

NN Group N.V. 2023 GRI Content Index table, Progress reports to the Principles for Sustainable Insurance and the UN Global Compact

NN Group N.V.
Supporters of change

This document contains the GRI Index table and our Progress reports to the Principles for Sustainable Insurance and to the United Nations Global Compact. These reports serve as a reference to the relevant pages in our 2023 Annual Report and our corporate website.

The Hague,
21 March 2024



GRI Index table

Statement of Use	NN Group N.V. has reported in accordance with the GRI Standards for the period of 01/01/2022 to 31/12/2022
GRI 1 Used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	None Apply

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organisational details	 About NN; NN at a glance  https://www.nn-group.com/our-company/our-structure/legal-structure.htm	A Gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	2-2 Entities included in the organisation's sustainability reporting	 Annual Account; Notes to the consolidated annual accounts (Note 34);  Other Information Our approach to reporting: Scope of the data in the Annual Report: Consolidation			
	2-3 Reporting period, frequency and contact point	 Other information: Our approach to reporting: Reporting profile  Other information: Contact and legal information			
	2-4 Restatements of information	 Other information: Our approach to reporting: Presentation of non-financial data			
	2-5 External assurance	 Corporate governance – Report of the Supervisory Board Audit Committee  7.4 Assurance report of the independent auditor  9.1 Our approach to reporting External assurance			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-6 Activities, value chain and other business relationships	 https://www.nn-group.com/our-company/who-we-are/our-brands.htm	b(ii,iii), c	Information unavailable/incomplete	NN Group currently reports on broader terms about its value chain and business relationships. The detailed information per business relationship is currently missing as we are improving our systems to contain the detailed level of data required for GRI 2-6. Since our first CSRD report will be published for FY 2024 in 2025 and we are currently working on implementing CSRD requirements, we strive to have this in more specific terms into our first AR based on the CSRD. There has been no significant changes in NN Group's sectors, value chain, and other business relationships compared to the previous reporting period.
	2-7 Employees	 Facts and figures: Human capital indicators  Notes to the Consolidated Annual Accounts (Note 34)  Creating value for our stakeholders: Empowering our people to be their best 4.3	b	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems, hence are not included. The timeline to include these employee data in the system in time for AR 2023 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.
	2-8 Workers who are not employees	 Facts and figures: Human capital indicators	a,b,c	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems, hence are not included. The timeline to include these employee data in the system in time for AR 2023 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.
	2-9 Governance structure and composition	 Corporate Governance: Report of the Supervisory Board  Corporate Governance: Our Supervisory Board, Management Board  Corporate governance 6.3 Corporate governance  Who we are – Corporate governance. https://www.nn-group.com/our-company/corporate-governance.htm			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-10 Nomination and selection of the highest governance body	<p> Corporate governance – Report of the Supervisory Board Nomination, Remuneration and Governance Committee</p> <p> Who we are – Corporate governance. https://www.nn-group.com/our-company/corporate-governance.htm</p> <p> https://www.nn-group.com/article-display-on-page-no-index/nn-di-policy-boards-and-senior-management.htm</p> <p> https://www.nn-group.com/article-display-on-page-no-index/charter-of-the-nomination-remuneration-and-governance-committee.htm</p>			
	2-11 Chair of the highest governance body	<p> https://www.nn-group.com/article-display-on-page-no-index/charter-of-the-supervisory-board-incl-annex-1.htm – page 11</p> <p> Corporate governance – Our Supervisory Board: David Cole</p>			
	2-12 Role of the highest governance body in overseeing the management of impacts	<p> Corporate Governance Report of the Supervisory Board</p>			<p>Sustainability matters were a prominent topic for the Supervisory Board. The Supervisory Board was informed of the double materiality approach as part of the implementation of the CSRD and invited to participate in NN Group's double materiality assessment. Moreover, environmental factors, such as climate change, were discussed within the Supervisory Board in terms of risk management, but also in terms of requested updates on NN Group's Paris alignment strategy and the Climate Action Plan reporting, as this is an integral part of the NN strategy.</p> <p>For more information on this, please refer to the Annual Report Corporate governance – Report of the Supervisory Board</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-13 Delegation of responsibility for managing impacts	<ul style="list-style-type: none">  Corporate Governance – Corporate governance continued Visual  Corporate governance – Corporate governance Sustainability Governance 			
	2-14 Role of the highest governance body in sustainability reporting	<ul style="list-style-type: none">  Determining our material matters: Approval process DMA 			
	2-15 Conflicts of interest	<ul style="list-style-type: none">  https://www.nn-group.com/article-display-on-page-no-index/charter-of-the-supervisory-board-incl-annex-1.htm  Notes to the Consolidated annual accounts 48 Related Parties  Corporate governance – Our Supervisory Board 			
	2-16 Communication of critical concerns	<ul style="list-style-type: none">  Corporate governance – Report of the Supervisory Board: Supervisory Board meetings;  Corporate governance – Report of the Supervisory Board: Discussion topics 			
	2-17 Collective knowledge of the highest governance body	<ul style="list-style-type: none">  Corporate governance – Report of the Supervisory Board Continued learning 			
	2-18 Evaluation of the performance of the highest governance body	<ul style="list-style-type: none">  Corporate governance – Report of the Supervisory Board 			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-19 Remuneration policies	 Remuneration report	a.iv	Confidentiality constraints	<p>NN Group currently has clawback provisions in place in the Remuneration Policies for the Executive Board, other senior executives and employees. For the Executive Board members, this is incorporated in the Remuneration Policy of the Executive Board, which is published on the NN Group website. For other employees, applicable clawback provisions are incorporated in the NN Group Remuneration Framework. Both the Remuneration Framework and Executive Board Remuneration Policy are described in the Remuneration Report in the NN Group Annual Report.</p> <p>There are no clawback provisions applicable for the Supervisory Board members, as they are not eligible for variable pay.</p>
	2-20 process to determine remuneration	 Nomination, Remuneration and Governance Committee			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-21 Annual total compensation ratio		a,b,c	Not applicable	<p>NN Group currently complies with the reporting requirements as described in e.g. BW2 Titel 9 and the Corporate Governance Code. In the market we see that a lot of the different initiatives have different definitions or reporting requirements.</p> <p>Until now we have chosen to focus on the requirements under the Corporate Governance Code. The Dutch Corporate Governance Code is embedded in Dutch law as a comply or explain requirement, while GRI is not embedded.</p> <p>NN Group complies with the most stringent calculation method, which is prescribed in the Corporate Governance Code. In the Annual Report, information is provided to understand the data and how the data have been compiled to perform this calculation. With regard to the pay ratio requirement as included in the GRI, NN only partly deviates in the methodology (i.e. applies the average employee compensation instead of the median).</p> <p>Going forward to CSRD the different topic owners are highly involved in preparing for the disclosure requirement as well as setting up the strategy and reporting. This will also align reporting with other specific requirements such as GRI.</p>
	2-22 Statement on sustainable development strategy	 Our strategy and performance; Our Strategy			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-23 Policy commitments	 NN human rights statement: https://www.nn-group.com/sustainability/how-we-do-business.htm  https://www.nn-group.com/article-display-on-page-no-index/nn-statement-of-living-our-values.htm  https://www.nn-group.com/article-display-on-page-no-index/code-of-conduct.htm  https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm  https://www.nn-group.com/article-display-on-page-no-index/nn-stakeholder-engagement-policy.htm  Stakeholder engagement and international commitments- Stakeholder engagement			
	2-24 Embedding policy commitments	 Our Code of Conduct and other policies  https://www.nn-group.com/sustainability/sustainable-business-operations.htm	a	Information unavailable/incomplete	The process currently in place to embed policy commitments for Responsible Business conduct throughout our activities and business relationships is bifurcated across different business units, process lines and teams. We have included a total overview on how we have structured our committees to support the strategy execution and monitoring the progress made. We do not report this on a policy level as this is very detailed; all detailed policy information is consolidated in the policy commitments reported. The information is only available on a high level. We are currently in the process to build a roadmap to allocate, integrate, implement policy commitments for responsible business conduct throughout its activities and business relationships on a more granular level for reporting purposes. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-25 processes to remediate negative impacts	 https://www.nn-group.com/article-display-on-page-no-index/nn-group-human-rights-statement.htm	b,c,d,e	Information unavailable/incomplete	Information requested in the requirements b,c,d,e is incomplete due to the fact that process and responsibility to remediate negative impact across NN Group is bifurcated across different business units, process lines and teams. We have a complaints page on business unit websites, we have a values and codes desk, several complaints committees as well as NN Counsellors. We are assessing how we can centralise the process to remediate negative impacts. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.
	2-26 Mechanisms for seeking advice and raising concerns	 https://www.nn-group.com/article-display-on-page-no-index/code-of-conduct.htm			
	2-27 Compliance with laws and regulations	 Note 45 Legal Proceedings			
	2-28 Membership associations	 Sustainability – Governance, stakeholder engagement, memberships and endorsements https://www.nn-group.com/sustainability/governance-stakeholders-memberships-and-endorsements.htm  Stakeholder engagement and international commitments- Stakeholder engagement & National and international commitments			
	2-29 Approach to stakeholder engagement	 https://www.nn-group.com/article-display-on-page-no-index/nn-stakeholder-engagement-policy.htm  Stakeholder engagement and international commitments- Stakeholder engagement			

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-30 Collective bargaining agreements	 Facts and figures – Key strategic and financial indicators continued	b	Information unavailable/incomplete	Within our Annual Report we have included the percentage of participants in the Dutch Collective Labour Agreement. This figure represents the percentage for our total employees who participate. The percentage for alternative collective bargaining agreements for employees that are not covered by the Dutch Collective Labour Agreement is not included in the report and we investigate the possibility for reporting in the upcoming years.

Material topics

GRI 3: Material Topics 2021	3-1 process to determine material topics	 Determining our material matters	A Gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	3-2 List of material topics	 NN Group Material sustainability matters			

Material Topic for Own Operations: Working conditions at NN – work-life balance and health and well-being

GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  Values statement https://www.nn-group.com/article-display-on-page-no-index/nn-statement-of-living-our-values.htm  OHS Policy https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm	e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for specific parts of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
-----------------------------	-----------------------------------	---	-----	------------------------------------	---

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	 https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm			
	403-2 Hazard identification, risk assessment, and incident investigation	 Engaging employees, Health and Vitality policy: https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm			
	403-3 Occupational health services	 Engaging employees, Health and Vitality policy: https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm			
	403-4 Worker participation, consultation, and communication on occupational health and safety	 https://www.nn-careers.com/uploads//NNCLA2021-2023UK.pdf			
	403-5 Worker training on occupational health and safety		a	Information unavailable/incomplete	Currently we have no data available on employees participating in training on occupational health and safety because of data unavailability. We are improving our system to register training hours going forward and to report in upcoming years.
	403-6 Promotion of worker health	 Creating value for our stakeholders Our people: Well-being			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		a	Not applicable	Since NN Group is a financial services organisation, there are no material or significant occupational health and safety impacts directly linked by business relationships.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	403-8 Workers covered by an occupational health and safety management system		a,b,c	Not applicable	Since NN Group is a financial services organisation, there are no material or significant occupational health and safety impacts directly linked by business relationships.
	403-9 Work-related injuries		a.i until g.	Not applicable	Since NN Group is a financial services organisation, there is no material or significant work-related ill health to report on.
	403-10 Work-related ill health		a. until e.	Not applicable	Since NN Group is a financial services organisation, there is no material or significant work-related ill health to report on.
Material Topic for Own Operations: Human Capital Development and attraction					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix, Creating value for our stakeholders: Our People: Workforce transformation  Creating value for our stakeholders: Our People: Digital capabilities, Empowering employees on sustainability, Leadership development	e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for specific parts of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is of risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	 Facts and figures (total spend and spend/FTE)	a.	Information unavailable/ incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employee data in the system in time for AR 2023 was too short. We also have robust policies on Training and development but we report on policy level and not on the granular data level required by GRI for this requirement. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.
	404-2 Programs for upgrading employee skills and transition assistance programs	 Creating value for our stakeholders: Our People: Digital capabilities, Empowering employees on sustainability and Leadership development  https://www.nn-careers.com/uploads//NNCLA2021-2023UK.pdf section External labour market			
	404-3 Percentage of employees receiving regular performance and career development reviews	 Facts and figures	a	Information unavailable/ incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employees data in the system in time for AR 2023 was too short. Our reporting on policies on career development is reported on a total NN Group level; in the AR we have not included the data on granular data level as required by GRI by employee gender and employee category because the data is not available in the system. We are taken steps towards improving our data availability on a more granular level since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic for Own Operations: Diversity and Inclusion					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix, 4.3.4 Diversity and inclusion  https://www.nn-group.com/article-display-on-page-no-index/nn-group-human-rights-statement.htm – Respecting human rights as an employer	e, f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	 Creating value for our stakeholders Our workforce  Corporate Governance Report of the Supervisory Board table on page 92 and management board table on page 94			
	405-2 Ratio of basic salary and remuneration of women to men		a, b	Confidentiality constraints	GRI requires NN to report on the gender pay gap by significant locations of operations. Currently it is only reported on total NN Group level due to Confidentiality constraints. The possibility to report on a more granular level is being investigated for reporting in the future also taking into account the new requirements under the Pay Transparency Directive.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic products and services Value chain: Social (financial) inclusion of consumers and/or end-users					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  Creating value for our stakeholders Customers: Financial well-being  Creating value for our stakeholders Customers: Innovation(Zorggenoot)  https://www.nn-group.com/article-display-on-page-no-index/nn-group-human-rights-statement.htm	e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
GRI 406: Non-discrimination 2016	Disclosure 406-1 Incidents of discrimination and corrective actions taken		a,b		<p>GRI requires NN to disclose the total number of complaints received from outside parties and substantiated by the organisation and complaints from regulatory bodies.</p> <p>NN Group is unable to report on a granular level the complaints received but since NN is a well-regulated entity through Dutch and European regulators, we have robust mechanisms in place to deal with complaints.</p> <p>Possibility to report on a more granular level is being investigated for reporting in the future.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic for own operations: Working conditions at NN – secure employment, social dialogue, workers rights & coll. agreements					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  Creating value for our stakeholders Our people Employee representation  https://www.nn-careers.com/uploads//NNCAO2021-2023.pdf	e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
GRI 407: Freedom of Association and Collective Bargaining 2016	Disclosure 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		a,b	Not applicable	NN Group is a financial services organisation regulated under Dutch, European and Japanese Regulators and the majority of our employees are based in countries with strong labour laws. Hence no operations can be considered at significant risk for freedom of association

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic for business partners: Other work-related rights (child labour, forced labour, adequate housing and privacy)					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm	d,e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
GRI 409: Forced or Compulsory Labor 2016	Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	 https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm	a,b	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic for Business Partners: Working conditions in our value chain (secure and fair employment)					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm	d,e,f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high level understanding of our process.
GRI 409: Forced or Compulsory Labor 2016	Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		a,b	Information unavailable/incomplete	NN Group has a Sustainable Procurement Statement and NN Supplier Code of Conduct which sets expectations of policies and procedures on our suppliers. Since NN Group is a financial services organisation with an operational footprint in Europe and Japan, we consider the risk for incidents of forced or compulsory labour to not be significant. Nonetheless, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic across the entire Value chain: Customer needs and satisfaction					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  Creating value for our stakeholders: Our NPS-r  Privacy statement NN Group https://www.nn-group.com/privacy-statement.htm  Our Code of Conduct and other policies: Data Privacy	e(iv),f	Information unavailable/incomplete	In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for specific a part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data		a. i. ii. b. c.	Confidentiality constraints	GRI requires NN to disclose the total number of complaints received from outside parties and substantiated by the organisation and complaints from regulatory bodies. NN Group reported that the number of complaints and data breaches is within an acceptable range due to Confidentiality constraints and lack of contextual information. Possibility to report on a more granular level is being investigated for reporting in the future.

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material topic across the entire value chain: Climate change adaptation					
Partnership for Carbon Accounting Financials (PCAF) methodology standard applied since no Topical GRI standard exists for this NN Group Material topic					
GRI 3: Material Topics 2021	3-3 Management of material topics	<ul style="list-style-type: none">  NN Group Material sustainability matters, Connectivity matrix, Creating a positive impact on society  https://www.nn-group.com/sustainability/taking-climate-action.htm  https://www.nn-group.com/sustainability/governance-stakeholders-memberships-and-endorsements.htm  https://www.nn-group.com/article-display-on-page-no-index/nn-group_climate-action-plan-2023-update.htm  Creating value for our stakeholders: Creating a positive impact on society  Our strategy and performance – Our strategic commitments and targets: Our 2023 progress  Facts and figures – Key strategic and financial indicators continued Environmental indicators  Facts and figures – Carbon footprint proprietary assets  Facts and figures – EU Taxonomy disclosures 	f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>We provide a table on Environmental Indicators that measures NN Group's impact, Carbon footprint proprietary assets which measures our footprint for proprietary assets, and EU Taxonomy disclosures in line with the EU Taxonomy regulation.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material topic across the entire value chain: Climate change mitigation					
Partnership for Carbon Accounting Financials (PCAF) methodology standard applied since no Topical GRI standard exists for this NN Group Material topic					
GRI 3: Material Topics 2021	3-3 Management of material topics	<ul style="list-style-type: none">  NN Group Material sustainability matters, Connectivity matrix, Creating a positive impact on society  https://www.nn-group.com/sustainability/taking-climate-action.htm  https://www.nn-group.com/sustainability/governance-stakeholders-memberships-and-endorsements.htm  https://www.nn-group.com/article-display-on-page-no-index/nn-group_climate-action-plan-2023-update.htm  Creating value for our stakeholders: Creating a positive impact on society  Our strategy and performance – Our strategic commitments and targets: Our 2023 progress  Facts and figures – Key strategic and financial indicators continued Environmental indicators  Facts and figures – Carbon footprint proprietary assets  Facts and figures – EU Taxonomy disclosures 	f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>We provide a table on Environmental Indicators that measures NN Group's impact, Carbon footprint proprietary assets which measures our footprint for proprietary assets, and EU Taxonomy disclosures in line with the EU Taxonomy regulation.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Own Operations Value chain: Community investments					
Corporate Community Investment of Business for Societal Impact (B4SI) Standards applied since no Topical GRI standard exists for this NN Group Material topic					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-human-rights-statement.htm  Creating value for our stakeholders: Community Investments  https://www.nn-group.com/our-company/positive-change-in-communities.htm	f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>We publish our community investment indicators in the Annual Report facts and figures and report in our Community Investment Overview that provides a comprehensive overview of the initiatives we support as part of our strategic commitment to contribute to society.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Investments Value chain: Water (water consumption, withdrawal & discharge & use of marine resources & extraction into ocean)					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix	c,d,e,f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>In 2023, we also joined several collective investor initiatives, such as the Ceres Valuing Water Initiative. NN's real estate manager, CBRE IM, also took steps to reduce GHG emissions and increase water data coverage across all asset classes. These initiatives helps us develop further on the topic of water for our Investments value chain.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Investments Value chain: Direct impact drivers of biodiversity loss					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix, Creating value for our stakeholders Approach on biodiversity  Sustainability and climate change risk management: Managing climate risk in our investment	e,f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>In 2023, NN Group established a cross-functions biodiversity working group to promote knowledge exchange on biodiversity and performed a nature-related impact assessment on our corporate investment portfolio.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Investments Value chain: Working conditions in our value chain (secure and fair employment)					
No topic standard applied since no relevant comparable topic standard which meets the definition of the material topic identified for NN Group					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm  https://www.nn-group.com/sustainability/sustainable-business-operations.htm	c,d,e,f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>The NN Supplier Code of Conduct (SCC) outlines our expectations regarding the policies and practices of our suppliers, in terms of the environment, human rights, diversity and inclusion, and integrity and ethics. All suppliers above a spend threshold of EUR 100K are asked to commit to our SCC. Our contract managers and procurement staff have access to the FSQS-NL platform, review the information on a yearly basis, and subsequently discuss steps for improvement with suppliers where necessary.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Investments Value chain: Other work-related rights (child labour, forced labour, adequate housing and privacy)					
No topic standard applied since no relevant comparable topic standard which meets the definition of the material topic identified for NN Group					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-supplier-code-of-conduct.htm  https://www.nn-group.com/sustainability/sustainable-business-operations.htm	c,d,e,f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>The NN Supplier Code of Conduct (SCC) outlines our expectations regarding the policies and practices of our suppliers, in terms of the environment, human rights, diversity and inclusion, and integrity and ethics. All suppliers above a spend threshold of EUR 100K are asked to commit to our SCC. Our contract managers and procurement staff have access to the FSQS-NL platform, review the information on a yearly basis, and subsequently discuss steps for improvement with suppliers where necessary.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic Investments Value chain: Human rights in our value chain					
No topic standard applied since no relevant comparable topic standard which meets the definition of the material topic identified for NN Group					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix  https://www.nn-group.com/article-display-on-page-no-index/nn-group-human-rights-statement.htm  Creating value – Society and communities: Our approach to human rights	d,e,f	Information unavailable/incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023.</p> <p>In 2023, we continued to enhance our human rights approach by conducting a salience assessment. Salient human rights issues are those human rights at risk of the most severe and likely actual or potential negative impact on people across the value chain. We will continue to further enhance and make progress on the Human rights-related impact on Investment value chain in 2024.</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Material Topic products and services Value chain: Circular economy for our products and services					
No topic standard applied since no relevant comparable topic standard which meets the definition of the material topic identified for NN Group					
GRI 3: Material Topics 2021	3-3 Management of material topics	 NN Group Material sustainability matters, Connectivity matrix	c,d,e,f	Information unavailable/ incomplete	<p>Since there is no GRI topical standard on this topic identified by NN Group as a material topic, we are using our own definition for this material topic as described in the definition material topics section of the Annual Report 2023</p> <p>In our Annual Report, we have listed the topics that are material across each part of the value chain and topics which are material for a specific part of the value chain. The connectivity matrix then describes the topic's association with impact materiality (either the topic is of positive impact or negative impact) or financial materiality (either the topic is a risk or opportunity). The data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview.</p> <p>Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data in our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high-level understanding of our process.</p>

Material Topics

Environmental topics	Definition
Climate change adaptation	Process of adjustment to actual and expected climate change and its impacts. Ways of how an organisation adjusts to current and anticipated climate change-related physical & transitional risks, as well as how it contributes to the ability of societies and economies to withstand impacts from climate change. This matter also covers an organisation's strategy in relation to the transition to a low-carbon economy and the impacts of that transition on workers and local communities.
Climate change mitigation	Process of reducing GHG emissions and holding the increase in the global average temperature to well below 2°C and pursuing efforts to limit it to 1.5°C above preindustrial levels, as laid down in the Paris Agreement.
Water – water consumption, withdrawal and discharge and use of marine resources and extraction into the ocean	The extraction and use of biological and non-biological resources found in the seas and oceans (e.g., deep sea minerals, gravels, and seafood products). This also includes the sum of effluents and other water leaving the boundaries of the organisation and released to ocean water over the course of the reporting period.
Direct impact drivers of biodiversity loss – land use changes and the management of natural resources	The human use, or management of a natural resource, of a specific area for a certain purpose (such as residential; agriculture; recreation; industrial, etc.). Influenced by, but not synonymous with, land cover. Land use change refers to a change in the use or management of land by humans, which may lead to a change in land cover. Examples of these direct impacts are exploitation by harvesting and abstraction, land degradation, desertification and soil sealing. The latter means covering up the original soil, for example by roads or the construction of homes.
Circular economy for our products and services	Resources that leaves the organisation's infrastructure (in the form of products and services).
Social topics	Definition
Working conditions – secure employment, social dialogue, workers rights and collective agreements	Increasing the percentage of workforce with employment contracts (especially permanent contracts) and social protection. This also includes the freedom of expression, which is the right to seek, receive and impart information and ideas of your choice without interference and regardless of frontiers. Extending social dialogue to more establishments and/or countries. This also includes increasing the percentage of own workers covered by collective bargaining, negotiating collective bargaining agreements over sustainability issues. This also includes privacy rights of NN Group employees, where these rights protect them from unlawful and unnecessary surveillance.
Working conditions – work-life balance and health and safety	Extending work-life measures to a greater percentage of own workers and reducing the rate of injuries and worktime lost due to physical and mental injuries.
Diversity and inclusion	Refers to a workforce that is representative and inclusive. This includes promoting gender equality and equal pay, increasing the presence of women in the workforce and top management, reducing the wage gap, the employment and inclusion of persons with disabilities, as well as increasing the representation of underrepresented groups in the workforce and top management to foster a diverse and inclusive organisational culture.
Human Capital Development and attraction	Human capital can be broadly defined as the stock of knowledge, skills and other personal characteristics embodied in people that helps them to be productive. Pursuing formal education (early childhood, formal school system, adult training programmes) but also informal and on-the-job learning and work experience all represent investment in human capital. This is the impact NN Group has on its own workforce by nurturing a culture that supports continuous learning and collaboration and investing in personal and professional development, as well as the impact on NN Group and our ability to execute our business strategy by attracting, retaining and developing talent needed and fostering employee satisfaction. This includes reskilling our workforce towards changing ways of working and insurance business models.

Material Topics **continued**

Social topics	Definition
Working conditions in our value chain – secure and fair employment	Increasing the percentage of workers in the value chain (e.g. employees working in organisations that are linked to NN Group as part of our value chain activities such as procurement activities or service organisations) with employment contracts (especially permanent contracts) and social protection. Increasing the percentage of workers in the value chain with flexible working time arrangements, while paying them adequate wages. This matter also covers the establishment of the social dialogue to more countries.
Other work-related rights – child labour, forced labour, adequate housing and privacy	Extending measures for preventing exposure of young persons to hazardous work to a greater percent of operations in the value chain. Extending measures for preventing child labour to a greater number of operations. Having secure tenure – not having to worry about being evicted or having home or land taken away. It means living somewhere that is in keeping with their culture, and having access to appropriate services, schools, and employment. Privacy rights protect the workers in the value chain from unlawful and unnecessary surveillance.
Human rights in our value chain	<p>Security concerns linked to climate change include impacts on food, water and energy supplies, increased competition over natural resources, loss of livelihoods, climate-related disasters, and forced migration and displacement.</p> <p>Right to seek, receive and impart information and ideas of their choice without interference and regardless of frontiers. Including the right to freedom of association which involves the right of individuals to interact and organise among themselves to collectively express, promote, pursue and defend common interests. This includes the right to form trade unions. Freedom of peaceful assembly and of association serve as a vehicle for the exercise of many other rights guaranteed under international law, including the rights to freedom of expression and to take part in the conduct of public affairs. The right to freedom of peaceful assembly and association is protected by article 20 of the Universal Declaration of Human Rights.</p> <p>Free, Prior and Informed Consent (FPIC) is a manifestation of indigenous peoples' right to self determine their political, social, economic and cultural priorities. It constitutes three interrelated and cumulative rights of indigenous peoples: the right to be consulted; the right to participate; and the right to their lands, territories and resources. Cultural rights protect the rights for each person, individually and in community with others, as well as groups of people, to develop and express their humanity, their world view and the meanings they give to their existence and their development through, inter alia, values, beliefs, convictions, languages, knowledge and the arts, institutions and ways of life.</p>
Community investments	The impact NN Group has on the communities around us by investing our resources, expertise and networks to maximise positive change in our communities, specifically around financial, mental and physical well-being (together with non-profit organisations and research institutes).
Customer needs and satisfaction	Satisfying the needs of our customers by offering them suitable products and services as well as living up to our duty of care. Including safeguarding (informational) safety of individuals who make use of our products and services, either for themselves or for others.
Social (financial) inclusion of customers	The process and actions taken to ensure that all individuals, regardless of their background or characteristics, have equal opportunities and access to products, services, and information. It involves promoting non-discrimination, eliminating barriers that hinder access, and implementing responsible marketing practices that prioritise transparency, fairness, and the well-being of consumers.
Governance topics	Definition
Corporate conduct	Corporate conduct expresses goals through values and beliefs. It guides the undertaking's activities through shared assumptions and group norms such as values or mission statements or a code of conduct.

Principles for Sustainable Insurance Progress report 2023

In June 2012, we became a founding signatory of the UN Principles for Sustainable Insurance. We report on our progress in implementing the principles in our business operations throughout the NN Group Annual Report.

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

Our commitment	Our Goals	Our progress 2023
We will embed in our decision-making environmental, social and governance issues, relevant to our business	Transition proprietary investment portfolio to net-zero GHG emissions by 2050 Transition the underwriting portfolio to net-zero GHG emissions by 2050 Reduce GHG emissions of own business operations to net-zero by 2040 More than double investments in climate solutions such as renewable infrastructure, green bonds and energy efficient real estate	Carbon footprint (measured as tonnes CO ₂ e/EUR million invested) of NN Group's proprietary assets was 39 tonnes of CO ₂ e in 2023  page 5 We set intermediate targets for 2030 : (i) decarbonisation for our underwriting portfolio, (ii) engagement in the value chain and (iii) insuring the transition  page 52 NN Group's grand total GHG emissions (includes market-based scope 2) of own business operations was 10 kilotonnes in 2023  page 132 NN Group's total Investments in Climate Solutions was 10,752 million in 2023  page 128
We will work together with clients and business partners to raise awareness of environmental, social and governance issues, manage risk and develop solutions	Reassess our role as an asset owner and expand active ownership activities Develop relevant products and services Manage our direct footprint and review our procurement process in order to create more sustainable practices	NN Group published its first active ownership report, providing an overview of our policies and activities related to our active ownership of proprietary assets.  https://www.nn-group.com/article-display-on-page-no-index/active-ownership-report.htm
We will work together with governments, regulators and other key stakeholders to promote widespread action across society on environmental, social and governance issues	Engage with stakeholders on general developments or more specific issues, ranging from products, services and business performance to our role in society. Contribute to communities by supporting the financial, physical and/or mental well-being of one million people by 2025	In 2023, we formulated a Stakeholder Engagement Policy, describing our principles and approach regarding our relations with stakeholders. We also joined Nature Action 100, a global investor-led initiative working to drive the necessary corporate action to reverse nature and biodiversity loss by 2050. NN will actively participate in a selected number of engagements to advance the investor expectations identified by Nature Action 100.
We will demonstrate accountability and transparency in regularly disclosing publicly on our progress in implementing the principles	Ensure public disclosure of our non-financial objectives, and the progress we make, in our annual reporting.	NN Group published our 2023 Annual Report. This table serves as a cross-reference to the relevant sections in these reports and our website.

United Nations Global Compact Progress report 2023

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p>Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights;</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights.</p> <p>Human rights are an integral part of NN Group's Responsible Investment Framework policy that applies to all asset classes.</p> <p>We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection, and anti-corruption.</p> <p>NN Group is a member of various international networks and initiatives.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.</p> <p>NN Group Sustainable Procurement Statement</p> <p>NN Group Supplier Code of Conduct</p> <p>NN Group memberships</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 2 Business should make sure that they are not complicit in human rights abuses.</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights.</p> <p>Human rights are an integral part of NN Group's Responsible Investment Framework policy that applies to all asset classes.</p> <p>We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection, and anti-corruption.</p> <p>NN Group is a member of various international networks and initiatives.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.</p> <p>NN Group Sustainable Procurement Statement</p> <p>NN Group Supplier Code of Conduct</p> <p>NN Group memberships</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>

United Nations Global Compact Progress report 2023 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p>Principle 3/ILO Conventions 87 and 98 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights, advocate equal opportunities and encourage diversity of thinking.</p> <p>At NN Group, we uphold the freedom of association for all our employees and recognise the right to collective bargaining.</p> <p>Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes.</p> <p>We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>Diversity and Inclusion overview</p> <p>Human Resources Framework Standard</p> <p>NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.</p> <p>NN Group Sustainable Procurement Statement</p> <p>NN Group Supplier Code of Conduct</p> <p> Pages 32-33, 37-40, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 4/ILO Conventions 29 and 105 Business should support the elimination of all forms of forced and compulsory labour</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights.</p> <p>Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes.</p> <p>We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.</p> <p>NN Group Sustainable Procurement Statement</p> <p>NN Group Supplier Code of Conduct</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>

United Nations Global Compact Progress report 2023 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p>Principle 5/ILO Conventions 138 and 182 Business should support the effective abolition of child labour</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights.</p> <p>Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes.</p> <p>We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.</p> <p>NN Group Sustainable Procurement Statement</p> <p>NN Group Supplier Code of Conduct</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 6/ILO Conventions 100 and 111 Business should support the elimination of discrimination in respect of employment and occupation</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights.</p> <p>At NN Group, we believe it is right for the composition of our workforce to reflect that of society and for our people to bring a diversity of talents, beliefs and perceptions to their work.</p>	<p>NN statement of Living our Values</p> <p>NN Group Human Rights statement</p> <p>Diversity and Inclusion overview</p> <p> Pages 37-40, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 7 Business should support a precautionary approach to environmental challenges</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in.</p> <p>NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion.</p> <p>NN Group's Climate action plan aims to mitigate environmental and social risk of our investment activities.</p> <p>NN Group's environmental approach aims to minimise the environmental impact of our own operations.</p> <p>NN Group's Procurement Policy includes environmental aspects.</p>	<p>NN statement of Living our Values</p> <p>NN Group Climate Action Plan</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>

United Nations Global Compact Progress report 2023 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p>Principle 8 Business should undertake initiatives to promote greater environmental responsibility</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in.</p> <p>NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion.</p> <p>NN Group's Responsible Investment Framework policy aims to mitigate environmental and social risk of our investment activities.</p> <p>NN Group's Procurement Policy includes environmental issues.</p> <p>NN Group is a member of various international networks and initiatives.</p>	<p>NN statement of Living our Values</p> <p>NN Group Climate Action Plan</p> <p>NN responsible Investment Framework Policy</p> <p>NN active ownership report</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 9 Business should encourage the development and diffusion of environmentally friendly technologies</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in.</p> <p>NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion.</p>	<p>NN statement of Living our Values</p> <p>NN Group Climate Action Plan</p> <p>NN responsible Investment Framework Policy</p> <p> Pages 32-33, 44-59</p> <p> www.nn-group.com</p>
<p>Principle 10 Business should work against corruption in all its forms, including extortion and bribery</p>	<p>The NN statement of Living our Values includes the commitment to act with integrity. NN Group has zero tolerance towards bribery and corruption and has clear policies on this. NN Group implements a Code of Conduct including Financial Economic Crime (FEC).</p>	<p>NN statement of Living our Values</p> <p>NN Group Code of Conduct</p> <p> Pages 32-33, 60-62</p> <p> www.nn-group.com</p>



NN Group N.V.
Schenkade 65
2595 AS Den Haag
P.O. Box 90504, 2509 LM Den Haag
The Netherlands
www.nn-group.com