



**LIVE OUR VALUES**



**KNOW OUR CODE**

## **Our responsibility**

Our business is about people, about life and about living together. We want to be an appealing organization in which you can recognize yourself and in which you can excel. The sum of our behaviour determines the trust clients and society put in us. We work together to create a culture where everyone can thrive. Our values ‘care, do the right thing, seek simplicity and dare to be different’ help us to make this possible. Our Code of Conduct is built on these values and provide guidance to the non-negotiable promises we make to each other, the principles we stick to, no matter what. We expect you to know our Code of Conduct. Therefore, it is important that you take time to read this document, and if in doubt, speak up and seek guidance! Live our values, know our code.



## **CARE**

We care about our clients, our business and each other.



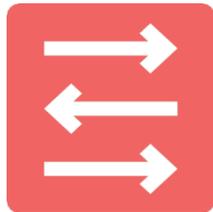
## **DO THE RIGHT THING**

We commit to always 'doing the right thing'.



## **SEEK SIMPLICITY**

We aim for smart simplicity in a complex business environment.



## **DARE TO BE DIFFERENT**

We do things differently where it brings more value.



## 1. RESPECT & PROFESSIONAL BEHAVIOUR

- 1.1 Treat each other respectful
- 1.2 Be honest, transparent and reliable
- 1.3 Treat customers fairly
- 1.4 Avoid being involved in financial economic crime
- 1.5 Discuss and report incidents and abuses



## 2. SUSTAINABILITY, INFORMATION & PROPERTY

- 2.1 Embrace sustainability
- 2.2 Treat information with due care
- 2.3 Prevent cybercrime
- 2.4 Do not misuse an information lead
- 2.5 Use company property responsibly



## 3. PRIVATE & BUSINESS SEPARATION

- 3.1 Avoid conflicts of interest
- 3.2 Do not do business for acquaintances or family members
- 3.3 Discuss business gifts and hospitality
- 3.4 Discuss external professional activities
- 3.5 Observe our trading bans

# 1. Respect & professional behaviour



## 1.1 Treat each other respectful

We work with each other in a respectful manner. We do not tolerate discrimination, bullying, spreading gossip, (sexual) harassment or any other form of inappropriate behaviour. We have an inclusive culture and we welcome diverse minds and abilities. We are open to giving and receiving feedback.

- i** *Certain behaviours can be harmful for groups or individuals, even if such behaviour is not intended that way. If you see or experience inappropriate behaviour and don't feel comfortable discussing it openly, please contact one of our confidential advisers. You can find more information via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag). Our office is where we shape Athora together. Within your team, make clear agreements about where and when you work, in line with our PASS principles (Wegwijzer: PASS).*



## 1.2 Be honest, transparent and reliable

We are honest, transparent and reliable in our actions. We adhere to our policies, the rules, the law and generally accepted standards. We avoid fraud, bribery, corruption and unfair competition. We complete our mandatory training activities with due attention and within the established deadlines.

- i** *Your behaviour can influence the image of Athora Netherlands, positively and negatively. Your behaviour should be example setting. To avoid reputational damage, think carefully whether and to what extent your behaviour is appropriate and adjust it, if needed. Furthermore, act on the principle that you say what you do and you do what you say.*



## 1.3 Treat customers fairly

We are fair and transparent towards our clients about our products and services. We offer products and services that meet the customer needs and create long-term value for them.

- i** *Your actions determine our success as well as the trust that clients put in us. Be a reliable and professional partner.*



## 1.4 Avoid being involved in financial economic crime

We avoid being involved in illegal actions and transactions by clients and business partners.

- i** *In order to prevent us being used by criminals for financial economic crime activities, Athora Netherlands adheres to the Know Your Customer principle. Report any unusual transactions from our customers and business partners immediately to the Money Laundering Reporting Officer via [compliance@athora.nl](mailto:compliance@athora.nl).*



## 1.5 Discuss and report incidents and abuses

We speak up and act when we observe non-compliant behaviour and/or operational incidents. We report incidents and abuses or the suspicion of incidents and abuses within 24 hours after detection to the Incident Reporting Point and we bring them up with our manager.

- i** *If you don't feel comfortable discussing abuses openly, contact one of our confidential advisers. Feel free to report incidents and abuses. You can find more information via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag).*

# 2. Sustainability, information & property



## 2.1 Embrace sustainability

We embrace our commitment to sustainability. We strive to contribute to an environment in which all people can work and live safely and healthy.

**i** You can find our commitment to sustainability via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag).



## 2.2 Treat information with due care

We treat information with due care, making allowance for the prescribed security procedures. This applies in particular to personal data, strategic information, inside information and intellectual property. This also applies to sharing information via artificial intelligence. We use artificial intelligence technology in a responsible and ethical manner and do not rely blindly on AI-generated information. We do not use company information for private purposes and we only share information with others on a need to know basis and when allowed.

**i** You can find our guidelines on social media via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag).  
Only record MS Teams meetings if there is a reasonable need to do so (for minutes, information, or training purposes) and after obtaining prior permission from the participants.



## 2.3 Prevent cybercrime

We are active and vigilant in protecting our IT environment and to use our technology in a manner that strengthens IT security. We report spam and phishing messages to Information Security immediately. We use unique and strong passwords.

**i** You can report spam and phishing messages to [valse-email@athora.nl](mailto:valse-email@athora.nl) and through the 'Report Phishing' button in Outlook.



## 2.4 Do not misuse an information lead

We do not use an information lead for (possible) personal gain. We do not engage in insider trading. We do not execute private securities transactions related to business orders of Athora Netherlands for at least 24 hours. We do not manipulate (share) prices. We report any inside information that we come across to Compliance immediately.

**i** Inside information may relate to both our own issued instruments and instruments issued by other companies. Report inside information immediately via [compliance@athora.nl](mailto:compliance@athora.nl).



## 2.5 Use company property responsibly

We use company property appropriately, responsibly and for business purposes only.

**i** Never use company resources, including internet and email, for actions that go against public morality. Don't get distracted in traffic, only use your phone hands-free.

# 3. Private & business separation



## 3.1 Avoid conflicts of interest

We avoid conflicts of interest and even the slightest appearance of such conflicts and disclose these to our manager and subsequently to Compliance.

- 1 A conflict of interest occurs when an entity or individual becomes dependent because of a clash between personal interests and professional duties or responsibilities. This may particularly occur in situations where an employee has a relation with (an employee of) a third party. Therefore, transparency is key, and it is important to disclose any actual or potential conflicts of interest at an early stage via [compliance@athora.nl](mailto:compliance@athora.nl).*



## 3.2 Do not do business for acquaintances or family members

We hand over insurance activities for family members and acquaintances to a colleague. We conduct our own personal insurance business via the regular customer channels.



## 3.3 Discuss business gifts

We do not accept and give business gifts that are intended or appear to compromise a person's independence. Business gifts worth more than 100 euro are subject to management written consent and must be registered in the gift database. We adhere to the commission ban standards and register all business gifts provided to the intermediary channel.

- 1 You can find more information about the gift registration process via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag). Business gifts also include events and dinners.*



## 3.4 Discuss external professional activities

We only engage in external professional activities that do not conflict with our business interests. External professional activities are subject to written management consent and must be provable assessed on potential conflict of interests by the employee who will carry out the intended external professional activity. External professional activities must be registered within Human Resources. ExCo and SB members must consult with Compliance before engaging in new or materially changed professional external activities.

- 1 You can find more information about the approval process and the self-assessment of external professional activities via our Atlas sitemap (Wegwijzer: Integriteit & Gedrag). An external activity is considered professional when it involves the application of specialized knowledge, skills, and expertise in a particular field.*



## 3.5 Observe our trading bans

We do not conduct private securities transactions in debt instruments issued by Athora Holding Ltd. or their subsidiaries, which also includes Athora Netherlands and SRLEV.

- 1 The trading ban applies to all securities transactions that you have or may have influence on, for example, transactions of your minor children.*



## Your obligations

### A. Compliance with the Code of Conduct

You are bound by the Code of Conduct. You are not permitted to by-pass the Code of Conduct. We do expect you to secure that our third parties, outsourcing- and business partners also act in line with our ethical standards.

### B. Cooperation

If so requested, you are required to provide information to Compliance and/or Fraud & Security in the context of an investigation into compliance with the Code of Conduct and/or our policies, the rules, the law and generally accepted standards.

### C. Insider statement

If you are considered an insider, you are required to sign an (electronic) insider statement.

### D. Oath/solemn affirmation

You are required to take the oath/solemn affirmation for the financial sector within 3 months after the start of your employment agreement.



## Powers of Athora Netherlands

### A. Dispensation

Compliance can grant you written dispensation from the rules contained in the Code of Conduct for compelling individual reasons. Compliance may impose conditions on any such dispensation.

### B. Absence of rules

If the Code of Conduct does not address a matter, the Executive Committee of Athora Netherlands will decide after having consulted with Compliance.

### C. Investigation

Compliance and/or Fraud & Security is authorized to investigate or have investigated the implementation of and compliance with the Code of Conduct and/or our policies, the rules, the law and generally accepted standards.

### D. Disciplinary actions

If you breach the Code of Conduct and/or our policies, the rules, the law and generally accepted standards, Athora Netherlands may impose a disciplinary action based on the Risk Policy Disciplinary Actions Employees.



Questions, doubts or remarks?

Contact us, [compliance@athora.nl](mailto:compliance@athora.nl)