

## Overview

### Purpose

The Whistleblowing Policy (the Policy) for Achmea Schadeverzekeringen N.V.'s Australian branch (Achmea Australia) empowers you to play an active part in ensuring that Achmea Australia lives up to its aspirations and values and mitigate any improper conduct, behaviour, or decisions in the workplace.

This Policy sets out how you can raise any concerns you may have regarding reportable conduct or practices as defined in the Policy, and how Achmea Australia will manage those reports.

### Scope

This Policy only applies to Achmea Australia's operations in Australia and all individuals, that are or have been any of the following connection in relation to Achmea Australia:

- an officer or employee (including but not limited to part-time/ full time employees, contractors, managers and directors);
- associates of the entity;
- third parties (including but not limited to, vendors, consultants and service providers); and
- spouse, relative(s) or dependant(s) of the individual.

### Rationale

Achmea Australia is committed to creating a safe work environment, where all employees act with integrity.

Achmea Australia encourages the raising of concerns and will ensure that any individual who has reasonable grounds for suspecting misconduct or a breach of law is able to make a report of Reportable Conduct.

A whistleblower will not be disadvantaged or victimised. Achmea Australia values the purpose of the Policy and will not tolerate detrimental conduct against those who raise Reportable Conduct.

### What is Reportable Conduct?

You can make a report, with the benefit of the protections set out in this Policy and under the Corporations Act 2001, if you

have reasonable grounds to suspect the information concerns misconduct, or an improper conduct or circumstances, including where Achmea Australia or any of its employees have engaged in conduct which is:

- dishonest or improper;
- fraudulent or corrupt;
- illegal, such as theft, drug sale or use;
- violent;
- bullying, discrimination, victimisation or harassment;
- criminal, such as damage to property or other breaches of state or federal legislation;
- a failure to comply with, or a breach of, legal or regulatory requirements, including but not limited to the Corporations Act 2001 and ASIC Act 2001;
- misconduct, or an improper situation or circumstances in relation to Achmea Australia's tax affairs;
- indicates that a responsible person does not meet the fit and proper criteria set out in the Achmea Australia Fit and Proper Policy;
- may be a systemic issue that a regulator should know about to properly perform its function;
- potentially harmful to Achmea Australia employees, such as unsafe work practices or environment; or
- represents a danger to the public or the financial system.

### How to report Reportable Conduct

An Eligible Whistleblower (you) is the person who makes the report and who has a connection with Achmea Australia.

Achmea Australia encourages the reporting of misconduct about which you have reasonable grounds for concerns.

In conjunction with KPMG, Achmea Australia has established a toll-free telephone hotline that you can use if you are concerned about unacceptable, unethical or illegal activities.

You can report anonymously and will be treated in strict confidence. Information will only be shared as may be required for the purpose of investigating and assessing the report.

Achmea Australia provides an independent FairCall service to ensure protection under whistleblower laws and this Policy. Refer to contact details on page 2 of this Policy. Reportable Conduct must be raised with an Eligible Recipient to ensure protection under whistleblower laws and this policy.

Contact Method	Details
Toll-free Hotline Australia	1800 500 965 Business days between 7.00 a.m. and 5.00 p.m.
Online facility	www.kpmgfaircall.kpmg.com.au/ achmea
Mail	The FairCall Manager KPMG Forensic PO Box H67 Australia Square NSW 1213 Australia

You must provide as much information on the concern and circumstances as possible to provide context to the Reportable Conduct. This may include but not limited to dates, times, persons involved or aware of the matter.

You have the right to remain anonymous, however, this may impact investigations and Achmea Australia’s ability to ensure your wellbeing and protection from repercussion. Maintaining open communication and feedback is important.

KPMG FairCall will give you a confidential identification number and provide Achmea Australia with a reference number. You will be provided with the option to remain anonymous and can remain anonymous to both Achmea Australia and KPMG.

Whistleblower protection applies and penalties are applicable to both an individual and the entity if they share information that identifies, or subsequently identifies you.

## Handling investigations of a Reportable Conduct

Any report made to our independent FairCall service will be detailed in a Reportable Conduct report to the Chief Risk Officer, unless information in the report relates to the Chief Risk Officer, in which case the report will be provided to the Chief Executive Officer. Similarly, if the Chief Risk Officer considers they may have an actual or potential conflict in relation to a disclosed matter, they should immediately pass all information relating to the disclosure to the Chief Executive Officer and remove themselves from further involvement. You will also be informed who will be acting as the Chief Risk Officer. Similarly, where a disclosed matter relates to the Chief Risk Officer and the Chief Executive Officer, all information relating to the disclosure is passed onto the Senior Officer Outside Australia.

## Assessment

After this initial report, the Chief Risk Officer (or Chief Executive Officer) will assess the disclosed matter to determine whether it qualifies for protection under this Policy and whether an investigation is warranted. You will be advised on the outcome of this assessment and/or whether further information is required.

## Investigation

The Chief Risk Officer (or Chief Executive Officer) manages the Reportable Conduct and will plan the nature, scope, and timeframe for the investigation, which may vary depending on the nature of the disclosure. You will be informed where a Whistleblower Investigation Officer with appropriate expertise and skills and operationally independent from the area under investigation is appointed.

The Chief Risk Officer may provide information about the subject of the disclosure to the Whistleblower Investigation Officer as is reasonably necessary for investigating the Reportable Conduct. Identifiable information will only be shared, where you have provided your consent for it to be shared.

The Whistleblower Investigation Officer will be responsible for ensuring that the investigation is objective, fair and independent, and if considered appropriate in consultation with the Chief Risk Officer (or Chief Executive Officer). The Whistleblower Investigation Officer may use external investigative resources where the investigation requires specialist knowledge or experience.

## Communications with you

During this process, the Whistleblower Investigations Officer and the Chief Risk Officer (or Chief Executive Officer), will keep you informed of the investigation’s progress and advise you of their ultimate decision. The content and frequency, and timeframe of updates will depend on the nature of the Reportable Conduct.

You are entitled to remain anonymous or use a pseudonym during the course of the investigation and are entitled to refuse to answer any questions put to you, though this may impact the effectiveness of the investigation.

The ultimate decision will also be communicated to the Chief Executive Officer without providing identifying details of the person reporting the concerns.

Where you are not satisfied with the conduct or outcome of the investigation, or the ultimate decision, you can request the Reportable Conduct escalated to the Chief Executive Officer for further consideration. Where the conduct related to the Chief Executive Officer, this can be escalated to the Senior Officer Outside Australia.

## Confidentiality

We recognise the decision to report a concern can be a difficult one to make. Having regard to that, Achmea Australia's representatives under the Policy will keep all information provided to them as part of a Reportable Conduct, including regarding your identity, in secure physical or network locations and will allow access to that information only in accordance with the terms of this Policy. They will maintain confidentiality over the information in accordance with this Policy. In passing on any information, care will be taken to minimise the risk of the discloser being identified, for instance by using gender neutral language and removing aspects of the information which could point towards your identity and/or role at Achmea Australia.

Reports may be made anonymously or using a pseudonym qualify for protection under this Policy and the Corporations Act 2001 (though this may impact the effectiveness of any whistleblowing investigation into the disclosure).

Where you do provide your identity or information likely to lead to your identification, it will only be disclosed to individuals other than the Chief Risk Officer and Whistleblower Investigation Officer, in the following circumstances:

- With your consent;
- To the Australian Securities Investment Commission (ASIC), Australian Prudential Regulation Authority (APRA) or the Australian Federal Police (AFP); or
- To a legal practitioner for the purpose of obtaining legal advice or representation about the Whistleblower provisions in the Corporations Act 2001.

It is illegal for a person to disclose your identity or information likely to lead to your identification other than in these circumstances.

## Protection of Individuals

Achmea Australia is committed to protecting individuals who disclose Reportable Conduct under this Policy. Any such individuals will not be subject to disciplinary or any other action even under circumstances where no Reportable Conduct is found to have occurred.

You must not suffer any detriment by having made a report. Where you suffer detriment due to conduct by an Achmea Australia employee in reprisal for a report being made under this Policy, it will be treated as serious misconduct and will result in disciplinary action.

You will also be protected from civil and criminal liability in relation to the making of the disclosure. This Policy does not however grant immunity for any misconduct by you if you have engaged in misconduct, or for disclosures where there are no reasonable grounds for believing misconduct had occurred.

## Achmea Australia's Culture

Achmea Australia encourages you to help us eliminate improper conduct and behaviour. If you become aware of known, suspected, or potential cases of Reportable Conduct, making a report under this Policy will help us manage its impact and promote appropriate conduct.

## Definitions

Term	Definition
Emergency Reportable Conduct	<p>Reportable Conduct made or disclosed to a journalist or parliamentarian in the following circumstances:</p> <ul style="list-style-type: none"> <li>• you have previously advised ASIC or APRA;</li> <li>• you have reasonable grounds to believe that information subject to the Reportable Conduct poses substantial and imminent danger to the health or safety of one or more persons or to the natural environment;</li> <li>• before making the emergency disclosure, you have given ASIC or APRA written notice that includes sufficient information to identify your earlier report and states your intention to make an emergency disclosure; and</li> <li>• the extent of the information disclosed in the emergency disclosure is no greater than is necessary to inform the journalist or parliamentarian of the substantial and imminent danger.</li> </ul>
Public Interest Reportable conduct	<p>Reportable Conduct made to a journalist or parliamentarian in the following circumstances:</p> <ul style="list-style-type: none"> <li>• you have previously advised ASIC or APRA;</li> <li>• at least 90 days have passed since you made the disclosure to ASIC or APRA;</li> <li>• you do not have reasonable grounds to believe that action is being, or has been taken, in relation to the Reportable Conduct;</li> <li>• you have reasonable grounds to believe that making a further disclosure of the information is in the public interest; and</li> <li>• before making the public interest disclosure and after 90 days, you have given ASIC or APRA written notice that includes sufficient information to identify your earlier report and states your intention to make a public interest disclosure; and</li> <li>• the extent of the information disclosed is no greater than is necessary to inform the recipient about your concerns.</li> </ul>
Reportable Conduct	<p>Achmea Australia or any of its employees engaging in misconduct, or an improper conduct or circumstances (where there are reasonable grounds to suspect) such as fraud, corruption, integrity and breaches of laws and regulations and criminal activity.</p>
Faircall (independent recipient)	<p>An Independent thirdparty facility, provided by Achmea Australia to an eligible whistleblower to use, to report or disclose misconduct. The Reportable Conduct can be made anonymously.</p>
Whistleblower Protection	<p>Protection afforded to you, as an Eligible Whistleblower reporting reportable conduct as defined within this Policy.</p> <p>This may include:</p> <ul style="list-style-type: none"> <li>• protection of your identity;</li> <li>• protection from acts or omissions that may cause you harm;</li> <li>• compensation and other remedies for loss or damages or injury suffered by you because reporting the Reportable Conduct;</li> <li>• civil, criminal and administrative liability protection available to you.</li> </ul> <p>Under the Policy you are informed of the protection available to you, Achmea Australia recommends that you seek independent legal advice should you require further information about legal action available to you.</p> <p>The protection also extends:</p> <ul style="list-style-type: none"> <li>• to a legal practitioner for the purpose of obtaining legal advice or legal representation; and</li> <li>• to where the legal practitioner concludes that a disclosure is not Reportable Conduct.</li> </ul>

## Roles and Responsibilities

Term	Definition
Eligible Recipient	<p>The Eligible Recipient is an individual that can receive the Reportable Conduct.</p> <p>Reporting the Reportable Conduct to an Eligible Recipient provides you with whistleblower protection under the Corporations Act.</p> <p>An Eligible Recipient can include:</p> <ul style="list-style-type: none"> <li>• Officer or senior manager of the entity</li> <li>• Internal or external auditor</li> <li>• Actuary of the entity</li> <li>• A person authorised by the entity to receive Reportable Conduct</li> </ul> <p>Reportable Conduct may also be raised with:</p> <ul style="list-style-type: none"> <li>• APRA, ASIC or another Commonwealth body prescribed by regulation; registered tax agent or BAS agent (for tax-related disclosable matters);</li> <li>• legal practitioner for the purposes of obtaining legal advice; or</li> <li>• journalist or parliamentarians under certain circumstances allowing emergency and public interest disclosures.</li> </ul> <p>To raise Reportable Conduct directly with Achmea Australia, Eligible Recipients (you) can do so via our independent FairCall service.</p>
Eligible Whistleblower	<p>Eligible Whistleblower (you) is the person who makes the report and who has a connection with Achmea Australia. The report can made anonymously.</p> <p>You can make a report if you are or have been:</p> <ul style="list-style-type: none"> <li>• a director or officer of Achmea Australia;</li> <li>• an employee of Achmea Australia;</li> <li>• a supplier of services or goods to Achmea Australia;</li> <li>• an employee of a supplier of services to Achmea Australia (whether paid or unpaid);</li> <li>• an associate of Achmea Australia; relative of any of the above individuals; or a spouse or dependent of any of the above individuals.</li> </ul>
Whistleblower Investigations Officer	<p>This may be the Chief Risk Officer and/or may include the use of internal (person/s appointed) to investigate the Reportable Conduct or external investigative resources, however, in all cases must be operationally independent of the area under investigation.</p>