



GUIDING PRINCIPLES FOR LOBBYING

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1. Introduction

- When undertaken with integrity and transparency, lobbying is a legitimate activity to engage in as part of the deliberate process of law making.
- The guiding principles described hereafter aim to provide a clear definition of lobbying and of the activities that are to be or not to be considered as lobbying activities, and to provide common guidelines around lobbying practices at Ageas.
- True to our company's value 'Share', we want to create transparency around the lobbying activities at Ageas to ensure accountability.
- These guiding principles for lobbying are to be read, inter alia, concurrently with the Ageas Anti-Bribery Policy and the Conflict of Interest Policy, all subjects being governed by a specific Policy.

2. Scope

- The guiding principles described in this document apply to ageas SA/NV and to all its subsidiaries, worldwide (hereafter called "Ageas"). Subsidiary means an entity in which ageas SA/NV, directly or indirectly, has a majority shareholding and holds operational control.
- The guiding principles refer to activities carried out by Ageas's employees, self-employed staff & management, and Board members - within the scope of their role at Ageas - and irrespective of their legal status (hereafter called "employees").

3. Definition of lobbying

Lobbying is defined as activities carried out to influence a government's or institution's policies and decisions in favour of a specific cause or outcome.

Lobbying includes amongst others the following activities - provided that they are intended to influence others ⁽¹⁾:

- Public campaigning – advocacy promotion and consultation
- Government consultations – participation by the company in a formal consultation organised by government and regulators
- Formal meetings – formal meetings between the company, politicians, and public officials and their staff
- Informal meetings and social events – contacts by the company with politicians and public officials and their staff
- Promotional activities – sponsorship of events attended by politicians, public officials and their staff.
- Intermediary influencers – through trade associations or sector groups
- Trainings, briefing events and workshops – used to inform politicians, public officials and their staff.
- The provision of support, and of tactical and strategic advice – to politicians, public officials and their staff.

Activities not defined as lobbying include, amongst others ⁽¹⁾:

- Advisory work and contacts with public bodies in order to better inform Ageas's stakeholders about a general legal situation or about their specific legal position, or to advise them whether a particular legal or administrative step is appropriate or admissible under the existing legal and regulatory environment;
- Communication of an independent analysis, study, or research on the potential impact of any legislative or regulatory changes with regard to the legal position or field of activity of Ageas's stakeholders, including advice to comply with the relevant and/or new law;
- Activities in response to direct and individual requests from public bodies, such as ad hoc or regular requests for factual public information, data, or expertise.

(1) Definition based on the agreement between the European Parliament and the European Commission on the transparency register for organisations and self-employed individuals engaged in EU policymaking and policy implementation (19.09.2014).

4. Ageas's vision on lobbying

Ageas wants to support the lives of its stakeholders in a world that is sometimes difficult to navigate and predict. By staying abreast of changing legislative or regulatory changes and by sharing our insights and expertise in the field of (beyond) (re)insurance with policymakers, governments and opinion leaders, Ageas can contribute to the effective development of rules and regulations and the exploration of sustainable solutions to societal challenges. This allows us to create a positive impact on the lives of our stakeholders and to fulfill the pledges taken towards them (e.g. as stated in Ageas's Code of Conduct).

5. Roles and responsibilities

The principles described hereafter reflect the practices of Ageas and describe the framework within which we expect our employees to perform lobbying activities.

If a subsidiary should undertake lobbying activities in the interest of business development in its local market, any mandatory reporting is the responsibility of the subsidiary.

6. Ageas's principles for lobbying

- We maintain a constructive working relationship with the main industry authorities, and contribute to consultations organised by the government, regulators and industry bodies designed to improve and enhance current practices and regulation.
- We conduct these contacts with integrity and honesty and provide accurate and reliable public information.
 - Whenever appropriate, we prefer to work in collaboration with industry/sector bodies to positively impact changes for the whole industry.
 - Ageas is also member of selected business network organisations, such as trade associations, industry associations and business associations, to allow the exchange of experience or views with domain experts and peer companies.

More info can be found in Ageas's lobbying and membership disclosure.

- We do not work with or retain any independent lobbying firm or third party to lobby on our behalf. Any lobbying activities undertaken are coordinated by the Ageas Executive Committee members, within the scope of their role or area of expertise.
- Ageas does not provide funding to political parties or entities, as stated in Ageas's Anti-Bribery and Corruption policy.
- Ageas keeps a list of all professional associations of which its staff are members.
- We are committed to transparency, including full and fair disclosure around our dialogue with public authorities. Consequently, we provide information on these activities to, amongst others, the Transparency Register, a joint initiative of the European Parliament and the European Commission (see appendix for fields of interest).

APPENDIX

Ageas's fields of interest:

- Banking and financial services
- Borders and Security
- Business and Industry
- Competition
- Consumers
- Sustainability
- Digital economy and society
- Economy, finance and the euro
- Institutional affairs
- Research and innovation
- Single market
- Taxation
- Trade