

Human rights due diligence

To identify a.s.r.'s most salient human rights risks the following steps were taken:

Desk research

Firstly, a sector analysis (peers) and value chain analysis were conducted to gain an overview of potentially relevant human rights

Interviews (internal stakeholders)

Subsequently, interviews were conducted with representatives of business units to understand how the central Human Rights policy is implemented within these business units

Potential human rights risks for a.s.r.

Following that, a longlist of human rights that are potentially relevant for a.s.r. was compiled, including explanatory definitions and identification of the involved stakeholders

Validation and assessment of human rights risks

Afterwards, a survey was developed to assess human rights risks based on severity (scale, scope, irreversibility) and likelihood. This survey was conducted across the various business units

Prioritisation of human rights risks

Finally, human rights risks were prioritised based on the gathered information from the preceding steps

Human rights risks in our different roles

We identify the following four roles

As a provider of insurance and financial products and services

As a developer and provider of various insurance products and services, a.s.r. faces the risk of having a negative impact on the rights of customers and/or being linked to direct negative impacts of customers on employees and local communities.

As an investor

As an investor, a.s.r. faces the risk of being linked to negative impacts on human rights of the employees of companies in which it invests and/or their business relationships. Additionally, there is a risk that a.s.r., through investments, is associated with negative impacts on the rights of local communities caused by the companies in which it invests and/or their business relationships

As an employer

As an employer, a.s.r. faces the risk of having a negative impact on the rights of individual employees of a.s.r. at the group level and in various business units

As a procurer

As a company, a.s.r. faces the risk of being linked to negative impacts on human rights of employees at direct business relations and business relations in the value chain. Additionally, there is a risk that a.s.r. is associated with negative impacts on the rights of local communities caused by direct business relations and business relations in the value chain

Potentiële human rights risks voor a.s.r. (1/4)

Longlist of potential human rights risks in the role of insurer and service provider

Subject	Stakeholder group	Description of the risk of human rights violations
Privacy	Consumer/End-user	Careless handling of personal data can infringe upon the right to privacy
		and can have far-reaching consequences, especially for vulnerable
		customers of a.s.r.
Equal treatment/non-discrimination	Consumer/End-user	Consciously or unconsciously making distinctions between groups of
		people in product development can lead to discrimination and unequal
		treatment in core processes and access to products and services. The risk
		also arises in data-driven decision-making processes and in general
		communication with customers
Access to information	Consumer/End-user	The insufficient or unclear provision of qualitative information in
		communication and through marketing activities
Right to a healthy and safe working	Workers in the value chain	The risk that companies purchasing an insurance product fail to ensure a
environment		healthy and safe working environment, resulting in incidents leading to
		physical and/or mental injuries
Equal treatment/non-discrimination	Workers in the value chain	The risk of discrimination and unequal treatment, including opportunities
		and compensation, for employees of companies that purchase insurance
		products
A healthy living environment	Affected communities	Insuring companies that have a severe or undesirable negative impact on
		the living environment of local communities

Potentiële mensenrechtenrisico's voor a.s.r. (2/4)

Long list of potential human rights risks in the role of an investor

Subject	Stakeholder group	Description of the risk of human rights violations
Equal treatment/non-discrimination	Workers in the value chain	The risk of discrimination and unequal treatment, including opportunities
		and remuneration, for employees of companies in which investments are
		made or for business relations in the value chain
Right to freedom of movement and	Workers in the value chain	The risk of forced labor, child labor, or involvement in human trafficking
protection from forced labor and human		within any of the companies in which investments are made or among
trafficking		business relations in the value chain
Right to a healthy and safe working	Workers in the value chain	The risk of unsafe working conditions for employees of companies in
environment		which investments are made or for business relations in the value chain,
		resulting in severe physical or mental harm
Right to organisation and collective	Workers in the value chain	The risk that employees of companies in which investments are made or
bargaining		their business relations in the value chain cannot organize and engage in
		collective bargaining for their working conditions and terms
Right to a decent standard of living	Workers in the value chain	The risk that employees of companies in which investments are made or
		their business relations do not receive adequate pay to maintain a decent
		standard of living and access basic necessities such as food, housing,
		clothing, water, and sanitation
Land & water rights	Affected communities	The risk that companies in which investments are made or their business
		relations are involved in activities that infringe upon the (informal) land
		rights of local communities and access to water

Subject	Stakeholder group	Description of the risk of human rights violations
Rights of Indigenous communities	Affected communities	The risk that companies in which investments are made or their business
		relations are involved in activities that violate the rights of indigenous
		populations, including the right to self-determination, cultural rights, and
		the voluntary, prior, and informed consent of indigenous peoples when an
		organization claims rights to their ancestral land and resources
A healthy living environment	Affected communities	The risk that companies in which investments are made or their business
		relations have a severe or undesirable negative impact on the healthy
		living environment of communities
Impacts on human rights defenders	Affected communities	The risk that companies in which investments are made or their business
		relations are involved in activities that endanger the health and safety of
		human rights defenders

Potentiële mensenrechtenrisico's voor a.s.r. (3/4)

Long list of potential human rights risks in the role of an employer

Subject	Stakeholder group	Description of the risk of human rights violations
Privacy	Own workforce	Careless handling of personal data can lead to a violation of employees'
		right to privacy
Equal treatment/non-discrimination	Own workforce	The risk of employees of a.s.r. being discriminated against and/or treated
		unfairly, including terms of employment and compensation, and/or not
		receiving equal opportunities
Right to a healthy and safe working	Own workforce	The failure to facilitate a healthy and safe working environment can lead
environment		to severe physical and/or mental consequences for employees of a.s.r.
		and their immediate surroundings

Potentiële mensenrechtenrisico's voor a.s.r. (4/4)

Long list of potential human rights risks in the role of a procurer

Subject	Stakeholder group	Description of the risk of human rights violations
Equal treatment/non-discrimination	Workers in the value chain	The risk of discrimination and unequal treatment, including opportunities
		and compensation, for employees of business relations in the value chain
Right to a healthy and safe working	Workers in the value chain	The risk of unsafe working conditions for employees in business relations
environment		within the value chain, resulting in severe physical or mental distress
Right to organisation and collective	Workers in the value chain	The risk that employees of business relations within the value chain
bargaining		cannot organize and engage in collective bargaining for their working
		conditions and terms
Right to freedom of movement and	Workers in the value chain	The risk of forced labor, child labor, or involvement in human trafficking
protection from forced labor and human		among business relations in the value chain
trafficking		
Land & water rights	Affected communities	The risk that business relations in the value chain are involved in activities
		that violate the (informal) land rights of local communities and access to
		water
Rights of Indigenous communities	Affected communities	The risk that business relations are involved in activities that violate the
		rights of indigenous populations, including the right to self-determinati-
		on, cultural rights, and the voluntary, prior, and informed consent of
		indigenous peoples when an organization claims rights to their ancestral
		land and resources
Impacts on human rights defenders	Affected communities	The risk that business relations are involved in activities that jeopardise
		the health and safety of human rights defenders

Subject	Stakeholder group	Description of the risk of human rights violations
Remedy and redress	All groups	Everyone has the right to access to remedy. Failing to provide or partici-
		pate in a complaint mechanism where victims of potential human rights
		violations can seek redress constitutes a standalone violation of this right

Prioritisation of human rights risks

Based on the desk research, interviews, and the survey, the following human rights were identified as a.s.r.'s most salient human rights risks. These rights may pose the greatest risks for a.s.r. and its stakeholders

As a provider of insurance and financial products and services

- Privacy
- Equal treatment/non-discrimination
- Access to information
- Right to a healthy and safe working environment
- Remedy and redress

As an investor

- Equal treatment/non-discrimination
- Rights of Indigenous communities
- Right to a healthy and safe working environment
- Right to freedom of movement and protection from forced labor and human trafficking
- Land & water rights
- Remedy and redress

As an employer $\,$

- Privacy
- Equal treatment/non-discrimination
- Remedy and redress

As a procurer

- Equal treatment/non-discrimination
- Right to a healthy and safe working environment
- Right to freedom of movement and protection from forced labor and human trafficking
- Land & water rights
- Remedy and redress