



Policy on Socially Responsible Debt Collection

α.s.r. Nederland

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1. Introduction

At the end of 2024, Nationale Coalitie Financiële Gezondheid (NCFG), SchuldenlabNL and the Schuldeiserscoalitie joined forces to agree on an 'Agreements Framework on Socially Responsible Debt Collection' or 'Afsprakenkader Sociaal Incasseren'. Too many people in the Netherlands are in arrears, struggling with problematic debts and/or living in poverty. It is still regularly noticeable that the way in which payment and debts are collected does not make the problems smaller, but larger or more complex. Socially responsible debt collection helps by offering a people-oriented approach, which prevents debts or helps to solve them in a sustainable way.

As a partner of the above-mentioned organisations, a.s.r. has ratified the creation and direction of the Agreements Framework.

This policy document gives further substance to the theme of social debt collection at a.s.r. The starting points, as defined in the Agreements Framework on Socially Responsible Debt Collection, are the basis for this.

1.1 Objective and link with α.s.r. strategy

Debtor management is carried out within a.s.r.'s product lines. An effective debt collection process is part of debtor management. In all cases, the starting point is that when exercising its rights, a.s.r. is aware of its social responsibility and takes into account the sometimes vulnerable financial position of the debtor.

The primary purpose of this central policy is to contribute to the financial health of our customers by preventing payment arrears and debts with a social method of collection. The policy is also relevant to what a.s.r. does for its own employees on this theme.

Social debt collection is one of the initiatives within the strategic sustainability pillar 'financial self-reliance and inclusion' and contributes to The story of a.s.r. It is also in line with a material sustainability topic from CSRD for a.s.r.:

- Consumers and end-users: mental and physical health impact through financial security and providing access to financial products for vulnerable groups.

1.2 Scope

This policy document is 'framework-setting' in nature. This means that the product lines within a.s.r. work within the framework of this policy and that the (decentralised) policy and processes are in line with this.

The policy document applies to ASR Nederland N.V. and its subsidiaries ("a.s.r.") and is aimed at providing services to private customers. This means that this policy applies to the following product lines that serve private customers: Non-Life, Disability, Life and Funeral, Health, Mortgages and Real Estate. The Policy does not apply to D&S Holding and its subsidiaries.

In their decentralized collection policy, Product Lines can choose to expand the scope of private customers to also include, for example, self-employed persons and Small and Medium-sized Enterprises.

1.3 Consistency with other policy documents

This Policy on Socially Responsible Debt Collection overlaps with other frameworks and/or policy documents (policy and/or procedures) of a.s.r. The policy document is part of a.s.r.'s Strategic Framework for Sustainable Business and is related to the following main policy documents:

- Code of Conduct a.s.r.
- Debt Collection Policy of the product lines P&C, Disability, Life and Funeral, Mortgages, Real Estate and Health

1.4 Deviating from the policy

In principle, deviating from the policy is not permitted. If a product line (temporarily) does not comply with the policy, the management of the product line is responsible for drawing up a proposal for a written exception. This exception is submitted to the Sustainability team.

This proposal must be drawn up in accordance with the template for exceptions and contains at least the following elements:

- The (part of) policy and/or procedure to which the deviation applies;
- A substantive description of the exception;
- An explanation of the reason for and consequences of the objection;
- The period (temporary or indefinite) to which the exception applies;
- A description of the management of the risk and the actions leading to lifting of the exception.

The Sustainability team assesses the exception and may decide to submit it to a.s.r.'s Sustainability Committee for advice. The decision on the exception is taken by the Management Board. Granting the exception may not lead to non-compliance with applicable laws and regulations or other applicable policy, unless an exception is also granted for the deviation from this other policy.

2. Legal framework

This policy, and more specifically the key requirements included in this policy, is based on the following laws and regulations, codes of conduct and self-regulation. The frameworks can be different for product lines.

Product lines P&C, Disability, Life and Funeral (insurance entities)

Level of laws and regulations, codes of conduct and self-regulation	Description of laws and regulations, codes of conduct and self-regulation
European	- General Data Protection Regulation (GDPR)
National	- Uitvoeringswet Algemene verordening gegevensbescherming (UAVG) - Gedragscode Verwerking Persoonsgegevens Verzekeraars - Breed moratorium (2017) - Wet Incassokosten (WIK) (2012) - Wet gemeentelijke schuldhulpverlening (o.a. vroegsignalering) (2021) - Wet kwaliteit incassodienstverlening (WKI) (2024)
Lower level (also from regulators)	- Gedragscode Verzekeraars (bindende zelfregulering Verbond van Verzekeraars) (2018) - Modelconvenant NVVK – Verbond van Verzekeraars (2020) - Gedragscode Sociaal Verantwoord Incasseren (SVI) - Protocol bij betalingsachterstanden (bindende zelfregulering Verbond van Verzekeraars) (2025) - Afsprakenkader Sociaal Incasseren (2025) - Het Ethisch Manifest (2021)

Product line Mortgages

Level of laws and regulations, codes of conduct and self-regulation	Description of laws and regulations, codes of conduct and self-regulation
European	- EBA-Guidelines - General Data Protection Regulation (GDPR)
National	- Wet op het financieel toezicht (Wft) - Wet ter voorkoming van witwassen en financiering van terrorisme (Wwft); - Gedragscode Hypothecaire Financieringen (GHF) - Tijdelijke regeling hypothecair krediet (Trhk) - Uitvoeringswet Algemene verordening gegevensbescherming (UAVG) - Besluit Gedragstoezicht financiële ondernemingen (Bgfo) - Sanctiewet 1977 - Regeling toezicht Sanctiewet 1977
Lower level (also from regulators)	- Gedragscode Verwerking Persoonsgegevens Verzekeraars - Het Ethisch Manifest (2021) - Afsprakenkader Sociaal Incasseren (2025)

* If there are differences, the strictest laws and regulations apply, unless this is excluded by laws and regulations.

Product line Real Estate

Level of laws and regulations, codes of conduct and self-regulation	Description of laws and regulations, codes of conduct and self-regulation
European	- General Data Protection Regulation (GDPR)
National	- Landelijk Convenant Vroegsignalering - Wet Incassokosten (WIK) (2012) - Wet kwaliteit incassodienstverlening (WKI) (2024) - Wet gemeentelijke schuldhulpverlening (2021) - Wet goed verhuurderschap (2023) - Wet ter voorkoming van witwassen en financiering van terrorisme (Wwft)
Lower level (also from regulators)	- Modelconvenant NVVK – Verbond van Verzekeraars (2020) - Het Ethisch Manifest (2021) - Afsprakenkader Sociaal Incasseren (2025)

Product line Health

Level of laws and regulations, codes of conduct and self-regulation	Description of laws and regulations, codes of conduct and self-regulation
National	- Zorgverzekeringswet, artikel 18a t/m 18d - Regeling Zorgverzekering, artikel 6.5.4 t/m 6.5.7 en 7b.1 - Landelijk Convenant Vroegsignalering - Regeling betalingsachterstand Zorgpremie (CAK)
Lower level (also from regulators)	- a.s.r. Zorg volgt, voor het dossier toeslagaffaire, de besluiten van Zorgverzekeraars Nederland om de financiële compensatie van de gedupeerden te realiseren. - Convenant NVVK - Zorgverzekeraars Nederland (2010) - Afsprakenkader Sociaal Incasseren (2025)

3. Key requirements

For this policy, the following key requirements have been¹ identified that apply to all product lines (see scope 1.2). See the table below.

The Protocol for payment arrears (of the Dutch Association of Insurers) applies to P&C, Disability, Life and Funeral (members affiliated with the Association). The Dutch Association of Insurers has made a mapping between the articles of the Protocol and the Socially Responsible Debt Collection Agreements Framework. This is included as a reference in the table below.

Key requirement	Reference
1. Offering support in finances and cooperating with debt counseling We help people as far as possible (and allowed) to get an overview and grip on their financial situation. Where necessary, we point people to (financial) help. Where possible and allowed, we cooperate with (recognised) debt counselling to achieve effective solutions.	- Agreements Framework on Socially Responsible Debt Collection (2025) - Protocol for payment arrears, article 8 and 9
2. Embedding socially responsible debt collection in policy and internal organization Within our organization, we have a collection policy that gives substance to Socially Responsible Debt Collection and implement it in our processes. This process puts the person first and treats everyone with respect.	- Agreements Framework on Socially Responsible Debt Collection (2025)
3. Prevention of high-risk payment obligations Where possible and allowed, we try to prevent (new) payment arrears from arising. We support the person who purchases our services in creating insight and overview of his or her payment obligations with us and we limit risks by being flexible in the payment method and the payment moment where possible, so that moments of income coincide with moments of high expenses. We pay extra attention to vulnerable groups and we try to protect them where possible. When necessary and possible, we as a creditor (temporarily) stop new obligations.	- Agreements Framework on Socially Responsible Debt Collection (2025)
4. Support in case of missing payment We are committed to getting into personal contact and connection with the person who is in arrears. We take into account the fact that in many cases it is about being unable and not about being unwilling to pay. We communicate clearly, in a timely manner, understandably and transparently, and our information about debts and (payment) procedures is clear and easy to find for the person in arrears.	- Agreements Framework on Socially Responsible Debt Collection (2025) - Protocol for payment arrears, article 11, 12 and 13

¹ Key requirements are elementary requirements that must be met at a minimum. This benefits the embedding of policy in processes and, if relevant, the establishment of controls. Ultimately, this should lead to better demonstrability that policy in the organization has been implemented.

Key requirement	Reference
5. Offer appropriate payment plan We offer appropriate payment arrangements in case of late payment. In doing so, we take into account, where possible and allowed, the personal (financial) situation of people. We recognize that information about debts is considered extra sensitive personal data. Therefore, the debtor is in control of personal data. The person can share (anonymized) information about payment arrears with other creditors - both public and private - with us in order to arrive at an appropriate payment arrangement.	<ul style="list-style-type: none">- Agreements Framework on Socially Responsible Debt Collection (2025)- Protocol for payment arrears, article 2, 3 and 4
6. Limited costs in the amicable collection process As primary creditors, we take responsibility for the social collection of payments from the personal relationship with the customer, even if a collection party is involved. When we work with a debt collection party, we make clear agreements to ensure that they also collect socially responsible.	<ul style="list-style-type: none">- Agreements Framework on Socially Responsible Debt Collection (2025)- Protocol for payment arrears, article 5 and 7
7. Judicial process as a last resort We only use formal, legal steps – such as summons, a court hearing, a judgment, execution and the imposition of a writ of execution – if other solutions prove ineffective and a judicial process is expected to be effective and if the additional costs resulting from the judicial process are in proportion to the main debt. We make agreements about this with bailiffs.	<ul style="list-style-type: none">- Agreements Framework on Socially Responsible Debt Collection (2025)- Protocol for payment arrears, article 1, 6 and 10

4. Description of the debt collection process

This policy supervises the implementation of the socially responsible element in the debt collection process by a.s.r. Nederland. The collection process is set up per product line and that is where the responsibility also lies (decentralized design).

The collection process can be broadly divided into the following three phases (see table below). The process has, in the value chain, a collaboration with collection agencies, bailiffs, municipalities and other external parties.

Phase of debt collection process	Execution by	Applies to product lines
1. Debtor management / internal debt collection	Debtor management product line	P&C, Disability, Life and Funeral, Health, Mortgages and Real Estate
2. Amicable debt collection process In an amicable collection process, the collection partner takes over the file from the creditor. The customer is informed about the outstanding debt and an attempt is made to make payment through formal collection letters and personal contact. Debt collection parties are selected and monitored to ensure that they meet the collection standards of a creditor's collection policy. (Source: National Government)	Debt collection bureau (Outsourcing from product line)	P&C, Disability
3. Judicial collection process (with start of extrajudicial phase by bailiff) In a judicial collection process, a creditor initiates proceedings in court to obtain a judgment and enforce payment from a customer. This phase is almost always preceded by an internal and amicable collection process and it is customary, also in this phase, to start with a number of extrajudicial activities given the impact of a judicial process on the customer. For example, with an upheld judgment, goods can be seized. A creditor or a collection agency cannot do this.	Bailiff and/or judicial	Health, Mortgages and Real Estate

5. Roles and responsibilities

The ownership and management of this policy lies with the Sustainability team. Sustainability drew up this policy in 2025 and reviews this policy for actuality at least every three years. In doing so, it provides a framework for product lines and makes the connection with decentralized policy of product lines that is already embedded in the organization.

Commitment to ESG policy documents (including this policy) is established at the board level. For example, the policy is submitted to the Sustainability Committee for advice and approved by the Management Board.

Important revisions to this policy are submitted for discussion in the Sustainability Committee. Minor textual updates and maintenance of this policy will not be brought into this committee and will be processed by the Sustainability team. In accordance with RASCI, the following functions/bodies involved have a role in this policy:

Department/body	Role	Responsibilities
Team Sustainability	Responsible	Owner and management of a.s.r.'s Policy on Socially Responsible Debt Collection. With activities such as: i. Drafting and revising policy ii. Monitoring policy (including quarterly report on responsible business and Agreements Framework Socially Responsible Debt Collection)
Product line: Debtor management, Sustainability and Management Team	Consulted	Input of expertise and advice to the Sustainability team and within the Product Line
	Accountable	Applying and monitoring policy within product line
Legal, Risk and Compliance	Consulted	Contribution of expertise and advice to product lines, Sustainability Committee and Management Board
HR	Consulted	Input of expertise and advice to the Sustainability team (for perspective of own employees)
Sustainability Committee	Consulted	Advisor to Management Board
Management Board	Accountable	Adopt ESG policy documents (including this policy)

Explanation of the RASCI matrix

R	Responsible	The person who performs the task is responsible for its execution. These are the people who carry out the work. Subsequently, the task performer must be accountable to the person who is 'Accountable'.
A	Accountable	This person bears the ultimate responsibility for the correct completion of one or more (project) tasks. He/she is accountable and he/she must approve (sign off) the task. Only one person is 'Accountable'.
S	Supporting	These are the people who, whether or not requested, support the execution of work.
C	Consulted	These are the people who are consulted before decisions are made or the work is carried out.
I	Informed	These are the people who need to be kept informed of progress and decisions. They do not have an active role in the execution of the work.

6. Reporting and monitoring

This chapter describes the relevant recurring reports. This also fulfils the central monitoring role for compliance with this policy.

Sustainable Business Report (internal)

In the quarterly Sustainable Business Report, a.s.r.'s Management Board is given a regular update on socially responsible debt collection. This report is drawn up by the Sustainability team, based on input from the product lines.

'Sustainability Statements' in the annual report (external)

In the section 'Sustainable Statements' in the annual report, an update is given on the implementation of the 'financial self-sufficiency and inclusion' pillar and the material sustainability topic from CSRD for a.s.r. with regard to social debt collection:

- Consumers and end-users: mental and physical health impact through financial security and providing access to financial products for vulnerable groups.

Report on the Social Debt Collection Agreements Framework (external)

Reporting on the implementation of the Social Debt Collection Agreements Framework takes place every year according to the principle of 'comply or explain'. This means that, by means of a self-assessment, it is described whether the principles of the Agreements Framework are met (comply) or whether the starting point (explain) is implemented in a different way than described in the Agreements Framework. This report is drawn up by the Sustainability team and in collaboration with the product lines.

The report is submitted by the Sustainability team to the Monitoring Committee of the (external) project organisation Socially Responsible Debt Collection. The Monitoring Committee is chaired by a rapporteur and enters into discussions with each creditor about their implementation plan and report, including the stated ambition to make the collection practice social. The Sustainability team is supported by the Services team so that uniformity is achieved with the STV assessments (see explanation below) that take place on the theme of socially responsible debt collection.

Protocol payment arrears (external)

The Protocol on Payment Arrears is binding self-regulation for members of the Dutch Association of Insurers and applies to payment arrears on insurance policies taken out by natural persons.

The STV (Stichting Toetsing Verzekeraars) carries out an assessment of insurers once every four years for compliance with this Protocol.

Monitoring

The Sustainability team is responsible for drafting and revising this policy and centrally monitoring compliance with this policy. It does this in various ways, namely:

1. Discussions about ambition and implementation of principles with product lines, Legal and Compliance
2. Conversations with Doenkracht regarding partnerships and/or initiatives on this theme
3. Keeping up with knowledge and market practices on the 'social theme' and, in this context: 'socially responsible debt collection' and 'financial self-sufficiency and inclusion'
4. Monitoring progress on metrics
5. Preparation of internal reports (described in this chapter)

Appendix A: Definitions

The table below provides an overview of relevant definitions that provide an understanding of the content and context included in this document.

Definition	Description
Socially responsible debt collection	A 'market practice' for a debt collection policy and implementation and laid down in the 'Agreements Framework for Socially Responsible Debt Collection'. (Source: Socially Responsible Debt Collection Agreements Framework)
Amicable debt collection process	In an amicable collection process, the collection partner takes over the file from the creditor. The customer is informed about the outstanding debt and an attempt is made to make payment through formal collection letters and personal contact. Debt collection parties are selected and monitored to ensure that they meet the collection standards of a creditor's collection policy. (Source: National Government)
Judicial collection process	In a judicial collection process, a creditor initiates proceedings in court to obtain a judgment and enforce payment from a customer. This phase is almost always preceded by an internal and amicable collection process. In addition, it is customary, also in this phase, to start a number of extrajudicial activities, partly in view of the impact of a judicial process on the client. For example, with an upheld judgment in this process, goods can be seized. A creditor or a collection agency cannot do this. (Source: National Government)
Early detection	Early detection, based on signals from third parties, has been a statutory task of every municipality since 1 January 2021. This is all about sharing information in a timely manner when a customer is having trouble paying bills. Think of arrears with rent, energy, health insurance or water. A signal about a backlog may be sent to the municipality without the consent of the customer concerned as soon as industry-specific collection steps have been met by the fixed costs partner. Early detection aims to prevent payment arrears from growing into problematic debts. (Source: NVVK)
Wet Kwaliteit Incassodienstverlening (WKI) and Wet Incasso Kosten (WIK)	From 1 April 2024, debt collection service providers will be required to meet quality requirements and register. With these requirements and the registration obligation from the Quality of Collection Services Act (WKI), the profession has been regulated in the Netherlands for the first time. In addition, the Collection Costs Act (WIK) caps the collection costs to a certain percentage of the outstanding amount. People with debts are better protected as a result and creditors know better what debt collection service providers can do for them. These laws lead to less unprofessional practices and limit the accumulation of collection costs. (Source: National Government)

Appendix B: Partnerships and initiatives

a.s.r. is a partner of various coalitions and affiliated with initiatives that help residents in the Netherlands to increase financial independence and prevent financial problems. See the table below for the partnerships and initiatives that strengthen this policy.

Partnership	Explanation and initiatives
Nationale Coalitie Financiële Gezondheid (NCFG)	<p>The NCFG consists of public and private organizations that want to build a financially healthy Netherlands together. They do this with the conviction that a financially healthy society contributes to the well-being of individuals, organizations, the economy and therefore our society.</p> <p>Involvement: a.s.r. is a partner of the NCFG. The COO/CTO of a.s.r. participates in the NCFG steering group. One of the initiatives of the NCFG, with SchuldenlabNL and the Schuldeiserscoalitie, is de totstandkoming van het Socially Responsible Debt Collection Agreements Framework (2025).</p>
SchuldenlabNL	<p>An independent foundation with the mission to make the Netherlands debt-free. This foundation is committed to the national scaling up of successful initiatives in order to prevent fragmentation in the supply of help. SchuldenlabNL itself provides no debt counseling.</p> <p>Involvement: a.s.r. is a partner of SchuldenlabNL.</p>
Schuldeiserscoalitie (SEC)	<p>A partner coalition of primary creditors who have a common goal to proactively help private customers who are unable or unable to pay.</p> <p>Involvement: a.s.r. is a partner of the Schuldeiserscoalitie.</p>
Nederlandse Schuldhulprouwe (NSR)	<p>A collaboration of companies, municipalities, (aid) interventions and other cooperation partners. One of the initiatives of the NSR is 'Geldfit'. Geldfit is an accessible counter to which people with financial problems can be referred (by organizations). She offers practical support, coaching and guidance.</p> <p>Involvement: a.s.r. is a partner of the NSR and is affiliated with Geldfit.</p>
Verbond van Verzekeraars / Dutch Association of Insurers	<p>The Dutch Association of Insurers facilitates various working groups on themes that connect insurers, including: socially responsible debt collection. The purpose of this is to exchange knowledge, draw up guidelines and improve processes. The Association has drawn up a 'Protocol for payment arrears' to which a.s.r. is affiliated. The assessment takes place on the basis of self-regulation and is carried out by the Stichting Toetsing Verzekeraars (STV). The Association has also co-signed the Socially Responsible Debt Collection Agreements Framework and is part of this external project organization (steering committee and supervisory committee).</p> <p>Involvement: a.s.r. is a member of the Dutch Association of Insurers and participates in the debtor management working group.</p>
Zorgverzekeraars Nederland	<p>Zorgverzekeraars Nederland facilitates various working groups on themes that connect health insurers, including: 'socially responsible debt collection'.</p> <p>Involvement: a.s.r. Health is a member of Zorgverzekeraars Nederland and participates in the debtor management working group.</p>

Partnership	Explanation and initiatives
NVVK	<p>The NVVK is a trade association for debt relief and financial services. The association is committed to quality standards for services and monitors the quality of member organizations through the Quality Framework.</p> <p>Involvement: a.s.r. has co-signed various covenants that have been accredited by the NVVK.</p>

Appendix C: Reading guide

A **policy** sets out the “why” and “what”. In addition, the policy describes the minimum requirements that are mandatory for product lines and/or subsidiaries of a.s.r., the so-called ‘key requirements’. This benefits the embedding of policy in processes and, if relevant, the establishment of controls. Ultimately, this should lead to better demonstrability that policy has been implemented in the organization. The aim is to establish the legal framework, (key) risks, strategic goals, key requirements and to provide further clarification. Product lines and/or subsidiaries may deviate from (the key requirements of) policy in accordance with the exception process by means of an exception (see paragraph 1.4).

A **procedure** describes the “what” (previously defined in a “Guideline”) and “how” (previously defined in a “Standard”). A procedure can help to achieve the implementation of policy in a way that contributes to quality, consistency and correctness. This is a ‘rule-based’ document with possible ‘principle-based’ additions. In principle, proceedings follow the principle of ‘comply or explain’. It is not necessary to apply for an exception in advance for a procedure, but an explanation and justification must be provided at the request of management, Risk, ERC or Compliance in the event that a procedure is (deliberately) not complied with.

Tools are resources that are used to carry out tasks belonging to the policy house easier, more efficiently and more effectively. This can include guidance, questionnaires and templates (e.g. the PARP template). Tools can be discretionary, but it is also possible that their use will be made mandatory.

The Decentralised policy sets out the “why” and “what” for a specific product line. The goal is to make the central Policy specific to a certain product line where necessary.

