



# Our approach to Speak Up

Based on the Speak Up Policy, version 3, approved by the  
Board of Directors on 10 December 2024



## INTRODUCTION

This policy sets out the principles aiming to encourage all Staff members and External parties to speak up when they have genuine concerns about unlawful behaviour or behaviour in contradiction of Ageas internal rules and code of conduct. It describes the mechanisms for identifying, reporting and investigating these concerns.

The purpose of this policy is to ensure that there is a process whereby such concerns can be escalated swiftly to the appropriate person for investigation and resolution, in confidence and without fear of reprisal.

## SCOPE OF THE POLICY

The policy applies to ageas SA/NV and its Subsidiaries

In case of discrepancies or deviation from the principles set out in the policy, these must be notified to the Group Director Compliance.

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 share with its affiliates the principles of this Charter, and upon request, advise similar principles with reasonable effort.

### Principle 1 – Concerns are freely reported within Ageas.

All Staff members and External parties are encouraged to speak up when they have genuine concerns about (alleged) Breaches related to:

i.) the following topics:

- financial services, products and markets
- prevention of money laundering and terrorist financing
- protection of privacy and personal data, and security of network and information systems
- consumer protection
- protection of the environment
- product safety and compliance
- financial interests of the EU
- EU internal market, including EU rules on competition and state aid
- violations of EU restrictive measures<sup>2</sup>
- fight against tax fraud
- fight against social fraud
- public procurement
- transport safety
- radiation protection and nuclear safety
- food and feed safety, animal health and welfare
- public health.

ii.) other laws and regulations applicable to Ageas or of Ageas' internal rules and code of conduct relating to a situation that has already caused or may cause adverse consequences.

The concerns of **Staff members** need to be escalated first to the line manager, or, if inappropriate, to the next level of line management.

If Staff members do not feel comfortable in doing so they are encouraged to use one of the Whistleblowing channels.

External parties are encouraged to use the Whistleblowing channel as available on Ageas website.



#### Principle 2 - Reporting persons notify reasonable suspicion.

The Reporting person should have reasonable grounds to believe that the information on (alleged) Breaches reported is true at the time of reporting.

#### Principle 3 – Local Whistleblowing channels are made available to Staff members and External parties.

#### Principle 4 - Whistleblowing channels coexist with other grievance mechanisms and Human Resources specific procedures.

Whistleblowing channels complement other existing grievance mechanisms for the handling of complaints or, of claims.

#### Principle 5 – Investigations are handled promptly, independently and objectively.

The Compliance Function is responsible for the reception and the handling of the reports submitted by reporting persons.

#### Principle 6 – The Staff Member involved in a Breach that he/she reports will not be protected against possible disciplinary or legal action.

#### Principle 7 – No tolerance for reporting intentionally false information.

If, after the investigation, it is established that false information was intentionally reported, the Reporting Person can be subject to legal action and, as the case may be, the Human resource department may consider applying disciplinary actions, in consultation with the hierarchy of the Staff member concerned.

#### Principle 8 – The identity of the Reporting person and third parties mentioned in the report will not be disclosed without consent.

The prohibition of disclosure applies unless a specific legal obligation in the context of investigations carried out by national authorities or in the context of legal proceedings requires deviation from this principle, but only when this is necessary and proportionate. In this case, the Reporting Person is informed before his/her identity is disclosed, unless such information would jeopardize the investigations or legal proceedings concerned.

#### Principle 9 – Personal data are processed in accordance with the law.

Any processing of personal data is carried out in accordance with the applicable data privacy legal and regulatory provisions.

#### Principle 10 – Retaliation is forbidden.

The Reporting Person will be protected against retaliation if he/she meets these cumulative conditions:

- he/she had reasonable motives to believe that the reported Information on the Breaches were true when reporting them and that this information fell within the application scope of this policy; and
- he/she duly reported the Information on the Breaches either internally or externally in accordance with this policy and/or the applicable legislation.

The protection measures against retaliation of Staff member who are whistleblowers implies the prohibition of retaliation, including threats of retaliation and attempts of retaliation in the form of, for example, dismissal, negative performance assessment or harassment.

An identical protection applies to Facilitators and third persons who are connected to the Reporting Person and who could suffer retaliation, or legal entities that the Reporting Person owns, works for or is otherwise connected with in a Work-related Context.

#### Principle 11 – Training and Information

Each new Staff member is introduced to the content of this policy.

This policy is also part of the regular code of conduct related training and awareness efforts provided to the Staff members.

#### Principle 12 – Local Compliance department reports anonymised data to the Group Director Compliance

### GOVERNANCE

The Board of Directors takes the initiative for promoting an integrity-based business by the institution. The Board of Directors sees to it that the institution has an appropriate integrity policy and enterprise values.

The Executive Committee is responsible for implementing the Speak Up Policy.

The Chief Executive Officer and senior management demonstrate visible and active commitment to the implementation of this Policy.