

Diversity, Equity, & Inclusion Policy

NN Group N.V.
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Contents

1. Introduction	3	4. Customers	10
1.1 Objective	3		
1.2 Scope	3	5. Communities	11
1.3 Regulatory framework	3		
2. Our DEI vision	4	6. Other stakeholders in our value chain	12
2.1 How we define diversity, equity, and inclusion at NN	4	6.1 Our role as an investor	12
2.2 How DEI relates to human rights and discrimination	4	6.2 Our role as a buyer	12
2.3 Our approach to DEI	5	7. Complaints mechanism	13
3. Colleagues	6	8. Policy accountability, implementation and monitoring	14
3.1 Gender diversity	6	8.1 Policy accountability and implementation	14
3.2 Other diversity	7	8.2 Policy monitoring	14
3.3 DEI is embedded within the employee journey	7	8.3 Policy adoption	14

1. Introduction

At NN Group, our purpose is **to help people care for what matters most to them**. We do so, guided by our values care, clear, commit, and our brand promise You matter. Our ambition is to become an industry leader, known for our customer engagement, talented people, and contribution to society. We aim to create sustainable long-term value for our stakeholders, and we respect people and the world we live in. This includes our responsibility to respect human rights, promote equal opportunities and increase inclusiveness.

1.1 Objective

The objective of the Diversity, Equity, and Inclusion (DEI) Policy is to outline our commitment to our colleagues, customers, communities, and other stakeholders in our value chain (including their workers). The policy supports our DEI ambition to be a supporter of diversity, equity and inclusion and outlines some of our actions towards creating a fair and equal workplace, customer experience and societal contribution.

This policy helps us to better understand and meet the changing needs of our various stakeholders in an ever-evolving world, particularly in the financial sector. It is intended to provide direction and support NN Group's business units, the NN Group DEI team, and other NN Group functions involved in embedding DEI in all aspects of our organisation. This is essential to achieve diverse representation and perspectives,

equitable policies, and to support inclusive employee and customer experiences.

Diversity in representation and thought at all levels of our organisation, particularly in our senior management, enables us to steer the NN Group strategy and more effectively address its impacts, risks, and opportunities. With this DEI Policy we also set forth our approach to reaching diverse and inclusive board and senior management compositions. This also includes diverse representation in our workforce, product and service offering, and our contributions to society.

1.2 Scope

The DEI Policy is applicable to NN Group¹ as a whole, including all business units. The intention of this policy is to be in line with all local laws and regulations of the countries where NN Group's business units are

situated. In case of a conflict between elements in this policy and relevant local laws and regulations, local laws and regulations prevail.

- When referring to **colleagues** we refer to our own workforce, being all employees employed by NN Group under an employment agreement and our contingent workers that qualify as 'non-employees.'
- When referring to **customers** we refer to customers of NN Group.
- When referring to **communities** we refer to communities benefiting from charitable contributions, corporate volunteering, and event sponsorship supported by NN Group.
- When referring to **other stakeholders in our value chain** we refer to those performing work within NN Group's value chain, regardless of the existence or

nature of any contractual relationship with NN Group. 'Workers in the value chain' encompasses workers employed by companies in both the upstream and downstream value chain, through our business partners and the companies we invest in.

1.3 Regulatory framework

This DEI Policy is drafted in accordance with section 2.1.5 of the Dutch Corporate Governance Code. The policy incorporates requirements from the Dutch Civil Code. This policy also provides a sound basis for complying with upcoming requirements of the European Pay Transparency Directive and the Solvency II Directive.

2. Our DEI vision

At NN, we believe our company is strongest when we embrace the full spectrum of humanity. Recognising each person's uniqueness and appreciating the value we all bring empowers us to succeed as individuals, as teams, and as a company. In our view, embedding DEI in our company enhances decision-making, promotes innovation, and improves business performance. It boosts employee engagement and is part of our broader commitment to creating sustainable long-term value for our stakeholders. Therefore, at NN, we are a supporter of diversity, equity, and inclusion and promoting equal opportunities for all.

We encourage our colleagues to bring their whole selves to work. Together, we create a culture where people belong. They feel welcomed, valued, and respected and where there is no room for discrimination – making NN a place where people are proud to work. We aim to deliver an inclusive customer experience, contribute to underserved communities, and – where deemed necessary – engage with our business partners and investee companies to uphold diverse, inclusive, and equitable practices in relation to workers in the value chain.

2.1 How we define diversity, equity, and inclusion at NN

DEI is embedded in how we aim to build our teams, create products and services for our customers, how we contribute to the well-being of our communities and treat other stakeholders in our value chain.

Diversity

At NN, we acknowledge diversity in all of its forms. The diversity dimensions of age, gender (identity), nationality, race, ethnicity, country of origin, abilities, neurodiversity, sexual orientation, education level, languages spoken, and belief systems are important for us as they shape our experiences and perspectives. They make us the unique talents that, together, make up NN. We respect how everyone relates to these and other facets of their identity.

Equity

Everyone at NN should have the opportunity to succeed, regardless of their distinct identities, background, and circumstances. This means we actively recognise and mitigate barriers to inclusion by addressing our biases (through past and future training), adjusting our behaviours, systems, procedures, and processes. We aim to help create a level playing field for individuals and communities leveraging structural and behavioural inclusion strategies.

Inclusion

NN encourages a workplace of learning and growth, where people can be themselves and feel respected, valued, safe, and engaged. This includes increasing dialogue to enhance understanding, promote inclusion, and enables previously unheard voices to be

heard. We aim to address our customers' real needs with inclusive experiences, empowering them to contribute to a world where people thrive for generations to come. We want to advance our communities through our social impact initiatives. Inclusion means everyone all the time, not some people some of the time.

2.2 How DEI relates to human rights and discrimination

Our stance on human rights

At NN, we believe embracing everyone includes our responsibility to respect human rights which is an integral part of our NN Group's values and impacts our business activities and interactions with stakeholders across our value chain. NN Group's policy

commitment to human rights is described in the NN Group Human Rights Statement, which sets out what we expect from ourselves and our business relationships in this area. In line with international standards, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, we have identified those human rights that are at risk of the most severe and likely actual or potential impacts on people through our activities and business relationships. These are also related to DEI. We have created an internal social roadmap with actions defined for our various roles for the coming years. For more information about our approach to human rights, refer to our [Human Rights Statement](#) on the Sustainability page of our website and the Sustainability Statement in our annual report.

Our stance on discrimination

We have various policies in place that aim to mitigate potential negative impacts of unfair treatment with regard to the customers we serve, the business and investment relations we engage with, the society we are part of, and foremost our colleagues, particularly those that belong to underrepresented groups. Discrimination can significantly affect employees' emotional and mental well-being, career advancement, work relationships, and sense of belonging in the workplace. Our Code of Conduct provides clear guidance on how colleagues should interact with each other, our customers, our communities, and

other stakeholders. We are committed to offering interactions, services, and a workplace that are free of discrimination, hostility, and physical or verbal harassment. All forms of harassment, whether racial, sexual, relating to disability, sexual orientation, identity, or expression, physical or psychological, or any other attribute, are prohibited. Any allegation of discrimination or harassment will be treated seriously and be dealt with in accordance with local legislation and applicable policies including our [Code of Conduct](#).

2.3 Our approach to DEI

Our approach to DEI is about embracing everyone. We focus on creating an environment where everyone can be their authentic selves. We aim for diverse representation in terms of gender, nationality, ethnicity, sexual orientation, age, neuro and physical diversity. The more diverse our workforce is – also in thought, skills, and experience – the better equipped we will be for whatever tomorrow brings. By investing in attracting, developing, and retaining diverse talent, we aim to build engaged and vibrant teams with the mindsets and capabilities to better serve our customers and communities.

Our long-term plans include actions that will affect meaningful change and leverage DEI data, for example, on gender diversity, to actively steer and facilitate well-balanced decision-making.

To achieve our ambition, we address DEI within our various roles and across our key stakeholder groups:

- **Colleagues** - provide an inclusive and diverse work environment where our employees can bring their whole selves to work.
- **Customers** - provide our customers with an inclusive customer experience.
- **Communities** - consider a DEI lens in NN Group's contributions to society.

With respect to **other stakeholders in our value chain**, we encourage them to uphold diverse, inclusive, and equitable practices for their workforce.

'We focus on creating an environment where everyone can be their authentic selves.'



3. Colleagues

Ambition

Our strategic commitment to our people is to support and empower them, and to foster a values-based culture. We aim to cultivate a workforce that reflects the diversity of our customer base and the communities in which we live and work. Therefore, we want to provide an inclusive and diverse work environment, in which our colleagues can bring their whole selves to work.

Key milestones

- DEI is embedded within our remuneration processes which supports us in contributing to an inclusive working environment by avoiding improper treatment of employees and focuses on offering equal opportunities, working conditions, and equal pay for equal work.
- DEI is embedded throughout the employee journey which guides our HR function and managers on how to support our colleagues best. It is further outlined in the section 'DEI is embedded in our employee journey' on page 8.
- We have started implementing the European Pay Transparency Directive.

Target

We have formulated several DEI related targets, some for internal guidance, others as metrics that we report on externally. When it comes to these external targets, we have committed ourselves to the following:

- Our 2025 target remains in place at $\geq 40\%$ women and $\geq 40\%$ men in Senior Management positions by the end of 2025. Senior Management up to the end of 2025 is defined as NN Group N.V.'s Management Board, managerial positions reporting directly to the Management Board, and managerial positions reporting directly to the CEOs of NN Non-life, NN Bank or the CEOs of the NN International business units.
- As of May 2025, our target is $\geq 40\%$ women and $\geq 40\%$ men in Senior Management positions by 2028 with an expanded target group to include additional managerial positions. The updated 2028 definition of Senior Management is defined as NN Group N.V.'s Management Board and managerial positions in the two levels below.

- For NN Group N.V.'s Executive Board, Management Board and Supervisory Board, and the management and supervisory boards and senior management² of NN Group companies in scope of the Dutch Act on gender diversity in boards of large companies³ we also have a target of $\geq 40\%$ women and $\geq 40\%$ men.
- We will fulfil local legal disability quotas where applicable.

Key metrics

- Target of $\geq 40\%$ women and $\geq 40\%$ men in Senior Management⁴ positions for NN Group N.V. as per current definition by 2025.
- Target of $\geq 40\%$ women and $\geq 40\%$ men in Senior Management⁵ positions for NN Group N.V. as per new definition by 2028.
- Target of $\geq 40\%$ women and $\geq 40\%$ men for NN Group N.V.'s Executive Board, Management Board and Supervisory Board, and the management and supervisory boards and senior management⁶ of NN Group companies in scope of the Dutch Act on gender diversity in boards of large companies⁷.

3.1 Gender diversity

To support all NN Group gender diversity targets, we invest in strengthening our female leadership talent bench through various initiatives, including mentoring, talent development, and leveraging gender employee resource groups.

We are committed to the following actions (amongst others) to achieve our gender diversity targets:

- Inclusive hiring practices with gender diverse slates to include 50% women and 50% men on shortlists in predetermined pipeline grades.
- Continuing to build inclusion within the talent management processes, ensuring quality and strength of gender balance in the leadership pipeline.
- Taking the 40% target into account in succession planning and appointment processes.
- Leveraging data insights on hiring, promotion, attrition, and exit data to understand movement between grades and leaks in the pipeline.

2. For NN Group's companies in scope of the Dutch Act on gender diversity in boards of large companies, senior management is defined as their management teams.
3. (Wet tot wijziging van Boek 2 van het Burgerlijk Wetboek in verband met het evenwichtiger maken van de verhouding tussen het aantal mannen en vrouwen in het bestuur en de raad van commissarissen van grote naamloze en besloten vennootschappen, 'the Dutch Act on gender diversity in boards of large companies')
4. For 2025, NN Group N.V.'s Senior Management is defined as NN Group N.V.'s Management Board, managerial positions reporting directly to the Management Board, and managerial positions reporting directly to the CEOs of NN Non-life, NN Bank or the CEOs of the NN International business units.
5. For 2028, NN Group N.V.'s Senior Management is defined as NN Group N.V.'s Management Board and managerial positions in the two levels below.
6. For NN Group's companies in scope of the Dutch Act on gender diversity in boards of large companies, senior management is defined as their management teams.
7. (Wet tot wijziging van Boek 2 van het Burgerlijk Wetboek in verband met het evenwichtiger maken van de verhouding tussen het aantal mannen en vrouwen in het bestuur en de raad van commissarissen van grote naamloze en besloten vennootschappen, 'the Dutch Act on gender diversity in boards of large companies')

- Expanding learning and development opportunities for colleagues by offering resources on topics such as unconscious bias and microaggressions.
- Evolving existing networks into impactful employee resource groups that can support diversity initiatives.
- Striving for gender balance of 50% men and 50% women in our leadership training programmes and the NN Group Traineeship tracks.
- Having signed the SER Diversity Charter, we aim to comply with the Dutch Civil Code, annual SER reporting for qualifying Dutch entities reporting on gender diversity targets, board composition, and action plans in both annual reports and in the Diversity Portal of the SER.



3.2 Other diversity

Beyond gender diversity, we aim to create diverse representation in our board and senior management compositions and at all levels of our organisation.

In optimising such compositions like our entire workforce, we aim for diversity of thinking. For the company, diversity is paramount to ensure a wide range of relevant perspectives and views. Therefore, in board compositions and senior management, beyond gender, we strive for diversity in the dimensions of age, nationality, race, ethnicity, country of origin, abilities, neurodiversity, sexual orientation, educational background, languages spoken, and belief systems. In addition, there has to be a balance in the affinity with the nature and culture of the business.

To achieve diverse representation beyond gender, we apply various principles and targets within our recruitment and appointment or nomination, where applicable.

3.3 DEI is embedded within the employee journey

Overall employee journey

Across the employee journey, we aim to provide equal opportunities and experiences for our colleagues.

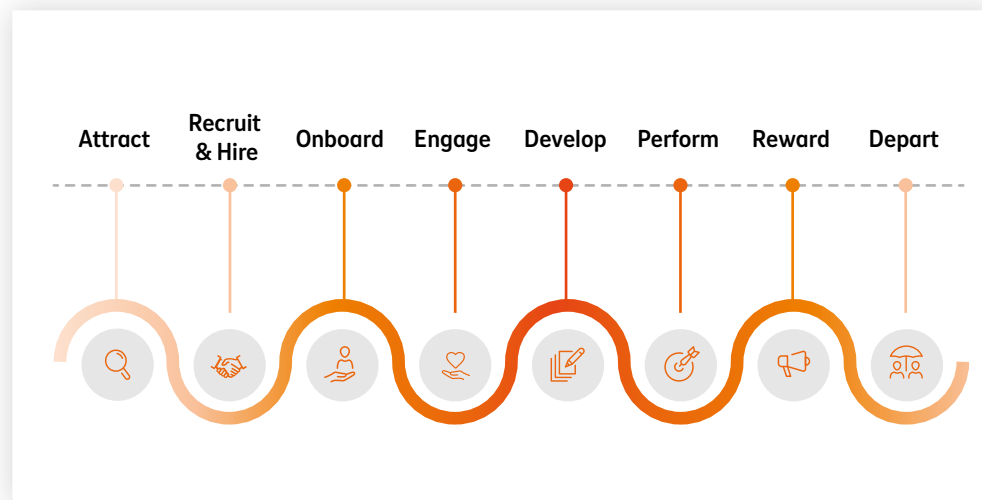
- **Fair employment:** we are committed to providing secure and fair employment to all our employees and understand that a safe and supportive work environment is essential for their wellbeing and success. We have a European Works Council (EWC) in place to support our commitment of secure employment, social dialogue, and workers' rights across all business units. The EWC plays a vital role in fostering social dialogue by addressing issues that affect workers across different countries. For applicable colleagues we have Collective Labour Agreements in the Netherlands, Belgium, Greece, Spain, and Romania which are negotiated with works councils and trade unions where applicable. These agreements not only enhance job security but also reinforce our commitment to adequate wages and equitable working conditions.
- **Holistic diversity:** we seek to look at diversity in a more intersectional manner. Beyond gender, we monitor diverse representations in dimensions such as nationality and age data which we collect today. In the future we would like to capture further diversity data where employee data can be collected in a voluntary, confidential, and legal manner. We value the privacy and security of our colleagues and recognise that personal data must be managed with care. We do this in line with legislative data protection requirements; the EU General Data Protection Regulation (GDPR) being the most important of these.
- **Leveraging data insights:** using DEI dashboards to better understand hiring, promotion, attrition, and exit data to provide insights on employee movements and leaks in the leadership pipeline. Also, our annual equal pay analysis provides insights.
- **Raising awareness of DEI:** we aim to celebrate diverse moments using a DEI calendar, marking moments such as Women's History Month, International Women's Day, and International Pride with activities and communications to raise awareness and promote belonging.
- **Assessing DEI maturity:** we want to measure DEI progress by conducting a cross-country annual benchmark exercise. Collaborating with an external partner, the exercise uses leadership interviews and employee surveys to assess how mature DEI initiatives are across our NN locations. With direct engagement with each of the countries, we can create tailored actions and ensure that DEI efforts are measured and responsive, addressing the countries' own unique challenges and opportunities.

- **Inclusive workplaces:** we aim to create an inclusive workplace that is accessible, adjustable, and predictable for all visitors and colleagues. This is by providing engaging and useful facilities (nursing rooms, prayer spaces) and services that offer accessible visitor and employee experiences with sensory-friendly workspaces, adjustable facilities, inclusive communication and prioritising transparency and consistency across all NN office locations.



Key employee steps:

We aim to make DEI improvements along our employee journey to achieve our ambition. These improvements are outlined below.



- **Attract, Recruit & Hire:** our talent acquisition processes are designed with inclusion and equity in mind with objective processes to mitigate bias and hire the best candidate for the role. Inclusive hiring practices incorporate gender diverse slates on shortlists, semi-structured interviews, diverse panels, and training for managers, all of which support the creation of diversity throughout the organisation. By stating salary ranges and refraining from

requesting historical pay data, we aim to contribute to equity. With our inclusive vacancy text which includes our DEI stance, and by offering fair growth opportunities by opening all roles, we aim to attract diverse candidates.

- **Onboard:** DEI is embedded within our onboarding experiences covering our ambition, targets, initiatives and how colleagues can get involved. In addition new colleagues are informed about how

to behave and interact in accordance with our **Values** which states that we respect each other and promote equal opportunities. Our **Code of Conduct** provides clear guidance on how colleagues should interact and prohibits all forms of discrimination.

- **Engage:**
 - **Employee surveys:** we aim to capture self-identification data following legislation in a voluntary and confidential manner where permitted in our people system. In addition, we plan to track employee sentiment regarding inclusion and belonging anonymously in our employee engagement tool Peakon.
 - **Employee Resource Groups (ERGs):** we cultivate and harness our ERGs to support our DEI strategy and to champion inclusivity within NN by advocating for the unique needs of our diverse workforce. Our ERGs are comprised of passionate colleagues who act as ambassadors of DEI within NN. At NN we have six ERGs representing five dimensions of gender, cultural diversity, sexual orientation, neurodiversity, and generations. For more information on our ERGs, please refer to our **Diversity, Equity, and Inclusion** page on our website.

- **Develop:** we consider all colleagues to have their own specific valuable talents, and we want to give them the opportunity to grow and develop their knowledge, skills, and behaviours in our organisation. We offer a comprehensive range of training and development opportunities to support learning and growth.
- **Key talent management:** NN's talent processes include talent reviews, talent forums for cross-business unit movement, and succession sessions for senior positions by the Management and Supervisory Boards. We actively identify female talents and bring them into hiring and succession (planning) processes to help them further develop when opportunities arise. Through data insights, we monitor impact and improve the diversity of our talent pool, pipelines, and management teams.
- **Leadership development:** NN offers management and business leaders training programmes incorporating DEI elements, such as understanding bias, allyship and inclusive leadership. The NN Group Traineeship attracts diverse young talent and helps them grow into future leaders.
- **Diversity, equity, and inclusion learning:** NN's DEI ambition is supported through awareness and learning

opportunities. Learning works differently for everyone and by offering a diverse range of mediums (in person, online, and self-service resources), colleagues can match their needs for personal and professional development. DEI trainings include unconscious bias, allyship, DEI terminology, and inclusive leadership. Where relevant, these training courses are and will be incorporated within other employee and management training curriculums.

- **Perform:** our performance management process, the People cycle, helps colleagues to set and align business goals, which are essential to realise our overall NN strategy. The process supports colleagues in their continuous development and aims to contribute to providing equal opportunities. Throughout the year, managers and team members have regular dialogues about colleagues' progress on their business and development goals. To monitor progress, the team member can proactively ask for and provide feedback. The Personal Development Plan (PDP) can be used to reflect on their long-term development goals.

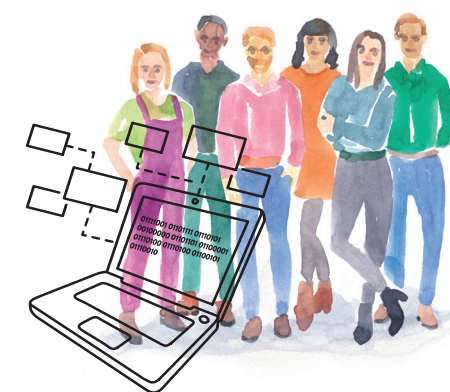
- **Reward:** NN aims to apply a clear and transparent remuneration policy that is adequate to attract and retain expert leaders, senior staff, and other highly qualified colleagues.
 - **Gender pay & equal pay:** NN is committed to contributing to an inclusive working environment by promoting equal opportunities, working conditions and equal pay for equal work for all NN employees, irrespective of their gender. On an annual basis, we analyse NN Group's pay for all business units with a focus on gender equality and report on this in our annual report. In general, men and women performing similar jobs, with similar experience and age, receive fair and equal pay. In promoting equal opportunities, we focus on our talent management, succession planning and DEI initiatives. We also closely monitor compensation packages for new hires and recently promoted women, ensuring a balanced pay structure for all NN employees.
- **Depart:** At NN we want to provide colleagues with employee experiences that motivate them to stay and grow with the company. Sometimes colleagues leave for various reasons, and we would like to understand reasons for their departure so that insights can be

leveraged to improve the employee experience and to retain our employees

- **Exit data:** through exit surveys and interviews with DEI questions embedded, we aim to understand why colleagues decide to leave NN. We want to use data insights around diversity, particularly gender, to track leavers at a senior management level.

Our approach to DEI for our colleagues is outlined above and implemented via:

- **Remuneration Policy** (a description of which is externally available in our annual report).
- **HR Framework Standard** (internally available).



4. Customers

Ambition

Our strategic commitment to customers is to deliver an outstanding customer and distributor experience and develop and provide attractive products and services. Therefore, we want our products and services to be accessible and inclusive for our customers.

Key initiatives

- Raising awareness and being compliant to the European Accessibility Act which may impact our products and services.
- Provide guidelines on inclusive communication following the NN Group's Brand language guidelines across markets.
- We aim to include X as an option next to female or male for all products where gender registration is needed and where legally permitted.

We aim to create an inclusive customer experience by using diverse representation in our communications, advertising, and expression, and tailoring our products and services to our diverse customer base. We evaluate our products and services, seek feedback from customers and other stakeholders, and follow developments in technology and legislation to safeguard our

ability to be accessible and inclusive.

By involving customers with disabilities in research, we aim to make our digital tools more accessible to them and bring focus in the organisation to accessibility and inclusivity. We will be further developing processes and actions that aim to provide equal opportunities and access to products, services, and information for all individuals, regardless of their background or characteristics, especially gender. These actions include promoting non-discrimination, eliminating barriers that hinder access, and implementing responsible marketing practices that prioritise transparency, fairness, and the well-being of customers.

Further information on inclusion for our customers is outlined in the following policies:

- [Responsible Insurance Underwriting Framework Policy](#).
- Product Policy (internally available).



5. Communities

Ambition

Our strategic commitment to society is to contribute to the well-being of people and the planet. Therefore, diversity, equity, and inclusion are considered in NN Group's contributions to society. We want to promote a society where everyone can participate and thrive for many generations.

Key milestones

- In 2020, we introduced the target of contributing 1% of operating result before tax by 2023 (based on a three-year average). In 2023, we reached this target and contributed 1.1% of our operating result before tax.
- In 2022, we moved to an output target: to support the financial, physical, and/or mental well-being of one million people. We do this in communities where NN is active, especially for those for whom this well-being is under pressure or at risk.

Target

- In 2025, we are continuing to further develop this ambition and have introduced a new target to support the financial, physical, and/or mental well-being of 2.5 million people by 2028 (accumulative since 2022).

Key initiatives

We use a DEI lens in our community investment activities:

- **Supporting underserved communities:** NN is committed to supporting underserved communities through strategic partnerships and investments.
- **Inclusive initiatives:** initiatives such as Disaster Relief Fund, NN Social Innovation Fund and partnerships with organisations like SOS Children's Villages and JA Europe focus on supporting diverse groups and show a commitment to providing equitable support to those in need.
- **Volunteering:** the emphasis on volunteering and the engagement of NN colleagues in social impact activities demonstrates a commitment to fostering an inclusive and supportive environment.
- **Health and well-being programmes:** programmes aimed at improving financial, physical, and mental well-being, particularly for young people and underserved communities, reflect a focus on equity and inclusion.

Our approach to inclusion within our communities is further outlined in our Sponsorship and Charitable Donations Policy (internally available) and our annual community investment achievements are reported on our [Community Investment](#) website.



6. Other stakeholders in our value chain

Ambition

In our role as an investor and buyer of products and services, we aim to encourage other companies to uphold diverse, inclusive, and equitable practices in relation to their workers.

As part of our internal social roadmap, which aims to address salient human rights issues in our value chain, NN Group plans to investigate establishing targets, tracking our progress against them and identifying possible areas and related actions for improvements.

6.1 Our role as an investor

As an investor, we consider violations of human rights and labour rights to be potential controversial conduct. This includes severe cases of discrimination against workers of investee companies, or those in their value chain. Discrimination of workers can have a significant impact on the emotional and mental well-being, career advancement, work relationships and sense of belonging in the workplace. Our Investment Guidance papers on Human Rights and Labour Rights provide guidance for our external asset managers and other stakeholders in evaluating investments on these topics.

Furthermore, for our proprietary assets, we support diverse board compositions, expecting investee companies to meet or exceed gender quotas and disclose diversity policies. NN Group generally votes in favour of proposals that request companies to report on plans to increase board diversity. We also generally support proposals seeking alignment with local market practice on racial equity audits and pay gap analyses. With regards to gender board diversity specifically, in the absence of local regulation referring to minimum female representation on boards, we expect companies to adhere to a minimum of 30% women on their board.

We include considerations of diversity and discrimination specifically in several of the (investment guidance) documents and also in our underlying Responsible Investment Framework Policy:

- [Responsible Investment Framework Policy](#).
- [Voting Policy for Proprietary Assets](#).
- [Investment Guidance paper on Human Rights](#).
- [Investment Guidance paper on Labour Rights](#).

6.2 Our role as a buyer

In the area of procurement, equal pay, and equal opportunities are important to address in our role as a buyer. We expect companies that provide us with products and services to have commitments or policies to address inequalities within their workforce. Unequal pay and opportunities can hurt workers' finances, limit their career growth, and damage work relationships. To mitigate this potential impact, we have in place the [Sustainable Procurement Statement](#) and we have included diversity, equity, and inclusion as part of our Supplier ESG programme. The topic of diversity, equity, and inclusion is also included in our [Supplier Code of Conduct](#), to which key suppliers are asked to commit to during the supplier onboarding or by signing the [NN Terms & conditions 2024](#) or as applicable at the time.

7. Complaints mechanism

Having processes in place for our stakeholders to express their concerns related to our DEI performance is key to effective stakeholder engagement. This includes complaints mechanisms for colleagues, customers, other stakeholders in local languages and ensures confidentiality by providing report access to authorised NN staff only. We aim to offer an accessible mechanism to manage complaints on NN Group activities in a systematic way, ensuring stakeholders are aware of the procedure and how it works. We provide named senior contacts on our website for each of our key stakeholder groups and publish the process for complaints on our Customer Support pages.

- **Colleagues** can raise concerns through our normal reporting channels or anonymously via the [NN Group Whistleblowing Standard](#), [NN International Whistleblowing Standard](#), and [Reporting Concerns Standard](#).
- **Customers** can make complaints which are dealt with in line with the relevant complaints management procedures and can be submitted anonymously via our local websites.

- **Other stakeholders**, such as suppliers and third parties, can also report concerns in a work-related context with NN. Stakeholders that identify particularly serious or recurring issues are fast-tracked to the relevant department.

We find it important to provide effective remedy wherever we cause or contribute to negative human rights impacts. More details on our grievance mechanism can be found in our [Human Rights Statement](#) on our Sustainability page.



8. Policy accountability, implementation and monitoring

8.1 Policy accountability and implementation

NN Group N.V.'s Supervisory Board is accountable for the DEI Policy and its implementation where applicable to NN Group N.V.'s Executive and Supervisory Board.

NN Group N.V.'s Executive Board is accountable for the DEI Policy and its implementation where applicable to NN Group N.V.'s Management Board (excluding Executive Board members), and/or NN Group N.V.'s Senior Management and the rest of the workforce.

NN Group N.V.'s Management Board is accountable for the DEI Policy and its implementation where applicable to customers, communities and other stakeholders in our value chain.

The policy is available on our NN Group website and is reviewed at least once every year. If the review indicates that an update is necessary, the policy is revised accordingly.

8.2 Policy monitoring

We monitor the effectiveness of this policy on DEI in several ways, including a periodic review of our adherence to our policies and standards, and dialogue with stakeholders. We also participate in initiatives to further improve our approach and deepen our understanding of DEI topics and issues.

8.3 Policy adoption

This Diversity, Equity and Inclusion policy was adopted:

- By NN Group N.V.'s Supervisory Board, where applicable to NN Group N.V.'s Executive and Supervisory Boards.
- By NN Group N.V.'s Executive Board where applicable to NN Group N.V.'s Management Board (excluding Executive Board members), and/or NN Group N.V.'s Senior Management and the rest of the workforce, with approval of the Supervisory Board.
- By NN Group N.V.'s Management Board, where applicable to customers, communities, and other stakeholders in our value chain.

Disclosure

We communicate and report on our approach to DEI, together with the key issues raised and actions taken, in our Annual Report.
The Hague, May 2025

Important legal information

This document is not intended to be relied upon by any third party. This Policy may be subject to change at any time.
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