

Stakeholder Engagement Policy

NN Group N.V.
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Introduction

At NN Group N.V. (hereafter: NN), our purpose is to help people care for what matters most to them. To fulfil this purpose, we base our work on three values: care, clear, commit. These values express what we hold dear, what we believe in and what we aim for. They guide, unite and inspire us.

The **NN Statement of Living our Values** sets the standard for carefully considering the interests of our stakeholders. These are:

- Our customers, who are the starting point of everything we do.
- Our colleagues, who realise the ambitions we envisage together.
- Our business partners, with whom we collaborate.
- Our societies, in which we work and live.
- Our investors, who invest in our company.
- Our regulators, with whom we engage in a constructive dialogue.

Objective

NN has formulated this Stakeholder Engagement Policy to set the framework for engaging with stakeholders, particularly regarding the sustainability aspects of our strategy. We strive for effective consultation and engagement with our stakeholders, to build strong relationships and consider their interests as part of NN's strategy to create sustainable long-term value. We seek and welcome feedback on various topics. This helps us to carefully balance the different interests of stakeholders. Additionally, stakeholder engagement serves as a valuable source of information for strategy and policy development, decision-making, monitoring, evaluation and reporting. This includes environmental, social and governance related topics, but is not limited thereto.

Through engagement, we identify matters that are important to our stakeholders and where we have a significant impact, face significant risks and seek opportunities. Depending on multiple aspects such as the topic, goals, opportunities and importance, we identify the necessary actions and timelines. By incorporating these insights and other feedback into our strategic planning process, Double Materiality Assessment (DMA), Human Rights Saliency assessment and our daily operations, we aim to align our business strategy with the needs and expectations of stakeholders.

Scope

The Stakeholder Engagement Policy is applicable to all businesses under NN's management control. Whenever stricter principles apply due to local regulations or standards, they are allowed, ensuring that the business remains in compliance with this policy.

Regulatory framework

This Stakeholder Engagement Policy is drafted in accordance with section 1.1.5 of the Dutch Corporate Governance Code. This policy incorporates requirements from the Corporate Sustainability Reporting Directive (CSRD) and the underlying European Sustainability Reporting Standards, and anticipates new European legislation. Next to this policy, NN has a **Policy regarding communications with (potential) shareholders**, in accordance with section 4.2.2 of the Dutch Corporate Governance Code.

¹ The definition of stakeholder engagement as used in this policy, which is in line with the definition stated in the European Sustainability Reporting Standards (Annex II: acronyms and glossary terms), which aims to provide detailed guidelines for sustainability reporting, (ESRS 2023), reads: 'A continuous process of interaction and dialogue between the company and its stakeholders, allowing the company to hear, understand and respond to their interests and concerns

Stakeholder Engagement

Modes of engagement

NN stimulates stakeholder dialogue in its various business activities and through multiple channels and activities tailored to stakeholder engagement. The methods of engagement support the continuous dialogue and relationships we have with our different stakeholders. We communicate proactively with stakeholders and offer a range of options for them to engage and enter into dialogue with us. This way, we seek to understand their perspective on our products and services, our business performance, our role in society, sustainability matters and other topics. The form that is chosen for any specific dialogue depends on the topic and on the stakeholders involved. See **Appendix I** for an example of the different methods, frequencies and topics of stakeholder engagement.

NN may choose not to accommodate or accept a request or invitation to engage in a dialogue with stakeholders, or to accommodate or accept such request or invitation under certain conditions.

Stakeholder overview

NN identifies its key stakeholders based on their potential to influence our activities and wider business and/or the extent to which they are or may be affected by our activities. Their potentially relevant knowledge about certain aspects of our activities is also considered. The group of stakeholders we engage with is not static and may change based on the topics of the dialogue and the developments thereof over time. We aim to include all perspectives by ensuring a fair representation of the different stakeholder groups or by making feedback mechanisms accessible to the full stakeholder group.

You can find an overview of NN's key stakeholders below.



Customers

Our customers are the starting point of everything we do. We aim to support them in dealing with expected and unforeseen changes at key moments in their lives by offering products and services that are easy to understand and use. We actively seek feedback from customers and end-users to improve our products and services and to align our business practices with their best interests, needs and expectations. We use their input to develop new products and propositions and to further enhance the customer experience.

Colleagues

As an employer, we value the people who work at our company and prioritise their well-being, safety and professional growth. Through competitive compensation and benefits, we empower our people to thrive.

We foster an inclusive environment that celebrates diversity, promotes work/life balance, and encourages collaboration. Gender equality contributes to an inclusive working environment by ensuring equal opportunities, working conditions, and equal pay for equal work.

The Diversity, Equity and Inclusion (DEI) Policy and the engagement with our Employee Resource Groups (ERGs) support and advocate for the interests of underrepresented colleague groups.

We safeguard continuous employee dialogue in our works councils and with labour unions. We recognise the importance of engaging with our colleagues, and regularly perform surveys to gather their feedback and input. The insights we gather from our employee engagement survey are discussed with the Management Board to evaluate whether our business goals and strategies are guiding us in the right direction, and we define relevant actions to be taken.

Business partners

We maintain relationships with many partners in our value chain, including suppliers, agents, intermediaries and other entities linked to our operations. We categorise them into two main groups to better reflect the nature of our business relations.

The first group consists of **suppliers**, with whom we collaborate on socio-economic issues, striving for fair labour conditions, focusing on human rights, and setting clear

expectations concerning conduct and climate change mitigation. We developed and implemented an [NN Group Sustainable Procurement Statement](#) and gather feedback from workers in our value chain. Next to gathering feedback from workers. Furthermore we consult with several civil society organisations regarding the salience of workers in our value chain.

(Tied) Agents and intermediaries are another important type of business partner. They are an important connection to our customers and serve as key channels through which we provide our products and services. Through different methods of engagement we receive their input and priority topics, and exchange feedback to enhance our collaboration and develop and improve on existing and new product and services.

Society

We do business with the future in mind and want to contribute to a world where people can thrive for many generations to come. We consider input from key societal stakeholders to be essential in our policy development. On climate change mitigation and adaptation, we participate in **expert groups and industry associations** taking into account sector guidance, commitments and stakeholder insights. On social topics, we engage with various stakeholders on human rights-related matters as well as geopolitical and societal developments.

We also engage with companies in our investment universe and have regular discussions with **(civil) societal and network organisations** about the sustainability risks and impacts we may be linked to as an investor. In addition, we actively seek dialogue with Non-Governmental Organisations (NGOs) if they signal specific issues to us, or if we have concerns about a specific sustainability case. We aim to understand their findings and, where relevant and possible, incorporate these in our policies and practices.

Regarding our community investment activities, we participate in expert groups, we take into account sector guidance, and maintain regular contact with societal partners, such as charitable organisations and social enterprises, to create positive impact in our **communities**.

Furthermore, we strive to take into account the interests of stakeholders who cannot share what matters most to them (so-called silent stakeholders, e.g. nature and future generations), to the best of our abilities in order to contribute to the well-being of the planet and people, today and for generations to come.

Investors

We are committed to deliver strong and sustainable returns to our investors for the capital they provide to NN and are clear and transparent in how we communicate. Our engagements with both investors and analysts give us an opportunity to understand their views on our strategy and business model, as well as address any concerns they may have. The [NN Group Investor Relations and Contacts with \(Potential\) Shareholders Policy](#) provides additional information on how NN engages with investors and takes their interests into account.

Regulators

We are in continuous dialogue with public decision-makers and regulators on financial market related developments, as well as our strategic choices and dilemmas as a financial service provider. We aim to contribute to fair and effective regulations, and advocate for a level playing field in the legislative and regulatory process. We maintain an element of flexibility in our long-term strategy to adapt to shifting developments, expectations and regulations. The [NN Group Public Affairs Charter](#) provides additional information on how NN engages with regulators and other stakeholders in the public affairs domain.

Monitoring, reporting & implementation

Complaints mechanism

Having processes in place for our stakeholders to express their concerns is key to effective stakeholder engagement. This includes complaints mechanisms for customers, colleagues, business partners, societal organisations, investors and analysts in local languages, and ensuring confidentiality by providing report access to authorised NN staff only.

Customer complaints are dealt with in line with the relevant Privacy Statements and Complaints Management Policies and can be submitted anonymously via our local websites.

Colleagues can raise concerns through our regular reporting channels such as our 'Speak Up' system or with a confidential counsellor, as well as anonymously via the NN Group Whistleblower Standard. An authorised Reporting Officer will handle the complaint and communicate with the reporter.

Other stakeholders, such as suppliers and third parties, can also report concerns in a work-related context through standard complaint and feedback processes or anonymously with NN.

We aim to offer an accessible mechanism to handle complaints on NN activities in a systematic way and ensure that stakeholders

are made aware of the procedure and how it works.

Stakeholders who identify particularly serious or recurring issues are fast-tracked to our relevant departments. We provide named senior contacts for each of our key stakeholder groups and publish the process for complaints on our Customer Support pages.

Evaluation and disclosure

At NN, stakeholder engagements continuously take place throughout the organisation and are monitored. We annually conduct a survey to assess the engagements with stakeholders that have occurred. NN evaluates the quality of stakeholder engagements, both on an overall and individual level.

We communicate and report on the results of the survey, our approach to stakeholder engagement, together with the key issues raised and actions taken, in our [Annual Report](#) and on our website. Our disclosures in the Annual Report are reviewed as part of the external assurance in accordance to applicable legislation. Based on the results of our stakeholder engagement monitoring and the developments in legislation, we will continue to evaluate and, where necessary,



create action plans and adapt our processes. This will help us remain compliant with laws and regulations and to continue to represent the interests of stakeholders in the best possible way.

In alignment with applicable regulations, NN discloses information about its business strategy, the resilience of its business model and strategy in relation to risks related to sustainability matters. This includes the significant impacts our business has on people and the environment. To identify the significant (material) matters to report upon we conduct a Double Materiality Assessment (DMA).

NN shall adhere to all legal obligations relating to confidentiality and shall only disclose publicly known information in meetings with stakeholders. In the event that inside information is inadvertently disclosed during any (bilateral) contact, NN will publicly announce such information as soon as possible.

Policy owner and approval

The Executive Board, Management Board and Supervisory Board of NN have approved this updated policy in May 2025. The Executive and Management Boards are responsible for the ongoing development of this policy. The policy is owned by the Corporate Culture & Affairs department of NN. The implementation of this policy is the responsibility of the teams directly responsible of relations with stakeholders, such as Human Resources, Sustainability and Social Impact, Investor Relations and Public and Government Affairs.

This statement will be reviewed regularly (at least every 2 years), and revised when necessary to ensure its continued relevance.

Appendix: Stakeholders, engagement, frequency, topics and goals

	Stakeholders	Methods of engagement	Frequency	Examples of topics discussed	Goals
Customers	Customers	User research, daily interactions, surveys and feedback mechanism in digital and contact centre channels	We engage with our customers daily through various methods, though some are spread over time, meaning we do not interact with every customer every day.	Customer needs and experiences	New and better experiences and products for customers, understanding their needs, increase satisfaction and trust
Colleagues	Colleagues	Leadership and other (digital) conferences, daily interactions, sessions, surveys, feedback mechanisms, Employee Resource Groups, employee engagement surveys, works councils and unions	We engage with our colleagues daily, some methods, like the bi-annual engagement survey, are more spread over time.	Business strategy engagement, topics on pay and remuneration, upskilling/reskilling employees, action plans, gender equality, climate change and equal pay	Inform and engage employees, improve policies for communication
Business partners	Suppliers	Human Rights Saliency Assessment, Double Materiality Assessment	We consult selected suppliers annually for validation	Climate change, gender equality and equal pay	Regular dialogue and reporting between suppliers and contract manager
	(Tied) agents and intermediaries	Research, surveys, roundtables, webinars, (digital) visits	We engage with our (tied) agents and intermediaries group daily as a business, some methods, like the quarterly roundtables, are more spread over time.	Market topics in general, co-creation, products and services	Understanding their needs, increased intermediary satisfaction and trust, well-informed brokers
Society	Societal and network organisations	Knowledge sessions, one-on-one and group meetings, membership meetings, roundtables	Periodically, depending on the method and topic, with fixed plannings or on a need basis	Human rights, defence policy development, ratings, animal welfare, biodiversity, active ownership	Development and update of policies and ratings, input on negative impacts, building on expertise
	Expert groups and industry associations	One-on-one and group meetings, knowledge sessions, working groups of various trade institutions, and trade organisations roundtables, board memberships	Periodically, depending on the method which are structured on fixed monthly plannings or on need basis, which can be more ad hoc	Impact assessment, data tools, corporate engagement, policy engagement, climate change, human rights, due diligence, just transition	Policy development, sharing knowledge/views, engagement
	Communities	Conversations, evaluation questionnaire, one-on-one and group meetings, knowledge sessions, membership meetings, social media	We engage with our communities weekly through various methods, though some are spread over time, meaning we do not interact with every community partner every week	Support needs of partners, evaluation of programmes	Inform and engage partners and provide input to improve our strategies and develop new projects and programmes
Investor	Investors and analysts	Annual shareholders meeting, analyst calls, investor meetings, survey, (ESG) conferences	We engage with our shareholders, analysts and investors daily through various methods, though some like the annual shareholders meeting are spread over time, meaning we do not interact with everyone in this group every day	Strategy, financial and operational developments, capital position, approach to sustainability, executive remuneration	Inform and engage with analysts, shareholders and other investors
Regulators	Public decision-makers and regulators	Meetings and work visits	Periodically, depending on the method and topic, with fixed plannings or on a need basis	Economics and financial market developments, risk assessments, insurance regulations, pension and labour market regulations, sustainable finance, ESG, digitalisation	Exchange views and insights, understanding of strategic choices and dilemmas, insights into their perspectives

Important legal information

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

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