



Our approach to Lobbying and Memberships

Table of content

1.	Introduction -----	3
2.	Scope-----	3
a.	Personal scope-----	3
b.	Material scope-----	3
3.	Principles-----	3
4.	Implementation-----	4
5.	Appendices -----	4
a.	Definitions -----	4
b.	Roles and Responsibilities-----	5
c.	Legal and Regulatory references-----	6
d.	Related documents-----	7

1. Introduction

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 (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 Ageas to create a positive impact on the lives of our Stakeholders and to fulfil the pledges taken towards them.

2. Scope

a. Personal scope

This policy applies to ageas SA/NV and its Subsidiaries, hereinafter referred to as "Ageas".

For the Subsidiaries, should compliance with this Policy result in non-compliance with local legislation or regulations, the latter must take precedence. The Group Policy owner must be informed and consulted immediately in such circumstances.

For the Affiliates it is recognised that the requirements of the local law, the local regulator and the majority shareholder's policy apply. However, Ageas will, upon request, advise similar principles with reasonable effort.

b. Material scope

The policy refers to all Lobbying Activities carried out by Employees of Ageas.

3. Principles

Ageas maintains a constructive working relationship with the main industry authorities and contributes to consultations organised by the government, regulators and industry bodies designed to improve and enhance current practices and regulation.

Insurance is by nature a topic that is strongly regulated (from a consumer and balance sheet perspective) and that plays an important role in society (e.g. pensions in 2nd, 3rd and 4th pillar, protection for catnat...). In this respect, and also building on the market leading positions we have in the markets we operate; we feel it is valuable to support the discussions with government, regulators and industry bodies by bringing a industry practitioner-perspective.

Ageas conducts these contacts with integrity and honesty and provides accurate and reliable public information to support the reflection.

- Whenever appropriate, Ageas prefers to work in collaboration with industry/sector bodies to positively impact changes for society and the 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. A list of memberships can be found in Ageas's lobbying and membership disclosure published on Ageas' website.

Lobbying Activities are overseen by members of the Ageas Executive Committee, aligned with their respective roles or areas of expertise. Local lobbying efforts and membership actions should be managed at the local level and reported to the local Executive Committee.

As stated in Ageas's Anti-Bribery and Corruption policy, Ageas prohibits its employees or agents to make direct or indirect contributions to political parties, organisations or individuals engaged in politics (including election committees, party affiliated organisations, party aligned research bodies, pressure or lobby groups, causes that are politically aligned, party officers and candidates), as a way of obtaining advantage in business transactions.

Ageas's sustainability commitments are considered when engaging in lobbying activities.

Any lobbying activity should be in line with Ageas's strategic ambitions.

4. Implementation

Ageas keeps a list of all professional associations of which its Employees are members and annually conducts a survey among Subsidiaries to assess their Lobbying Activities.

Any lobbying activities undertaken are coordinated by the Ageas Executive Committee members, within the scope of their role or area of expertise. Local lobbying efforts and membership actions should be managed at the local level and and yearly reported to Group communications, who will report to the Executive Committee.

5. Appendices

a. Definitions

Lobbying activities:

Lobbying is defined as activities carried out to influence the formulation or implementation of a governments or institutions policies, legislation and decisions in favor of a specific cause or outcome.

Lobbying activities include amongst others, the following activities—provided that they are intended to influence decisions or policies in favor of a specific cause or outcome:

- Activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators, European Union institutions, bodies, offices, and agencies, or standard setters.
- Public campaigning – advocacy promotion and consultation
- Government consultations – participation by the company in a formal consultation organised by government and regulators, including contributing to/participating in public consultations, hearings, or other similar initiatives
- Formal meetings – formal meetings between the company, politicians, public officials, and their Staff
- Informal meetings and social events – contacts by the company with politicians and public officials and their Staff, including organising or participating in meetings, conferences, and events, carried out with the objective of influencing the formulation or implementation of policy or legislation.
- 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 tactical and strategic advice – to politicians, public officials, and their Staff
- Preparing/commissioning policy and position papers, opinion polls, surveys, open letters, and research work as per the activities covered by transparency register rules

Activities not defined as lobbying include, amongst others:

- Advisory work and contacts with public or industrial bodies to better inform Ageas's Stakeholders about a general legal situation or their specific legal position, or to advise them on 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"

Ageas: ageas SA/NV and all its Subsidiaries.

Subsidiaries: an entity in which ageas SA/NV, directly or indirectly, has a majority shareholding and holds operational control.

Affiliates: an entity in which ageas SA/NV, directly or indirectly, has a minority shareholding and holds no or limited operational control.

Employees: persons employed by Ageas

Stakeholders: individuals, groups, or entities, both internal and external who can affect or be affected by the undertaking, such as employees, management, business partners, investors, customers, regulators, communities and society, competitors, media, special interest groups and industry associations.

b. Roles and Responsibilities

The principles described in this Policy 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.

If any deviation or breach occurs locally, the Head of Corporate Communication must be consulted immediately. The Head of Corporate Communication will subsequently inform other departments.

The Board of Directors:

- Defines and supervises the Lobbying Policy, endorses its principles, which is evidenced by their validation of this policy.

The Executive Management:

- Implements this Policy, as well as the related documents as herein described

Senior Management:

- The Chief Executive Officer, Senior Management and Line Management are responsible and accountable for ensuring that the employees under their supervision are complying with this Policy, in accordance with the supervisory requirements in their locations.
- Line Managers are expected to inform the Policy Owner in case they become aware of any material breaches of the principles included in this policy.

Employees

All Employees are expected to adhere to the policy principles.

Communications department ageas SA/NV:

- Owns this policy
- Puts in place a process of deviation identification and reporting
- Annually conducts a survey among Subsidiaries to assess their Lobbying Activities and memberships

c. Legal and Regulatory references

International and Supranational level	<p>European Union (EU): EU Accounting Directive: Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, as amended among other by: CSRD: Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.</p> <p>Sector-Agnostic European Sustainability Reporting Standards or sector-agnostic ESRS: The European Commission's Delegated Act (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards</p>
National level	<p>Belgium: The legal basis for sustainability reporting measures, including entity-specific material topics, will be set out further in the following laws and regulations: Belgian Code of Companies and associations, in particular the sections related to the (consolidated) management report, as amended from time to time.</p>

Reporting

An annual mandatory questionnaire is sent out to the Subsidiaries of Ageas to report on any Lobbying Activities, (professional) memberships and/or political contributions.

d. Related documents

Ageas Anti-Bribery Policy and Code of Conduct.

Next review date:

The Lobbying Policy will be reviewed on a triennial basis.