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1. Objective and scope

The mission of a.s.r. is to help customers insure risks they are unwilling or unable to bear themselves. Whether it concerns damage to a car, house or contents, medical expenses, funeral costs, or income if someone is temporarily unable to work. A.s.r. also offers mortgages. Anyone wanting to build up assets for later or a pension, or have assets managed can also come to a.s.r.

The core of our strategy is long-term value creation for our key stakeholders: customers, employees, society, and shareholders. This is why an ongoing dialogue with our stakeholders is of great importance to a.s.r. and why we want to involve them in, and consult them about, our strategy and policy in the context of sustainable business activities and about relevant social developments in which a.s.r. can play an active role.

1.1 Objective

ASR Nederland N.V.'s stakeholder policy aims to take the interests of relevant stakeholders into account when determining and further developing its (sustainability) strategy. In this, effective consultation of, and engagement with our stakeholders are important, whereby we strive to serve their interests as well as possible and build a long-term relationship with them. This policy focuses on creating long-term sustainable value and provides guidelines and principles to maintain and strengthen relationships with stakeholders.

This document provides guidance to the Management Board ("MB"), management and employees. This document is also of interest to external stakeholders of a.s.r. such as clients, civil society organizations and regulators.

1.2 Scope

This policy document applies to ASR Nederland N.V. and its subsidiaries (hereinafter "a.s.r."). This policy document also applies to all employees, persons and entities performing activities in this context for or on behalf of ASR Nederland N.V. and its subsidiaries.

1.3 Consistency with other policy documents

This Stakeholder Policy correlates with other policies of a.s.r. The main policy documents it corresponds with are:

- Strategic framework for sustainable business
- Human rights policy
- Policy on sustainable insurance
- Responsible investment policy
- Diversity, equity and inclusion policy
- Climate transition plan
- Tax policy

1.4 Deviations from policy

Deviation from this policy is in principle not permitted¹. When a product line, business unit or subsidiary does not (temporarily) comply with the policy or certain key requirements, management is responsible for drafting a written exception. This exception should be formulated in accordance with the template and contain at least the following elements:

- The policy and/or procedure (or part thereof) to which the exception applies;
- A substantive description of the exception;
- An explanation of the cause and consequences of the exception;
- The period the exception applies to;
- A description of the actions leading to the removal of the exception.

Team Sustainability reviews the exception and may decide to submit it to a.s.r.'s Sustainability Committee for advice.

Deviations are permitted in order to comply with legal permit obligations, or on the basis of the 'apply or explain' principle after approval from Compliance.

¹ Deviations are permitted in order to comply with legal permit obligations, or on the basis of the 'apply or explain' principle after approval from Compliance.

2. Legal framework and α.s.r. strategy

2.1 Link with law and regulations

With this policy document, α.s.r. complies with the Dutch Corporate Governance Code (December 2022). The Dutch Corporate Governance Code contains principles and 'best practice' provisions aimed at encouraging good governance at listed companies. The Code states that a company should strive to create sustainable long-term value. It emphasises the importance of considering the (potential) impact of the company and its affiliates on people and the environment and the (potential) impact of sustainability issues on the company and its affiliates when developing its vision, strategy, and concrete objectives (double materiality). To ensure that the interests of the company's relevant stakeholders are taken into account when determining the aspects of the strategy that relate to sustainability, the company establishes an outline policy for effective dialogue with these stakeholders.

This policy also substantiates the Corporate Sustainability Reporting Directive ("CSRD"). Stakeholder engagement is central to due diligence processes and the double materiality analysis. The CSRD legislation describes that the company (continuously) engages with stakeholders affected by the company ("affected stakeholders") or their representatives (such as consumer organisations or trade unions), along with users of sustainability reporting and other experts, to receive their input or feedback on the outcomes of material impacts, risks, and opportunities.

2.2 Link with α.s.r.'s strategy

The core of our strategy is long-term value creation for our key stakeholders: customers, employees, society, and shareholders. Therefore, a continuous dialogue with our stakeholders is of great importance to α.s.r. and we want to involve them in, and consult them on our strategy, our policy in the context of sustainable business activities, and on relevant social developments in which α.s.r. can play an active role.

3. Key requirements

3.1 Key requirements

The following key requirements existing for this policy have been identified:

Key requirement	Explanation
a.s.r. engages with its customers (see 6.2)	<p>Who and frequency:</p> <ul style="list-style-type: none"> - Business units – daily - MB – regularly <p>Topics of dialogue:</p> <ul style="list-style-type: none"> - Defining, reviewing and prioritising material issues for (sustainability) strategy, policy and reporting. - Clarifying the (negative and positive) impact a.s.r. has on its stakeholders. - Identifying sustainability risks and how they can be mitigated. - Answering the question of how a.s.r. can further increase its social added value and positive impact in the short and long term. - Expanding and improving understanding of current and future themes and trends. <p>Type of interaction:</p> <ul style="list-style-type: none"> - Phone and email - Surveys (e.g. NPS) - Raad van Doen (customer opinion panel) - Webinars - Social media - Stakeholder dialogue
a.s.r. engages with its employees (see 6.2)	<p>Who and frequency:</p> <ul style="list-style-type: none"> - HR – daily - MB – regularly - Supervisory Board – regularly <p>Type of interaction:</p> <ul style="list-style-type: none"> - Phone, email and Teams - Performance Reviews - Works Council - Social media - Sam (intranet) - Staff meetings - Information and inspiration sessions - Employee panel - Stakeholder dialogue

Key requirement	Explanation
a.s.r. engages with its investors (see 6.2)	<p>Who and frequency:</p> <ul style="list-style-type: none"> - Investor relations – daily - MB - regularly <p>Type of interaction:</p> <ul style="list-style-type: none"> - Meetings with Investor Relations team and board members - Conference calls with analysts and (potential) investors - Webinars - Road shows - Company presentations - Stakeholder dialogue
a.s.r. engages with society (see 6.2)	<p>Who: team Sustainability, MB, employees</p> <p>Frequency: regularly</p> <p>Type of interaction:</p> <ul style="list-style-type: none"> - Events - Partnerships & memberships - Meetings - Telephone and email- Stakeholder dialogue
Two- to three-yearly stakeholder dialogue is organised with representatives of all major stakeholder groups and for the purpose of reporting on that stakeholder dialogue. (See 7.	<p>Who: Team Sustainability, MB, senior management</p> <p>Frequency: biannually or triennially</p> <p>Type of interaction: stakeholder event</p>
(Continuous) measuring Net Promoter Score (NPS) (See 7.1)	<p>Who: Customer and digital</p> <p>Frequency: daily</p> <p>Type of interaction: measuring Net Promoter Score (NPS). The MB monitors NPS-i score quarterly, as this is a strategic target</p>
Regular consultations with and surveys among employees such as the Denison Scan and eMood®. (See 7.2)	<p>Who: HR, employees</p> <p>Frequency:</p> <ul style="list-style-type: none"> - Denison culture scan - annually - eMood® - biweekly <p>Type of interaction: survey</p>

4. Roles and responsibilities

The ownership and management of the stakeholder policy lies with team 'Sustainability'. This team reviews this policy for relevance at least every 3 years. The policy is determined by the MB and approved by the Supervisory Board. Significant revisions to this policy are submitted to the Sustainability Committee for discussion. Minor textual updates and maintenance of this policy are not submitted to this committee.

It is up to the MB of a.s.r. to determine on a case-by-case basis who the relevant stakeholders are and whether dialogue is in the best interests of a.s.r. Team Sustainability is responsible for organising and facilitating a periodic stakeholder dialogue.

Appendix C contains a RASCI table outlining the roles of functions involved in this policy.

5. Principles of stakeholder engagement

This stakeholder policy is based on the Dutch Corporate Governance Code and international guidelines and standards including the AA1000 Stakeholder Engagement Standard and the European CSRD Directive.

The Dutch Corporate Governance Code is based on the premise that the company is a long-term collaborative partnership of various stakeholders involved in a company. Stakeholders are groups and individuals who directly or indirectly influence the achievement of a company's objectives, or are (potentially) influenced by them: employees, shareholders and other providers of capital, suppliers, customers, and other stakeholders. The MB and the Supervisory Board have a responsibility to weigh these interests and are generally focused on the continuity of the company and its affiliated business. Stakeholders must feel confident that their interests are carefully considered, as this is a prerequisite for them to cooperate within and with the company (Corporate Governance Code, 2022).

The definition of stakeholder engagement as used in the AA1000 Stakeholder Engagement Standard is, "Stakeholder engagement is the process an organisation uses to engage relevant stakeholders for a clear purpose to achieve agreed outcomes. It is also recognised as an accountability mechanism as it requires an organisation to engage stakeholders to identify, understand and respond to sustainability issues and concerns and report, explain, and respond to stakeholders for decisions, activities, and performance" (AA1000 Stakeholder Engagement Standard, 2015).

The definition of stakeholder engagement described in the European guideline 'CSRD': 'A continuous process of interaction and dialogue between the company and its stakeholders, enabling the company to hear, understand and respond to their interests and concerns.'

The following basic principles are used by a.s.r. to create and build engagement with stakeholders:

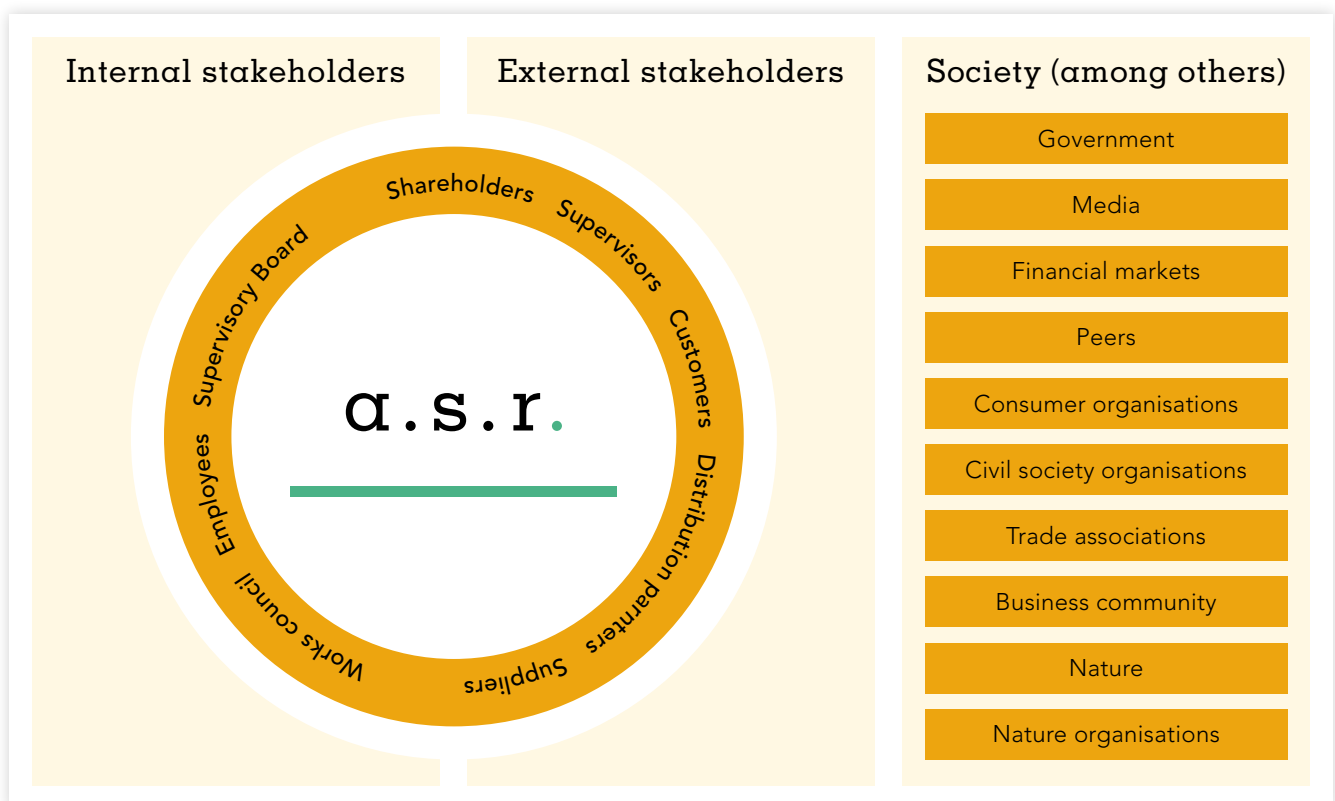
- Inclusion - relevant stakeholders are actively engaged and given the opportunity to express their interests and expectations on issues and decision-making that affect them.
- Materiality - decision-makers should periodically identify the impacts, risks and opportunities that matter and factor them into its decision-making.
- Transparency - a.s.r. is open and honest in communicating about material impacts, risks and opportunities and how they are dealt with.

a.s.r. applies the following principles in organising stakeholder engagement and stakeholder consultation:

- Stakeholder engagement strengthens relationships with key stakeholders to create mutual insight and understanding and opportunities for collaboration.
- Stakeholder consultation contributes to the creation of long-term value for our stakeholders by including stakeholder interests in the tightening of a.s.r.'s policy, strategy and activities. Through dialogue, a.s.r. continuously tests whether the focus is still sufficiently on the right policy areas in the eyes of stakeholders.
- Stakeholders are asked to provide input on:
 - Determining, reviewing and prioritising material issues for (sustainability) strategy, policy and reporting.
 - Providing insight into the (negative and positive) impact that a.s.r. has on its stakeholders.
 - Identification of sustainability risks and how they can be mitigated.
 - Answering the question of how a.s.r. can further increase its social added value and positive impact in the short and long term.
 - Expanding and improving the understanding of current and future themes and trends.
- a.s.r. believes in the power of collaboration and, together with stakeholders, investigates societal themes, issues and activities aimed at improving them.

6. Stakeholders of α.s.r.

a.s.r. deals with various stakeholder groups, see figure below.



6.1 Stakeholder identification and analysis

In order to carry out constructive stakeholder engagement and consultation, a.s.r. initially needs good insight into who its stakeholders are, in what way a.s.r. affects or influences their interests - positively or negatively, - through a.s.r.'s activities and its direct and indirect business relationships in its value chain. These can also be users of sustainability information in the annual report. And then in what ways a.s.r. wants to create engagement with the stakeholder group in question. This can be with the individual stakeholder, but also with a representative of the stakeholder group in question or with an entire stakeholder group.

The type of engagement with a stakeholder is determined on the basis of the extent to which a stakeholder has an interest in, or is affected by, a.s.r.'s activities and the extent to which the stakeholder has an influence on a.s.r.'s activities. Depending on these aspects, the way in which engagement with stakeholders is organised and facilitated is determined. This ranges from monitoring stakeholders to proactively involving, and collaborating with, stakeholders. Data-driven applications can also be used in monitoring stakeholders.

6.2 Key stakeholder groups

For a.s.r. all stakeholder groups are of great importance. a.s.r. distinguishes four stakeholder groups on which the (sustainability) strategy focuses specifically: customers, employees, investors, and the society in which a.s.r. operates. Within the decision-making process, their interests are carefully weighed.

Customers: By customers we mean private customers and corporate clients, as well as the institutional investors who are clients of our asset manager. The *raison d'être* of a.s.r. is to help people. A.s.r. fulfills this by focusing on creating customer value. This means that clients experience clear added value in products and services provided by a.s.r. We do this by focusing on customer needs. Through a strategy aimed at creating value for customers, they can be effectively connected to a.s.r.

Employees: The employees of a.s.r. are direct stakeholders of a.s.r. Employees seek a professional working environment and autonomy regarding their work and career and their sustainable employability. For employees it is important that:

- they have good working conditions,
- they do suitable work that gives them satisfaction,
- they have a good work-life balance,
- attention is paid to their health and well-being,
- they are appreciated for the contribution they make,
- they are recognised for who they are and feel part of the a.s.r. organisation.

a.s.r. encourages and supports employees to develop themselves in order to increase their opportunities on the internal and external labour market. In addition, a.s.r. has an extensive range of vitality services and helps employees stay healthy and fit for work. a.s.r. also strives for an inclusive culture, in which differences are recognised, valued and utilised, and promotes diversity in the workforce composition.

Investors: Investors and shareholders trust a.s.r.'s management to formulate and execute a successful business strategy to create long-term value. A key principle of this is "value over volume," which stipulates that growth is pursued only if it adds long-term value, and by only carrying out those mergers and acquisitions that align well with the strategy. There is also a focus on maintaining a strong cost discipline, while a.s.r. strives to retain a strong balance sheet and a robust Solvency II ratio so that a.s.r. can continue to meet its obligations in the long term. Investors are increasingly interested in the social relevance of the companies they invest in. For them, it is also important that a.s.r. serves the interests of all key stakeholders, thereby ensuring a good return on capital and value creation for the long term, as well as earning its license to operate.

Society: In addition to the stakeholders listed above, a.s.r. has a range of other stakeholders to consider in its operations, including affected communities, civil society organisations, distribution partners, suppliers, government, tax and regulatory authorities, regulators, labour unions, media, science, competitors, and partners. Depending on the topic and type of relationship, expectations and interests can range from responsible investing, being compliant with laws and regulations and helping people be financially self-reliant. In short, these various stakeholders expect a.s.r. to create responsible social value for the long term.

Silent stakeholders

Stakeholders without a voice (or 'silent stakeholders'²) are stakeholders who do not have a voice or whose voice is barely or not heard. Nature can be considered a 'silent stakeholder'. Nature is essential to the lives of all of us, but is under great pressure. Consider global warming and the loss of biodiversity. To promote the interests of nature, it is necessary to understand our 'footprint' or impact on nature. a.s.r. is an adopter of the Taskforce for Nature-related Financial Disclosures framework ('TNFD'). Partly as a result of the TNFD LEAP³ assessment conducted in 2023, policies and actions were formulated and published in the 2023 Climate and Biodiversity Report. In addition, a.s.r. has committed to the Finance for Biodiversity Pledge. At the end of 2024, a.s.r. set an ambition and targets regarding biodiversity and ecosystem services and will report on them in the annual report. Future generations are also stakeholders without a voice. They will experience the adverse effects of contemporary decision-making on the environment and natural resources in the future. These interests are considered in the long-term climate ambition where the goal is net zero emissions in 2050.

7. Consultation and communication

Strategic, constructive, and proactive consultation with stakeholders is of great importance to a.s.r. to properly align strategy, policy and activities with stakeholder expectations and interests. The method of communication depends on the type of stakeholder, topic, and objective of the discussion. Means used for this purpose range from personal contact to organising roadshows, customer, and employee surveys, the use of data-driven applications and round table and dialogue sessions. The appendix provides a complete overview of how a.s.r. communicates by stakeholder group. The following describes how a.s.r. consults key stakeholder groups to represent their interests in the formulation and realisation of the strategy.

7.1 Customer research

Among customers, continuous Net Promoter Score (NPS) measurements take place on the overall relationship (NPS-r), on process level (NPS-p) and on contact moments (NPS-c), to measure and improve customer satisfaction. Starting in 2025, the Net Promoter Score for interactions (NPS-i) will also be measured. This is a measurement tool that evaluates customer satisfaction based on interactions with a.s.r. When dealing with customers, intermediaries, distribution partners and advisors are also considered a stakeholder of a.s.r.

Customers are increasingly finding it important that (large) companies contribute to solving environmental and social problems. The Dutch are concerned about climate change and increasing socio-economic inequality, for example. These concerns affect people's actions and also their choice of insurance policies and where to place their assets. Therefore, consumer attitudes and behavior regarding the social role of companies are monitored annually at a central level.

To improve overall service and customer input, the Raad van Doen has been established. The Raad van Doen is the online customer and advisor panel of a.s.r. Through this panel, customers and advisors are involved in improving a.s.r.'s services: as a sounding board for a.s.r.'s direction, as a forum for co-creation, product development, customer interest advocacy, and as a sparring partner. Business units also use panel members from the Raad van Doen to conduct customer research on customer expectations regarding sustainability aspects for specific insurance products and services. This can be done through questionnaires, but also by organising a dialogue session with panel members.

² The term 'silent stakeholder' is used in the Corporate Sustainability Reporting Directive: "Nature may be considered as a silent stakeholder."

³ LEAP stands for: Locate your interface with nature, evaluate your dependencies and impacts on nature Assess your nature-related risks and opportunities, prepare to respond to nature-related risks and opportunities and to report on your material nature-related issues.

7.2 Employee engagement

The Works Council (OR) of a.s.r. meets twelve times a year and officially consults with (a representative of) the MB six times a year. Twice a year, the state of affairs in the company is discussed in the presence of two members of the Supervisory Board. Additionally, the OR periodically consults with the commissioner(s) it has nominated. There is also regular consultation with the Employee Council⁴.

In October 2024, the Duurzame Doeners platform was launched by the Sustainability team, where a.s.r. employees can exchange ideas about sustainability and initiate activities.

Furthermore, a.s.r. has a Diversity, Equity, and Inclusion (Dutch acronym: DGI) Working Group, consisting of representatives from Corporate Communication, Compliance, Sustainability, business units, and HR. Employees can also join a DGI sounding board group. Teams within a.s.r. can organise dialogue sessions on this theme, guided by an external expert in diversity, equity and inclusion. There are also various employee communities within a.s.r., such as Zichtbaar Jezelf (lhbtqi+ network) and Cultuurrijk (bi-cultural network).

To measure employee engagement and gather their input, a.s.r. uses various surveys, including the annual Denison Culture Scan, and the weekly eMood® with statements about vitality, job satisfaction, and productivity. Additionally, an Employee Panel was established in 2022. The panel is representative of the diversity within a.s.r.'s workforce. In the a.s.r. Employee Panel, colleagues can share their opinions on various topics through polls, open questions, surveys, interviews, or group discussions. Topics can range from hybrid working to development offerings and diversity, equity, and inclusion.

7.3 Engaging with investors

Annually, a.s.r. invites its shareholders and other entitled parties to the General Meeting of Shareholders of ASR Nederland N.V. In preparation for this, MB members engage with representatives of (institutional) investors. ESG (environment, social, governance) topics may also be discussed. Additionally, roadshows and meetings are organised around the publication of (half and) full year results to engage with shareholders (investors) and analysts. The Investor Relations team coordinates stakeholder engagement with investors.

Within a.s.r., the 'Benchmarking and Reporting' team is responsible for compiling the a.s.r. annual report and providing various ESG benchmarks and indices with relevant information to compare a.s.r.'s activities and performance internationally. ESG scores and benchmarks are important data sources for investors who consider ESG factors in their investment decisions. The questionnaires prepared by benchmark and index providers, combined with proactive discussions with them, provide a.s.r. with insights into the questions (institutional) investors have or what they consider important in terms of sustainability. This feedback is then used to refine a.s.r.'s own policies.

7.4 Periodic dialogue sessions

In addition to continuously engaging with stakeholders in various ways, a.s.r. also organises a periodic comprehensive stakeholder dialogue every two to three years, where all major stakeholder groups are represented. This periodic stakeholder dialogue is organised for both external stakeholders and employees, including representatives of the Works Council. During this dialogue, a.s.r. engages in focused discussions about its strategy, material topics, and related activities. Both the entire MB and a delegation of senior management participate to hear stakeholders' viewpoints, answer questions, and engage in discussions.

The outcomes of the periodic stakeholder dialogue are shared with the Executive Board, the Works Council, dialogue participants, and other interested parties. Additionally, the key outcomes of the dialogue are included in the a.s.r. annual report and used as input for the sustainability report included in the annual report. The outcomes may also lead to adjustments or refinements in the strategic framework for sustainable business or policies. Activities may also be initiated or terminated based on these outcomes.

⁴ The Employee Council (RvM) consists of 1 member from each subcommittee (OC) and the 13 Works Council (OR) members. Each business unit has a subcommittee.

In addition to organising a structured periodic stakeholder dialogue with various stakeholders, MB members regularly engage with individual stakeholders. This includes discussions with advisors, trade unions, shareholders, regulators, politicians, and social organisations. The aim of these discussions is to receive feedback on our societal impact, gain insights into the (changing) expectations and interests of stakeholders, and stay informed about developments within and outside the financial sector. But also to gather new insights, innovative solutions, and inspiration that contribute to furthering of the sustainability of a.s.r.'s activities and operations.

7.5 Sector Initiatives

a.s.r. collaborates with other financial institutions, social organisations, and government agencies to jointly develop policies and promote their implementation. For example, a.s.r. participates in a joint dialogue session with several stakeholders initiated by the Dutch Association of Insurers. a.s.r. is also actively involved in various sector initiatives, including the Platform for Sustainable Finance of DNB, the Creditors Coalition, Platform Living Wages Financials (PLWF), the Energy Efficient Mortgages Hub Netherlands, the Green Deal Sustainable Healthcare, and the Partnership for Carbon Accounting Financials (PCAF). More information can be found on the [website](#).

Appendix A Interaction per stakeholder group

Stakeholder group	Type interaction	Frequency
Customers	<ul style="list-style-type: none"> - Phone and email - Surveys (e.g. NPS) - Raad van Doen - Webinars - Social media - Stakeholder dialogue 	Daily
Intermediary, distribution partners and advisors	<ul style="list-style-type: none"> - Phone and email - Surveys (e.g. NPS) - Webinars - Social media - Stakeholder dialogue 	Daily
Employees	<ul style="list-style-type: none"> - Phone, email and Teams - Performance reviews - Works Council - Social Media - Sam (intranet) - Staff meetings - Information and inspiration sessions - Employee panel - Stakeholder dialogue 	Daily
Prospects	<ul style="list-style-type: none"> - Social media - Commercial - Website contactpage 	Daily
Financial market participants: investors, shareholders, analysts, banks, and rating agencies	<ul style="list-style-type: none"> - Meetings with Investor Relations team and board members - Conference calls with analysts and (potential) investors - Webinars - Roadshows - Company presentations - Stakeholder dialogue 	Daily
Competitors and partners	<ul style="list-style-type: none"> - Meetings - Phone and email - Stakeholder dialogue 	Regularly
Regulators and tax authorities	<ul style="list-style-type: none"> - Meetings with executives and departments of Compliance and Tax - Phone and email - Stakeholder dialogue 	Regularly
Government	<ul style="list-style-type: none"> - Meetings with board members, senior management, and Public Affairs - Phone and email - Stakeholder dialogue 	Regularly
Suppliers	<ul style="list-style-type: none"> - Consultation at strategic (2-4 times per year), tactical (monthly) and operational (daily) levels - Stakeholder dialogue 	Regularly

Stakeholder group	Type interaction	Frequency
Media	<ul style="list-style-type: none"> - Meetings - Phone and email - Stakeholder dialogue 	Almost daily
Unions	<ul style="list-style-type: none"> - Meetings - Phone and email - Stakeholder dialogue 	Quarterly
Social partners	<ul style="list-style-type: none"> - Meetings - Phone and email - Dialogue with stakeholders 	Regularly
Civil society organisations & interest groups	<ul style="list-style-type: none"> - Events - Partnerships & memberships - Meetings - Phone and email - Stakeholder dialogue 	Regularly

Appendix B Definitions

Definitie	Beschrijving
Stakeholders	Stakeholders are groups and individuals who directly or indirectly influence the achievement of a company's objectives or can (potentially) be influenced by them.
Stakeholderbetrokkenheid	Delegated Regulation 2023/2772 ⁵ , Annex II, Table 2: <i>'An ongoing process of interaction and dialogue between the company and its stakeholders, allowing the company to hear, understand, and respond to their interests and concerns.'</i>

5 Delegated Regulation based on CSRD (EU) 2022/2464).

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