

# NN Group N.V. 2022 GRI Content Index table, Progress reports to the Principles for Sustainable Insurance and the UN Global Compact

**NN Group N.V.**  
Supporters of change

This document contains the GRI Index table and our Progress reports to the Principles for Sustainable Insurance and to the United Nations Global Compact. These reports serve as a reference to the relevant pages in our 2022 Annual Report and our corporate website.

The Hague,  
9 March 2023










# GRI Index table

Statement of Use	NN Group N.V. has reported in accordance with the GRI Standards for the period of 01/01/2022 to 31/12/2022
GRI 1 Used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	None Apply

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.










 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>General disclosures</b>						
GRI 2: General Disclosures 2021	2-1 Organisational details	 Contact and legal information				
	2-2 Entities included in the organisation's sustainability reporting	 Notes to the consolidated annual accounts (Note 34 Principal subsidiaries and geographical information)				
	2-3 Reporting period, frequency and contact point	 9 Other information: 9.1 Our approach to reporting				
	2-4 Restatements of information	 9 Other information: 9.1 Our approach to reporting				
	2-5 External assurance	 9 Other Information: 9.1 Our approach to reporting, 7 Facts and Figures: 7.4 Assurance report of the independent auditor				
	2-6 Activities, value chain and other business relationships	 1 About NN: 1.1 Who we are, 2 Our Operating Environment, 4 Creating value for our stakeholders: 4.1 How we create value, Notes to the Consolidated Annual Accounts (Note 34 Principal subsidiaries and geographical information)	b(ii,iii), c	Information unavailable/incomplete	NN Group currently reports on broader terms about its value chain and business relationships. The detailed information per business relationships is currently missing as we are improving our systems to contain the detailed level of data required for GRI 2-6. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this in more specific terms into our first AR based on the CSRD.	
	2-7 Employees	 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best, 7 Facts and figures: Human capital indicators	b	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employees data into the system to be in time for AR 2022 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.











 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	2-8 Workers who are not employees	 7 Facts and figures: Human capital indicators	a, b, c	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these workers data into the system to be in time for AR 2022 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	2-9 Governance structure and composition	 1 About NN: 1.1 Who we are, 6 Corporate governance  Who we are/Corporate governance <a href="https://www.nn-group.com/our-company/corporate-governance.htm">https://www.nn-group.com/our-company/corporate-governance.htm</a>				
	2-10 Nomination and selection of the highest governance body	 6 Corporate governance  Who we are/Corporate governance <a href="https://www.nn-group.com/our-company/corporate-governance.htm">https://www.nn-group.com/our-company/corporate-governance.htm</a>				
	2-11 Chair of the highest governance body	 6 Corporate governance  Who we are/Corporate governance <a href="https://www.nn-group.com/our-company/corporate-governance.htm">https://www.nn-group.com/our-company/corporate-governance.htm</a>				
	2-12 Role of the highest governance body in overseeing the management of impacts	 6 Corporate governance				
	2-13 Delegation of responsibility for managing impacts	 6 Corporate governance				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.




 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	2-14 Role of the highest governance body in sustainability reporting	 6 Corporate Governance  <a href="https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm">https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm</a>				
	2-15 Conflicts of interest	 5 Safeguarding value creation				
	2-16 Communication of critical concerns	 6 Corporate governance				
	2-17 Collective knowledge of the highest governance body	 6 Corporate governance				
	2-18 Evaluation of the performance of the highest governance body	 6 Corporate governance: 6.4 Remuneration Report				
	2-19 Remuneration policies	 6 Corporate governance: 6.4 Remuneration Report	a.iv	Information unavailable/incomplete	NN Group currently has no clawback provision in the Remuneration Policies. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	2-20 Process to determine remuneration	 6 Corporate governance: 6.4 Remuneration Report				
	2-21 Annual total compensation ratio	 6 Corporate governance: 6.4 Remuneration Report (aggregated level)		Not applicable	NN Group is reporting in line with BW2 title 9 and the Dutch Corporate Governance Code on using the average. Within the current calculation an primo and ultimo is used for calculating the average. We have applied this different indicator in order to comply with the disclosure requirements of the Dutch Corporate Governance Code. The Dutch Corporate Governance Code is embedded in Dutch law as a comply or explain requirement, while GRI is not embedded.	
	2-22 Statement on sustainable development strategy	 5 Safeguarding value creation				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.









 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
2-23 Policy commitments		4 Creating Value for our stakeholders, 4.1 How we create value, 5 Safeguarding Value creation, 5.2 Our code of conduct and other policies, 5.3 Stakeholder engagement. International Corporate Social Responsibility (ICSR) sector covenant, 5.4 Managing our risks, Managing Biodiversity and Human Rights, 5.1 Our values, Living our Values programme, 5.3 Stakeholder engagement and international commitments.   NN Human rights statement: <a href="https://www.nn-group.com/sustainability/how-we-do-business.htm">https://www.nn-group.com/sustainability/how-we-do-business.htm</a>				
2-24 Embedding policy commitments		3 Our strategy and performance: 3.2 Our strategic commitments and targets, 6 Corporate Governance, Strategy setting	a	Information unavailable/incomplete	The process currently in place to embed policy commitments for Responsible Business conduct throughout our activities and business relationship is bifurcated across different business units, process lines and teams. We have included a total overview on how we have structured our committees to support the strategy execution and monitoring the progress made. We do not report this on a policy level as this is very detailed, all detailed policy information is consolidated in the policy commitments reported. The information is only available on high level. We are currently in the process to build a roadmap to allocate, integrate, implement policy commitments for responsible business conduct throughout its activities and business relationships on a more granular level for reporting purposes. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.





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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	2-25 Processes to remediate negative impacts	 4 Creating value for our stakeholders, 5 Safeguarding value creation, 5.2 Our Code of Conduct and other policies, 6 Corporate Governance	b, c, d, e	Information unavailable/incomplete	Information requested in the requirements b,c,d,e is incomplete due to the fact that process and responsibility to remediate negative impact across NN Group is bifurcated across different business units, process lines and teams. We have complaints page on Business unit website, we have a values and codes desk, several complaints committees as well as NN Counsellors. we are assessing how we can centralize the process to remediate negative impacts. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	2-26 Mechanisms for seeking advice and raising concerns	 4 Safeguarding value creation, 6 Corporate Governance   Who we are/Corporate governance. <a href="https://www.nn-group.com/our-company/corporate-governance.htm">https://www.nn-group.com/our-company/corporate-governance.htm</a>				
	2-27 Compliance with laws and regulations	 Note 45 Legal proceedings				
	2-28 Membership associations	 4 Creating value for our stakeholders  Sustainability/Governance, memberships and endorsements <a href="https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm">https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm</a>				
	2-29 Approach to stakeholder engagement	 4 Creating value for our stakeholders  Sustainability/Governance, memberships and endorsements <a href="https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm">https://www.nn-group.com/sustainability/governance-memberships-and-endorsements.htm</a>				

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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	2-30 Collective bargaining agreements	 4 Creating Value for our stakeholders: 4.3 Empowering our people to be their best, Collective Labour Agreement (CLA), 7 Facts and figures	b	Not applicable	Within our annual report we have included the percentage of participants in the Dutch Collective Labour Agreement. This figure represents the percentage for our total employees who participate. The percentage for alternative collective bargaining agreements for employees that are not covered by the dutch collective labour agreement is not included in the report and we investigate the possibility for reporting in the upcoming years.	
<b>Material topics</b>						
GRI 3: Material Topics 2021	3-1 Process to determine material topics	 2 Our operating environment: 2.2 Determining our material topics				
	3-2 List of material topics	 2 Our operating environment: 2.2 Determining our material topics				
<b>Financial solidity</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 3 Our strategy and performance: 3.2 Our strategic commitments and targets, financial strength, 4 Creating value for our stakeholders: 4.4 Creating value for investors, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	 2.2 Determining our material topics, 2.3 Connectivity matrix, 3.2 Our strategic commitments and targets 4 Creating value for our stakeholders, 4.1 How we create value	b	Not applicable	The EVG&D at country, regional or market level is not significant for NN Group.	
	201-2 Financial implications and other risks and opportunities due to climate change	 5 Safeguarding value creation				
	201-3 Defined benefit plan obligations and other retirement plans	 Notes to the consolidated annual accounts  CAO paragraph 8.1 pension <a href="https://nn-careers.com/nl/nl/werken-bij-arbeidsvoorwaarden">https://nn-careers.com/nl/nl/werken-bij-arbeidsvoorwaarden</a>				
	201-4 Financial assistance received from government			Not applicable	NN Group has not received any significant financial assistance from any Government	
<b>Integrity, ethics and compliance</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 5 Safeguarding value creation: 5.1 Our values, 5.2 Our Code of Conduct and other policies, 5.3 Stakeholder engagement and international commitments, 5.4 Managing our risks and 5.5 Sustainability and climate change risk management	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given a high level understanding of our process.	



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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 205: Anti- corruption 2016	205-1 Operations assessed for risks related to corruption	 5 Safeguarding value creation: 5.2 Our Code of Conduct and other policies, NN Code of Conduct	a	Information unavailable/incomplete	NN Group's Code of Conduct governs NN Group's employees behaviour regarding anti corruption matters. We strive for 100% acknowledgement of code of conduct policies but specific anti corruption policies and procedures trainings are still being formulated for employees to be trained on. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	205-2 Communication and training about anti-corruption policies and procedures	 5 Safeguarding value creation: 5.2 Our Code of Conduct and other policies, NN Code of Conduct, 5.2 Our Code of Conduct and other policies: Awareness and e-learning	b, c, d, e	Information unavailable/incomplete	NN Group's Code of Conduct governs NN Group's employees behaviour regarding anti corruption matters. We strive for 100% acknowledgement of Code of Conduct policies but specifically the logging of employee participation on anti-corruption trainings and awareness and e-learnings is being developed. Therefore no percentage reported. We are including the reporting on training participation in our training application for the upcoming years. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	205-3 Confirmed incidents of corruption and actions taken	 5 Safeguarding value creation: 5.2 Our Code of Conduct and other policies: Reporting misconduct, 5 Safeguarding value creation: 5.2 Our Code of Conduct and other policies: Other incidents and concerns, Note 45 Legal proceedings	c	Confidentiality constraints	In the Annual report we include reporting of misconduct and other incidents and concerns, currently the data reported covers employees or a external party, the data reported is not disaggregated to incidents with employees and business partners. We will look into the possibility for upcoming reporting periods if this level of disaggregation can be included to comply with the requirements. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

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## GRI Index table continued

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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 3: Material Topics 2021	3-3 Management of material topics	<p> Total Tax Contribution report</p> <p> 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 5 Safeguarding value creation: 5.1 Our values, 5.2 Our Code of Conduct and other policies, 5.3 Stakeholder engagement and international commitments</p> <p> Our Approach to tax <a href="https://www.nn-group.com/investors/financial-reports-1.htm">https://www.nn-group.com/investors/financial-reports-1.htm</a></p>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 207: Tax 2019	207-1 Approach to tax	<p> Our Approach to tax; NN In society/NN's Approach to tax/Group Tax charter</p> <p> Our Approach to tax, website: <a href="https://www.nn-group.com/investors/financial-reports-1.htm">https://www.nn-group.com/investors/financial-reports-1.htm</a></p>				
	207-2 Tax governance, control, and risk management	<p> Our Approach to tax; NN In society/NN's Approach to tax/Group Tax charter</p> <p> In society/NN's Approach to tax/Group Tax charter</p>				
	207-3 Stakeholder engagement and management of concerns related to tax	<p> Our Approach to tax; NN In society/NN's Approach to tax/Group Tax charter</p>				
	207-4 Country-by-country reporting	<p> Tax Contribution report</p> <p> Corporate Income Tax in the Annual Accounts</p>				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.


 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Sustainable operations</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, Strategic commitment on the footprint of our own operations 4 Creating value for our stakeholders., 4.5 Creating a positive impact on society: Own operations, 4.6 Contributing to the SDGs, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, Own operations, 7 Facts and figures environmental indicators.	a, b, c, d, e, g.	Information unavailable/incomplete	For NN Group's energy consumption, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is unavailable since these subsidiaries might be too small or located in shared locations or data is unavailable. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	302-2 Energy consumption outside of the organisation	 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, Own operations, 7 Facts and figures environmental indicators.	a	Information unavailable/incomplete	For NN Group's energy consumption outside of organization, we focus only on business travel and upstream leased assets. Other forms of energy consumption outside of organization might be not material or data is unavailable. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	302-3 Energy intensity	 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, Own operations, 7 Facts and figures environmental indicators. 7.2 Carbon footprint proprietary assets	a	Information unavailable/incomplete	For NN Group's energy intensity, we focus only on energy consumed per FTE for our own operations and for our proprietary assets on Weighted average carbon intensity (tCO <sub>2</sub> e/EURm of revenue). Other forms of energy intensity might be not material or data is unavailable. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.


 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	302-4 Reduction of energy consumption	 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, Own operations, 7 Facts and figures environmental indicators.	a	Information unavailable/incomplete	Since NN Group mainly operates out of offices the energy consumption of our direct operations is not significant. We still strive to increase the share of renewables in our energy usage. We show this data in our environmental indicators. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	302-5 Reductions in energy requirements of products and services		a, b	Information unavailable/incomplete	For reductions in energy requirements of NN Group products and services, NN group has joined NZIA which sets protocols for science based requirements and targets to reduce energy requirements of insurance products. NN Group will set its first intermediate targets aligned with this protocol by July 2023.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Sustainable operations</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, Strategic commitment on the footprint of our own operations, 4 Creating value for our stakeholders: 4.5 Creating a positive impact on society, Own operations, 4.6 Contributing to the SDGs, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments.	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	 7 Facts and figures	c, d, e, f, g	Information unavailable/ incomplete	For NN Group GHG emissions on own operations, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is unavailable since these subsidiaries might be too small or located in shared locations. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. NN Group includes only CO <sub>2</sub> emissions equivalent given it being material for a financial services company and our strategic commitment. Others gases are not applicable. The carbon footprint of the fixed income and listed equity holdings was measured as per 31 December 2020, and is based on the latest available emissions data for governments and companies. This data is retrieved from ISS-Ethic Climate Solutions, an external provider that primarily uses the data for all the greenhouse gases in accordance with the Greenhouse Gas Protocol (GHG Protocol) converted to carbon dioxide equivalent (CO <sub>2</sub> e).	
	305-2 Energy indirect (Scope 2) GHG emissions	 7 Facts and figures	d, e, f, g	Information unavailable/ incomplete	For NN Group GHG emissions on own operations, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is unavailable since these subsidiaries might be too small or located in shared locations. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. NN Group includes only CO <sub>2</sub> emissions equivalent given it being material for a financial services company and our strategic commitment. Others gases are not applicable. The carbon footprint of the fixed income and listed equity holdings was measured as per 31 December 2020, and is based on the latest available emissions data for governments and companies. This data is retrieved from ISS-Ethic Climate Solutions, an external provider that primarily uses the data for all the greenhouse gases in accordance with the Greenhouse Gas Protocol (GHG Protocol) converted to carbon dioxide equivalent (CO <sub>2</sub> e).	

## GRI Index table continued

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 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	305-3 Other indirect (Scope 3) GHG emissions	 7 Facts and figures	c, e, f, g	Information unavailable/incomplete	For NN Group GHG emissions on own operations, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is unavailable since these subsidiaries might be too small or located in shared locations. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. NN Group includes only CO <sub>2</sub> emissions equivalent given it being material for a financial services company and our strategic commitment. Others gases are not applicable. The carbon footprint of the fixed income and listed equity holdings was measured as per 31 December 2020, and is based on the latest available emissions data for governments and companies. This data is retrieved from ISS-Ethic Climate Solutions, an external provider that primarily uses the data for all the greenhouse gases in accordance with the Greenhouse Gas Protocol (GHG Protocol) converted to carbon dioxide equivalent (CO <sub>2</sub> e).	
	305-4 GHG emissions intensity	 7 Facts and figures, environmental indicators, GHG emissions (tonnes)/FTE	d	Information unavailable/incomplete	NN Group includes only CO <sub>2</sub> emissions equivalent given it being material for a financial services company and our strategic commitment. Others gases are not applicable. The carbon footprint of the fixed income and listed equity holdings was measured as per 31 December 2020, and is based on the latest available emissions data for governments and companies. This data is retrieved from ISS-Ethic Climate Solutions, an external provider that primarily uses the data for all the greenhouse gases in accordance with the Greenhouse Gas Protocol (GHG Protocol) converted to carbon dioxide equivalent (CO <sub>2</sub> e). For NN Group GHG emissions on own operations, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is not available	

## GRI Index table continued

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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	305-5 Reduction of GHG emissions	 4 Creating value for our stakeholders, 4,5 Creating a positive impact on society, Own operations	b, c, d, e	Information unavailable/ incomplete	For NN Group GHG emissions on own operations, we focus only on our principle subsidiaries. Other information on non-principal subsidiaries is unavailable since these subsidiaries might be too small or located in shared locations. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. NN Group includes only CO <sub>2</sub> emissions equivalent given it being material for a financial services company and our strategic commitment. Others gases are not applicable. The carbon footprint of the fixed income and listed equity holdings was measured as per 31 December 2020, and is based on the latest available emissions data for governments and companies. This data is retrieved from ISS-Ethic Climate Solutions, an external provider that primarily uses the data for all the greenhouse gases in accordance with the Greenhouse Gas Protocol (GHG Protocol) converted to carbon dioxide equivalent (CO <sub>2</sub> e).	
	305-6 Emissions of ozone-depleting substances (ODS)			Not applicable	NN Group has no significant emissions related to Ozone depleting Substances	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions			Not applicable	NN Group has no significant emissions related to Ozone depleting Substances	



## GRI Index table continued

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GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Supply chain management</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders: 4.5 Creating a positive impact on society, Own operations and Sustainable sourcing, 4.6 Contributing to the SDGs, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments   NN sustainable operations <a href="https://www.nn-group.com/sustainability/sustainable-business-operations.htm">https://www.nn-group.com/sustainability/sustainable-business-operations.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	 4 Creating value for our stakeholders				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.




 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	308-2 Negative environmental impacts in the supply chain and actions taken	 4 Creating value for our stakeholders   NN Sustainable procurement statement. <a href="https://www.nn-group.com/sustainability/sustainable-business-operations.htm">https://www.nn-group.com/sustainability/sustainable-business-operations.htm</a>	a, b, c, d, e	Information unavailable/incomplete	NN Group has a Sustainable sourcing statement and NN Supplier Code of Conduct which sets expectations of policies and procedures on our suppliers. However, We require we report on policy level and not on data level for each supplier. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
<b>Employee attraction and retention</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2,3 Connectivity matrix, 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.




 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	 7 Facts and figures (aggregated level)	a,b	Information unavailable/incomplete	NN Group does not disclose the number, rate of new employee hires and rate of employee turnover split by age group, gender and region. Furthermore, NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include this employee data into the system to be in time for AR 2022 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best 7 Facts and figures, Notes to the consolidated annual accounts, Note 28	a, b	Information unavailable/incomplete	NN Group does not disclose on 'significant locations of operation'. These locations are not yet in the HR systems hence are not included. The timeline to include this employee data into the system to be in time for AR 2022 was too short. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	401-3 Parental leave	 NN Group vitality and well-being <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a>	a, b, c, d, e	Information unavailable/incomplete	NN Group has robust policies on parental leave in line with the Dutch legalisation as well as the Collective labour agreement. However, we report on policy level and not on data level for parental leave. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.






 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Employee attraction and retention</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best: Our workforce, 4.3.5 Diversity and inclusion, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments,   NN diversity and inclusion, health and vitality <a href="https://www.nn-group.com/our-company/diversity-and-inclusion.htm">https://www.nn-group.com/our-company/diversity-and-inclusion.htm</a> and <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.







 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Diversity and inclusion</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2 Our operating environment: 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best, 4.3.5 Diversity and inclusion, 5 Safeguarding value creation: 5.3 Stakeholder engagement and international commitments.	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
		 NN diversity and inclusion, health and vitality <a href="https://www.nn-group.com/our-company/diversity-and-inclusion.htm">https://www.nn-group.com/our-company/diversity-and-inclusion.htm</a> and <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a>				
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	 Engaging employees, Health and Vitality policy: <a href="https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm">https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm</a>				
	403-2 Hazard identification, risk assessment, and incident investigation	 Engaging employees, Health and Vitality policy: <a href="https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm">https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm</a>				
	403-3 Occupational health services	 Engaging employees, Health and Vitality policy: <a href="https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm">https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm</a>				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.





 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	403-4 Worker participation, consultation, and communication on occupational health and safety	 Engaging employees, Health and Vitality policy: <a href="https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm">https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm</a>				
	403-5 Worker training on occupational health and safety		a	Information unavailable/incomplete	Currently we have no data available of employees participating in training on occupational health and safety because of data unavailability. We are improving our system to register training hours going forward and to report in upcoming years.	
	403-6 Promotion of worker health	 Engaging employees, Health and Vitality policy: <a href="https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm">https://www.nn-group.com/article-display-on-page-no-index/health-safety-sick-leave-and-vitality-policy.htm</a>				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	 4 Creating value for our stakeholders: 4.3 Empowering our people to be their best: 4.3.2 Our NN culture: Well-being	a.i	Not applicable	Since NN group is a financial services organization, there are no material or significant occupational health and safety impacts directly linked by business relationships	
	403-8 Workers covered by an occupational health and safety management system	 4.3.2 Our NN culture, Well-being		Not applicable	Since NN Group is a financial services organisation, there is no material or significant work-related ill health to report on.	
	403-9 Work-related injuries	 4.3.2 Our NN culture, Well-being		Not applicable	Since NN Group is a financial services organisation, there is no material or significant work-related ill health to report on.	
	403-10 Work-related ill health	 4.3.2 Our NN culture, Well-being		Not applicable	Since NN Group is a financial services organisation, there is no material or significant work-related ill health to report on.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Employee attraction and retention</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders, 4.3 Empowering our people to be their best, 4.3.3 Our workforce, 4.3.5 Diversity and inclusion, 5.3 Stakeholder engagement and international commitments.   NN Group website <a href="https://www.nn-group.com/our-company/diversity-and-inclusion.htm">https://www.nn-group.com/our-company/diversity-and-inclusion.htm</a> [ <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a> - health and vitality]	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	 4 Creating value for our stakeholders, Employees, 7 Facts and figures (total spend and spend/FTE)	a	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employees data into the system to be in time for AR 2022 was too short. we also have robust policies on Training and development but we report on policy level and not on granular data level required by GRI for this requirement. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	404-2 Programs for upgrading employee skills and transition assistance programs	 4 Creating value for our stakeholders, Employees, 7 Facts and figures	b	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employees data into the system to be in time for AR 2022 was too short. we also have robust policies on providing but we report on policy level and not on granular data level required by GRI for this requirement. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website


GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
	404-3 Percentage of employees receiving regular performance and career development reviews	 7 Facts and figures	a	Information unavailable/incomplete	NN Group's newly acquired entities are not yet in the HR systems hence are not included. The timeline to include these employees data into the system to be in time for AR 2022 was too short. Our reporting on policies on career development is reported on a total NN group level, in the AR we have not included the data on granular data level as required by GRI by employee gender and employee category because the data is not available in the system. We are taken steps towards improving our data availability on a more granular level since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
<b>Diversity and inclusion</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders, 4.3 Empowering our people to be their best, 4.3.5 Diversity and inclusion, 5.3 Stakeholder engagement and international commitments.	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
		 NN Group website <a href="https://www.nn-group.com/our-company/diversity-and-inclusion.htm">https://www.nn-group.com/our-company/diversity-and-inclusion.htm</a> <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a>				



## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	 4 Creating value for our stakeholders, 4.3.5 Diversity and inclusion, table Our diversity and inclusion figures, indicators Management positions, Senior management positions, Management Board, Supervisory Board				
	405-2 Ratio of basic salary and remuneration of women to men		a, b	Confidentiality constraints	GRI requires NN to report on the gender pay gap by significant locations of operations. Currently it is only reported on total NN Group level due to Confidentiality constraints. Possibility to report on a more granular level is being investigated for reporting in the future	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.






 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Diversity and inclusion</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders, 4.3 Empowering our people to be their best, 4.3.5 Diversity and inclusion, 5.3 Stakeholder engagement and international commitments.   <a href="https://www.nn-group.com/our-company/diversity-and-inclusion.htm">https://www.nn-group.com/our-company/diversity-and-inclusion.htm</a> <a href="https://www.nn-group.com/careers/engaging-employees.htm">https://www.nn-group.com/careers/engaging-employees.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken		a, b	Confidentiality constraints	GRI requires NN to disclose the total number of incidents of discrimination. NN Group only reports the total number of incidents and concerns in Safeguarding value creation; facts and figures; human capital indicators. Indicator 'Other incidents and concerns'. Any incidents of discrimination are included in this overall figure. Possibility to report on a more granular level is being investigated for reporting in the future.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.




 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Supply chain management</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, Own operations and Sustainable sourcing, 4.6 Contributing to the SDGs, 5.3 Stakeholder engagement and international commitments.   <a href="https://www.nn-group.com/sustainability/sustainable-business-operations.htm">https://www.nn-group.com/sustainability/sustainable-business-operations.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	 4 Creating value for stakeholders, Sustainable sourcing   <a href="https://www.nn-group.com/sustainability/sustainable-business-operations.htm">https://www.nn-group.com/sustainability/sustainable-business-operations.htm</a>		Information unavailable/incomplete	NN Group has a Sustainable Procurement Statement and NN Supplier Code of Conduct which sets expectations of policies and procedures on our suppliers. We report the total number of suppliers (with a spend threshold of EUR 100K) who have completed the questionnaire and do not include the percentage of new suppliers that were screened. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD.	
	414-2 Negative social impacts in the supply chain and actions taken	 <a href="https://www.nn-group.com/sustainability/sustainable-business-operations.htm">https://www.nn-group.com/sustainability/sustainable-business-operations.htm</a>				

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Data privacy and protection</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 5. Safeguarding value creation, Our Code of Conduct and other policies, Data Privacy, 5.4 Managing our risks, Cyber risk, 5.3 Stakeholder engagement and international commitments.  Privacy statement NN Group <a href="https://www.nn-group.com/privacy-statement.htm">https://www.nn-group.com/privacy-statement.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
GRI 418:	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	 Determining our material topics (process, no data reported yet)	a, b, c	Confidentiality constraints	GRI requires NN to disclose the total number of complaints received from outside parties and substantiated by the organization and complaints from regulatory bodies. NN Group only reported that the number of complaints and data breaches is within an acceptable range due to Confidentiality constraints and lack of contextual information. Possibility to report on a more granular level is being investigated for reporting in the future.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.


 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Responsible investing</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 3.2 Our strategic commitments and targets, Society, 4 Creating value for our stakeholders, 4.5 Creating a positive impact on society, 4.5.1 Responsible investment 5.3 Stakeholder engagement and international commitments   <a href="https://www.nn-group.com/sustainability/responsible-investment.htm">https://www.nn-group.com/sustainability/ responsible-investment.htm</a>	a, e	Information unavailable/ incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.



 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Customer engagement</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 3.2 Our strategic commitments and targets - customers and distribution, 4.2 Adding value for customers, 4.2.1 Improving the customer experience, 4.2.3 Measuring our progress, 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/ incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Products &amp; services with societal benefits</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 3.2 Our strategic commitments and targets, Customers and distribution, 4.2 Adding value for customers, 4.2.1 Improving the customer experience, 4.2.2 Helping customers address societal and environmental challenges, 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
<b>Accessible finance</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, 3.2 Our strategic commitments and targets, Customers and distribution, 4.2 Adding value for customers, 4.2.1 Improving the customer experience, 4.2.2 Helping customers address societal and environmental challenges, 5.1 Our values, 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	

## GRI Index table continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

GRI standard/ other source	Disclosure	Location	Omission			GRI sector standard ref. No.
			Requirement(s) omitted	Reason	Explanation	
<b>Community Investment</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, Strategic commitment Support the financial, physical and/or mental well-being of 1m people by 2025, 4 Creating value for our stakeholders society, 4.5 Creating a positive impact on society, 4.5.3 Our contribution to our communities, 4.6 Contributing to the SDGs, 5.3 Stakeholder engagement and international commitments Community investment report.   Positive change in communities <a href="https://www.nn-group.com/our-company/positive-change-in-communities.htm">https://www.nn-group.com/our-company/positive-change-in-communities.htm</a>	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	
<b>Customer protection and transparency</b>						
GRI 3: Material Topics 2021	3-3 Management of material topics	 2.2 Determining our material topics, 2.3 Connectivity matrix, Strategic commitment Net Promoter Score, 4 Creating value for our stakeholders customers, 4.2 Adding value for customers, 4.6 Contributing to the SDGs 5.3 Stakeholder engagement and international commitments	a, e	Information unavailable/incomplete	Within the annual report the management of material topics is shown on a consolidated level within our connectivity table, data on a more granular level of impacts identified and actions taken per material topic is being developed for the purpose of reporting and to provide stakeholders with a more detailed overview. Since CSRD is on the horizon and we are currently working on implementing CSRD requirements, we strive to have this data into our first AR based on the CSRD. For now we report the omission as we do not show the level of detailed that is required by GRI, but feel we have given an high level understanding of our process.	



# Material Topics





Ranking	Material topic	Definition
1	Responsible investing	The impact on people and planet of integrating environmental, social and governance (ESG) is part of our investment processes as well as our impact strategies. Given the size of our investment portfolio, NN Group can leverage its investments to drive and accelerate positive change. At the same time, responsible investments can help to protect or enhance the value of our investments in the long term.
2	Financial solidity	The impact of societal developments (economic and geopolitical uncertainty) on NN Group's business model and financial solidity and maintaining financial resilience so we can meet our financial obligations and fulfil our short- and long-term commitments to all our stakeholders.
3	Products & services with societal benefits	The impact of NN Group developing insurance, pensions and banking products to help customers address societal challenges (e.g. physical/mental health or social/economic well-being) and/or promote environmentally responsible behaviour (e.g. circularity or reduced use of natural resources). This includes aligning or adapting our products or terms & conditions to arising risks and (ESG) challenges.
4	Integrity, ethics and compliance	The impact that NN Group's integrity, ethics and compliance behaviour has on business continuity, trust, transparency and our license to operate. Strong business ethics and transparency impact stakeholder trust and enable future regulatory compliance.
5	Customer protection and transparency	The way in which NN Group considers consumer needs and interests by giving fair and honest information and advice about our products & services, and protecting customers against risks they cannot bear. This includes offering guidance and tools that increase knowledge and awareness of financial matters to empower customers to make sound financial choices.
6	Customer engagement	The impact of NN Group's ability to sufficiently meet the changing needs and expectations of customers by leveraging data and digital expertise and capabilities to develop a differentiated customer journey and experience.
7	Sustainable operations	The impact of NN Group's own day-to-day operations (e.g. offices, business travel) on the environment through reducing our greenhouse gas (GHG) emissions, water usage and waste. By minimising the environmental footprint of our business operations, NN Group can contribute to climate change mitigation and operate in line with the low-carbon economy of the future.
8	Employee attraction and retention	The impact NN Group has on its own workforce by nurturing a culture which supports continuous learning and collaboration, and investing in personal and professional development, as well as the impact on NN Group and our ability to execute our business strategy by attracting, retaining and developing the necessary talent and fostering employee satisfaction. This includes reskilling our workforce towards evolving ways of working and insurance business models.
9	Good governance	The impact NN Group has on its own workforce by nurturing a culture which supports continuous learning and collaboration, and investing in personal and professional development, as well as the impact on NN Group and our ability to execute our business strategy by attracting, retaining and developing the necessary talent and fostering employee satisfaction. This includes reskilling our workforce towards evolving ways of working and insurance business models.
10	Diversity and inclusion	The impact on the well-being and welfare of NN Group's employees, by aiming to foster an inclusive and inspiring work environment, diversity of thinking, equal opportunities and pay, and hybrid ways of working, as well as the impact of a diverse and inclusive workforce on NN Group in terms of innovative power, operational performance and customer experience.
11	Data privacy and protection	The impact of sound data privacy and cyber security on all stakeholders that NN Group has a responsibility for (given the nature of NN Group's business and the implied sensitivity of the data it handles), as well as on business continuity by addressing this responsibility properly (in terms of non-compliance, stakeholder pressure and fines).
12	Accessible finance	The impact NN Group has on our customers by developing products that are and that remain inclusive to all in terms of accessibility and affordability, safeguarding the future insurability of society as a whole.
13	Community investment	The impact NN Group has on the communities around us by investing our resources, expertise and networks to maximise positive change in our communities, specifically around financial, mental and physical well-being (together with non-profit organisations and research institutes).
14	Supply chain management	The impact NN Group has on ensuring our supply chain is responsible and sustainable. This includes executing a sustainable procurement process, performing ESG due diligence and ensuring our partners (intermediaries, asset managers, back office) adhere to relevant codes of conduct and are trustworthy of delivering the right quality of service to our customers.

# Principles for Sustainable Insurance Progress report 2022

In June 2012, we became a founding signatory of the UN Principles for Sustainable Insurance. We report on our progress in implementing the principles in our business operations throughout the NN Group Annual Report.

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

Our commitment	Our goals	Our progress 2022
We will embed in our decision-making environmental, social and governance issues, relevant to our business	Transition proprietary investment portfolio to net-zero GHG emissions by 2050	Carbon footprint (measured as tonnes CO <sub>2</sub> e/EUR million invested) of NN Group's proprietary assets was 41 tonnes of CO <sub>2</sub> e in 2022  page 146
	Transition the underwriting portfolio to net-zero GHG emissions by 2050	NN Group will set its first intermediate targets aligned with Net- Zero Insurance Alliance by July 2023  page 54
	Reduce GHG emissions of own business operations to net-zero by 2040	NN Group's grand total GHG emissions (includes market-based scope 2) of own business operations was 12 kilotonnes in 2022  page 145
	More than double investments in climate solutions such as renewable infrastructure, green bonds and energy efficient real estate	NN Group's total Investments in Climate Solutions was 8,167 million in 2022  page 141
We will work together with clients and business partners to raise awareness of environmental, social and governance issues, manage risk and develop solutions	Increase the proportion of financed emissions that are either 'aligned' or under engagement and stewardship actions to 75% from 2021 baseline	NN Group's proportion of financed emissions in sectors that either already meet net-zero 'aligned' criteria or that will be subject to direct or collective engagement actions end of 2022 was 65%
	Develop relevant products and services, such as sustainable pensions, Woonnu (sustainable mortgages) and Powerly	As part of our efforts to promote a more circular economy, we aim to improve the insurability of the recycling sector in the Netherlands. NN Non-life started a pilot with 65 recycling companies in the Netherlands to investigate how this sector can be better insured  Through our partnership with Hello Mobility, a service to help fleet owners achieve less damages, lower costs and a more sustainable fleet by data-driven coaching of their drivers
	Manage our direct footprint and review our procurement process in order to create more sustainable practices	We updated our Sustainable Procurement Statement in 2022. We also have a process and governance in place for screening the integrity of the supplier through active engagement, both at onboarding and during the contract lifecycle
We will work together with governments, regulators and other key stakeholders to promote widespread action across society on environmental, social and governance issue	Engage with stakeholders on general developments or more specific issues	50 shareholders meetings where we voted and 686 agenda items on which we voted
	Contribution to communities by supporting the financial, physical and/or mental well-being of 1 million people by 2025	We set up a Community Investment impact fund where we focus our impact on supporting social enterprises
We will demonstrate accountability and transparency in regularly disclosing publicly on our progress in implementing the principles	Ensure public disclosure of our non-financial objectives, and the progress we make, in our annual reporting	NN Group published our 2022 Annual Report. This table serves as a cross-reference to the relevant sections in these reports and our website

# United Nations Global Compact Progress report 2022

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

## UN Global Compact

### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights;

### NN Group commitment

The NN statement of Living our Values includes the commitment to respect human rights.

Human rights are an integral part of NN Group's Responsible Investment Framework policy that applies to all asset classes

We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection, and anti-corruption.

NN Group is a member of various international networks and initiatives

### Performance

NN statement of Living our Values

NN Group Human Rights statement

NN Group's Responsible Investment Framework policy sets out our vision and approach in this area.


NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human


Rights, and the OECD Guidelines for Multinational Enterprises.

NN Group Sustainable Procurement Statement 2022

NN Group Supplier Code of Conduct

NN Group memberships

 pages 47-57, 62-69

 [www.nn-group.com](http://www.nn-group.com)

### Principle 2

Business should make sure that they are not complicit in human rights abuses.

The NN statement of Living our Values includes the commitment to respect human rights.

Human rights are an integral part of NN Group's Responsible Investment Framework policy that applies to all asset classes.

We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection, and anti-corruption.

NN Group is a member of various international networks and initiatives.

NN statement of Living our Values

NN Group Human Rights statement

NN Group's Responsible Investment Framework policy sets out our vision and approach in this area.


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NN Group Sustainable Procurement Statement 2022

NN Group Supplier Code of Conduct

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## United Nations Global Compact Progress report 2022 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

### UN Global Compact

#### Principle 3/ILO Conventions 87 and 98

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

### NN Group commitment

The NN statement of Living our Values includes the commitment to respect human rights, advocate equal opportunities and encourage diversity of thinking.

At NN Group, we uphold the freedom of association for all our employees and recognise the right to collective bargaining.

Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes.

We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption

### Performance

NN statement of Living our Values

NN Group Human Rights statement


Diversity and Inclusion report 2021


Human Capital Policy. In 2022, a new collective labour agreement (CLA) for the Netherlands was agreed between the NN Group Management and the Unions.

NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

NN Group Sustainable Procurement Statement 2022

NN Group Supplier Code of Conduct

 pages 39-42, 47-57, 62-69

 [www.nn-group.com](http://www.nn-group.com)

#### Principle 4/ILO Conventions 29 and 105

Business should support the elimination of all forms of forced and compulsory labour

The NN statement of Living our Values includes the commitment to respect human rights.

Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes.

We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption


NN statement of Living our Values

NN Group Human Rights statement

NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

NN Group Sustainable Procurement Statement 2022

NN Group Supplier Code of Conduct







 pages 47-57, 62-69

 [www.nn-group.com](http://www.nn-group.com)

## United Nations Global Compact Progress report 2022 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.







 Annual Report  Total Tax Contribution Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p><b>Principle 5/ILO Conventions 138 and 182</b> Business should support support the effective abolition of child labour</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights. Human rights are an integral part of NN Group's Responsible Investment Framework policy and applies to all asset classes. We ask our suppliers to agree to comply with the UNGC principles that promote human rights, fair labour practices, environmental protection and anti-corruption.</p>	<p>NN statement of Living our Values NN Group Human Rights statement NN Group's Responsible Investment Framework policy sets out our vision and approach in this area. NN Group applies norms-based Responsible Investment criteria that are a reflection of relevant laws, the organisation's values, and internationally recognised standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises. NN Group Sustainable Procurement Statement 2022 NN Group Supplier Code of Conduct  pages 47-57, 62-69  <a href="http://www.nn-group.com">www.nn-group.com</a></p>
<p><b>Principle 6/ILO Conventions 100 and 111</b> Business should support the elimination of discrimination in respect of employment and occupation</p>	<p>The NN statement of Living our Values includes the commitment to respect human rights. At NN Group, we believe it is right for the composition of our workforce to reflect that of society and for our people to bring a diversity of talents, beliefs and perceptions to their work</p>	<p>NN statement of Living our Values NN Group Human Rights statement Diversity and Inclusion report 2021  pages 39-42, 47-57, 62-69  <a href="http://www.nn-group.com">www.nn-group.com</a></p>
<p><b>Principle 7</b> Business should support a precautionary approach to environmental challenges</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in. NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion NN Group's Climate action plan aims to mitigate environmental and social risk of our investment activities. NN Group's environmental approach aims to minimise the environmental impact of our own operations. NN Group's Procurement Policy includes environmental aspects</p>	<p>NN statement of Living our Values NN Group Climate Action Plan  pages 62-69  <a href="http://www.nn-group.com">www.nn-group.com</a></p>

## United Nations Global Compact Progress report 2022 continued

The overview below provides a selection of examples from this progress, including references to the relevant pages in the report.

 Annual Report  Total Tax Contribution Report  NN Group website

UN Global Compact	NN Group commitment	Performance
<p><b>Principle 8</b></p> <p>Business should undertake initiatives to promote greater environmental responsibility</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in.</p> <p>NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion</p> <p>NN Group's Responsible Investment Framework policy aims to mitigate environmental and social risk of our investment activities.</p> <p>NN Group's Procurement Policy includes environmental issues, this is to ensure environmental sustainability.</p> <p>NN Group is a member of various international networks and initiatives</p>	<p>NN statement of Living our Values</p> <p>NN Group Climate Action Plan</p> <p>NN responsible Investment Framework Policy</p> <p> pages 62-69</p> <p> <a href="http://www.nn-group.com">www.nn-group.com</a></p>
<p><b>Principle 9</b></p> <p>Business should encourage the development and diffusion of environmentally friendly technologies</p>	<p>The NN statement of Living our Values includes the commitment to respect each other and the world we live in.</p> <p>NN Group will increase investments in climate solutions with an additional EUR 6 billion by 2030, taking the total investments in climate solutions to around EUR 11 billion</p>	<p>NN statement of Living our Values</p> <p>NN Group Climate Action Plan</p> <p>NN responsible Investment Framework Policy</p> <p> pages 62-69</p> <p> <a href="http://www.nn-group.com">www.nn-group.com</a></p>
<p><b>Principle 10</b></p> <p>Business should work against corruption in all its forms, including extortion and bribery</p>	<p>The NN statement of Living our Values includes the commitment to act with integrity. NN Group has zero tolerance towards bribery and corruption and has clear policies on this. NN Group implements a Code of Conduct including Financial Economic Crime (FEC).</p>	<p>NN statement of Living our Values</p> <p>NN Group Code of Conduct</p> <p> pages 62-66</p> <p> <a href="http://www.nn-group.com">www.nn-group.com</a></p>



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