

Environmental policy for Achmea's Internal Business Operations

Creating sustainable value for our
customers, employees, company
and society at large

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Chapter 1

Introduction and structure

Our ambition is to create sustainable value for our customers, our employees, our company and society at large. We do this based on our mission to solve major social issues together. In doing so we focus on four domains: **Bringing healthcare closer, Smart mobility, Carefree living & working and Income for today and tomorrow.** These all come together in Achmea's mission: Sustainable Living. Together.

Achmea is one of the biggest financial service providers in the Netherlands and offers a wide range of financial services and products. We serve approximately 10 million customers with health, life, pension and property & casualty insurance, savings and mortgage products via our brands, such as Centraal Beheer, Interpolis, Zilveren Kruis, FBTO and InShared. In addition, we administer pension schemes and conduct asset management (investments and real estate) on behalf of institutional clients.

Sustainable business practices and Corporate Social Responsibility (CSR) are integral components of our strategy, business operations and interactions with our environment. We are well aware of the role we play in society and interpret this actively. Thanks to our cooperative background, we are alert to the long-term interests of all our stakeholders.

As an employer and via our housing we aim to achieve fully sustainable and climate-neutral business operations by 2030. This environmental policy has been compiled with a view to safeguarding this vision and ambition and in doing so we are committed to reducing energy consumption in our own buildings and data centres, reducing and making our employee mobility more sustainable, cutting paper consumption and reducing and separating our waste as much as possible. We manage water sustainably by combating wastefulness and we boost biodiversity at our office locations. We conduct sustainable procurement and make the areas around our office locations more sustainable. Our target is to achieve net zero (carbon footprint) for the carbon emissions from our business operations. We will compensate for the residual net



carbon emissions after implementation of all the measures for a period of 40 years via large-scale reforestation.

Structure

This document explains Achmea's environmental policy for its internal business operations and therefore relates to HR, IT, procurement for internal business operations, housing and facility and document logistics. For all the environmental focus areas relevant to Achmea we describe what these involve, the goals we have set and how we aim to achieve them. We also outline how governance of the environmental policy is structured. This covers the organisation of activities, supplier and contract management, creating environmental awareness, financing, monitoring and reporting and the environment-related laws and legislation. This environmental policy is aligned with Achmea's ESG Policy Framework.

Chapter 2

Definition and Scope

Environmental policy

The environmental policy focuses on identifying environmental aspects, managing them and where possible preventing, reducing and/or compensating for the environmentally harmful effects we have as an organisation. We obtain insight into the environmental footprint of our business operations by measuring the relevant environmental impact. This involves measuring the carbon emissions from e.g. our energy consumption and fleet of cars. Yet this also includes measuring water consumption, paper consumption and the use of (raw) materials.

Focus areas

As Achmea is a provider of business services, there are a relatively small number of relevant environmental focus areas. Working out of an office environment, in which working from home is part of our standard way of working, the most important environmental focus areas for Achmea are:

- Housing
- Energy consumption of office locations
- Energy consumption of data centres and cloud services
- Water consumption
- Biodiversity
- Use of (raw) materials
- Management of raw materials
- Paper consumption
- MobilityHuisvesting

Scope

This document concerns the environmental policy of Achmea B.V. for internal operations in the Netherlands. The policy applies to all locations and all employees of Achmea Interne Diensten N.V. In addition, this document is also provided to Achmea's foreign Operating Companies as a guideline for drawing up their own environmental policy. The focus areas in this environmental policy come under the purview of Facility Management & Document Logistics (FB&DL), HR and Achmea IT. This also makes these business units accountable for implementation and accountability thereof. The policy nevertheless has an impact on all Achmea's activities in the Netherlands, whereby the abovementioned business units bear individual responsibility and/or occupy a coordinating role, supported by Procurement.

This policy does not cover environmental aspects in the external chains of other business units, such as damage repair. The environmental policy is reviewed annually against current events, revised where necessary and submitted to the responsible management and the Achmea Samen Duurzaam Programme Board for approval.

Chapter 3

Environmental focus areas

Housing

What does this cover

Achmea currently has six office locations in the Netherlands: Amsterdam, Apeldoorn, Leeuwarden, Leiden, Tilburg and Zeist. Half the office locations are owned by Achmea (Apeldoorn, Leeuwarden and Tilburg), while the other three are leased under long-term contracts. The Amsterdam location is a multi-tenant building. Achmea Interne Diensten N.V. is the owner or tenant of our office locations. All our office locations are in scope with this plan.

What is our goal

Via our housing we contribute as much as possible to achieving climate-neutral business operations in 2030. To do so we are committed to reducing energy consumption in our buildings, reducing and making employee mobility more sustainable and separating our waste as much as possible. We focus on maximum reuse of existing materials, buy circular and energy-efficient materials as much as

possible where necessary and make the surroundings of our office sites more sustainable.

How do we aim to achieve this

The following sustainability criteria apply to all office locations, whether we own or lease them:

- Building at least energy label A in 2030;
- Compliance with the Dutch Green Building Council's (DGBC) Paris Proof commitment by 2040: maximum 70 kWh per m² of usable area;
- As of 2030, each building has a BREEAM-in-Use certification rating of at least 'Excellent' for the asset, management and use components. This means that we need to make arrangements on this with the landlords of our leased offices. The Amsterdam site has BREEAM 'Pass' certification for the user part. We have opted for BREEAM as it enables us to monitor the sustainability performance of our offices on an ongoing basis. Moreover, a minimum rating of 'Very Good' yields an exemption from a variety of mandatory audits;
- Wherever possible we enhance the biodiversity around our offices;
- We provide sufficient high-quality charging stations for electric transportation (cars and bicycles);
- Easy disabled access to buildings and the surrounding area.

The following additional criteria apply to selecting future office locations (ownership or lease):

- Geographically favorable location with respect to climate risks, such as flooding,

- subsidence caused by low groundwater levels;
- In or next to green spaces with a view to promoting the well-being and vitality of our employees;
- No more than a 15-minute walk from a railway station;
- Green Lease terms and conditions will be drawn up for leased properties;
- The materials used are circular wherever possible (in accordance with the 10-R model);
- In the case of leased properties, sustainability measures need to be embedded in the owner's multi-year maintenance plans.

Sustainable maintenance and management of our office locations

Maintenance of our office locations is contracted out to third parties.

These maintenance parties are responsible for the management and maintenance of the buildings and sites. This covers technical installations, structural aspects, the site and greenery. Maintenance plans that safeguard Achmea's sustainability ambitions are drawn up together with these parties. We challenge suppliers/manufacturers to come up with sustainable innovations that are aligned with our objectives.

A number of important criteria in the maintenance plans relate to:

- Compliance with NEN 2767 minimum condition 3 and no 'serious' defects at condition levels 1 to 3 for buildings and installations;
- Quarterly energy analyses;
- Proposals for improving energy-saving measures;
- Use of materials is in accordance with the 10-R model for circularity, whereby we

aim to achieve the highest-possible level of circularity (see also the 'Management of raw materials' focus area);

- Responsible water management, for both drinking water and rainwater;
- Biodiversity-enhancing measures.

We have a sustainable multi-year maintenance plan for all office locations we own. In the case of the leased offices, we inspect the lessor's multi-year maintenance plan in order to decide whether the measures in these plans contribute to Achmea's sustainability goals. If these plans contain insufficient measures, we will engage with the landlord on this topic.

A management plan is drawn up for managing each individual location, which includes sustainability aspects of the site in question.

Alterations and renovation

In the case of alterations or renovation, the above sustainability criteria and requirements

are included in the programme of requirements. If a leased property is involved, we will discuss this with the lessor in order to safeguard our sustainability ambitions as far as possible. As energy-saving measures have a direct impact on operating expenses, agreements are made with the lessor about the division of the costs.

Energy consumption of office locations

What does this cover

We use electricity, natural gas, heat and cold storage to meet the demand for energy at our office locations. Insofar as we do not generate this ourselves, we purchase green energy.

What is our goal

The goal is to reduce our energy consumption as much as possible and where possible to generate energy locally and sustainably with a view to achieving climate neutrality in 2030.

How do we aim to achieve this

At the moment we generate some of the electricity we consume at our Apeldoorn office via our own solar panels. Our Apeldoorn, Leiden and Tilburg office locations have Thermal Energy Storage (TES) installations that provide some of the heating and cooling requirement. The Leiden and Apeldoorn locations are gas-free. In Amsterdam we are connected to a sustainable cooling network. Our policy is to purchase green energy via Guarantees of Origin (GOs). These are European wind certificates for electricity and climate-neutral gas certificates for natural gas. From 2025 we will buy only GOs from Dutch wind.

We distinguish between building-related and user-related energy. The larger part of Achmea's energy consumption comprises building-related energy. This includes

heating, cooling, ventilation and lighting in the offices. The user-related energy is all the energy that is not consumed for the functioning of the building. This is the energy consumption of all the free-standing appliances in the workplace and in communal areas, such as the restaurant and pantries, but also the charging stations for electric transportation.

A roadmap has been drawn up for all owned office locations which contains measures for reducing energy consumption or making it more sustainable in the period up to 2030.

Examples of such measures include making the Apeldoorn location energy-neutral as by end 2025 and locations Tilburg and Leeuwarden (excluding Building 7) by the end of 2030. For Leeuwarden, this means potentially connecting to a geothermal heat network from 2026, as long as this proves to be technically and economically feasible and possibly in combination with Thermal Energy Storage. For Leeuwarden Building 7, the goal is to achieve Paris Proof commitment 2040. Other measures are:

- LED lighting instead of TL lighting;
- smart controls for lighting;
- façade and roof insulation;
- energy-efficient circulation and transfer pumps;
- use of Thermal Energy Storage (TES);
- heat pumps for heating;
- solar boilers for hot water;
- other measures to eliminate the use of natural gas;

- solar panels for generating electricity;
- energy monitoring system.

In order to reduce user-related energy as well, we buy energy-saving appliances and make arrangements with our suppliers, such as caterers and cleaning companies, about the appliances they use. Examples of measures include making the kitchens gas-free and removing the hot water supply from pantries.

Making office locations more sustainable (self-generation via solar panels), further electrification of the fleet of cars and demand for more charging stations are at odds with the problem of grid congestion and fire safety in closed car parks and/or under buildings. For this reason, in the event of sustainability issues we need to seek a combination of efficient energy management (peak-shaving through smart switches, more efficient appliances) and smart grid solutions together with other companies in the surrounding area.

Energy consumption of data centers and cloud services

What does this cover

Data traffic and storage for Achmea is contracted out to external providers. They report on the related energy consumption and how they are making this more sustainable.

What is our goal and how do we aim to achieve this?

Policy on this will be ready by the end of 2024 and will form part of the next update to the environmental policy.

Water consumption

What does this cover

We distinguish between drinking water and rainwater. All the water purchased from the water supply network (via water taps in and to the building) is drinking water. This is used in e.g. the pantries, restaurants, for washing windows and in the toilets. Rainwater is water that falls from the sky: rain, snow, hail and dew.

What is our goal

Although we encourage Achmea employees to drink tap water as part of our good health and vitality drive, we mainly work to combat wastefulness when it comes to drinking water. In addition, we aim to have as little rainwater as possible run off into the drains and instead return it to the soil and/or use it on our own site. None of the implemented measures may result in concessions to safety, health or quality.

How do we aim to achieve this

We combat wastefulness when it comes to drinking water by taking a number of measures:

- Replacing all the water meters with smart meters, so that we have real-time insight

into our water consumption;

- Periodic analysis of water consumption, which enables us to identify any deviations in consumption at an early stage and act accordingly;
- All buildings are fitted with water-saving taps and showerheads;
- Reducing the amount of water per flush to a minimum in the toilets;
- Installing water-free urinals when replacing or renovating urinals, as is already the case in Zeist;
- No longer using drinking water for cleaning, washing the façade or windows, watering plants inside and outside the building.

Measures to ensure as little rainwater as possible runs off into the drains:

- At the Apeldoorn location, some rainwater is already collected in an infiltration tank below the car park and in wadis. A wadi is a channel in which the rainwater can collect and from there run off into the soil. Green roofs have been installed on some of the smaller roofs at this location. The plants on these roofs absorb some of the rainwater and less runs off into the drains;
- When renovating roofs we investigate the options for installing a green roof, as has already been done on one of the roofs in Tilburg;
- Research into other options for collecting rainwater for re-use.

Biodiversity

What does this cover

Managing and monitoring the impact on the environment of the activities in and around our buildings. And encouraging improvements to the ecological value in and around the buildings.

What is our goal

We want to enhance the biodiversity value at those office locations where we are able to exert an influence on biodiversity within the boundaries of the site, i.e. in Apeldoorn, Tilburg and Zeist. For the other office locations we aim to do this in collaboration with other parties in the surrounding area.

How do we aim to achieve this

To identify the potential for boosting biodiversity, an ecologist conducted quick scans at all our office locations in 2019 (excl. Amsterdam as it was not yet in our portfolio).

These scans were taken as a basis for implementing tangible measures in Apeldoorn and Zeist. Examples of measures include: a different mowing policy, the construction of reservoirs, planting a wider variety of native trees and bushes, re-use of pruning waste at the location itself and insect hotels. In Apeldoorn, this - according to the Meetlat Biodiversiteit®-led to an increase in the biodiversity score from 158 points (out of the maximum achievable 280) in 2019 to 246 points, by the end of 2023. In Zeist, the score doubled from 40 to 91 points (from the maximum achievable 217

there). For this rental location, biodiversity measures are more difficult to achieve. Pilots with ecological management will start in 2024 at both locations. This will include annual monitoring of the effects of the measures taken and ecological maintenance. At the Tilburg location, the current Tivoli garden will be transformed into a biodiverse Interpolis garden in the second half of 2024. In addition, a 'Green Roof' of various sedum species is already in place on the roof of the 'Parkvleugel'.

At those office locations where we do not own the land around the building, we actively seek options for improving biodiversity in the surrounding area together with other parties. In Leiden, the municipality has already included a number of proposals in the development plans for the public area around our building. For instance, around the entrance to the site bamboo has been replaced by native trees, bushes and plants. Containers planted with native bushes and flowering plants have also been placed in the area in front of the building. Together with Stichting Buitenfonds and the National Forest Service in the Netherlands, Achmea employees can donate trees for Achmea forests as an original gift for employees, customers or external speakers. This initiative led to new forests being planted with a mix of native species in Apeldoorn/Ugchelen (2022), Chaam (2023) and Zoelen (2024).

Use of (raw) materials

What does this cover

Within Achmea we use a wide variety of (raw) materials. This includes items such as furniture, office supplies, marketing & communication resources, cleaning products, laptops, catering and refreshment services, but also dividing walls or ceiling tiles during alterations.

What is our goal

The aim is to buy only products with a minimum environmental impact by using fewer or different (raw) materials and for which energy consumption is kept as low as possible during manufacture. As of 2030, our goal for consumer items and building materials for our office locations is primarily to re-use existing products, then only to buy products for which no new raw materials have been used and if these are unavailable, to buy new products with maximum circularity at the end of their lifespan. For consumables such as cleaning and hygiene products, catering and refreshment services, our goal as of 2030 is only to use raw materials with the lowest possible environmental impact.

How do we aim to achieve this

Over the past few years we have taken measures within a number of products and services that have resulted in some good examples. Sustainable procurement is crucial to achieving our 2030 target. For the

purpose of procurement and contract management, a guide on Circular Procurement was drawn up in 2023.

Office furniture

Sustainable procurement is crucial to achieving our 2030 target. For the purpose of procurement and contract management, a guide on Circular Procurement was drawn up in 2023. Since 2018, we have been using used furniture as much as possible in refurbishment projects. In 2022, a Furnishing Manual was drawn up for modular furnishing composition with an insight into the materials used. In 2023, a large-scale refurbishment programme called 'This is how we furnish' was launched in which the working environment at all locations will be redesigned on the basis of activity-based working. Based on the so-called 10 R-model (see focus area 'Resource management'), we will redesign the new work floor as circular as possible. We reuse the existing furniture as much as possible. Where necessary (and possible), we repair, reupholster and clean it. Sometimes we do need something new, in which case we always look for a sustainable solution. For example, new carpet is made of sustainable materials. The carpet tiles consist of 93.7% recycled and bio-based raw materials. And are CO₂ neutral over their entire life cycle. We will complete the refurbishment programme in 2025.

Property management

In 2020, with the renovation of air handling units in Tilburg, as many recycled materials as possible were used. During a roof renovation in Tilburg in 2022, the old materials that were released were returned to the supplier who then recycled or

reused them as new raw materials. When lighting sources are replaced by LED, retrofit makes existing luminaires suitable for this new lighting source. This saves production of new luminaires and thus the mining of new raw materials.

Office supplies and IT resources

In 2020, sustainable criteria were included in the procurement of office supplies, significantly reducing the range, stock and number of dispensing points. For roll-up banners, used cassettes are reused. In 2021, IT introduced laptop accessories, such as desk stand and laptop bag, made from recycled materials. Meanwhile, laptops and monitors are also partly made of these materials. For laptops, the lifespan is five years. At end-of-life, the various IT assets (mainly laptops and old phones) are collected by a supplier who then tries to give these assets a second life. They check the functionality and estimate whether the product can be used again, often after a minor repair. Some 95% of all IT assets get a second life. If they can no longer do anything with it, it goes to the recycler. The recycler still tries to recover as many raw materials as possible.

Catering and beverage services

Together with our supplier, we work structurally to reduce the carbon footprint of our catering facilities. We do this by consciously making sustainable choices in the assortment and operations. To this end, we continuously look for (practical) solutions to minimise the environmental impact and CO₂ emissions. We use environmentally and animal-friendly ingredients, materials and working methods wherever possible. We avoid using plastic as much as possible. We want to avoid labelling the assortment vegan, vegetarian, unhealthy, sustainable, healthy vegetable, etc. as much as possible

(unless people ask for it). We opt for tasty, varied and an almost self-evident choice for 'lowest possible CO₂ emissions'. Information on the relevant climate score is provided with the products.

In the 2021 hot drinks supply contract, sustainable coffee and tea were chosen and only refurbished coffee machines were used. For coffee and tea, this means minimising the carbon footprint throughout the chain. Social sustainability lies in the sustainable development and improvement of the living conditions of workers on the plantations. Coffee beans and tea purchased by Achmea must have at least one independent certified sustainability label ('Rainforest Alliance', 'Fairtrade' or 'Fair For Life'). An organic certificate such as 'Demeter' or 'BIO' is a plus in this respect, but not a requirement. We no longer have disposable cups at Achmea. Since 2024, everyone brings their own cup to the office. That saves 7.4 million cups a year, a huge mountain of paper and plastic, a CO₂ emission of 13,000 kg.

Cleaning and hygiene agents

For new procurement of cleaning and hygiene agents, it has been agreed with suppliers that the highest possible degree of circularity will be achieved. In particular, by applying the 10-R model. Therefore, we use only sustainably produced materials in the sanitary area. Toilet paper and hand towels are made from raw materials from responsibly managed forests and recycled materials. No bleaching agents are used in the production process. The holders for toilet paper, hand towels, soap, toilet seat cleaner and air freshener are produced on a circular basis and eventually become raw materials for new products.

To achieve our goal in 2030, in 2024 we will draw up a 'map' for each product/service containing specific sustainability criteria that from that date will be used in procurement procedures and in regular meetings with existing suppliers. These criteria not only cover reducing the environmental impact of the specific product or service but also focus on social aspects, such as diversity and inclusion within the supplier's organization.

Waste management

What does this cover

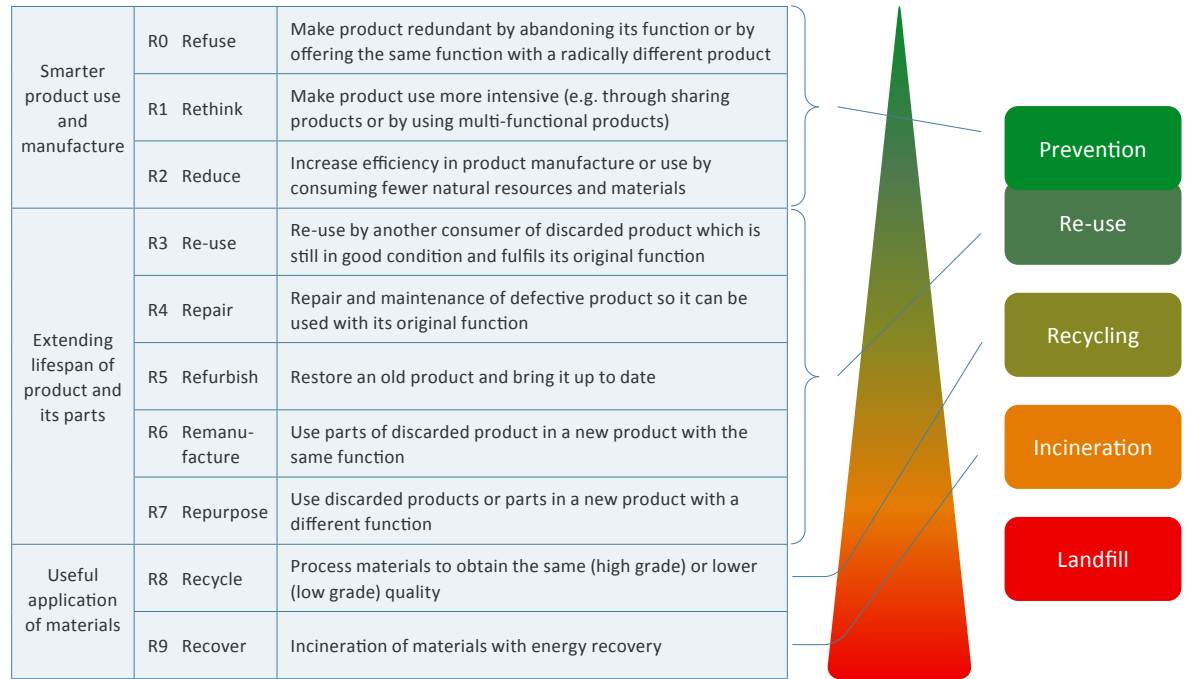
Waste management primarily focuses on preventing waste as much as possible, and where this is not possible dealing with residual waste in a controlled and responsible manner. We have several waste flows within Achmea. Each waste flow is potentially a raw material for re-use (same), upcycling (high grade) or recycling (low grade). Residual waste, the lowest-grade waste flow, generally ends up in incinerators where it is used to generate heat and/or energy.

These are the waste flows that are disposed of within Achmea:

- Company waste
- Construction waste and rubble
- Archive materials/confidential documents
- Sewage
- Foil
- Glass
- Wood
- Cardboard/paper
- Metal
- EPS (foam)
- Plastic/PBD
- Swill incl. coffee grinds
- Fat
- Hazardous waste (chemical waste)



10R model



What is our goal

Our goal is Zero Waste (waste-free office) by 2030. This means that we prevent waste as much as possible by re-using, upcycling or recycling materials. And that ultimately the residual waste no longer contains materials that could be used as a raw material in some other way. This residual waste will then purely comprise combustible materials that come under the lowest and last R of the 10-R circularity model: Recover. We want residual waste only to be used to generate energy.

How do we aim to achieve this

Achmea has collected, disposed of and processed separate waste from workstations and removals, clear-outs etc. as well as from catering since 2015. We aim to reduce the percentage of residual waste even further. It will require a joint effort from manufacturers, product/service owners, procurement officers and users. At all times.

In 2024, we started a new 4-year contract containing a planned approach to achieve our goal of Zero Waste 2030. Together with our contract partner, (data) analyses are made throughout the chain and attention is drawn to the subject with all participants in the chain through various instruments.

The use of workshops and additional campaigns for awareness, communication and instruction for all Achmea employees and suppliers are part of this.

Paper consumption

What does this cover

As a financial service provider, we have long experience of many different paper flows. These include headed letter paper, envelopes and blank paper for both customer communications (such as policy terms and conditions, correspondence, PR and marketing materials) and internal use at the office (paper for printing and copying).

What is our goal

Our goal is to reduce the paper consumption as much as possible, leaving a maximum volume of 300,000 kg in 2030. Compared to 2018, this represents a reduction of 974,000 kg or 76%. For legal reasons it is not yet possible to reduce physical customer communications to zero.

How do we aim to achieve this

In line with our ambition to become a digital insurer, paper consumption within Achmea has been drastically reduced in the past few years. More and more customer communication is taking place digitally, and with more and more working from home as well as working digitally, we see that the number of prints made by employees in the office has decreased significantly. The policy of drastically reducing the number of

printers in the office has contributed to this. The volume still stood at over 1.3m kg in 2018. In 2023 this had dropped over 397,000 kg. Since mid-2022 we have used 80-gram paper instead of 90-gram paper, which has yielded a CO₂ reduction of 11%. We aim to switch at least all paper to 80-gram paper. We are also already discussing with suppliers the use of 70-gram paper. We use only FSC certified paper. Responsibility for the policy on paper consumption lies within the individual business units, with FB&DL occupying a coordinating role in implementation.

In order to achieve our goal in 2030, we will discuss with those in charge at the business units options and alternatives to achieve maximum reduction of physical customer communications.

Mobility

What does this cover

Mobility relates to how employees get around for their work. Here we distinguish between commuting and business travel.

What is our goal

Our goal is to reduce the number of journeys made by our employees as much as possible and make them more sustainable. Our mobility vision statement declares that Achmea is acting to combat the climate change and impact of employee journeys and acknowledges the importance of emission-free journeys. Our ambition for 2030 is for

all our business travel to be carbon neutral and for us to make our commuting more sustainable. This is aligned with the common ambition of the Anders Reizen coalition in which Achmea participates. Together with over 70 other major employers, the aim is to halve carbon emissions from business travel in 2030 (versus 2016), with commuting being included in business travel in this objective.

How do we aim to achieve this

We are making our employees' travel more sustainable by, for example, implementing an electric vehicle lease policy as of 1 May 2023 and reducing carbon emissions from business journeys. Our fuel supplier already delivers the fossil fuels for lease vehicles in a carbonneutral manner. At a number of Achmea locations, electric shared cars are available for business travel. With an increase in the number of electric cars (both leased and private), the charging infrastructure at the locations will be further expanded. In the field of international travel, we have implemented several sustainability measures, such as preferring alternatives (for example meeting via Microsoft Teams) and no longer flying within a 700 km radius. Various mobility schemes are in place that encourage the use of public transport and/or cycling.

To help employees make their mobility more sustainable, Achmea provides a climate budget of € 2,500 net (in case of a 34-hour working week or more, otherwise on a pro rata basis) that can be spent on e.g. an electric car, an electric scooter or an (electric) bicycle.

From our 'This is how we work' programme, we work at the place that best suits the work we are doing at the time. Partly from home and partly in the office. This way of working has already led to a considerable reduction in mobility over the past four years. This development prompted us to include the CO₂ emissions from working from home in scope 3 of our CO₂ footprint from 2024 onwards.

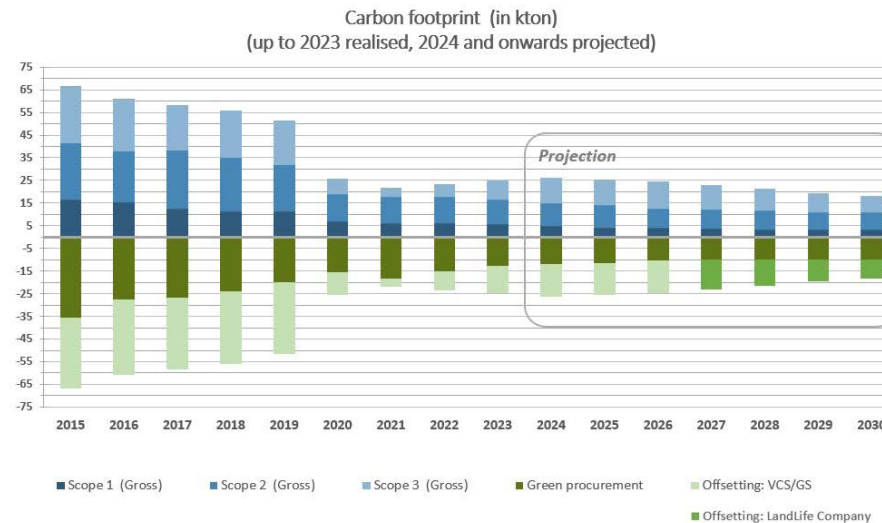


Chapter 4

Carbon footprint and compensation

Since 2011, Achmea has reported on its carbon footprint in the annual report and we have compensated for our net carbon emissions by purchasing certificates.

However, in line with our ambition of having climate-neutral business operations in 2030, we are mainly working on measures to reduce our carbon footprint as much as possible. We have calculated the measures towards 2030. The figure on the right shows the expected trend in the carbon footprint of our operations. The years 2020, 2021 and 2022 saw a temporarily lower footprint. Due to corona, there was less travel and employees did not visit the office much, if at all. From 2024, CO₂ emissions from working from home are included in the footprint.



The footprint will fall further thanks to measures that have already been implemented as well as actions scheduled for the coming years. In the meantime, we will continue to compensate for the net footprint.

In the years up to and including 2026 we will do this by annually purchasing certificates from projects based on the criteria listed below:

- The scope of the relevant projects encompasses activities that contribute to at least two of Achmea's three focus Sustainable Development Goals (SDGs);
- Projects must be additional in nature; this means that the project must result in a clear, quantifiable reduction in emissions versus the autonomous situation;
- If the projects meet the above criteria the lowest costs are the deciding factor.

For the medium and long term, we opt for compensation through tree planting. To this end, we have entered into a partnership with [Land Life Company](#). Over 3 years (2021- 2024), trees will be planted in Australia and Spain with which we will offset the remaining CO₂ emissions (approx. 200,000 tonnes) from 2027 for a duration of 40 years. By the end of 2023, 72% had already been planted. As these are young trees, it will take several years before they can absorb enough CO₂ and be certified.



Chapter 5

Environmental policy governance structure

Organisation

The environmental policy plan contains frameworks and tools for implementing a sound environmental policy. Responsibility for implementation lies in the line with the business units CDV/FB&DL and Procurement, HR and S&I/IT and is embedded in the operational process. The central coordinating role is held by the Sustainability advisor within CDV. This officer is responsible for monitoring progress and reporting to Achmea's Sustainability department. The annual review of the environmental policy against current events and where necessary revision of this policy plan come under the responsibility of CDV. There are periodic meetings between the Sustainability advisor and the responsible officers within CDV/FB&DL and Procurement, HR, S&T/IT and Achmea's Finance and Reporting departments.

Supplier and contract management

Partners and suppliers share responsibility with us for reducing energy consumption, reducing CO₂ emissions, using circular materials and resources.

When it comes to sustainable procurement, we apply a number of criteria:

- Sustainability is included and considered in quotation/tender processes, such as climate, circularity, social entrepreneurship, etc.
- Suppliers sign the Achmea Sustainability Statement
- Specific (product/service) sustainability agreements are made with suppliers
- Innovations and pilots contribute to Achmea objectives

In regular consultations:

- Is 'Sustainability' a fixed agenda item and discussion topic
- The supplier presents its vision, objectives and results regarding CSR/Sustainability
Encourage the supplier to join EcoVadis and discuss its Sustainability performance
- We challenge the supplier to come up with (more) sustainable solutions in relation to the products/services to be delivered
- Where possible, opportunities and contributions in the field of Sustainability are exploited

In reports:

- Does Achmea gain insight into e.g. CO₂ emissions, energy consumption, circularity and inclusion with respect to delivered services and products
- In accordance with CSDD legislation, supplier informs Achmea about sustainable and responsible business behaviour
- Are contractually agreed KPIs around Sustainability monitored.

Creating environmental awareness

Achmea considers it important to increase the environmental awareness of its employees. After all, they are pivotal in making the organisation more sustainable. We do this in various ways. For every employee who has been employed for more than one year, we provide a climate budget of € 2,500 net (in case of a 34-hour working week or more, otherwise on a pro rata basis). This budget can be spent via Centraal

Beheer's online Climate Shop, which offers products and services to make one's home environment and mobility more sustainable. By mid-2024, 75% of employees will have (partly) used the climate budget. Every year, we organise the Achmea Climate Week (during National Climate Week) in which various business units present their climate-related initiatives and activities (adaptation and mitigation). Throughout the year, guided lunch walks are organised on request at locations Apeldoorn and Tilburg, giving colleagues an insight into Achmea's sustainable business operations.

A mandatory e-learning Sustainable Living Together and Sustainability within Achmea will be launched for all Achmea employees in the third quarter of 2024. In an interactive way, employees will be informed about Achmea's sustainability ambitions, internal and external developments in the field of sustainability and activated to make their own contribution.

Financing

The budget for implementing the activities to achieve the goals listed in this environmental policy, both in terms of operations and investments, is included in the regular budget cycle by the responsible product/service owner. Expenses and social value are considered carefully in each part of this process.

Through subsidies the government encourages a range of efforts by companies to save energy or implement environmentally-friendly measures. There are various schemes

that partially or fully compensate for the additional expenses of environmentally-friendly investments. Subsidy applications should form part of the contracts with suppliers and maintenance parties.

Monitoring & reporting

One way we monitor progress on achieving our environmental goals each quarter is via the climate-neutral business operations dashboard. We report on this each year, in accordance with CSRD guidelines, in the Achmea annual report.

To underline our ambition to have energy-neutral buildings, on 5 July 2021 we signed the Dutch Green Building Council's (DGBC) Paris Proof Commitment. In doing so, Achmea is committing itself to making all existing and new buildings under the direct control of Achmea Interne Diensten (own real estate) Paris Proof in 2040 (i.e. a maximum of 70 kWh per m² of usable area). We report our progress on this annually to the DGBC.

By participating in the Anders Reizen coalition we commit to halving carbon emissions from business travel as of 2030 (versus 2016). This is laid down in

the sustainable mobility pledge we have signed. We report our progress on this annually to Anders Reizen.

Laws and legislation

Environmental legislation sets limits for people and businesses for activities that have an impact on the quality of life of people, animals and plants. Laws and regulations are constantly evolving. Below you will find a list of the most important environmental legislation and regulations that apply to our activities:

- Environmental Management Act
- Activities Decree on Environmental Management
- EU Energy Efficiency Directive (EED)
- Buildings decree: BENG Non-residential Buildings (Near Energy Neutrality Buildings)
- Buildings decree: Energy label C offices (2023) and Energy label A offices (2030)
- Climate Act
- Spatial Planning Act
- Water Act
- Environmental Act - Decree on Work-related employee mobility (= reporting obligation)
- Corporate Sustainability Reporting Directive (CSRD) and EU Taxonomy
- Corporate Sustainability Due Diligence Directive (CSDDD)

Colophon

Environmental policy for Achmea’s Internal Business Operations

Version 2.0 approved by Programme Board Achmea Sustainable Together, 12 August 2024. This plan is published at: www.achmea.nl

Disclaimer

This document reflects the environmental policy of Achmea’s internal business operations as it applies to Achmea B.V. (‘Achmea’) at the time of publication and has been drawn up from a Dutch law perspective. The environmental policy continues to evolve on an ongoing basis. We aim to update this report annually. This report does not contain an offer, advice or recommendation.

This document includes objectives, plans and statements relating to Achmea’s internal business operations. These are based on the available data, standards, methods, information, knowledge and views on the date of publication of this document. Internal and external developments may affect Achmea’s environmental policy. The data, standards and methods on the basis of which Achmea partly determines its environmental policy, including methods for measuring CO₂ and setting reduction targets, are in full development. Thereby, the availability and quality of data is still often a challenge. Both the quantity and quality of data are expected to improve in the coming years.

This may give rise to new insights that could lead to Achmea having to adjust its environmental policy and to us having to adapt our objectives, plans and statements. We will update this document periodically. We note that if we publish other reports or documents relating to climate or other topics covered in this report, we will not update this report simultaneously.

Changes Environmental Policy Internal Operations

Version	Date	Adjustments
1.1	October 2023	Roadmap Zero Waste 2023-2026 removed
2.0	August 2024	<ul style="list-style-type: none"> • General update Environmental Policy Internal Operations (including addition Leeuwarden and Tilburg energy neutral in 2030, Zero Waste approach, introduction of ‘pay per use’ within mobility) • Land use paragraph renamed Biodiversity • New layout and expansion of paragraph Materials and use of raw materials • CO₂ footprint trends up to 2030 added • Extension of paragraph Organisation with governance from programme Achmea Sustainable Together • Supplier and contract management - paragraph added • Creating environmental awareness - paragraph added • Text disclaimer adapted