and 2023.

Remuneration of the members of the Executive Board
The members of the Executive Board are the (former) directors of Achmea B.V. who hold key positions at Group level.

The remuneration of the Executive Board is in line with the responsibility of their positions. The different positions are weighted, taking into account aspects such as size and nature of the responsibilities, complexity of the managerial context in which one acts and the required knowledge, experience and competences.

Annual Salary
The salary of the Executive Board is the gross fixed all-inclusive annual salary including holiday allowance and end-of-year bonus. Where applicable, the fixed annual salary also includes the benefit of private use of a lease car.

On 1 January 2024, the Executive Board's salary was increased by 3% (as of 1 January 2023: 1%).

Variable Remuneration
Apart from the fixed salary, variable remuneration is also part of the Executive Board's regular remuneration package. The percentage of variable remuneration is a maximum of 20% of the fixed annual salary. The Supervisory Board, on the advice of the Remuneration Committee, decides on the allocation of variable remuneration to the Executive Board for the performance year. If variable remuneration is awarded, half of it is deferred for five years.

Pension
Since 1 January 2015, the Executive Board has been subject to the (CAO) pension scheme applicable to other employees. This is a CDC-funded pension scheme with career average earnings and a maximum contribution of 40% of the pension base (based on the amended collective labour agreement 2023-2025), including the following features as of 1 January 2024:
- Maximum pensionable salary €137,800.
- Accrual 1.875% per year, provided the contribution is sufficient.
- Franchise € 17,545.
- Pension age: first day of the month on which age 68 is reached.
- Survivor's pension.
- Non-contributory continuation of pension accrual in case of partial or full occupational disability.
- Conditional indexation.
- Own contribution standard 3.25% of pensionable earnings.

The rights accrued up to 31 December 2014 by one member of the Executive Board are insured with Achmea Pensioen- en Levensverzekeringen N.V. The indexation over the pension accrued with Achmea Pensioen- en Levensverzekeringen N.V. by the respective member of the Executive Board is determined and financed by Stichting Pensioenfonds Achmea.

Pension above the (tax) pension limit
Since 1 January 2015, a limit applies to the income over which pension accrual can take place with tax support. In 2024, this limit is € 137,800.

For employees with an income above this (fiscal) pension limit, agreements were made as of 1 January 2015 (in the collective labour agreement) on a different pension accrual. These agreements also apply to the Executive Board. Achmea annually determines the total budget for compensation for this group. That budget is a percentage of the pensionable salary above the fiscal pension limit. The percentage is equal to the percentage employer's share of the pension premium intended for pension accrual below the fiscal pension limit.

The employer's contribution includes the two components listed below:

1. An age-dependent contribution by the employer that the employee can spend after taxation to participate in a net pension insurance for pension accrual above the fiscal pension limit (= gross 'contribution to net pension' in the overview above). The age-dependent contribution is calculated on the basis of the (maximum) fiscal graduated scale set by the Ministry of Finance;
2. A so-called gross 'salary supplement pension'. From any remaining employer's portion of the pension contribution, an equal percentage supplement is calculated for everyone with a pensionable income above €137,800. This supplement will be 8% of pensionable income above the fiscal limit in 2024. It will be calculated in January by Willis Towers Watson.

Remuneration of the Executive Board members

OVERVIEW OF REMUNERATION OF THE EXECUTIVE BOARD CHARGED TO THE FINANCIAL YEAR (€ MILLION)

	2024	2023
Short-term staff remuneration	6.01	5.80
Pension charges	1.84	1.80
Other long-term remuneration	0.41	0.18
Total	**8.26**	**7.78**

The total remuneration for the Executive Board charged to the 2024 financial year is € 8.26 million (2023: € 7.78 million). This total charge relates to the performance year or financial year 2024, excluding any variable remuneration in respect of 2024.
Decision-making on the actual allocation of variable remuneration for performance year 2024 will take place after the adoption of the 2024 financial statements and will be reported in the 2024 Remuneration Report to be published later in 2025.
For the performance year 2023, variable remuneration was granted to the Executive Board after the adoption of the 2023 financial statements.

The annual charge 2024 includes €0.81 million as charge for variable remuneration for performance year 2023. The annual charge 2023 includes € 0.36 million as charge for variable remuneration in respect of performance year 2022. The deferred variable remuneration (50%) for both performance years is included as part of 'Other long-term remuneration'.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

OVERVIEW OF REGULAR REMUNERATION OF EXECUTIVE BOARD MEMBERS FOR CURRENT PERFORMANCE YEAR

(€ MILLION)

Active Executive Board members as of 31 December 2024	ANNUAL SALARY (SHORT-TERM PERSONNEL REMUNERATION)[1]	VARIABLE REMUNERATION AWARDED (OTHER SHORT-TERM STAFF REMUNERATION)[1]	VARIABLE REMUNERATION AWARDED (OTHER LONG-TERM REMUNERATION)[1]	PENSION (LIMIT € 137,800)[2]	CONTRIBUTION TO NET PENSION (ABOVE € 137,800)[2]	WAGE SUPPLEMENT (ABOVE € 137,800)[2]	TOTAL
B.E.M. (Bianca) Tetteroo, Chair	1.24	t.b.d.	t.b.d.	0.04	0.23	0.13	**1.64**
M.A.N. (Michel) Lamie, Vice Chair/CFO	1.06	t.b.d.	t.b.d.	0.05	0.23	0.07	**1.41**
M.G. (Michiel) Delfos, CRO	0.91	t.b.d.	t.b.d.	0.04	0.16	0.06	**1.17**
D.C. (Daphne) de Kluis	0.93	t.b.d.	t.b.d.	0.04	0.16	0.06	**1.19**
R. (Robert) Otto	0.97	t.b.d.	t.b.d.	0.05	0.20	0.07	**1.29**
L.T. (Lidwien) Suur	0.90	t.b.d.	t.b.d.	0.04	0.14	0.06	**1.14**
Total 2024	**6.01**	**0**	**0**	**0.26**	**1.12**	**0.45**	**7.84**
Total 2023	5.60	0.43[3]	0.41[3]	0.21	1.05	0.43	8.13

1 Excluding employers' share in social security contributions.
2 The post-employment benefits have as elements: the expense for the accrual over the maximum pensionable salary of € 137,800. In the column 'Wage supplement (over € 128,810)', compensation is also included in an individual case in connection with the lapsing of benefits from the old management arrangement.
3 € 1.83 million was recognised as a liability at the balance sheet date in respect of deferred variable remuneration awarded (conditionally) in previous years to current and former board members.

Termination benefits
Both in 2024 and 2023, no termination benefits were awarded related to termination of an employment contract.

Claw back
In 2024, there were no adjustments or claw back of remuneration from former years with regard to members of the Executive Board, and nor were there any in 2023.

Loans
Executive Board members have no loans outstanding with Achmea Bank N.V. as at balance sheet date 2024 (31 December 2023: the same, no outstanding loans).

Remuneration of the Supervisory Board members
The following table shows the remuneration of the Supervisory Board members of Achmea B.V. for 2024.

The remuneration structure of the Supervisory Board did not change in 2024. The remuneration of the Supervisory Board is determined in accordance with Achmea's remuneration policy for a member of the Supervisory Board.

OVERVIEW OF ANNUAL REMUNERATION OF THE SUPERVISORY BOARD MEMBERS[1]

(€ MILLION)

Supervisory Board as of 31 December 2024:	
J. (Jan) van den Berg, Chair	0.20
W.H. (Wim) de Weijer, Vice-chair	0.15
T.R. (Tjahny) Bercx	0.09
A. (Antonio) Cano[2]	0.03
M.R. (Miriam) van Dongen	0.17
P.H.M. (Petri) Hofsté	0.16
A.M. (Lex) Kloosterman	0.12
E.C. (Nienke) Meijer	0.08
R.Th. (Roel) Wijmenga	0.15
Total 2024	**1.15**
Total 2023	1.04

1 Excluding expense allowances, including fees for commissions and supervisory board memberships at group companies.
2 Antonio Cano was appointed with effect from 5 September 2024

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

The composition of the Supervisory Board of Achmea B.V. was changed in 2024 and expanded from eight to nine members. Mr Cano was appointed as a member of the Supervisory Board with effect from 5 September 2024.

Loans

Members of the Supervisory Board have no loans outstanding with Achmea Bank N.V. as at balance sheet date 2024 (31 December 2023: no loans).

Directors' liability

Achmea has taken out directors' liability insurance for Management Board and Supervisory Board members of Achmea B.V. and its subsidiaries. Under certain conditions, some board members are also indemnified against financial loss based on third-party claims, insofar as this loss exceeds the insured cover.

Rabobank

Achmea uses various regular banking services of Rabobank Group for its operations. All services and transactions with Rabobank are regular transactions and based on regular market rates.

Distribution channel

Local Rabobank branches are an important distribution channel for Achmea's Dutch insurance products. For the distribution of insurance products, Achmea paid € 274 million in commission to local Rabobanks over 2024 (2023: € 255 million).

Insurance services provided to Rabobank

Rabobank has insured several risks with Achmea, including a collective Health Insurance contract with Zilveren Kruis. The premiums relating to this insurance cover for 2024 total € 75 million (2023: € 71 million).

Provisions and liabilities as at 31 December 2024 with Rabobank Group

The balance sheet position for Rabobank Group includes commodity fund-related shares, savings accounts for the account and risk of policyholders, bank accounts (all Note 7) and a credit facility accounted for under Loans and funds drawn down (Note 8).

Vereniging Achmea

Vereniging Achmea is the association of Achmea customers and aims to protect the continuity of Achmea. Vereniging Achmea uses Achmea personnel and office space. These are charged at cost price. At the end of 2024, Achmea has a claim on Vereniging Achmea for this of € 0.3 million (2023: €0.2 million). Vereniging Achmea provided two time deposits to Achmea B.V., a deposit of € 40 million with an interest rate of 2.75% with an effective date of 28 November 2024 and a deposit of € 15.9 million with an interest rate of 2.99% with an effective date of 30 December 2024 (2023 € 54 million). Other transactions with Vereniging Achmea relate to its relationship with Achmea as a shareholder and are explained in Note 19 Shareholders' equity.

Stichting Pensioenfonds Achmea

Stichting Pensioenfonds Achmea (SPA) administers the pension scheme for employees to whom the Achmea CLA applies and for employees with whom participation in SPA's pension scheme has been agreed by employment contract. For the majority of Dutch employees, the pension scheme is a collective defined contribution (CDC) scheme. In 2024, Achmea paid € 212 million (2023: € 198 million) in premiums for this CDC scheme. For more information on the pension schemes operated by Stichting Pensioenfonds Achmea, please refer to Note 20 Other provisions - Pension provision. Achmea performs administration and asset management services for Stichting Pensioenfonds Achmea. Fees of € 12.2 million (2023: € 11.5 million) were received for these services in 2024.

Stichting Achmea Algemeen Pensioenfonds
Achmea B.V. has provided deposits to Stichting Achmea Algemeen Pensioenfonds.

These are two time deposits with a maturity date of 12-07-2026 and 22-12-2026, and with an interest rate of 2.06%. At the end of 2024, the total amount of deposits amounts to € 1.5 million (31 December 2023: € 1.5 million).

In addition, in 2024 Achmea B.V. made donations to Stichting Achmea Algemeen Pensioenfonds to strengthen its resilience totalling € 3.5 million (2023: € 2.3 million).

Achmea performs administration and asset management services for Stichting Achmea Algemeen Pensioenfonds. For these services, fees of € 23.5 million (2023: € 18.2 million) were received in 2024.

Stichting Achmea Foundation
Achmea has committed to transfer 0.5% of its net result to the Achmea Foundation annually for an indefinite period. In 2024, after determining the 2023 result, the contribution from the previous financial year €4.1 million (2023: €0.5 million) was determined and remitted. Achmea Foundation uses these funds to finance its projects worldwide for the sustainable improvement of economic and/or social living conditions of groups of needy people in society. The Achmea Foundation uses Achmea personnel and office space. These are charged at cost price.

On 4 December 2024 to 6 January 2025, Stichting Achmea Foundation granted a deposit to Achmea B.V. of € 1.7 million at an interest rate of 3.0%.

34. SUBSEQUENT EVENTS

On 28 January 2025, Achmea B.V. issued €300 million of perpetual Restricted Tier 1 Securities. These Securities contain a first early redemption option after 10 years, on 28 January 2035, in accordance with the applicable redemption conditions. The Securities are priced with a coupon of 6.125% until the first reset date on 28 July 2035. On the balance sheet, they are presented under other equity instruments within total equity.

With reference to Note 10 Financial liabilities, the remaining nominal debt of the subordinated Tier 2 perpetual loan of €393 million was repaid early on 4 February 2025.

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

AUTHORISATION OF THE CONDENSED CONSOLIDATED FINANCIAL STATEMENTS

Zeist, 12 March 2025

Executive Board

B.E.M. (Bianca) Tetteroo, Chairman

M.A.N. (Michel) Lamie, Vice-Chairman and CFO

M. (Michiel) Delfos

D.C. (Daphne) de Kluis

R. (Robert) Otto

L.T. (Lidwien) Suur

Board of Commissioners

J. (Jan) van den Berg, Chairman

W.H. (Wim) de Weijer, Vice-Chairman

T.R. (Tjahny) Bercx

A (Antonio) Cano

M.R. (Miriam) van Dongen

P.H.M. (Petri) Hofsté

A.M. (Lex) Kloosterman

E.C. (Nienke) Meijer

R.Th. (Roel) Wijmenga

TABLE OF CONTENTS

COMPANY FINANCIAL STATEMENTS

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

BALANCE SHEET

(BEFORE APPROPRIATION OF RESULT)

(€ MILLION)

	NOTES	31 DECEMBER 2024	31 DECEMBER 2023
Assets			
Intangible assets	2	658	662
Financial fixed assets	3	12,172	10,828
Deferred tax assets	4	124	192
Receivables	5	9	5
Cash and cash equivalents	6	39	4
Total assets		**13,002**	**11,691**
Shareholders' equity	**7**		
Share capital		411	411
Share premium		10,590	10,590
Own shares		-182	-420
Legal reserves		101	88
Revaluation reserves		651	518
Net foreign exchange difference		-518	-525
Cash flow hedges		-7	-7
Other reserves		-3,436	-3,741
Result for the year		1,303	814
Other Equity instruments		500	1,250
Equity attributable to holders of equity instruments of the company		**9,413**	**8,978**
Liabilities			
Other provisions	8	95	99
Long-term liabilities	9	2,034	1,792
Short-term liabilities	10	1,460	822
Total liabilities		**3,589**	**2,713**
Total equity and liabilities		**13,002**	**11,691**

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

PROFIT AND LOSS

(€ MILLION)

	NOTES	2024	2023
Other operating income	13	42	23
Income from associates and joint ventures		18	3
Total income		**60**	**26**
Interest expenses and similar expenses	14	115	74
Other expenses	15	153	81
Total expenses		**268**	**155**
Result before tax		**-208**	**-129**
Income tax	16	-71	-51
Results of subsidiaries and associates		1,440	892
Net result		**1,303**	**814**

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

1. ACCOUNTING POLICIES

General

For the cash flow statement of Achmea B.V., the exemption under section 360.106 of the Guidelines of the Dutch Accounting Standards Board (RJ) has been used.

The legally required list of participations pursuant to Sections 2:379 and 2:414 of the Netherlands Civil Code has been filed with the Trade Register of the Chamber of Commerce.

Principles for the valuation of assets and liabilities and determination of results

Achmea makes use of the option in section 2:362(8) of the Dutch Civil Code. This means that the principles for the valuation of assets and liabilities and determination of the Result after tax applied in the company financial statements of Achmea B.V. are the same as those applied in the consolidated financial statements. By using this option, the Equity attributable to holders of equity instruments is the same in the consolidated financial statements and in the company financial statements. Investments in subsidiaries are measured at net asset value, with goodwill (if any) recognised under intangible assets. The company financial statements have been prepared in accordance with Part 9, Book 2 of the Dutch Civil Code and drawn up on the basis of a going concern assumption for at least the next twelve months.

For a description of the accounting policies applied, please refer to Note 1 Accounting policies and the Basis of valuation to the specific provisions in the consolidated financial statements.

Presentation of pension provision and related assets

In the separate financial statements, the fair value of the insurance contract related to the pension provision and the value of this pension provision are presented as two separate balance sheet items. The fair value of the insurance contract is presented in accordance with the reimbursement rights system for internally insured pension contracts in IAS 19. The changes in both provisions relate to interest expenses and income and actuarial gains and losses. These changes are included in the statement of profit and loss. The movements in Shareholders' Equity are zero on balance and are not shown.

2. INTANGIBLE ASSETS

(€ MILLION)

	GOODWILL	OTHER INTANGIBLE ASSETS	TOTAL 2024	TOTAL 2023
Cost				
Balance at 1 January	691		691	691
Adjustments intangible assets		14	14	
Balance at 31 December	**691**	**14**	**705**	**691**
Amortisation and impairment losses				
Balance at 1 January	29		29	29
Impairments	18		18	
Balance at 31 December	**47**		**47**	**29**
Carrying amount				
At 1 January	662		662	662
At 31 December	644	14	658	662

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

3. FINANCIAL FIXED ASSETS

FINANCIAL FIXED ASSETS

	SUBSIDIARIES	ASSOCIATED COMPANIES AND JOINT VENTURES	BONDS	DERIVATIVES	LOANS	REIMBURSEMENT RIGHTS	EQUITIES, SIMILAR INVESTMENTS AND OTHER INVESTMENTS	TOTAL 2024	TOTAL 2023
Balance at 1 January	**9,893**	**16**	**803**		**39**	**78**		**10,829**	**10,349**
Acquisitions, investments and loans granted	111		4,201		263			4,575	4,599
Sales, disposals and money withdrawn			-4,134		-300	-5		-4,439	-4,591
Annual results	7	18						25	984
Fair value changes	1,430		8					1,438	-192
Dividend received	-270	-7						-277	-358
Currency Translation Differences	19	-1						18	31
Accrued interest			2			2		4	
Unrecognised actuarial gains and losses on employee benefits						-1		-1	6
Other changes									1
Balance at 31 December	**11,190**	**26**	**880**		**2**	**74**		**12,172**	**10,829**

Bonds and Derivatives are measured at fair value. The fair value of these investments based on prices in an active market (listed) is € 880 million (31 December 2023: € 803 million). The purchase price of Bonds and Derivatives at 31 December 2024 is € 873 million (31 December 2023: € 798 million).

An amount of € 2 million is recognised under Loans and Deposits, valued at amortised cost. The fair value of these investments is € 2 million (31 December 2023: € 39 million). The value of the insurance contract with Achmea Pensioen- en Levensverzekeringen N.V. refers to the fair value of the investments (reimbursement rights) in respect of the defined benefit liability from old schemes insured with Achmea Pensioen- en Levensverzekeringen N.V. (See Note 8 Other Provisions).

4. DEFERRED TAX ASSETS

(€ MILLION)

	BALANCE AT 1 JANUARY 2024	RECOGNISED IN PROFIT AND LOSS ACCOUNT	RECOGNISED IN EQUITY	BALANCE AT 31 DECEMBER 2024	BALANCE AT 1 JANUARY 2023	RECOGNISED IN PROFIT AND LOSS ACCOUNT	RECOGNISED IN EQUITY	BALANCE AT 31 DECEMBER 2023
Investments		1		1				
Other assets		1	2	3	3	-3		
Employee benefits	4			4	4			4
Other liabilities	-2	-2		-4	-2			-2
Tax losses	190	-69	-1	120	224	-34		190
	192	**-69**	**1**	**124**	**229**	**-37**		**192**

Achmea B.V. and most of its Dutch subsidiaries together form a fiscal unity for corporate tax and VAT. On this basis, the company is liable for all deferred and current liabilities of the subsidiaries involved in the fiscal unity with regard to corporate tax and VAT. No deferred tax assets have been recognised for carry forwards of losses from previous years.

As at 31 December 2024, € 121 million (31 December 2023: € 46 million) of the deferred tax assets has an expected maturity date within one year from the balance sheet date.

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

5. RECEIVABLES

RECEIVABLES

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Subsidiaries	9	5
	9	**5**

Receivables are measured at amortised cost. The fair value of these assets is € 9 million (31 December 2023: € 5 million). Aligned with 2023, the expected maturity date of the Receivables is within a year after the balance sheet date.

6. CASH AND CASH EQUIVALENTS

The Cash and cash equivalents comprise cash and bank balances and call deposits. Cash and cash equivalents subject to restrictions amount to € 1 million. (2023: nil).

7. EQUITY ATTRIBUTABLE TO HOLDERS OF EQUITY INSTRUMENTS IN THE COMPANY

OVERVIEW OF TOTAL EQUITY

	SHARE CAPITAL	PREMIUM	OWN SHARES	LEGAL RESERVES	REVALUATION RESERVE	EXCHANGE DIFFERENCE RESERVE	CASHFLOW HEDGES	OTHER RESERVES	RESULT FOR THE YEAR	OTHER EQUITY INSTRUMENTS	TOTAL EQUITY
Balance at 1 January 2024	**411**	**10,590**	**-420**	**88**	**518**	**-525**	**-7**	**-3,741**	**814**	**1,250**	**8,978**
Net other comprehensive income					8	7		5			20
Net result									1,303		1,303
Total result					**8**	**7**		**5**	**1,303**		**1,323**
Appropriations to reserves				13	125			676	-814		
Dividend payments			238					-302			-64
Coupon payments								-74			-74
Issue, sale and purchase of equity instruments										-750	-750
Balance at 31 December 2024	**411**	**10,590**	**-182**	**101**	**651**	**-518**	**-7**	**-3,436**	**1,303**	**500**	**9,413**
Balance at 1 january 2023	**411**	**10,946**	**-507**	**80**	**667**	**-513**	**-7**	**-2,924**	**-808**	**1,250**	**8,595**
Net other comprehensive income				6	-18	-33		-34			-79
Net comprehensive									814		814
Total result				**6**	**-18**	**-33**		**-34**	**814**		**735**
Appropriations to reserves				2	-131	21		-700	808		
Dividend payments								-30			-30
Coupon payments								-55			-55
Issue, sale and purchase of equity instruments		-356	87					2			-267
Balance at 31 December 2023	**411**	**10,590**	**-420**	**88**	**518**	**-525**	**-7**	**-3,741**	**814**	**1,250**	**8,978**

Total equity refers to the Equity attributable to holders of equity instruments in the company.

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

8. OTHER PROVISIONS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Pension benefits	93	97
Other provisions	2	2
Balance at 31 December	**95**	**99**

PENSION BENEFITS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Balance at 1 January	97	92
Net interest expense on defined benefit liability	3	4
Actuarial gains and losses arising from changes in:		
Financial assumptions	-2	6
Benefit payments	-5	-5
Balance at 31 December	**93**	**97**

The provision for benefit obligations relates to defined benefit liability insured by Achmea Pensioen- en Levensverzekeringen N.V.

Annual contributions to the pension schemes are paid to finance the liabilities to be paid during the duration of the scheme, calculated in accordance with local legal requirements. In addition, where applicable, additional contributions are paid to ensure that the pension schemes comply with applicable local regulations on investments and funding levels.

OTHER PROVISIONS

(€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Balance at 1 January	2	7
Withdrawal		-5
Balance at 31 December	**2**	**2**

Other provisions mainly relate to legal proceedings. Aligned with 2023, the Other provisions are long-term in nature.

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

9. LONG-TERM LIABILITIES

MOVEMENT LONG-TERM LIABILITIES

(€ MILLION)

	UNSECURED LOANS	SUBORDINATED LOANS	OTHER	TOTAL 2024
Balance at 1 January	1,244	548		1,792
Money deposited		741		741
Reclassification to Current liabilities	-503			-503
Other mutations	3	1		4
Balance at 31 December	**744**	**1,290**		**2,034**

MOVEMENT LONG-TERM LIABILITIES

(€ MILLION)

	UNSECURED LOANS	SUBORDINATED LOANS	OTHER	TOTAL 2023
Balance at 1 January	1,244	250		1,494
Money deposited		298		298
Reclassification to Current liabilities				
Other mutations				
Balance at 31 December	**1,244**	**548**		**1,792**

The maturities of long-term liabilities between one and five years is an amount of € 744 million (2023: € 1,245 million) and longer than five years an amount of € 1,290 million (2023: € 548 million). The fair value of long-term liabilities measured at amortised cost at the end of the financial year was € 2,032 million (31 December 2023: € 1,713 million).

In May 2024, Achmea B.V. issued € 750 million of subordinated bonds with a coupon of 5.625%. These bonds have a maturity of 20 years (maturity date is 2 November 2044). The bonds are listed on Euronext in Dublin, Ireland.

In May 2020, Achmea B.V. issued an unsecured loan (Senior Unsecured Notes - whose transaction costs are included in the book value) of € 750 million. This loan has a maturity of 7 years (maturity date is 26 May 2027) and is listed on Euronext Dublin, Ireland. The coupon on this loan is 1.5%.

In September 2019, Achmea B.V. issued € 250 million of subordinated loans with a coupon of 2.5%. These subordinated loans have a term of 20 years (maturity date is 24 September 2039) with a first call option after 10 years. The Notes are listed on the Irish Stock Exchange in Dublin, Ireland.

In December 2023, Achmea B.V. issued € 300 million of subordinated notes with a coupon of 6.75%. These loans have a term of 20 years (maturity date is 26 December 2043).

Achmea B.V.'s syndicated credit facility has a maximum size of € 1 billion and matures in 2029. At the end of 2024 the allocated credit lines were undrawn.

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

10. SHORT-TERM LIABILITIES

SHORT-TERM LIABILITIES (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Subsidiaries	302	589
Subordinated Tier 2 perpetual loan	408	
Taxes	54	134
Loans	564	60
Other	132	39
	1,460	**822**

The remaining debt of the subordinated Tier 2 perpetual loan including accrued interest of € 408 million repaid on 4 February 2025 is presented under current liabilities as at 31 December 2024. Previously, this perpetual loan was included under other equity instruments in the amount of € 393 million.

The fair value of short-term liabilities measured at amortised cost at the end of the financial year is € 1,460 million (31 December 2023: € 822 million).

Aligned with 2023, the expected maturity date of the Short-term liabilities is within a year after the balance sheet date.

11. RELATED PARTY TRANSACTIONS

For an overview of transactions with related parties, please refer to Note 33 Related party transactions in the consolidated financial statements.

12. CONTINGENCIES

Legal procedures

Achmea B.V. and the companies that are part of the Achmea Group are involved in legal and arbitration procedures. These procedures relate to claims filed by and against these companies arising from regular business activities, including those conducted in the capacity of insurer, lender, service provider, employer, investor and taxpayer. Although it is not possible to predict or determine the outcome of pending or upcoming legal proceedings, the Executive Board is of the opinion that it is not likely that the outcomes of the proceedings will have a material adverse effect on Achmea B.V.'s financial position.

Contingent Liabilities

Achmea B.V. has issued guarantees on behalf of subsidiaries related to the activities of these subsidiaries in their capacity as insurer, lender, service provider, employer, investor and taxpayer. Achmea B.V. has also issued guarantees for the benefit of third parties pursuant to sales transactions.

Achmea B.V. has indemnified Vereniging Achmea and Rabobank for amounts imposed by the Australian regulator in relation to the Australian business of Achmea Schadeverzekeringen N.V., in the event that the Australian regulator imposes additional obligations and responsibilities on Vereniging Achmea and Rabobank as shareholder of the parent company of Achmea Schadeverzekeringen N.V. in relation to these Australian operations. There are not expected to be any material losses in relation to this indemnification. Due to the nature of the indemnification, it cannot be quantified.

The table below summarises all contingent liabilities assumed by Achmea B.V. for the benefit of its subsidiaries. There are not expected to be any material losses in relation to these guarantees and indemnities.

CONTINGENT LIABILITIES (€ MILLION)

	31 DECEMBER 2024	31 DECEMBER 2023
Guarantees	33	49
Total	**33**	**49**

Contingent Assets

Conflict between the Slovak government and Achmea B.V.

Achmea demanded compensation for damages suffered and payment of statutory interest through an international arbitration tribunal. In December 2012, the tribunal ruled in favour of Achmea. Based on this ruling, the Slovakian government must compensate Achmea for damages suffered and for paying statutory interest. This compensation amounted to approximately € 25 million. The Slovak government publicly stated that it would not pay the amounts awarded to Achmea and submitted the arbitration award to a German court for annulment. In the first instance proceedings, Slovakia's claim was rejected. Slovakia appealed that ruling to the Bundesgerichtshof in Karlsruhe. The Bundesgerichtshof then referred some legal questions to the European Court of Justice. In March 2018, the European Court of Justice ruled that the arbitration clause in the bilateral investment treaty on which the arbitration proceedings were based was invalid. Partly based on this ruling by the European Court of Justice, the Federal Supreme Court overturned the arbitration award. Achmea filed a final appeal against this with the German Constitutional Court in 2018 and filed a claim for damages in Slovakia. In September 2024, it became clear that Achmea's constitutional complaints had been rejected, exhausting Achmea's legal options in Germany and Achmea is now focusing on the lawsuit in Slovakia. In light of the litigation in Slovakia, Achmea does not consider the amounts receivable to be sufficiently certain to recognise them as an asset.

13. OTHER OPERATING INCOME

OTHER OPERATING INCOME (€ MILLION)

	2024	2023
Other income	42	23
	42	**23**

14. INTEREST AND SIMILAR EXPENSES

INTEREST AND SIMILAR EXPENSES (€ MILLION)

	2024	2023
Interest expense on loans and borrowings	115	74
	115	**74**

15. OTHER EXPENSES

OTHER EXPENSES (€ MILLION)

	2024	2023
Overhead cost	153	81
	153	**81**

COMPANY FINANCIAL STATEMENTS ACHMEA B.V.

16. CORPORATE TAX

RECONCILIATION EFFECTIVE TAX RATE

(€ MILLION)

	2024	2023
Result before tax	-208	-129
Corporate tax rate in the Netherlands	25.8%	25.8%
Local corporation tax	-54	-33
Tax effect on:		
Non-deductible expenses	14	1
Participation exemption	-5	-1
Other movements	-26	-18
Effective tax amount	**-71**	**-51**

The effective tax rate for 2024 was 33.8% (2023: 39.5%).

SPECIFICATION OF THE CURRENT AND THE DEFERRED INCOME TAX

(€ MILLION)

	2024	2023
Current income tax		
Current year	-140	-88
Deferred income tax		
Tax losses utilised	69	37
Total income tax expense in Income Statement	**-71**	**-51**

17. REGISTERED OFFICE

Achmea B.V. has its registered office in Zeist, the Netherlands, maintains its office at Handelsweg 2 in Zeist and is registered in the Trade Register of the Chamber of Commerce under number 33235189.

18. NUMBER OF EMPLOYEES

Apart from the members of the Executive Board, no employees are employed by Achmea B.V. in both 2024 and 2023. For more information on the remuneration of the Executive Board, please refer to Note 33 Related-party transactions in the consolidated financial statements.

19. SUBSEQUENT EVENTS

On 28 January 2025, Achmea B.V. issued € 300 million of perpetual Restricted Tier 1 Securities. These Securities contain a first early redemption option after 10 years, on 28 January 2035, in accordance with the applicable redemption conditions. The Securities are priced with a coupon of 6.125% until the first reset date on 28 July 2035. On the balance sheet, they are presented under other equity instruments within total equity.

With reference to Note 10 Current liabilities, the remaining nominal debt of the subordinated Tier 2 perpetual loan of € 393 million was repaid early on 4 February 2025.

20. PROPOSAL REGARDING APPROPRIATION OF RESULT

For the statutory provisions surrounding the appropriation of earnings, see Other Information.

TOTAL NET RESULT IS PROPOSED TO BE DISTRIBUTED AS FOLLOWS

(€ MILLION)

	2024
Net result attributable to holders of equity instruments of the company	1,303
Net result attributable to holders of ordinary shares	**1,303**
To be distributed as follows:	
Dividend on ordinary shares	335
Addition to retained earnings	968
	1,303
Number of ordinary shares (excluding repurchased own shares)	395,629,239
Dividend per ordinary share (in euro's per share)	0.85

The Executive Board's proposal to allocate the result is in line with the dividend policy adopted by the General Meeting and is based on the required SII and statutory tests (test based on prudent capital and liquidity policy and the statutory balance sheet and distribution test). Decision-making by the General Meeting to allocate the result, and thus to pay out dividend, is subject to the suspensive condition of (i) a positive outcome of the aforementioned financial tests and (ii) the approval of the Executive Board. Each time prior to - successively - the decision-making by the General Meeting, the resolution of approval by the Executive Board and the payment of the dividend, the validity of the conclusions of the financial tests, in particular the distribution test, are assessed on the basis of current insights. If the outcome is positive, the Executive Board determines and reconfirms that distribution is still in line with prudent financial policy and that distribution is therefore justified. It is proposed to the General Meeting to pay € 335 million in dividend over the financial year 2024. This proposal is based on a market-based dividend yield of 7%, calculated on Achmea's valuation, taking into account the shareholders' expected choice between a (partial or full) dividend in cash or in the form of Achmea ordinary shares.

CONSOLIDATED FINANCIAL STATEMENTS ACHMEA B.V.

SIGNING OF THE FINANCIAL STATEMENTS OF ACHMEA B.V.

Zeist, 12 March 2025

Executive Board

B.E.M. (Bianca) Tetteroo, Chairman

M.A.N. (Michel) Lamie, Vice-Chairman and CFO

M. (Michiel) Delfos

D.C. (Daphne) de Kluis

R. (Robert) Otto

L.T. (Lidwien) Suur

Board of Commissioners

J. (Jan) van den Berg, Chairman

W.H. (Wim) de Weijer, Vice-Chairman

T.R. (Tjahny) Bercx

A (Antonio) Cano

M.R. (Miriam) van Dongen

P.H.M. (Petri) Hofsté

A.M. (Lex) Kloosterman

E.C. (Nienke) Meijer

R.Th. (Roel) Wijmenga

OTHER INFORMATION

OTHER INFORMATION

STATUTORY PRINCIPLES RELATED TO APPROPRIATION OF PROFIT

The Articles of Association of Achmea B.V. contain the following provisions regarding the appropriation of profit.

The appropriation of the result is regulated in Article 34 and can be summarized as follows:
- Profit is at the free disposal of the General Meeting.
- Profits may only be distributed to shareholders and other entitled parties to the extent that shareholders' equity exceeds the paid and called-up part of the capital plus reserves required to be maintained by law. The distribution must be approved by the Board of Directors. The Board of Directors shall refuse approval only if it knows or should reasonably foresee that the company will not be able to continue paying its due debts after the distribution.
- If the General Meeting resolves to distribute dividends, a dividend will initially be paid, if possible, to the holders of preference shares equal to 3.7% of the nominal amount plus the share premium paid on issue.
- The Executive Board may, if approved by the Supervisory Board, increase the above percentage, set in February 2014, annually by a maximum of 1.8%.
- If no cash dividend was paid, a dividend in the form of preferred shares may be paid instead.
- If the General Meeting decides to pay a dividend and no dividend on preferred shares has been paid in previous years, cash dividends will first be paid to the holders of preferred shares for the previous years before any dividend can be paid to other shareholders.

SHAREHOLDERS OF ACHMEA B.V. PER 31 DECEMBER 2024

	COUNTRY	NUMBER OF SHARES	% SHARES (ORDINARY)	% SHARES (INCL. PREFERENCE SHARES)
Vereniging Achmea direct and through Stichting Administratie-Kantoor Achmea[1]	The Netherlands	269,084,684	68.01%	68.01%
Coöperatieve Rabobank U.A.	The Netherlands	119,333,102	30.16%	30.16%
Gothaer Allgemeine Versicherung AG	Germany	2,072,055	0.53%	0.53%
Barmenia.Gothaer Finanzholding AG	Germany	2,370,153	0.60%	0.60%
Schweizerische Mobiliar Versicherungsgesellschaft A.G.	Switzerland	2,769,246	0.70%	0.70%
Total number of shares[2]		**395,629,240**	**100.00%**	**100.00%**

1 Including 1 A-share
2 Excluding 15,190,934 treasury shares held by Achmea B,V, See Note 19 Equity for more information

Stichting Administratie-Kantoor Achmea is - among other things - the holder of the only A share issued by Achmea B,V, Special rights have been granted to the A share, Important resolutions of the General Meeting of Achmea B,V, can only be made with the consent of the holder of the A share, The members of the Board of Directors of Stichting Administratie-Kantoor Achmea are I,C, van den Broek, E,M,H, Hirsch Ballin, M,J,A, van Putten, A,W, Veenman and J, Versteegh.

OTHER INFORMATION

STATEMENT OF THE EXECUTIVE BOARD OF ACHMEA B.V.

The Executive Board of Achmea B.V. is responsible for the preparation of the Annual Report 2024, including the Consolidated Financial Statements 2024 and the Company Financial Statements 2024 of Achmea B.V. The Consolidated Financial Statements 2024 are prepared in accordance with International Financial Reporting Standards as adopted by the European Union effective as at 31 December 2024. The Company Financial Statements 2024 and the Executive Board Report are prepared in accordance with Book 2, Part 9 of the Dutch Civil Code. The Executive Board reviewed the Achmea B.V. Consolidated and Company Financial Statements on 5 March 2025 and granted permission for submission to the Supervisory Board.

The Executive Board declares, in accordance with principle 1.4.3 of the Corporate Governance Code and based on its own assessment, that to the best of its current knowledge:

- the report provides sufficient insights into any failings in the effectiveness of the internal risk management and control systems with regard to strategic, operational, compliance and reporting risks;
- the aforementioned systems provide reasonable assurance that the financial reporting does not contain any material inaccuracies;
- based on the current state of affairs, it is justified that the financial reporting is prepared on a going concern basis; and
- the report states those material risks and uncertainties that are relevant to the expectation of the company’s continuity for the period of twelve months after the preparation of the report.

The Executive Board of Achmea B.V. declares that, to the best of its knowledge, the Achmea B.V. Consolidated and Company Financial Statements 2024 give a true and fair view of the assets, liabilities, financial position and the result of Achmea B.V. and that the information contained herein has no omissions likely to modify significantly the scope of any statements made.

The Executive Board of Achmea B.V. also declares that the Executive Board Report 2024 gives a true and fair view of the situation as at 31 December 2024, the development and performance during 2024 and describes the principal risks of the businesses of the Group. The Achmea B.V. Consolidated Financial Statements 2024 and Company Financial Statements 2024 will be submitted to the Annual General Meeting for approval on 15 April 2025.

Zeist, 12 March 2025

The Executive Board

B.E.M. (Bianca) Tetteroo, Chair
M.A.N. (Michel) Lamie, Vice-chair and CFO
M.G. (Michiel) Delfos, CRO
D.C. (Daphne) de Kluis
R. (Robert) Otto
L.T. (Lidwien) Suur

OTHER INFORMATION

The following is an English translation of the independent auditor's report issued on 12 March 2025.

Independent auditor's report

To: the shareholders and supervisory board of Achmea B.V.

Report on the audit of the financial statements 2024 included in the annual report

Our opinion

We have audited the accompanying financial statements 2024 of Achmea B.V. based in Zeist, the Netherlands. The financial statements comprise the consolidated and company financial statements.

In our opinion:
- The consolidated financial statements give a true and fair view of the financial position of Achmea B.V. as at 31 December 2024 and of its result and its cash flows for 2024 in accordance with International Financial Reporting Standards as adopted in the European Union (EU-IFRSs) and with Part 9 of Book 2 of the Dutch Civil Code
- The company financial statements give a true and fair view of the financial position of Achmea B.V. as at 31 December 2024 and of its result for 2024 in accordance with Part 9 of Book 2 of the Dutch Civil Code

The consolidated financial statements comprise:
- The consolidated statement of financial position as at 31 December 2024
- The following statements for 2024: the consolidated income statement, the consolidated statements of comprehensive income, changes in total equity and cash flows
- The notes comprising material accounting policy information and other explanatory information

The company financial statements comprise:
- The company balance sheet as at 31 December 2024
- The company profit and loss account for 2024
- 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 Achmea B.V. (hereinafter: Achmea, the group or the Company) in accordance with the EU Regulation on specific requirements regarding statutory audit of public-interest entities, the "Wet toezicht accountantsorganisaties" (Wta, Audit firms supervision act), 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 believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Information in support of our opinion

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 following information in support of our opinion and any findings were addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

Our understanding of the business

Achmea B.V. is the holding company for a group of entities that operate mainly in the non-life, health, income-protection and life insurance business, offering savings and mortgage products and asset management and retirement services. These activities are conducted primarily in the Netherlands and selectively abroad. The group is structured in components and we tailored our group audit approach accordingly. We paid specific attention in our audit to a number of areas driven by the operations of the group and our risk assessment.

We determined materiality and identified and assessed the risks of material misstatement of the financial statements, whether due to fraud or error in order to design audit procedures responsive to those risks and to obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.

Materiality

Materiality	€140 million (2022: €130 million)
Benchmark applied	1,5% of equity attributable to holders of equity instruments of the company
Explanation	We consider Achmea's total equity and solvency, and the ability to meet liabilities towards policyholders and others, the key indicators for the users of its financial statements. The way in which we determined the materiality is consistent with the previous financial year.

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 supervisory board that misstatements in excess of €5 million, which are identified during the audit, 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

Achmea B.V. is at the head of a group of entities (hereinafter: group entities). The financial information of this group is included in the financial statements.

We are responsible for planning and performing the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the group as a basis for forming an opinion on the financial statements. We are also responsible for the direction, supervision, review and evaluation of the audit work performed for purposes of the group audit. We bear the full responsibility for the auditor's report.

OTHER INFORMATION

Based on our understanding of the group and its environment, the applicable financial framework and the group's system of internal control, we identified and assessed risks of material misstatement of the financial statements and the significant accounts and disclosures. Based on this risk assessment, we determined the nature, timing and extent of audit work performed, including the group entities at which to perform audit work. For this determination we considered the nature of the relevant events and conditions underlying the identified risks of material misstatements for the financial statements, the association of these risks to components and the materiality or financial size of the components relative to the group. We performed the work ourselves for the group entities in the Netherlands as the group auditor and auditors of the group entities and have made use of other auditors within the EY Global network for the procedures at the group entities in Greece and Turkey. We communicated the audit work to be performed and identified risks through instructions for component auditors as well as requesting component auditors to communicate matters related to the financial information of the component that is relevant to identifying and assessing risks.

This resulted in a coverage of 95% of equity attributable to holders of equity instruments of the company, 80% of the profit before tax and 99% of total assets. For other components, we performed specific further audit procedures and analytical procedures to corroborate that our risk assessment and scoping remained appropriate throughout the audit.

We reviewed and evaluated the adequacy of the deliverables from component auditors and reviewed key working papers for selected components to address the risks of material misstatement. We attended closing meetings with local management and component teams. During these meetings and calls, amongst others, the procedures performed based on risk assessments, findings and observations were discussed as well as any further work that was determined and performed.

By performing the audit work mentioned above at the group entities within the group, together with additional work at group level, we have been able to obtain sufficient and appropriate audit evidence about the group's financial information to provide an opinion on the financial statements.

Teaming, use of specialists and internal audit

We ensured that the audit teams both at group and at component level included the appropriate skills and competences which are needed for the audit of an internationally operating financial institution.
We included specialists in the areas of IT audit and forensics. Furthermore, we have made use of our own actuaries, income tax specialists and experts in the areas of valuations of liabilities relating to insurance contracts, the valuation of unlisted investments, real estate, derivatives and the tax position.

We performed our audit in cooperation with Internal Audit of Achmea. We make use of their in-depth knowledge of Achmea and work performed by Internal Audit. We agreed on the joint coordination of the audit planning, the nature and scope of the work to be performed, reporting and documentation.
We evaluated and tested the relevant work performed by Internal Audit to satisfy ourselves that the work was adequate for our purposes and established what work had to be performed by our own professionals.

OTHER INFORMATION

Our focus on climate risks and the energy transition

Climate change and the energy transition determine to a significant extent the public agenda and lead to significant change for many businesses and society. The executive board (hereinafter also referred to as: management) of Achmea summarized Achmea's plans and commitments, and reported in the section Climate change of the Sustainability statements how the group is addressing climate-related and environmental risks also taking into account related regulatory and supervisory guidance and recommendations.

As part of our audit of the financial statements, we evaluated the extent to which climate risks and the possible effects of the energy transition and the plans and commitments in this area, are taken into account in accounting estimates and significant assumptions as well as in the design of relevant internal control measures by Achmea including those related to the estimation of liabilities related to insurance contracts and actual liabilities in this area. Furthermore, we read the executive board report and considered whether there is any material inconsistency between the non-financial information in the Sustainability statements and the financial statements.

Based on the audit procedures performed, we do not deem climate-related risks and the energy transition to have a material impact on the financial reporting judgements, estimates or significant assumptions as at 31 December 2024.

Our focus on fraud and non-compliance with laws and regulations

Our responsibility

Although we are not responsible for preventing fraud or non-compliance and we cannot be expected to detect non-compliance with all laws and regulations, it is our responsibility to obtain reasonable assurance that the financial statements, taken as a whole, are free from material misstatement, whether caused by fraud or error. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Our audit response related to fraud risks

We identified and assessed the risks of material misstatements in the financial statements due to fraud. During our audit we obtained an understanding of the company and its environment and the components of the system of internal control, including the risk assessment process and the executive board's process for responding to the risks of fraud and monitoring the system of internal control and how the supervisory board exercises oversight, as well as the outcomes. We refer to Note 2 Capital and Risk Management of the consolidated financial statements in which the risk analysis of the executive board is included, taking into account potential fraud risks.

We evaluated the design and relevant aspects of the system of internal control and in particular the fraud risk assessment, as well as the Achmea's code of conduct, Achmea's whistleblower policy and incident registration. We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness, of internal controls designed to mitigate fraud risks. As part of our process of identifying fraud risks, we evaluated fraud risk factors with respect to financial reporting fraud, misappropriation of assets and bribery and corruption in close co-operation with our forensic specialists. In our assessment, we specifically considered the different jurisdictions in which the company operates. We evaluated whether these factors indicate that a risk of material misstatement due fraud is present.

We incorporated elements of unpredictability in our audit. We also considered the outcome of our other audit procedures and evaluated whether any findings were indicative of fraud or non-compliance.

OTHER INFORMATION

We addressed the risks related to management override of controls, as this risk is present in all organizations. For these risks we have performed procedures among others to evaluate key accounting estimates for management bias that may represent a risk of material misstatement due to fraud, in particular relating to important judgment areas and significant accounting estimates as disclosed per each significant component in Key assumptions and estimates in the financial statements. We have also used data analysis to identify and address high-risk journal entries and evaluated the business rationale (or the lack thereof) of significant extraordinary transactions, including those with related parties.
As included in our key audit matter Estimates used in calculation of liabilities related to insurance contracts, we have considered, because of the risk of management override of controls, among others, the judgments and assumptions that may represent a risk of material misstatement.

When identifying and assessing fraud risks we presumed that there are risks of fraud in revenue recognition. We have determined that specifically the following revenues give rise to these risks:

- Accounting for insurance revenues as further detailed in the key audit matter Estimates used in calculation of liabilities related to insurance contracts.
- Unrealized results on investments valued as fair value through profit or loss from unlisted investments and real estate investments included in Net financial result from (re)insurance activities as further detailed in the key audit matter Fair value measurement of unlisted investments.

We considered available information and made enquiries of relevant members of the executive board, management, Internal Audit, legal, the Compliance & Risk management departments, directors of group entities and the supervisory board.

The fraud risk we identified, enquiries and other available information did not lead to specific indications for fraud or suspected fraud potentially materially impacting the view of the financial statements.

Our audit response related to risks of non-compliance with laws and regulations
We performed appropriate audit procedures regarding compliance with the provisions of those laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements. Furthermore, we assessed factors related to the risks of non-compliance with laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general industry experience. We have assessed it through, among others, discussions with the executive board, inspecting the integrity risk analysis (SIRA), reading minutes, inspection of internal audit and compliance & risk management reports, communication with and reading correspondence from relevant regulatory and supervisory authorities, inspection of remediation plans and performing substantive tests of details of classes of transactions, account balances or disclosures. We refer to Note 2 Capital and Risk Management section non-compliance to the financial statements.

We also inspected lawyers' letters and remained alert to any indication of (suspected) non-compliance with laws and regulations throughout the audit, particularly relating to indications for any shortcomings in relation to compliance with the Dutch Act on the prevention of money laundering and financing of terrorism, the Sanction Law and privacy regulation. In case of potential non-compliance with laws and regulations that may have a material effect on the financial statements, we assessed whether Achmea has an adequate process in place to evaluate the impact of non-compliance for its activities and financial reporting and, where relevant, whether Achmea implemented remediation plans.

Finally we obtained written representations that all known instances of non-compliance with laws and regulations have been disclosed to us.

OTHER INFORMATION

Our audit response related to going concern

As disclosed in Section 1. Accounting policies in the financial statements, the financial statements have been prepared on a going concern basis. When preparing the financial statements, the executive board made a specific assessment of the Company's ability to continue as a going concern and to continue its operations for at least the next twelve months.

We discussed and evaluated the specific assessment with the executive board exercising professional judgment and maintaining professional scepticism. We considered whether the executive board's going concern assessment, based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, contains all relevant events or conditions that may cast significant doubt on the Company's ability to continue as a going concern, also focusing on whether the Company will continue to meet the regulatory solvency requirements for an insurance group. To this end, we also inspected the Own Risk & Solvency Assessment (ORSA). If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion.

Based on our procedures performed, we did not identify material uncertainties about the Company's ability to continue as a going concern for the next twelve months. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause a company to cease to continue as a going concern.

Our key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements. We have communicated the key audit matters to the supervisory board. The key audit matters are not a comprehensive reflection of all matters discussed.

In comparison with previous year, the key audit matter Initial application of IFRS 17 and IFRS 9 is no longer included. We consider the key audit matter Solvency II disclosure no longer key to our audit on the basis of our reevaluation of the risks of material misstatements in the financial statements.

OTHER INFORMATION

Estimates used in calculation of liabilities related to insurance contracts	
Risk	Achmea has liabilities related to insurance contracts of €3.9 billion representing 60% of the group's total liabilities. The measurement of these liabilities involves judgment over uncertain future outcomes, which involves setting various assumptions regarding the total settlement value of insurance liabilities. The determination of the liabilities related to insurance contracts requires the use of complex (actuarial) models and other computational tools for which it is important that their design and configuration is adequate, the assumptions used are appropriate and the input data is complete and accurate. The use of different actuarial techniques and assumptions could produce materially different estimates of liabilities related to insurance contracts, including reporting of the related results. In this relation, we take into account the possibility of management override of controls and that management can influence the financial reporting process in other unauthorized manners. We therefore consider the estimates used in the calculation of liabilities related to insurance contracts a key audit matter. The key assumptions which are used in the estimates concern: ▪ Discount rate, including ultimate forward rate (UFR), the extrapolation methodology and the illiquidity premium applied, used to adjust the expected future cash flows for the time value of money. ▪ Cost of capital percentage, risk drivers and time diversification applied in the risk adjustment calculation. ▪ Inflation of insurance claims and costs. ▪ For Life insurance group pension contracts: scalability of recurring expense and expense allocation. ▪ For Non-life and Health insurance: claims run-off, claim trends and determining the loss component. ▪ For Non-life insurance: assumptions for disability and recovery. ▪ For Health insurance: (equalization) contributions from the Dutch Health Insurance Fund. We refer to the Note 7 Assets and liabilities related to insurance contracts and share of reinsurers in insurance liabilities and Note 10 Insurance service result of the consolidated financial statements of Achmea B.V.
Our audit approach	Our audit procedures included, among others, evaluation of the appropriateness of the Company's accounting policies related to the measurement of insurance contract liabilities according to IFRS 17 *Insurance contracts* and whether assumptions and the methods for making the accounting estimates are appropriate and have been applied consistently. We involved our actuaries to assist us in performing audit procedures in this area. Our key audit procedures included evaluating the Company's methodology for calculating the insurance contract liabilities and obtaining understanding and evaluating the design and existence of internal controls in this respect. Furthermore, we performed the following procedures: ▪ Challenging the assumptions on the discount rate (including illiquidity premium) and the cost of capital percentage used in valuation of insurance contract liabilities based on Company's and market data. ▪ Challenging the nature, timing and completeness of changes in key assumptions, models and methods, including their impact on financial reporting. ▪ Evaluating whether the assumptions and outcomes are in line with our expectations based on our sector knowledge and external publications and performing detailed audit procedures, among which comparing the provision determined by Achmea with that determined independently by us on a sample basis.

OTHER INFORMATION

Estimates used in calculation of liabilities related to insurance contracts	

	▪ Evaluating the scope, extent and outcomes of the model validations performed by the Company in respect of the (valuation) models and other computational tools. Performing analytical review procedures, including period to period analysis of changes in liabilities related to insurance contracts, based on our understanding of developments in the business and our expectations derived from market experience and assessing whether such changes appropriately reflect the developments in the current reporting period.
	▪ Specifically for Health insurance:
	  ▪ Reconciling the assumptions and movements in the contribution of the Dutch Health Insurance Fund per budget year with the information received from Healthcare Institute of the Netherlands (ZiNL) and testing the reasonableness of the model applied including the assumptions used by Achmea in determining the equalization contributions.
	  ▪ Consideration of the reasonableness of the expected technical result 2025 related to evaluating whether a liability for loss-making insurance contracts should be recorded.
	
	We evaluated whether the disclosures of Achmea in relation to insurance contract liabilities comply with the requirements of IFRS 17 *Insurance contracts*. In particular we evaluated that disclosures adequately convey the degree of estimation uncertainty.

Key observations	We consider the estimates used in the calculation of liabilities related to insurance contracts to be reasonable.

Fair value measurement of unlisted investments	
Risk	Achmea invests in various asset classes. 73% of assets are carried at fair value in the statement of financial position. Of the total assets, 13% is related to investments for which no published prices in active markets are available. Fair value measurement can be subjective, such as for areas reliant on model based valuation. Valuation techniques for unlisted investments such as mortgages, loans, investment property and non-quoted equities involve using unobservable inputs regarding pricing factors. The use of different valuation techniques and inputs could produce significantly different outcomes of fair value, including reporting of the related (un)realized results. Furthermore, we have considered that there are fraud risks in accounting for the unrealized results from unlisted investments. We therefore consider the fair value measurement of unlisted investments a key audit matter. We refer to the Note 5 Investment properties, Note 6 Investments, Note 9 Fair value hierarchy and Note 11 Net financial result from (re)insurance activities to the financial statements.
Our audit approach	Our audit procedures included, among others, evaluating the appropriateness of the Company's accounting policies related to the fair value measurement of unlisted investments according to IFRS13 *Fair Value Measurement*. We have also tested whether valuation techniques and inputs for measuring fair value are appropriate and have been applied consistently. We evaluated the design and tested operating effectiveness of the controls over the valuation of unlisted investments. We performed additional substantive procedures, supported by our valuation specialists where necessary. This included, where relevant, validation of the used unobservable inputs, performing parallel valuation for a sample of unlisted investments and inspection of a sample of valuation reports. We

Fair value measurement of unlisted investments	
	also assessed the impact of other sources of fair value information including realized results on investments sold and fair value information based on the Company's own purchase transactions. Finally, we evaluated the related disclosures to establish that they comply with the requirements of IFRS 7 *Financial instruments: disclosures* and IFRS 13 *Fair Value Measurement*. In particular we evaluated that disclosures adequately convey the degree of estimation uncertainty and ranges for significant unobservable inputs.
Key observations	We consider the fair value of unlisted investments that are reported at fair value on the balance sheet to be within a reasonable range.

Deferred tax asset recoverability	
Risk	Achmea has recognized a (net) deferred tax asset of €715 million, out of which €592 million relates to temporary differences and €123 million relates to tax losses carried forward. For the recognition of these deferred tax asset, an assessment of recoverability is required which involves judgment about the extent of the available future taxable profits and the tax planning opportunities available to the company. Determining future taxable profits involves setting various assumptions regarding the expected future income (including investment income), expenses and the capital position. The use of different assumptions could produce materially different outcomes and conclusions on the recoverability of the deferred tax asset. We therefore consider the estimates used in the recoverability assessment of the deferred tax assets a key audit matter. We refer to the Note 16 Deferred tax assets and liabilities of the consolidated financial statements of Achmea B.V.
Our audit approach	Our audit procedures included, among others, evaluating the appropriateness of the Company's accounting policies related to the measurement of deferred tax assets and liabilities according to IAS 12 *Income taxes*. We have furthermore assessed whether the assumptions and the methods for determining the estimates are appropriate and have been applied consistently. Furthermore, we have evaluated the design and existence of the related internal controls. Achmea concludes in their assessment that the deferred tax asset is recoverable. We have considered the validity of this assessment and in this relation, we have: ▪ Considered the reasonableness of the forecast of future profits ▪ Assessed whether the assumptions used in determining the future profits are in accordance with the company's multi-year budget approved by the supervisory board ▪ Assessed that the assumptions used are consistent with other reporting frameworks (such as Solvency II) As part of our procedures, we also evaluated the reasonableness of the forecasts by comparing the forecasted results for recent years with actual results. Hereby we evaluated positive and negative variances. We considered the horizon of the forecast in conjunction with maximum settlement period and had specific focus on the reasonableness of the profit forecasts for years which lie further into the future due to the inherently higher uncertainty. We also considered the reasonableness of the tax planning opportunities and the extent the company has influence on their application. We have made use of our tax specialists in performing our audit procedures.

OTHER INFORMATION

Deferred tax asset recoverability	
	We evaluated Achmea's disclosures in relation to deferred tax assets in accordance with IAS 12. In this relation we evaluated in particular that disclosures adequately convey the methods and assumptions used for the deferred tax assets recoverability assessment as well as the degree of estimation uncertainty.
Key observations	We consider the estimates used in the recognition of deferred tax assets to be reasonable.

Reliability and continuity of the information technology and systems	
Risk	The activities and financial reporting of Achmea are highly dependent on the reliability and continuity of the IT environment. Achmea has a complex IT landscape, with different parties involved. As also disclosed in Note 2 Capital and Risk Management, effective IT general controls with respect to change management, logical access, infrastructure and operations, are important to support the integrity and continuity of the IT environment as well as the operating effectiveness of the automated controls. Achmea, as an internationally operating financial institution, is inherently subject to higher risks of cybersecurity attacks. Based on the above, we identified the reliability and continuity of the IT environment to be a key audit matter.
Our audit approach	IT audit professionals are an integral part of the audit team and assessed the reliability and continuity of the IT environment to the extent necessary for the scope of our audit of the financial statements. Our audit was not primarily designed to express an opinion on the continuity and reliability of Achmea's automated data processing (or parts thereof). As part of our audit, we assessed the impact of changes to the IT environment and performed the following procedures: ▪ Evaluating the design and existence of the IT general control processes and testing the operating effectiveness of general IT controls for the main IT processes. These procedures were performed for the IT applications to the extent relevant for our financial statements audit, for the underlying operating system, and include database management and supporting tooling for the IT processes. ▪ Executing IT substantive procedures for missing or ineffective IT controls. ▪ Reviewing reports on the internal controls of vendors for outsourced important IT processes, including critical cloud computing. ▪ Testing application controls over data processing, data feeds and interfaces relevant for financial reporting. ▪ Evaluating key IT related projects and data migrations relevant to the financial statement audit. Our audit was not aimed at making a statement about Achmea's procedures and internal controls in relation to cybersecurity. However we did perform procedures to obtain an understanding of this topic.
Key observations	Based on our procedures performed, we have obtained sufficient and appropriate information about the reliability of the automated data processing of IT systems that are relevant in the context of the financial statements audit.

Report on other information included in the annual report

The annual report contains other information in addition to the financial statements and our auditor’s report thereon.

Based on the following procedures performed, we conclude that the other information:
- Is consistent with the financial statements and does not contain material misstatements
- Contains all the information as required by Part 9 of Book 2 of the Dutch Civil Code for the management report (with exception for sustainability statements) and the 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 substantially 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 management report and other information in accordance with Part 9 of Book 2 of the Dutch Civil Code.

Report on other legal and regulatory requirements

Engagement

We were appointed by the general meeting as auditor of Achmea B.V. on 16 December 2019, as of the audit for the year 2021 and have operated as statutory auditor since that financial year.

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 audit of public-interest entities.

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-IFRSs and Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the executive board is responsible for such internal control as the executive board determines is necessary to enable the preparation of the financial statements that are free from material misstatement, whether due to fraud or error.

As part of the preparation of the financial statements, the executive board is responsible for assessing the Company’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 the Company 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 the Company’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 misstatements, whether due to fraud or error 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.

We have exercised professional judgment and have maintained professional skepticism throughout the audit, in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. The Information in support of our opinion section above includes an informative summary of our responsibilities and the work performed as the basis for our opinion.

Our audit further included among others:

- Performing audit procedures responsive to the risks identified, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion
- Obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the executive board
- Evaluating the overall presentation, structure and content of the financial statements, including the disclosures
- Evaluating whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation

Communication

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant findings in internal control that we identify during our audit. In this respect we also submit an additional report to the Audit & Risk Committee of the supervisory board in accordance with Article 11 of the EU Regulation on specific requirements regarding statutory audit of public-interest entities. The information included in this additional report is consistent with our audit opinion in this auditor's report.

We provide the audit and risk committee of the supervisory board with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the supervisory board, we determine the key audit matters: those matters that were of most significance in the audit of the financial statements. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, not communicating the matter is in the public interest.

Amsterdam, 12 March 2025

EY Accountants B.V.

W.J. Smit

The following is an English translation of the independent auditor's report issued 12 March 2025

Limited assurance report of the independent auditor on the sustainability statement

To: the shareholders and supervisory board of Achmea B.V.

Our conclusion

We have performed a limited assurance engagement on the consolidated sustainability statement for 2024 of Achmea B.V. based in Zeist (hereinafter: Achmea or the company) in section "Sustainability Statement" of the accompanying Integrated Annual Report for 2024 including the information incorporated in the sustainability statement by reference (hereinafter: the sustainability statement).

Based on our procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the sustainability statement is not, in all material respects:
- prepared in accordance with the European Sustainability Reporting Standards (ESRS) as adopted by the European Commission and compliant 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).

Our conclusion has been formed on the basis of the matters outlined in this limited assurance report.

Basis for our conclusion

We have performed our limited assurance engagement on the sustainability statement 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 assurance engagement was aimed to obtain a limited level of assurance that the sustainability statement is free from material misstatements. The procedures vary in nature and timing from, and are less in extent, than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.
Our responsibilities in this regard are further described in the section 'Our responsibilities for the limited assurance engagement on the sustainability statement' of our report.

We are independent of Achmea 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. This includes that we do not perform any activities that could result in a conflict of interest with our independent assurance engagement and we are not involved in the preparation of the sustainability statement, as doing so may compromise our independence. Furthermore, we have complied with the Verordening gedrags- en beroepsregels accountants (VGBA, Dutch Code of Ethics for Professional Accountants). The ViO and VGBA are at least as demanding as the International code of ethics for professional accountants (including International independence standards) of the International Ethics Standards Board for Accountants (the IESBA Code) as relevant to limited assurance engagements on sustainability statements of public interest entities in the European Union.

We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Emphasis of matter

The sustainability statement has been prepared in a context of new sustainability reporting standards, requiring entity-specific interpretations and addressing inherent measurement or evaluation uncertainties. In this context, we want to emphasize the following matters:

Emphasis on the most significant uncertainties affecting the quantitative metrics and monetary amounts

We draw attention to section *Annex A: Approach to sustainability reporting -Estimation Uncertainties i*n the sustainability statement that identifies 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, especially in the initial years.

Emphasis on the double materiality assessment process

We draw attention to sections *Strategy and business model – Process to identify material topics* in the sustainability statement. 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 requires the company to make key judgments and use thresholds and may also be impacted in time by sector-specific standards to be adopted.
Therefore, the sustainability statement 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 of these matters.

Comparative information not assured

Sustainability information for 2023 included in the sustainability statement has not been part of this limited assurance engagement. Consequently, we do not provide any assurance on the comparative information and thereto related disclosures in the sustainability statement for 2023.
Our conclusion is not modified in respect of this matter.

Limitation to the scope of our assurance engagement

In reporting forward-looking information in accordance with the ESRS, the management board describes the underlying assumptions and methods of producing the information, as well as other factors that provide evidence that it reflects the actual plans or decisions made by the company (actions). Forward-looking information relates to events and actions that have not yet occurred and may never occur. The actual outcome is likely to be different since anticipated events frequently do not occur as expected. We do not provide assurance on the achievability of forward-looking information.
Our conclusion is not modified in respect of this matter.

Responsibilities of the management board and the supervisory board for the sustainability statement

The management board is responsible for the preparation of the sustainability statement in accordance with the ESRS, including the double materiality assessment process carried out by Achmea as the basis for the sustainability statement and disclosure of material impacts, risks and opportunities in accordance with the ESRS. As part of the preparation of the sustainability statement, the management board is responsible for compliance with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). Management 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 management board is responsible for such internal control as it determines is necessary to enable the preparation of the sustainability statement that is 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 limited assurance engagement on the sustainability statement

Our responsibility is to plan and perform the limited assurance engagement in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

We apply the applicable quality management requirements pursuant to the Nadere voorschriften kwaliteitsmanagement (NVKM, regulations for quality management) and the International Standard on Quality Management (ISQM) 1, and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and other relevant legal and regulatory requirements.

Our limited assurance engagement included amongst others:

- 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 statement 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 statement and for identifying the company's activities, determining eligible and aligned economic activities and prepare the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), without obtaining assurance information 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 statement, including the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), where misleading or unbalanced information or material misstatements, whether due to fraud or error, are likely to arise ('selected disclosures'). Designing and performing further assurance procedures aimed at assessing that the sustainability statement is free from material misstatements responsive to this risk analysis.
- Considering whether the description of the double materiality assessment process in the sustainability statement made by the management board appears consistent with the process carried out by the company
- Performing analytical review procedures on quantitative information in the sustainability statement, including consideration of data and trends

OTHER INFORMATION

- 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 the management board's estimates
- Analyzing, 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 statement
- 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 statement, 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 whether the key performance indicators disclosures have been defined and calculated in accordance with the Taxonomy reference framework, and comply 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 fundamental qualitative characteristics of information (relevance and faithful representation: complete, neutral and accurate) reported in the sustainability statement, including the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)
- Considering, based on our limited assurance procedures and evaluation of the evidence obtained, whether the sustainability statement as a whole, is free from material misstatements and prepared in accordance with the ESRS.

Communication

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the assurance engagement and significant findings that we identify during our assurance engagement.

Amsterdam, 12 March 2025

EY Accountants B.V.

Signed by drs. R.J. Bleijs

SUPPLEMENTS

SUPPLEMENT A. GLOSSARY

Absenteeism
Refers to the situation in which an employee is temporarily unable to work due to health issues or illness. This can include both physical and mental conditions. Sick leave is calculated by dividing the number of recorded sick hours by the total number of available hours for employees.

Access to (quality) information
Is essential for informed decision-making by consumers. This includes access to clear, accurate, and complete information about the products and services being offered.

Access to products and services
The availability and affordability of products and services for consumers. Ensuring equal access to products and services promotes social inclusion for consumers. This includes non-discrimination, where all individuals are treated equally.

Acute risk
Climate risks that manifest suddenly as a result of extreme weather conditions, including coastal erosion, river flooding, low river flows, tropical cyclones, and fire risks.

All You Can Learn (AYCL)
Provides access to various training opportunities, with employees receiving financial support and allocated study time to pursue their education. AYCL is accessible to Achmea employees employed by Achmea B.V. in the Netherlands, including temporary workers who have worked continuously for Achmea for at least three months.

Asset-backed securities
Financial instruments financed with cash flow generated by an asset portfolio, with the assets having been provided as business security.

Assets under Management (AuM)
The market value of assets under management (including assets managed on behalf of third parties).

Basic health insurance
Mandatory health insurance for everyone living or working in the Netherlands based on the Health Insurance Act (Zvw). The Dutch government determines what is included in this basic package, which covers standard care from general practitioners, hospitals, and pharmacies. Most care in the basic package is subject to an own risk charge, and there may also be additional contributions. The basic package is the same for everyone and can change annually. Health insurers must accept everyone for the basic insurance.

Biodiversity
The variability of living organisms from all sources: land, ocean, freshwater, and the atmosphere. It is an essential and indispensable characteristic of nature that ensures ecosystems are productive, resilient, and capable of adaptation. The direct impact factors of biodiversity loss include the various ways in which the diversity of life, such as animals, plants, fungi, and microorganisms, is decreasing. Specifically, pollution (including nitrogen) and the effects and dependencies of ecosystems are considered significant factors.

CEO pay-ratio
The salary of the highest-paid individual in the company compared to the median salary of employees both domestically and internationally. In accordance with the Dutch Corporate Governance Code, the pay ratio is also calculated based on the salary of the highest-paid individual in comparison to the average salary of employees.

Chronic risk
Climate risks that occur gradually and can lead to business disruptions over time, including extreme cold, extreme heat, extreme precipitation, extreme snowfall, and extreme wind.

Circular economy
An economic system in which the value of products, materials, and other resources in the economy is retained for as long as possible, enabling their more efficient use in production and consumption. This reduces the environmental impact of their use and minimizes waste and the release of hazardous substances at all stages of the lifecycle.

Claims ratio
The claims ratio is determined as the claims incurred during the period, including claims handling expenses, expressed as a percentage of insurance revenue.

Climate adaptation
The process of adjusting to climate-related risks arising from climate change, in order to reduce negative effects and take advantage of potential benefits.

Climate mitigation
Limiting the global temperature increase to an average of 1.5 °C above pre-industrial levels by 2050.

Climate neutral
Certain activities do not exacerbate the greenhouse effect, meaning they do not contribute to the amount of greenhouse gases in the atmosphere. This can be achieved by reducing greenhouse gas emissions and by removing these gases from the atmosphere, for example, through tree planting. The terms climate neutral, net zero, and CO_2 neutral are often used interchangeably.

CO_2 emissions/greenhouse gas emissions
Direct and indirect emissions of greenhouse gases associated with all activities of a company. To aggregate the impact of the different greenhouse gases, the emission figures are converted to CO_2 equivalents (CO_2e). Emissions are expressed

SUPPLEMENT A. GLOSSARY

in Scope 1, 2, and 3. We also refer to these as absolute CO_2 emissions.

CO_2 equivalents
A universal measurement unit that indicates the global warming potential (GWP) of each greenhouse gas, expressed in terms of the global warming potential of one unit of carbon dioxide. This unit is used to evaluate the release of different greenhouse gases (or the avoidance of their release) on a common basis.

CO_2 intensity
CO_2e emissions expressed per specific unit: tCO_2/m^2 or tCO_2/€ million invested capital. When referring to tCO_2/€ million invested capital, we speak of the CO_2 footprint.

CO_2 footprint
CO_2e emissions expressed per amount of invested capital (tCO2/€ million).

Collateral
An asset pledged by a borrower to secure a loan and subject to seizure in the case of default.

Collective engagement
Engaging in a joint dialogue with companies or international policymakers (such as governments) alongside other institutional investors when this is more effective than an individual approach.

Combined ratio
The combined ratio is a measure of profitability used by insurance companies to indicate how well they are performing in their day-to-day operations. A ratio below 100% indicates that the company is making underwriting profit while a ratio above 100% means it is incurring higher expenses and paying out more money in claims than it is receiving from premiums. A ratio of over 100% does not necessarily mean that an insurer is making a loss on the contract, however, given that an insurer can still generate investment income. The combined ratio is the sum of the claims ratio and the expense ratio.

Complaints mechanism
Stakeholders, such as customers, consumers, and employees in the value chain, can report their concerns and needs regarding issues such as environmental problems and human rights directly to the company through the complaints mechanism. This enables the company to identify and address misconduct at an early stage, preventing the escalation of complaints and the worsening of issues.

Confidential advisers
An appointed person within or outside an organisation who supports employees with work-related issues, such as unwanted behaviour, harassment, or conflicts. This person provides advice and guidance and ensures a safe, confidential environment where employees can openly share their concerns without fear of repercussions.

Confidential information
Refers to data that should be considered private or secret and is accessible only to authorized individuals. This includes, among other things, privacy-sensitive, business-sensitive, and other sensitive information. This data must not be disclosed to third parties without permission. The disclosure of confidential information can have harmful consequences for individuals, organizations, or their interests.

Contractual Service Margin (CSM)
A component of the carrying amount of the asset or liability for a group of (re)insurance contracts representing the unearned profit the entity will recognise as it provides insurance contract services under the insurance contracts.

Corporate Biodiversity Footprint (CBF)
The Corporate Biodiversity Footprint is a metric that indicates how much biodiversity has been lost in square kilometres as a result of a company's activities over a period of one year. This score takes into account the impact of emissions in Scopes 1, 2, and 3, incorporating both direct and indirect effects on biodiversity. The score is based on four key impact factors: greenhouse gas emissions (CO_2e), land use, air pollution, and water pollution.

Corporate culture
Formulates objectives based on values and beliefs. The culture serves as a guideline for the activities of the organisation, supported by shared assumptions and group norms, such as values or mission statements and a code of conduct.

Corporate Governance
Corporate Governance refers to the way in which companies are governed, and involves maintaining a system of checks and balances within corporations. It refers to a combination of governing, managing, supervising and accounting for the company’s policies to a number of different stakeholders, including customers, employees and shareholders and other capital providers.

Corporate Sustainability Reporting Directive (CSRD)
A guideline by which large and publicly listed companies report on their most material themes, particularly regarding the impact of their activities on people and the environment, as well as the social and environmental risks they face. Sustainability information must be disclosed in the annual report and is subject to verification by an accountant with a minimum of 'limited assurance.' The CSRD replaces the European directive on sustainability reporting, the Non-Financial Reporting Directive (NFRD).

SUPPLEMENT A. GLOSSARY

Counterparty default risk
The risk to each party of a contract that the counterparty will not live up to its contractual obligations. Achmea is exposed to many counterparties in the areas of investment, treasury, banking, reinsurance, healthcare providers, brokers and policyholders.

Covered bonds
Debt instruments secured by a cover pool of mortgage loans, which provide bond holders with additional security.

Credit default swap (CDS) spread
A CDS is a contract between two parties that involves the transfer of third-party credit risk. It can be used as insurance for a bond investment portfolio, whereby, if the bond issuer defaults on repayment of the loan amount, the credit default swap compensates for this loss. The spread of a CDS is an indication of the risk associated with the swap, i.e. the difference between the expected yield of the CDS and the yield of the bond.

Credit risk
The risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss.

Data- en cybersecurity
Protecting digital information from unauthorised access, corruption, or theft throughout its entire lifecycle. It encompasses all aspects of information security, including the physical security of hardware and storage devices, administrative and access controls, as well as the logical security of software applications. This topic also includes the company's policies and procedures.

Debt leverage ratio
This is the ratio that expresses non-banking debt and perpetual subordinated bonds as a percentage of the sum of total equity, non-banking debt, perpetual subordinated debentures, CSM and risk adjustment minus goodwill.

Defined benefit pension plan (DB)
A type of pension plan in which an employer commits to paying a specified monthly benefit to its employees on retirement. The amount to be paid for the pension entitlement is set using a formula that is usually based on the employee’s income and length of service.

Defined contribution pension plan (DC)
Pension scheme in which the employer makes fixed contributions to the pension fund or insurer. The employer has no legal or constructive obligation to pay further contributions if the fund does not hold sufficient assets to meet its obligations.

Derivatives
Financial instruments whose price depends on, or is based on, one or more underlying assets. Their value is determined by fluctuations in the underlying asset.

Double leverage ratio
The double leverage ratio is calculated as follows: the ratio between total equity of subsidiaries, including related goodwill and other intangible fixed assets and the total equity of the group (share capital, hybrid capital, subordinated debt and preference shares).

Double materiality analysis (DMA)
Conducted to identify the material impacts, risks, and opportunities, along with the associated material themes for a company. An environmental, social, and governance theme is considered material if it meets the criteria for impact materiality, financial materiality, or both. This analysis forms the basis for sustainability reporting according to the ESRS.

Downstream (value chain)
Entities, such as intermediaries and customers, that receive products or services from the company.

Due diligence
The process by which a company identifies, prevents, and mitigates actual and potential negative impacts on people and the environment, and how the company responds to those impacts. It includes negative impacts related to the company's own activities and its upstream and downstream value chain through its products or services, as well as its business relationships. Due diligence is an ongoing process.

Employee Engagement Survey (Medewerker Betrokkenheidsonderzoek (MBO))
An annual survey conducted among employees to measure satisfaction. Results are discussed within teams, and joint actions are established to address areas for improvement. Feedback is documented and integrated into decision-making, and employees are informed about how their input has contributed to decisions and actions. Additionally, a Net Promoter Score (NPS) indicator for employee satisfaction is established.

Employee in the value chain
Employees within the upstream and downstream value chain of the company who may experience material impacts from the company. This includes impacts related to the company’s own activities and its value chain, including through its products or services, as well as through its business relationships. This refers to employees who are not included under own employees.

Energy label
Indicates how energy-efficient a home is. Homeowners are required to provide an energy label to buyers or tenants,

SUPPLEMENT A. GLOSSARY

including those building a new home. The label indicates whether a home consumes a lot or a little energy and provides recommendations for energy-efficient improvements, as well as information on the suitability of the home for gas-free living. Energy labels are valid for 10 years and are issued by an energy advisor.

Enterprise Value Including Cash (EVIC)
As the name suggests, Enterprise Value (EV) is the value of a company. It is an alternative valuation method that gives the market value of a company. EVIC is the sum of:
- the market capitalisation: this is equal to the company's current equity price multiplied by the number of outstanding shares;
- total debt: this is the sum of all the company's short-term and long-term liabilities;
- cash and cash equivalents: this is cash, foreign currencies and cash equivalents (bank accounts, short-term bonds etc.) and is equal to the company's liquid assets but potentially excluding tradeable securities.

ESG
Environmental, Social & Governance aspects of sustainability:
- Environmental: The impact of a company on the environment, such as energy consumption, waste management, and greenhouse gas emission.
- Social: The relationships of a company with employees, customers, suppliers, and the community, including working conditions and human rights.
- Governance: The internal structures and processes of a company, such as good governance, transparency, and ethics.

European Sustainability Reporting Standards (ESRS)
Establish what information a company must report regarding its material impacts, risks, and opportunities related to material themes in the environmental, social, and governance (ESG) areas.

EU Taxonomy
A classification system that sets criteria for economic activities that contribute to environmental objectives. The aim is to promote investments in economic activities that meet established criteria for achieving environmental goals, in line with the European Green Deal.

Exclusion (relating to responsible investment)
Investments are excluded if they are inconsistent with general societal norms and personal beliefs, and when there is no expectation of improvement. Exclusion aims to reduce negative social impact and financial risks.

Execution only
Execution-only services refer to services whereby customers select their own insurance products, including all product options, without seeking actual advice from the insurer.

Expected credit losses (ECL)
The weighted average of expected credit losses using the respective probabilities of default as weighting factors.

Expense ratio
The expense ratio is operating expenses, including internal costs of handling claims, less internal investment expenses and less restructuring provision expenses, expressed as a percentage of Insurance revenue.

Fair value approach for transition (FVA)
One of the permitted alternative methods for the transition to IFRS 17 (compared to the Full retrospective approach).

Fair value through other comprehensive income (FVOCI)
Measurement in the balance sheet at fair value through other comprehensive income.

Fair value through profit and loss (FVPL)
Measurement in the balance sheet at fair value with changes in fair value recognised in the statement of profit and loss.

Financed (greenhouse gas) emissions
Arise as a result of loans and investments from banks and investors. An attribution factor is used to determine what percentage of the emissions can be attributed to the relevant bank or investor. The methods for these calculations are outlined in the standard of the Partnership for Carbon Accounting Financials (PCAF).

Financial materiality (ESRS)
A topic is considered financially material if it generates risks or opportunities that have (or could have) an impact on the financial position, financial performance, cash flows, access to financing, or cost of capital of a company in the short, medium, or long term.

Fixed Charge Coverage Ratio (FCCR)
The FCCR is a measure of how well a company is able to cover its fixed costs, such as repayments and interest expenses. FCCR is calculated by adding fixed costs (the interest expense on senior debt and depreciation) and impairments (the EBITDA) to the pre-tax result and dividing it by the interest expense on senior debt and fees on other equity instruments (hybrids). The FCCR is based on the results and financing charges of the last four quarters.

Flood risk
The likelihood that an area will be affected by flooding, where water rises above normal water levels and intrudes onto land or infrastructure. This risk is influenced by factors such as weather conditions, geography, soil composition, and human activities such as urbanisation. Flood risks can cause significant damage to homes, infrastructure, agriculture, and ecosystems, and can also pose health risks to people.

SUPPLEMENT A. GLOSSARY

Free Capital Generation (FCG)
The change in equity that is freely available, for example for dividend payments or investments. This is the increase in capital above the required capital under Solvency II or the required capital according to the own requirement.

FTE (Fulltime-equivalent)
A measure calculated based on a standard workweek. One full-time equivalent (FTE) corresponds to the working hours of a full-time employee over a specific period. The FTE value may vary by company and country. For Achmea, a workweek of 34 hours applies to collective agreement employees in the Netherlands, while a 40-hour workweek applies to employees not covered by the collective agreement and to employees abroad.

Fulfilment cash flows
The fulfilment cash flows represent the settlement of the obligations from the insurance contract with the policyholder. The expected value of the insurance liabilities is determined as an explicit, unbiased and probability-weighted estimate of the present value of the future cash flows that will arise as the entity fulfils its insurance contracts, increased with a risk adjustment for non-financial risk.

Full retrospective approach (FRA)
Transition method when an IFRS standard is first applied, where prior periods are recalculated as if the standard had always been applied.

Gender pay gap
The difference in remuneration between men and women, calculated by expressing the difference between the average gross hourly wage of men and women as a percentage of the average gross hourly wage of male employees.

General model under IFRS 17 (GMM)
Default measurement model used within IFRS 17 for measuring (re)insurance contracts. Other measurement models are the PAA and VFA.

General Pension Fund (Algemeen Pensioenfonds (APF))
APFs are players in the second pillar of the pension market and are not restricted to a specific area. This allows APFs to combine and administer the pension schemes of different employers or pension funds. This may result in economies of scale and cost benefits, while still maintaining control over the pension scheme.

Goodwill
The amount of future economic benefits arising from assets that are not capable of being individually identified and separately recognised as an asset in a business combination.

Green Finance Framework (GFF)
Developed by Achmea to attract green financing, the GFF offers sustainable investment opportunities in Dutch mortgages. The proceeds from financial instruments issued under the GFF are used for new and existing energy-efficient homes in the Netherlands and for energy-efficient commercial buildings in the Netherlands and beyond. The GFF complies with the Green Bond Principles and the Green Loan Principles and is primarily used for the (re)financing of existing mortgages.

Green bonds
Green bonds are financial instruments issued by governments, international institutions, or companies, with the proceeds specifically allocated for financing sustainable or 'green' projects. These projects focus on generating renewable energy, improving energy efficiency in buildings, sustainable transportation, and sustainable water and waste management. Green bonds also encompass sustainable and social bonds aimed at addressing or mitigating specific sustainable or social issues.

Greenhouse gases
Consist of carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), nitrogen trifluoride (NF_3), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

Gross operating expenses
All costs associated with sales and operational activities (excluding commission) consisting of personnel expenses, depreciation costs for property for own use and equipment and general expenses, including IT expenses and marketing expenses.

Gross written premiums (GWP)
Total written premiums in a given period. For Non-life insurance (with the exception of disability insurance contracts) and Health insurance, these relate to insurance contracts with starting dates during the reporting period and comprise the contractual premiums throughout the entire contract period. The contract period is the period during which Achmea is unable to (entirely) adjust the premiums or the insurance coverage for the changed risk profile of policyholders. The gross written premiums for Health insurance also include the contribution from the Health Insurance Equalisation Fund. For the other insurance contracts, the amount of Gross written premiums is equal to the premiums owed or earned during the contract period.

Heat stress
Negative effects of high temperatures on human health, ecosystems, and infrastructure, where prolonged exposure to extreme heat can lead to health risks, decreased productivity, and damage to natural resources.

SUPPLEMENT A. GLOSSARY

Human rights
Fundamental rights and freedoms that belong to all people, regardless of their nationality, gender, ethnicity, religion, or other status. These rights are intended to ensure the dignity, freedom, and equality of individuals and include rights such as the right to life, freedom of expression, the right to a fair trial, and protection against discrimination and violence. Human rights are enshrined in international treaties and declarations, such as the Universal Declaration of Human Rights, and form the basis for a just and humane society.

Impact investing
Aims to achieve a positive, measurable social and/or environmental impact in addition to generating a financial return. It has three essential components:
- Intentionality, meaning that achieving a positive impact is a predefined goal;
- Measurability, which is important to demonstrate the realised impact and to prevent greenwashing or impact washing; and
- A financial return that is in line with the market.

Impact materiality (ESRS)
A topic is considered impact material when it relates to the material actual or potential positive or negative impacts of the company on people or the environment in the short, medium, and long term. From the perspective of impact materiality, a topic includes impacts related to the company's own activities and its upstream and downstream value chain, including through its products and services, as well as through its business relationships.

Impairment
The amount by which the carrying amount of an asset or cash-generating unit exceeds its recoverable amount. The asset's carrying amount is reduced to its fair value and the loss is recognised in profit and loss.

Inclusion, diversity, and equity (ID&E)
The inclusion of individuals from various demographic backgrounds and the fair treatment of employees in the workplace concerning salary, benefits, and promotions.

Insurance contract
A contract under which one party (the insurer) accepts an insurance risk from another party (the policyholder) by agreeing that the policyholder will receive compensation if a specific future event (i.e. the insured event) adversely affects the policyholder.

Insurance-related emissions (greenhouse gas)
These are greenhouse gas emissions that can be associated with (re)insurance policies. An attribution factor is used to define the portion of the emissions that can be attributed to the insurer. The methods for this are described in the Partnership for Carbon Accounting Financials (PCAF) standard for insurance-related emissions.

Intangible asset
An identifiable, non-monetary asset without physical substance.

Integrated Governance, Risk and Compliance system (IGRC)
Describes the structure and implementation of Achmea's risk management and internal control system.

Interest rate risk
The risk that the fair value or future cash flows of a financial instrument and/or commitments will fluctuate because of changes in market interest rates.

International Financial Reporting Standards (IFRS)
Reporting standards and interpretations for companies issued by the International Accounting Standards Board (IASB). These comprise: International Financial Reporting Standards (IFRS and IAS); and Interpretations by the International Financial Reporting Interpretations Committee (IFRICs and SICs).

Investment result from (re)insurance activities
Result consisting of changes in the value of investments, interest income, other investment income, investment expenses and impairment losses.

Labour rights
Fundamental rights and freedoms that employees have in their work relationship. These rights include, among others, the right to a fair wage, safe and healthy working conditions, the right to time off and rest, the right to non-discrimination, and the right to organise and engage in collective bargaining. Labour rights are intended to ensure the dignity, safety, and well-being of employees and are often enshrined in national legislation and international treaties.

Liability for incurred claims (LFIC)
Liability related to claims that have already occurred arising from insurance contracts, consisting of:
a) claims related to insured events that have already occurred, including claims for which claims have not yet been reported; and
b) amounts not included under (a) for services already provided or investment components or other amounts not related to insurance contract services and not included in the LFRC.

Liability for remaining coverage (LFRC)
Liability for remaining coverage for insurance contracts, consisting of:
a) expected future claims for insured events that have not yet occurred that are covered under existing insurance contracts; and

SUPPLEMENT A. GLOSSARY

b) amounts not included under (a) for insurance contract services not yet provided, or investment components or other amounts not related to insurance contract services that have not been transferred to the LFIC.

Liquidity risk
Liquidity risk constitutes the risk that actual and potential payments and obligations cannot be fulfilled at the time of their maturity.

Locked-in discount rate
Discount rate at initial recognition used to discount the CSM in the General model under IFRS 17.

Market risk
Market risk refers to the risk that an entire market or asset class declines, which can potentially affect the price and value of the assets in the portfolio.

Material opportunities (ESRS)
Positive financial effects that have or could have a material impact on the company's cash flows, access to financing, or cost of capital in the short, medium, or long term.

Material risks (ESRS)
Negative financial effects that have or could have a material impact on the company's cash flows, access to financing, or cost of capital in the short, medium, or long term.

Material topic
Meets the criteria established for impact materiality, financial materiality, or both.

Material use and waste
Material use refers to the input of resources, such as raw materials, used in the activities or value chain of a company. In our health insurance, this pertains to the resources utilized in the value chain of health insurance. In property and casualty insurance, it relates to the materials used in the claims repair process (claims handling). Waste is any material that the owner considers no longer useful and therefore discards. In our healthcare activities, this definition applies to waste generated during medical procedures. In property and casualty insurance, it refers to the waste produced during the claims repair process.

Mean Species Abundance (MSA)
MSA measures the average abundance of species in an ecosystem. It is an indicator of biodiversity and reflects how well an ecosystem is functioning. A higher MSA value generally indicates a healthier and more diverse ecosystem, while a lower value suggests a decline in biodiversity and a potentially disturbed ecosystem.

Measures against violence and harassment in the workplace
The prevention of actions that are unwanted by the individual affected by them.

Net financial result from (re)insurance activities
Result consisting of the Investment result from (re)insurance activities, finance result from insurance contracts and finance result from reinsurance contracts held.

Net Promoter Score (NPS)
A metric for customer loyalty and employee satisfaction, based on the question: "How likely are you to recommend us to a friend or colleague?" Customers and employees give a score from 0 to 10 and are categorised into three groups: Promoters (9-10), Passives (7-8), and Detractors (0-6). The Net Promoter Score (NPS) is calculated by subtracting the percentage of Detractors from the percentage of Promoters, with a score ranging from -100 to +100. A higher NPS indicates greater customer satisfaction and loyalty.

Net zero
Certain activities do not exacerbate the greenhouse effect, meaning they do not contribute to the amount of greenhouse gases in the atmosphere. This can be achieved by reducing greenhouse gas emissions and by removing these gases from the atmosphere, for example, through tree planting. The terms climate neutral, net zero, and CO_2 neutral are often used interchangeably.

Normative engagement
Engaging in dialogue with companies in which investments are made and that violate internationally recognized standards, such as those related to human and labour rights, corruption, and the environment, with the aim of encouraging them to make their activities more sustainable and improve the quality of their governance.

Operating expenses
The portion of the Gross operating expenses not included as part of the fulfilment cash flows and therefore not part of underwriting expenses.

Operational result
The operational result is used for the internal management of Achmea’s activities to maintain focus and control over the underlying development of results. It is calculated as the result before tax adjusted for reorganisation expenses, transaction results (mergers & acquisitions) and application of an expected return method for the net financial result from (re)insurance activities. Here, Achmea bases its calculations on the expected market rates at the start of the year and normalised returns on equities and investment property. The same market rates are used to determine the discount curve for provision for unwinding of discount of the insurance liabilities when calculating the operational result.

SUPPLEMENT A. GLOSSARY

Operational risk
The risk that losses may occur from the inadequacy or malfunctioning of internal processes or systems, or external events.

Option
A financial instrument that conveys the right to buy (call option) or a right to sell (put option) a security at a reference price during a specified time frame.

Own employees
Refers to employees who have an employment relationship with the company, as well as employees not on the payroll who are either individual contractors providing labour to the company (self-employed) or individuals supplied by companies primarily engaged in labour mediation.

Physical risks
Risks arising from the physical effects of climate change can be event-driven (acute), such as an increase in extreme weather events (e.g., droughts and floods), or they can relate to long-term adjustments (chronic) to factors such as temperature, precipitation, rising sea levels, and greater variability in weather patterns.

Premium allocation approach (PAA) under IFRS 17
One of the valuation models within IFRS 17 that can be applied conditionally.

Prevention of corruption and bribery
Involves managing the risks of unethical practices. This relates to the misuse of entrusted power for personal gain and includes practices such as fraud, extortion, collusion, and money laundering. It can also involve offering or accepting gifts or other benefits, both in cash and in kind, to influence someone to engage in dishonest or illegal behavior.

Privacy of customers personal data
Customers have a human right to privacy, the security of personal data, and protection against the unauthorised use of personal information and unsolicited communication. Customer privacy concerns how we collect, use, and process customers' personal data, and how we respect customers' rights regarding their data and privacy.

Private equity
An asset class consisting of equity securities of companies that are not publicly traded on a stock exchange.

Product Approval Review Process (PARP)
Procedure for the introduction and assessment of products. It ensures that products are not traded or distributed without considering the interests of consumers (including the impact on consumers) and the interests of the company (including the associated risks and opportunities).

Responsible advertising
Ethical and socially responsible methods for advertising and promoting products and services to customers include presenting information truthfully and transparently, avoiding misleading claims and greenwashing, and refraining from harmful advertising practices targeting vulnerable populations.

Responsible investment
Responsible investment (also referred to as ‘ethical investment’ or ‘socially-responsible investment’) is a form of investment whereby financiers consider the impact on human beings and the environment in their investment decisions.

Reinsurance assets for remaining coverage
The reinsurer’s share of the fulfilment cash flows related to future services and any CSM at that date.

Reinsurance assets for incurred claims
The reinsurer’s share of the fulfilment cash flows of claims incurred.

Risk Adjustment (RA)
Risk adjustment for non-financial risk. The compensation required by an entity for bearing the uncertainty arising from non-financial risk regarding the amount and timing of cash flows associated with insurance contracts.

Scope 1 emissions
Direct greenhouse gas emissions from sources owned or controlled by the company.

Scope 2 emissions
Indirect emissions resulting from the generation of purchased or acquired electricity, steam, heating, or cooling consumed by the company.

Scope 3 emissions
All indirect emissions (not included in Scope 2 emissions) that occur within the value chain of the reporting company, including both upstream and downstream emissions. Scope 3 emissions are further categorised into Scope 3 categories.

Service book
Portfolio of pension & life insurance contracts. This insurance portfolio consists of a closed portfolio of pension and life insurances in which no new policies are sold and an open portfolio of new sales of term life insurance policies and direct annuities.

Solely payments of principal and interest (SPPI)
Test under IFRS 9 used to determine whether the contractual cash flows for a financial instrument consist solely of principal repayment and interest payments.

SUPPLEMENT A. GLOSSARY

Solvency
Solvency expresses the degree to which insurers are able to meet their future obligations. All insurance companies are required by law to maintain a specific solvency margin as a safety margin (required solvency margin). This is regulated by De Nederlandsche Bank, thereby providing additional security to policyholders. If an insurance company's actual solvency margin is equal to the minimum solvency requirement, the solvency ratio is 100%, while if an insurer maintains a capital than required, the solvency ratio exceeds 100%.

Solvency II (SII)
Solvency II is a European Union legislative initiative that became effective in all EU Member States on 1 January 2016. It is a standardised regulatory regime for insurers across Europe and contains legislation regarding insurance solvency and risk convergence.

Solvency II ratio
This measure is used to monitor the solvency position based on the regulatory framework. The ratio reflects the permitted equity components as a percentage of the required Solvency II capital.

Stakeholders
Parties that may influence the company or whom the company may influence.

Subordinated debt
Loans (or securities) that rank after other debts should the company fall into receivership or be closed.

Supplementary health insurance
A health insurance policy that provides coverage for care not included in the basic health insurance. A supplementary health insurance policy is not mandatory. Health insurers determine the terms, reimbursements, and premiums of the supplementary insurance themselves. The covered healthcare may vary by additional health insurance policy.

Talent, Development & Performance (TOP)
Aims to identify, develop, and optimize employees' skills. TOP includes personal development, coaching, training, and setting clear objectives to promote growth and improvement. Employee performance assessments do not affect compensation or salary increases. This applies to Achmea employees in the Netherlands.

Thematic engagement
Focuses on companies that can improve their financial and social performance on specific themes. The themes for engagement are aligned with Achmea's priorities, taking into account factors such as environmental and social relevance, the size of the company within the investment portfolio, and the likelihood of success in the dialogue.

Third-party companies
Third-party companies include Achmea subsidiaries of which the social and environmental aspects are not registered at the central level. This is in line with the structure used for HR policy (see also annex B.) and comprises the following entities: Eurocross Assistance, InShared and Klant Contact Services.

Training and development
Providing education and resources to employees to enhance their knowledge, skills, capabilities, and work performance.

Transition risks
Risks associated with the transition to a low-carbon economy. These risks are linked to policy changes by, for example, governments and legislative measures, technological changes, market responses, and reputational damage.

Ultimate Forward Rate (UFR)
The UFR represents the notional interest rate after the last liquid point (LLP) in the forward swap market. It is a risk-free notional interest rate used for long-term contracts which are undertraded due to the long period of time involved. The UFR is used for a variety of purposes, including the valuation of specific long-term contracts and to calculate the solvency ratio.

Underwriting risk
The risk the insurer has taken over from the policyholder. Achmea is exposed to life risk, non-life risk, income risk and health risk as a result of its broad insurance product range.

Unit-linked contracts
Life-insurance contract which involves investing in an investment fund through the purchase of units. There is often a choice between equity, bond and mixed funds.

Upstream
Entities, such as suppliers, that provide products or services used in the development of the company's own products or services

Value chain
Includes all activities, resources, and relationships associated with the company's business model and its external environment. It encompasses the various steps the company goes through to create its products or services, starting from design and continuing through to delivery, consumption, and the end of the lifecycle. The entities involved within the value chain can be located both upstream (before) and downstream (after) the company in the process.

Variable Fee Approach (VFA) under IFRS 17
One of the measurement models within IFRS 17 that can be applied conditionally.

SUPPLEMENT A. GLOSSARY

Vitality
Refers to an individual's capacity for living, growing, and developing, encompassing energy and the strength to take action. Vitality is assessed based on the annual Employee Engagement Survey (MBO), which consists of a questionnaire allowing employees to provide feedback on various topics, including vitality. The vitality score is the average of all participants in the MBO.

Voting/Voting Policy
Votes are cast at shareholders' meetings according to an established voting policy for investments. When a shareholder proposal is not in accordance with the voting policy, a vote is cast against it. The voting policy is based on international best practices and laws and regulations regarding corporate governance. In exercising voting rights, relevant national laws and regulations, local market standards, and corporate governance codes in each individual market are taken into account.

Water and soil pollution
The presence of harmful substances in various environments, which can have a significant impact on living organisms and ecosystems. Water pollution refers to water being contaminated by chemicals, microorganisms, and waste materials. Soil pollution refers to the contamination of the soil by harmful substances. These pollutants can be detrimental to human health, the environment, or the proper use of land.

Working conditions in the value chain
Collective aspects that shape the professional environment of employees within the value chain. This includes regulated working hours and overtime, a balanced work-life distribution, the safeguarding of physical and mental health and safety in the workplace, respect for workers' rights such as the right to association, the prohibition of discriminatory and unfair labor practices, and the provision of a living wage that ensures a decent standard of living for employees and their families, based on normal working hours and country-specific economic conditions.

Work-life balance
The demands of both work and personal life can coexist without friction.

COLOPHON AND CONTACT INFORMATION

Colophon and contact information
This is the English version of the Achmea annual report for 2024. A Dutch version of this report is also available. In the event of any discrepancies between the Dutch and English versions of this report, the Dutch version will take precedence. The annual report can be downloaded from the Achmea website (www.achmea.nl).

Achmea B.V.
Handelsweg 2
3707 NH Zeist
P.O. Box 866
3700 AW Zeist
Telephone +31 30 693 70 00
www.achmea.nl

Colophon
Corporate Communications:
achmeacommunicatie@achmea.nl
Investor Relations: investors@achmea.com
Achmea Sustainability: sustainability@achmea.nl

Editor
Jan Jaap Omvlee, Cognito,
Amsterdam

Design
Achmea Creatieve Diensten,
info@achmeacreatievediensten.nl