



Health & Safety, Sick Leave and Vitality Policy
Effective as from 30 June 2022

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1. Vision

NN wants to enable colleagues to reach their full potential. We can only achieve that if employees are fit and energetic, so they are better able to cope with change and keep their focus on important things.

If an employee becomes occupationally disabled, NN provides them with effective support during their sick leave, as part of its policy of being a good employer. The collective labour agreement (CLA) also includes schemes that provide employees with financial and other types of support during their sick leave.

2. Basic principles

The following principles serve as guidelines for this policy:

- Vitality and well-being are essential in order to deliver good performance, and to learn and cope with new developments as an individual;
- Well organised work procedures that aim to prevent work-related health issues are fundamental to preventing absenteeism and fostering employability. Key elements are autonomy, collaboration, support and appreciation, work pressure and optimal working conditions;
- Preventing absenteeism is important. This is why managers as well as employees can consult the company doctor, the company doctor assistant or other experts (e.g. the work-life coach) even if the employee is not on sick leave. The employee can consult the company doctor without any interference from his/her manager. NN aims to keep absenteeism below 3.6% per year;
- If the employee is in the process of reintegrating, the focus is on what the employee can still do rather than on what he/she is no longer capable of doing; NN offers employees who are on sick leave the best possible reintegration programmes, aimed at getting them back into their own job or a different job;
- The employee and the manager share responsibility for the employee's reintegration process if the employee becomes (fully or partly) occupationally disabled. In line with the Eligibility for Permanent Invalidation Benefit [Restrictions] Act (WVP), the manager is the case manager;
- NN is an own risk bearer under the Sickness Benefits Act and under the Resumption of Work (Partially Fit Persons) Regulation (WGA);
- This policy applies to employees employed by NN Personeel B.V. and is based on Dutch laws and regulations (such as the Dutch Civil Code, the Sickness Benefits Act (ZW), the WVP, the Work and Care Act (WAZO), the Work and Income (Ability to Work) Act (WIA), the Health & Safety Act (Arbowet), the General Data Protection Regulation (AVG) and the applicable CLA;
- On behalf of NN, this policy is carried out by NN's in-house HR specialists, and by external company doctors and company doctor assistants under a master agreement with a Health & Safety agency. We also have contracts with providers specialised in physical working conditions and mental health;
- At NN, the responsibility for optimal execution of the Health & Safety, Sick Leave and Vitality Policy is borne by the board of directors, the management, HR specialists, prevention officers, reintegration consultants, company doctors, company doctor assistants, work-life coaches, counsellors, the head of the BHV organisation (company first-aiders), the Safety, Health, Wellbeing and Environment (VGWM)



Committee and the employees.

3. Vitality

The wide range of services we offer via our [Health&Vitality page on SAM](#) is meant to encourage and inspire employees to take action with regard to their vitality. Feeling fit will keep employees energetic and happy in their work, now and in the future.

Employees can reach their full potential if they are mentally and physically fit, because it makes them more resilient and energetic. More information about exercising and relaxation, coping with work pressure, and having a healthy lifestyle can be found on [SAM Health&Vitality – Mentally and physically fit](#). Employees may also consult a work-life coach if they are feeling down due to problems at work or at home.

Having a good workspace is an essential part of working in a healthy manner. Employees can go to the SAM page [Health&Vitality – At and around your workspace](#) for advice on setting up and using their workspace effectively, or they can consult an adviser.

4. Sick leave and reintegration

4.1 Duties and responsibilities

If an employee becomes occupationally disabled, a process is set in motion under which various parties have different duties and responsibilities. The main roles are for the employee and the manager, as they share responsibility for the reintegration process. Under the WVP, the employer and the employee share responsibility for the reintegration process of the occupationally disabled employee. They both have rights and obligations, including for writing a reintegration plan.

Below is a description of the duties and responsibilities of those involved in the sick leave and reintegration process.

The employee

The occupationally disabled employee has several rights and obligations, which are set out in article 7:660a of the Dutch Civil Code. The occupationally disabled employee is expected to actively cooperate in his/her reintegration process. He/she is expected to be available for contact with the employer and the company doctor and to take part in reintegration activities during regular office hours.

The manager

The manager is responsible on behalf of NN and acts as the case manager during the employee's first 104 weeks of sick leave. Based on advice provided by the company doctor, the manager is required to find suitable work for the employee, either in his/her own department or at another department.

The employee and the manager may ask the support of various in-house experts throughout the reintegration process. A short description of their roles and duties is given below. The [Health&Vitality page on SAM](#) provides more details on the roles and tasks of the in-house experts and work-life coaches.

The reintegration consultant

The reintegration consultant advises the manager with regard to the employee's reintegration process and monitors compliance with the legal requirements that NN and the employee need to fulfil with regard to sick leave and reintegration. Throughout the process, the reintegration consultant collaborates closely with the company doctor and the company doctor assistant, but does not have access to any medical



information. Employees may consult the reintegration consultant with any questions they have concerning their reintegration process. Section 4.5 specifies which information the reintegration consultant is allowed to retrieve and record under current privacy laws.

The company doctor

The company doctor assesses the degree of the employee's occupational disability. Only the company doctor can determine whether an employee is occupationally disabled (temporarily or permanently). The company doctor writes a problem analysis which serves as the basis of the employee's reintegration plan. The company doctor advises the employee and the manager on reintegration facilities, including the use of interventions. Employees who are not on sick leave are also allowed to consult the company doctor for preventive advice. With authorisation from the employee, the company doctor may request medical information from doctors or therapists treating the employee. Section 4.5 specifies which information the company doctor is allowed to retrieve and share under current privacy laws.

The company doctor assistant

The company doctor assistant works under the supervision and responsibility of the company doctor and discusses the sick leave with the employee and the manager. The company doctor assistant also gives advice regarding reintegration facilities, including the use of interventions. The company doctor assistant supports the company doctor in carrying out the duties. Employees who are not on sick leave are also allowed to consult the company doctor assistant for preventive advice.

The HR business partner (HRBP)

If the employee is on sick leave (or his/her sick leave is imminent) due to work-related conflicts or performance-related problems, the HR Business Partner is called in to advise. If a reintegration position needs to be found for the employee outside his/her own job, team or department, the manager may request the HRBP to help find a suitable reintegration position elsewhere in the organisation. The HRBP is not given access to information concerning the occupationally disabled employee unless the HRBP's involvement is needed for that specific employee and/or in relation to the performance of his/her duties. The HRBP is not given access to medical information.

4.2 Sick leave and reintegration protocol

NN's sick leave support protocol is consistent with the provisions of the Eligibility for Permanent Invalidity Benefit [Restrictions] Act (WVP). The protocol sets out the requirements and procedures applying to employees and manager in the event of sick leave.

4.3 Activities and duties in the event of sick leave

The WVP sets out several mandatory activities that serve as a framework for the reintegration efforts. The collective labour agreement (CLA) also sets out several terms that have been agreed with regard to sick leave.

4.4 Time frame in the event of sick leave

The table below sets out the steps of the sick leave support protocol.

Day 1	The employee	<p>Calls in sick to his/her manager if he/she is unable to work due to illness or disability.</p> <p>The manager is allowed to ask the employee the following questions:</p> <ul style="list-style-type: none"> - how long the sick leave is likely to take; - which of the employee's duties need to be handed over to colleagues; - whether there is anything the manager can do for the employee in terms of the reintegration process; - when the manager and the employee will be in touch again; <p>The manager is not allowed to enquire about the following:</p> <ul style="list-style-type: none"> - what caused the illness or disability; - the employee's physical or mental incapacitation; - whether the employee is able to perform any duties.
	The manager	<p>Is responsible for appropriate and regular contact with the employee from the first day of the employee's sick leave. Reports the employee sick and starts collecting documents for the reintegration file, which is not allowed to contain any medical information.</p>
Day 2	The employee	<p>Receives an email providing information on:</p> <ul style="list-style-type: none"> - the sick leave support programme; - facilities available for general interventions; - contact with the company doctor; - how to deal with conflicts.
	The manager	<p>Receives an email providing information on:</p> <ul style="list-style-type: none"> - the sick leave support programme; - situations where a prompt visit to the company doctor or an intervention is advisable. For example, in the event of a conflict, possible mental symptoms and during pregnancy; - situations where another type of leave applies instead of sick leave; - safety net situations (including illness due to pregnancy or organ donation).
	The manager	<p>Receives questions that will help explain the reason for the sick leave in order to deploy targeted interventions as soon as possible.</p>
	The employee	<p>receives questions that will help explain the reason for the sick leave in order to deploy targeted interventions as soon as</p>



		possible.
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Day 3	The manager	Receives an email providing information on what to do in the event of frequent sick leave, if the employee has called in sick frequently (3x in 12 months).
Day 7	The company doctor assistant	The company doctor assistant gets in touch with the employee to discuss the sick leave. The company doctor assistant assesses whether with company doctor or work-life coach or another intervention will be needed on short notice.
Days 7-10	The company doctor assistant	Gets in touch with the manager to give an indication of the possible duration of the employee's sick leave and to set up a targeted and appropriate plan.
Week 6	The employee	By the 6th week of the employee's sick leave, he/she receives an invitation to visit the company doctor, so a problem analysis can be written. From that time onwards, the employee makes regular visits to the company doctor or company doctor assistant. The company doctor and the company doctor assistant may decide to have the problem analysis written by the company doctor assistant, under the supervision of the company doctor.
	The company doctor	Based on his/her medical examination of the employee, the company doctor writes a problem analysis, which he/she sends to the employee and the manager. The company doctor and the company doctor assistant may decide to have the problem analysis written by the company doctor assistant, under the supervision of the company doctor.
Weeks 6-8	The employee & the manager	Together, they write a reintegration plan based on the problem analysis, and they both sign it.
	The manager	Adds the signed reintegration plan to the reintegration file.
	The reintegration consultant	Monitors progress throughout the reintegration process and advises the manager.
From week 8	The employee & the manager	Evaluate progress made in the employee's reintegration plan at least once every 6 weeks. Record their evaluation in the form 'First year evaluation'.
	The manager	Adds all signed evaluations of the reintegration plan to the reintegration file.
	The reintegration consultant	Monitors progress throughout the reintegration process and advises the manager.
Week 9	The reintegration consultant	Monitors the reintegration plan in terms of: <ul style="list-style-type: none"> - timeliness and quality; - consistency with the problem analysis; - the use of supplemental (non-medical) interventions; - not containing any record of medical information.

From week 26	Salary supplement	In keeping with the provisions of the collective labour agreement (CLA), the employee receives a conditional wage supplement for the hours he/she is on sick leave, provided he/she cooperates throughout his/her reintegration process. If there is any indication that the employee is insufficiently cooperating during the reintegration process, the UWV Institute for Employee Benefit Schemes will be requested to make an assessment by way of an expert's opinion.
Week 42	The reintegration consultant	Reports to the UWV that the employee has been on sick leave for 42 weeks (this is required by law).
Week 52	The employee and the manager	Write the first-year evaluation together.
	The manager	Adds the signed first-year evaluation to the reintegration file.
Week 86	The employee	Receives an email from Health&Vitality providing information on the application for Work and Income (Ability to Work) Act (WIA) benefits.
Week 88	The employee	Receives information needed to apply for a WIA assessment from the UWV Institute for Employee Benefit Schemes. The employee must submit this application to the UWV in the 93rd week at the latest. The reintegration consultant contacts the employee to make an appointment for support in the application procedure.
Week 89	The manager	Writes the mandatory parts of the reintegration report on behalf of the company. The employee adds these to the documents required for the WIA benefits application.
	The company doctor	Writes the mandatory parts of the medical section of the reintegration report. The employee receives the medical report from the company doctor on paper and sends it to the UWV, which needs this information for its WIA assessment.
Week 93	The employee	Applies for WIA benefits at the UWV. The employee can ask for support from the reintegration consultant.
	The reintegration consultant	Submits the documents to the UWV on behalf of the company; the UWV needs these documents in order to assess the WIA application.
No later than in week 104	The UWV	Assesses whether the employee is entitled to WIA benefits.

4.5 Privacy of information regarding sick leave

The 'Policy rules for processing personal data on the health of occupationally disabled employees' published by the Dutch Data Protection Authority, and the General Data Protection Regulation (in Dutch: AVG), set out which information is allowed to be processed by employers of occupationally disabled employees. Based on these regulations, a list has also been made of the information that is allowed to be retrieved, recorded and shared by staff members involved in the sick leave support programme. As a basic principle, only the company doctor and the company doctor assistant have access to medical information, while all other information relating to the employee's sick leave is only allowed to be shared with other staff members to the extent that they need this information in order to carry out their duties.

Medical information shared by the employee voluntarily is not allowed to be recorded by anyone other than the company doctor or the company doctor assistant. If the employee requests the company doctor to share medical information with colleagues for medical reasons, this is allowed. This could be necessary in cases where colleagues need to know how to act in the event of an emergency (e.g. diabetes or epilepsy).

Wat mag de leidinggevende (niet) vragen bij een ziekmelding?		
Zieke medewerker	Leidinggevende	
		
↔		
<input checked="" type="checkbox"/> Kan ik iets voor je doen?		
<input checked="" type="checkbox"/> De vermoedelijke duur van het verzuim.		
<input checked="" type="checkbox"/> De lopende afspraken en werkzaamheden.		
<input checked="" type="checkbox"/> Het telefoonnummer, het e-mailadres en het (verpleeg)adres van de medewerker.		
<input checked="" type="checkbox"/> Of de arbeidsongeschiktheid verband houdt met een arbeidsongeval.		
<input checked="" type="checkbox"/> Of er sprake is van een verkeersongeval waarbij een eventueel aansprakelijke derde is betrokken (regresmogelijkheid).		
<input checked="" type="checkbox"/> Of de medewerker onder een van de vangnetbepalingen van de Ziektewet valt (maar niet onder welke vangnetbepaling hij/zij valt).		
<input checked="" type="checkbox"/> Wanneer hebben we weer contact?		
<input checked="" type="checkbox"/> De aard of oorzaak van de ziekte		
<input checked="" type="checkbox"/> Wat kan de medewerker nog wel?		
Welke ziekteverzuimgegevens mogen leidinggevende en verzuimconsultant (niet) vastleggen?		
Leidinggevende	Zieke medewerker	Verzuimconsultant
		
↔		↔
<input checked="" type="checkbox"/> Gegevens die hij/zij heeft ontvangen van de bedrijfsarts.		
<input checked="" type="checkbox"/> Gegevens over hoe vaak en hoe lang een medewerker ziek is ten behoeve van de loondoorbetaling en het maken van verzuimoverzichten.		
<input checked="" type="checkbox"/> Documenten die volgens de Wet verbetering Poortwachter in het re-integratieintegratiedossier moeten worden opgenomen, zoals het Plan van Aanpak en de (Eerstejaars)evaluatie.		
<input checked="" type="checkbox"/> Medische gegevens, dit mag ook niet als deze door de medewerker vrijwillig verstrekt zijn		
Welke gegevens mag de bedrijfsarts (niet) delen met de leidinggevende en de verzuimconsultant ?		
Leidinggevende	Bedrijfsarts	Verzuimconsultant
		
↔		↔
<input checked="" type="checkbox"/> De werkzaamheden waartoe de medewerker niet meer of nog wel in staat is. (functionele beperkingen, restmogelijkheden en implicaties voor het soort werk dat de medewerker nog kan doen)		
<input checked="" type="checkbox"/> De verwachte duur van het verzuim.		
<input checked="" type="checkbox"/> De mate van arbeidsongeschikt van de medewerker.		
<input checked="" type="checkbox"/> Adviezen over aanpassingen, werkvoorzieningen of interventies die de leidinggevende voor de re-integratie moet treffen.		
<input checked="" type="checkbox"/> Informatie over de gezondheid van de zieke medewerker:		
- Diagnoses, naam ziekte, specifieke klachten of pijn aanduidingen		
- Eigen waarnemingen over de gezondheidstoestand van de medewerker		
- Informatie over therapieën		
- Afspraken met artsen, therapeuten of begeleiders		
- Problemen van de medewerker uit het verleden of in de privéfeer		
Dit valt onder het medisch beroepsgeheim.		

Welke overige gegevens mag de verzuimconsultant registreren en doorgeven?	
<input checked="" type="checkbox"/>	De verzuimconsultant mag dezelfde gegevens registreren als de leidinggevende.
<input checked="" type="checkbox"/>	De verzuimconsultant mag, namens Nationale-Nederlanden, niet-medische gegevens doorgeven aan het UWV.
<input checked="" type="checkbox"/>	De verzuimconsultant mag, na toestemming van de medewerker, niet-medische gegevens doorgeven aan externe deskundigen die worden ingezet voor een interventie tijdens de re-integratie van de medewerker, zoals een arbeidsdeskundige. Er mogen alleen gegevens worden doorgegeven die strikt noodzakelijk zijn voor de uitvoering van de interventie.
<input checked="" type="checkbox"/>	Medische gegevens, dit mag ook niet als deze door de medewerker vrijwillig verstrekt zijn.
Welke managementgegevens mogen management, leidinggevenden, HRBP's en medewerkers van Health & gegevens inzien?	
<input checked="" type="checkbox"/>	Algemene verzuimgegevens en -kengetallen over het verzuim in totaliteit of per bedrijfs onderdeel of afdeling. Deze informatie wordt zodanig opgesteld, dat de gegevens niet te herleiden zijn tot individuele medewerkers. (gegevens van heel kleine afdelingen zijn daarom niet per afdeling beschikbaar).
<input checked="" type="checkbox"/>	Medische gegevens en alle andere gegevens die te herleiden zijn tot individuele medewerkers behoren niet tot de managementgegevens.

4.6 The employee - actions and obligations

The employee reports sick

An employee is considered to be occupationally disabled if he/she is unable to perform all or part of his/her duties due to an illness or disability. On the first day of his/her sick leave, the employee must report this to his/her manager (or the substitute manager) before the workday begins. If the employee becomes ill or disabled during working hours, he/she must report this to his/her manager immediately. The employee and the manager must make sure they contact each other by telephone on the first day of the sick leave.

During their call, the manager may ask the employee about his/her outstanding tasks and can discuss the hand-over of those tasks with the employee. The manager is also allowed to ask how long the employee expects to be on sick leave. The employee and manager schedule the next conversation and record the employee's contact details (telephone number, email address, hospital address, etc.). The table in section 4.5 shows what the manager is allowed to ask when an employee calls in sick.

The employee's contact details

The manager and/or Health&Vitality staff must be able to contact the employee, by telephone or email, at his/her home, hospital or nursing address. The employee must report any change in these contact details to the Health&Vitality department within 24 hours by telephone at 070- 5138888 or by email at health@nn.nl.

Active effort to recover

The employee is required by law to make an active effort to recover without obstructing or delaying his/her recovery process. If necessary, the employee must seek medical treatment on time. The employee is required to accept suitable work. This includes adaptations to his/her own work, or other work, taking into account the employee's limitations and capabilities as determined by the company doctor.

The employee visits the company doctor

By the end of the employee's sixth week of sick leave, the employee receives a notification for an appointment with the company doctor. If the employee wishes to see the company doctor before that time, he/she may contact Health&Vitality for an appointment.

The company doctor assesses the degree of the employee's occupational disability. Only the company doctor can determine whether an employee is fully or partly occupationally disabled (temporarily or permanently). The appointment with the company doctor is compulsory and the employee will be invited for further appointments throughout his/her sick leave on a regular basis. If the employee is unable to make it to the appointment, he/she must report this, including the reason, to his/her manager and the Health&Vitality department right away. Failure to appear at an appointment with the company doctor may have legal consequences for the employee, including possible discontinuation of his/her salary payments.

The company doctor is allowed to process the employee's medical information to the extent that this information is needed, including in relation to salary payments and the reintegration process.

The employee must ensure the company doctor has access to relevant medical details. In some cases, the company doctor needs more information in order to make an assessment of the situation. The employee is required to authorise the company doctor, upon his/her request, to retrieve any medical information he/she needs for the assessment from the employee's doctors or therapists.



This obligation follows from the employee's duty to cooperate in the recovery process.

4.7 The manager - actions and obligations

Throughout the employee's sick leave, he/she and the manager share responsibility for the employee's reintegration process and the fulfilment of all duties required by law.

Recording sick leave

The manager records the employee as sick or recovered. The manager is only allowed to record the employee's recovery on the advice of the company doctor.

Calling in the company doctor or company doctor assistant

If the manager has doubts regarding the employee's disability to work, he/she can ask the company doctor to give a medical opinion. The company doctor will send the employee and the manager a written opinion. If the manager thinks the sick leave will take a long time or is caused by work-related or mental factors, it is wise to inform the company doctor of this right away.

Writing and evaluating a reintegration plan

When the manager and the employee have received the problem analysis, they write the reintegration plan. The manager must evaluate the reintegration plan with the employee at least once every 6 weeks. Progress made in the reintegration process must be recorded in the reintegration plan. Finally, both the manager and the employee must sign the reintegration plan.

The reintegration file

Starting on the first day of the employee's sick leave, the manager must keep records in a reintegration file. The manager sends the signed reintegration plan and the first-year and other evaluations to the Health&Vitality department. These documents are not allowed to contain any medical information.

Workplace adaptations

On the advice of the company doctor, the manager must ensure the employee's work, workplace and/or work tools are adapted to facilitate the employee's reintegration process.

Frequent sick leave

If an employee has been on sick leave more than three times in a year, the manager invites him/her to have a conversation. The aim of the conversation is to avoid future sick leave by assessing whether the cause is work-related, whether the employee's tasks need to be adapted and whether any preventive action can be taken to prevent frequent or long-term sick leave in the future. A report of the conversation is drawn up. The manager and the employee may ask the company doctor, company doctor assistant or the reintegration consultant for advice on this matter.

4.8 Sick leave and holidays

If the employee becomes disabled or ill during his/her holiday, he/she must immediately report this to his/her manager by telephone. If the employee is on holiday abroad, he/she must get a medical statement from an official medical facility (general practitioner or medical specialist), preferably in Dutch, English, German or French. The statement must specify the date, diagnosis and treatment. When the employee has returned home, he/she must send the statement issued by the foreign doctor or medical facility to the company doctor. As soon as the employee has returned home, he/she must immediately contact his/her manager. If the employee recovers during his/her holiday, he/she must immediately report this to his/her manager.

The employee is on (full or part-time) sick leave and wants to go on a holiday

An employee who is sick leave must ask his/her manager's permission before going on a holiday . While the employee is on sick leave, he/she is entitled to full accrual of holiday leave. When the employee takes leave hours, he/she records the leave in the same manner as an employee who is completely fit for work. The manager may ask the company doctor for advice.

4.9 Sick leave and exceptional circumstances

Sick leave and redundancy

If an employee is made redundant while on sick leave, he/she will be unable to reintegrate into his/her former job. Reintegration of this group of employees is subject to specific terms agreed upon and recorded in a process for redundant employees on sick leave.

Sick leave due to a work-related conflict

In the event of a work-related conflict between the employee and his/her manager or colleagues, it is essential that this conflict be resolved as quickly as possible, where necessary with the help of the work-life coach or a mediator.

In the event of a work-related conflict combined with medical issues causing the employee's inability to perform his/her job, the sick leave protocol under the WVP applies. The reintegration process is started up in tandem with the resolution of the conflict. In the event of a conflict without medical issues, the guidelines of the "STECR" foundation are followed. The manager may ask the HRBP to advise with regard to the conflict.

Safety net provisions and claiming costs of sick leave from third parties

The company can claim the cost of sick leave from the UWV Institute for Employee Benefit Schemes in cases where the safety net provisions of the Sickness Benefits Act apply. For example, if the employee is occupationally disabled due to pregnancy or organ donation. In such cases, the UWV will repay the cost of sick leave to the company. The employee is expected to report to his/her manager that a relevant situation applies, but the manager is not allowed to enquire which situation. Furthermore, the situation could involve a third party who could be held liable for the cost of the sick leave. It is therefore important for the employee to report that the sick leave was caused by a potentially liable third party. The manager is allowed to enquire about this.

4.10 Reintegration into suitable work

During the first two years of sick leave, the employee reintegrates into suitable work. As long as the employee is unable to perform all or some of his/her duties, efforts are made to find possibilities within the employee's job by adjusting their work hours and/or duties. If this is not possible due to the employee's incapacitation, efforts are made to find different suitable work within NN. Suitable work is work the employee carries out temporarily, bearing in mind the employee's knowledge, skills and incapacitation. The purpose of the reintegration into suitable work is to achieve the employee's full recovery or a maximum reintegration result.

4.11 Outside positions or duties

If the employee holds an outside position or performs outside duties, he/she must notify both the manager and the company doctor immediately. The employee will only be allowed to continue the outside position or duties after the company doctor has concluded that these duties do not stand in the way of the employee's recovery, given their nature and scope.

If the company doctor concludes that the outside position or duties do stand in the way of the employee's recovery, the employee will not be allowed to carry out the outside position or duties while he/she is on sick leave. If the employee is allowed to carry out the outside position or duties while on sick leave, he/she must report any rewards received in this respect to the manager. The rewards will be deducted from the employee's salary in line with the law.

4.12 Disputes and complaints

Under Dutch law, there are several places employees can turn to if they disagree with an advice, a decision, a procedure or the circumstances of their reintegration process. The appropriate route for an employee with a complaint or comment depends on the nature of the complaint. The diagram below sets out possible routes for filing a complaint.

What employees can do if they have a complaint /dispute about occupational disability and reintegration		
What route to follow?	What is the complaint or issue about?	Who is allowed to request or start the procedure?
Expert opinion by the UWV	Company doctor's advice on: <ul style="list-style-type: none"> the level of the employee's occupational disability. Reintegration efforts made by the employer/employee: <ul style="list-style-type: none"> is enough effort being put into the reintegration process? is the work offered suitable for the employee? 	Employee & Employer
Second opinion from a company doctor	Company doctor's advice on: <ul style="list-style-type: none"> the sick leave support programme examinations conducted with regard to the employee's health other health and work-related issues 	Employee
Regulations for complaints and disputes	Complaints regarding inappropriate behaviour. This procedure applies to complaints regarding all employees of NN, including complaints about inappropriate behaviour by the company doctor	Employee
Regulations for complaints regarding the company doctor	Other complaints regarding the company doctor or an employee authorised to act on behalf of the company doctor. (Quality of the services)	Employee
Regulations governing the WGA Complaints Committee	Complaints regarding measures affecting WGA benefits under the Resumption of Work (Partially Fit Persons) Regulation	Former employee

Expert opinion by the UWV

If there is a dispute about disability or reintegration, both the employee and the manager can ask the UWV Institute for Employee Benefit Schemes to provide an expert's opinion. The requester pays for the cost of the expert opinion.

The following questions can be put to the UWV:

- Is the employee fit enough to fully perform his/her own duties?

- If the employee wants or is required to perform adapted or other duties, are these duties suitable for the employee?
- Is the company doing enough to help the employee get back to work?
- Is the employee doing enough to get back to work?

The UWV's decision is authoritative, but not legally binding. If the parties involved continue to disagree, they may take the matter to court.

Second opinion from a company doctor

Employees can ask for a second opinion if they have doubts about advice given by the company doctor regarding the sick leave support programme, examinations conducted with regard to the employee's health or other health and work-related issues.

A second opinion is not meant to contest the advice given by the company doctor on the employee's degree of disability. Both the employee and the manager can ask the UWV Institute for Employee Benefit Schemes to provide an expert's opinion. NN facilitates a second opinion by its own company doctors or by company doctors associated with a network of company doctors for financial institutions. The employee may select which company doctor (from this group or from NN) is to give the second opinion.

Only the employee can ask for a second opinion from the primary company doctor. The primary company doctor fills out the form "Apply for a second opinion" together with the employee. Next, the employee selects a company doctor from the list of second opinion company doctors. The primary company doctor submits the application form to the company doctor selected for the second opinion. Subject to the employee's permission, the primary company doctor must furnish the second opinion company doctor with all relevant information, including the advice he/she had given. The employee will then receive an invitation for a visit to the second opinion company doctor.

The second opinion company doctor then gives his/her independent advice. The second opinion company doctor does not give an opinion on the advice given by the primary company doctor. If the employee refuses to give permission for sharing certain information, the second opinion company doctor must assess whether he/she is in a position to advise on the matter. The second opinion company doctor discusses his/her advice with the employee. The employee decides whether the advice will be sent to the primary company doctor. The advice given by the second opinion company doctor is not binding. When the primary company doctor has received the advice, he/she informs the employee whether he/she will or will not implement all or part of the advice given by the second opinion company doctor. A second opinion does not suspend the advice of the primary company doctor. After implementation of the second opinion, the primary company doctor resumes the sick leave support programme.

The costs of a second opinion by a company doctor from the list of second opinion company doctors are for the account of NN.

Regulations for complaints and disputes

Employees can submit complaints about their work situation or about inappropriate behaviour to NN Group's Complaints Committee. This procedure is governed by the Regulations for the Complaints Procedure of NN Group NV.

Procedure for complaints regarding the company doctor

Under the new Health and Safety Act (article 2.14), companies are required to implement a

complaints procedure regarding the company doctor. This procedure ensures that employees can file complaints about the quality of the services provided by the company doctor or an employee authorised to act on behalf of the company doctor. The purpose of this procedure is to remove discontent and to maintain or restore the quality of the relationship and services. The complaints procedure can be found on [SAM Health&Vitality](#).

The procedure is as follows:

- the employee submits a written complaint to the manager of the company doctor or the employee authorised to act on behalf of the company doctor;
- the manager sends the employee a written confirmation of receipt within 5 workdays;
- the manager handles the complaint, investigates the matter if necessary and may call in the help of an HR Consultant;
- the manager ensures that the employee is informed about progress made in the handling of the case;
- the manager sends the employee a written report of his/her opinion and decision on the complaint, including any measures taken to address the complaint. The manager must provide a detailed motivation of his/her opinion and decision. In principle, the complaint is handled within one month, unless more time is needed. In the latter case, the employee is informed about this in writing.

Regulations governing the WGA Complaints Committee

The WGA Complaints Committee handles complaints filed by former employees regarding any decision NN Group makes that affects their WGA benefits, for example a measure taken if a former employee insufficiently cooperates in his/her reintegration process. After collecting written information from parties involved and hearing them, the Committee renders its decision to the parties. Appeal against the decision can be made in an administrative court. The regulations governing the WGA Complaints Committee can be found on SAM.

4.13 Sanctions for non-compliance with the sick leave protocol and the WVP

The occupationally disabled employee is required to comply with the sick leave protocol. If he/she fails to cooperate, NN can impose a sanction on the (partly or fully) occupationally disabled employee, including suspension or discontinuation of wage payments. The UWV may also impose sanctions (including in retrospect) if either the employee or the company have not or insufficiently cooperated in the recovery and/or reintegration process. The UWV may postpone its WIA decision or even refuse the benefits.

5. Reintegration of employees receiving WGA benefits

NN is an own risk bearer under the Resumption of Work (Partially Fit Persons) Regulation (WGA). This means that NN will pay WGA benefits to employees and former employees for as long as 10 years. During this time, NN assumes the UWV's duties regarding the reintegration process.

5.1 Receipt of the decision on the WIA

The employee must submit an application for WIA benefits in the 93rd week of his/her sick leave at the latest. Within 10 weeks after the application, the UWV will send its WIA decision, specifying which benefits the employee will be receiving or why the application has been refused. The company doctor, reintegration consultant and manager will then decide whether they wish to file an objection. If there are sufficient grounds, NN will file an objection. NN may consult an insurance doctor in this process. The employee may file an objection against the WIA decision as well. The employee may request the reintegration consultant to support him/her.

Benefits under the Income Provision to Persons with Full Incapacity for Work Act (IVA)

If the UWV grants an employee IVA benefits, NN will no longer be under a duty to reintegrate this employee because he/she will never be able to return to work.

5.2 After the second year of sick leave

When the employee has been on sick leave for two years, the employer's obligation to continue paying their salary expires. Subsequently, there are three possible scenarios. NN will take the initiative to terminate the employment agreement. The employee will be entitled to a legal transition payment upon termination of their employment.

a. The employee continues reintegrating in suitable work

For the hours that the employee carries out suitable work, he/she is paid a salary. In addition, the employee may receive WGA benefit. The employee's official job continues to be the job he/she had on the first day of sick leave. If the employee becomes ill or disable again, NN will not pay salary.

b. The employee gets a new job (new agreed work)

If a stable situation has been reached and the employee has no further prospects for reintegration, the reintegration process is ended. An assessment is made to determine whether the suitable work that the employee was carrying out can be offered to him/her in a new job (new agreed work). Subject to certain conditions, the employee is eligible for a legal transition payment on a pro rata basis. If the employee becomes ill or disable again, the employer will be under a new duty to continue paying his/her salary.

c. The employment contract is discontinued:

If it is not expected that the employee will be able to perform his/her own work within 26 weeks' time and there are no opportunities for redeployment within 26 weeks, NN take the initiative to terminate the employment contract. In the case of a IVA decision (the employee is fully incapacitated), the contract will always be terminated, but even in the case of a WGA decision (the employee is partially incapacitated), it may be terminated.

5.3 Reintegration combined with WGA benefits

An employee who reintegrates while the WGA applies to him/her requires a tailor-made plan. In some cases, the employee is fit enough to resume some of their own duties or perform other suitable work. The reintegration process that was already started for the employee under the WVP is continued after WGA benefits have been granted, until the maximum possible reintegration result has been reached for the employee. Until such time, the company doctor will continue to be involved.

Once that result has been reached, no new reintegration activities are initiated unless there is reason to do so. In that case, the employee receiving WGA benefits is invited to visit the company doctor once a year. The company doctor assesses whether there is any change in circumstances or in the workload that would be acceptable for the employee and whether these changes call for a different reintegration plan or a reassessment of the employee's disability by the UWV.

If so, the company doctor, reintegration consultant and manager decide whether to start, intensify or cancel the reintegration process. Of course, this is also discussed with the employee. The reintegration consultant helps the manager in find a suitable job for the employee and carry out other reintegration duties.

Reassessment by the UWV

If there is reason to do so, NN may request the UWV to reassess the employee's situation. As a basic principle, this is always carried out before the end of the period during which the employee receives salary-related WGA benefits. A reassessment may also be expedient at other times, for example if the employee's ability to work has changed or if the employee has been in WGA disability classification 80%-100% for a long time.

A reassessment can lead to the following changes:

- an increase or decrease of the employee's WIA disability classification;
- termination of the WIA benefit because the employee's disability is less than 35%;
- termination of the WIA benefit because the employee is entitled to IVA benefit.

The employee is informed of the application for a reassessment and is required to cooperate in the process. This includes consultations and visits to an independent expertise bureau or insurance doctor at the request of NN.

When the reassessment has been completed, the UWV makes a decision. If NN disagrees with the UWV's decision, NN can file an objection.

5.4 Reintegration of former employees receiving WGA benefits

As NN is an own risk bearer under the WGA, it is also responsible for the reintegration process of its former employees. For this group of former employees, the reintegration consultant is the case manager.

Reintegration processes already under way are continued after the employee leaves employment. If new prospects for reintegration arise for the former employee, NN undertakes action. The former employee may ask NN for support via the reintegration consultant.

When reintegrating former employees, the services of an external insurance doctor are used instead of the company doctor. NN may invite former employees to visit the insurance doctor once a year. The former employee is required to cooperate in this respect. The insurance doctor assesses options for reintegration activities and whether a reassessment would be expedient.

6. Reintegration of former employees under the Sickness Benefits Act (ZW)

NN is an own risk bearer (ERD) under the Sickness Benefits Act. This means NN is responsible for granting, assessing, paying and administering the Sickness Benefits Act for former employees whose employment was terminated while on sick leave and former employees who reported sick within four weeks after termination of their employment and are not yet eligible for unemployment benefits. In these cases, NN administers the reintegration requirements instead of the UWV.

6.1 ERD sick leave protocol

The protocol below sets out the obligations of the former employee and NN and the application procedure for sickness benefits.

Step 1 - Reporting sick

If the employee is still employed when he/she becomes disabled or ill, he/she must report sick to his/her manager by telephone, as required by the sick leave protocol. As long as the employee stays employed, the sick leave protocol applies. If the employment contract has been terminated and the former employee becomes ill or disabled within 4 weeks after the last day of his/her employment at NN, the former employee must report sick to the Health&Vitality department by telephone (at 070-513 88 88) no later than on the second day of his/her disability or illness. If the disability or illness started during the employee's holiday in the Netherlands or abroad, the former employee is also required to call in sick no later than on the second day of his/her disability or illness. If the former employee reports sick too late, he/she will temporarily receive fewer or no benefits, as NN will be unable to determine the employee's eligibility for sickness benefits immediately.

Step 2 – Cooperate in the examination

When the former employee calls in sick by telephone, an appointment is scheduled for a visit to the company doctor. The former employee is required to cooperate in this respect. The company doctor will assess what needs to be done to get the former back to work as quickly as possible. For a valid reason only, the employee can reschedule the appointment with the company doctor up to 24 hours in advance by contacting the Health&Vitality department (tel. 070- 513 88 88). If the former employee fails to appear at the appointment without cancellation or without a valid reason for cancellation, his/her benefits may be affected.

Step 3 - Decision regarding sickness benefits

When the former employee calls in sick by telephone, several questions are asked. Eligibility for sickness benefits is not based solely on the person's health. The former employee must meet the following conditions in order to qualify for sickness benefits:

- the employee became disabled or ill within four weeks after termination of his/her employment contract;
- the employee's illness or disability started while he/she was on holiday (within the 4-week period), but he/she did not leave for holiday immediately after the final date of his/her employment contract;
- the employee does not qualify for unemployment benefits. Note that this does not mean the unemployment benefits must actually be applied for.

6.2 NN grants sickness benefits

NN confirms in writing whether the former employee is entitled to sickness benefits. The sections below set out the amount of the sickness benefits, the maximum duration and what we expect from the employee.

Amount and duration

Sickness benefits are equal to 70% of the former employee's daily wage (up to 70% of the maximum daily wage that applies by law). Sickness benefits are paid out to the employee including holiday allowance. Sickness benefits are paid out for a maximum of 104 weeks. After 52 weeks of sick leave, the UWV assesses whether the sickness benefits will be paid out for another 52 weeks. The assessment will include an examination of the former employee's ability to earn more than 65% of

the wages a healthy, similar person would be able to earn in a generally accepted regular job. If the former employee is considered capable of this, the sickness benefits are discontinued. The benefits are also discontinued when the former employee reaches his/her retirement age for Dutch state pension.

6.3 What is expected from the employee?

Being reachable

After reporting sick, the former employee needs to stay reachable by telephone. When reporting sick, the former employee must give a telephone number and email address where he/she can be reached.

Active effort to recover

If the former employee becomes ill or disabled, he/she must make every effort to recover as quickly as possible. If necessary, he/she must consult a general practitioner or other doctor and follow their advice.

Cooperate in the reintegration process

In most cases, the former employee will be able to return to work within a short period of time. If the former employee stays ill or disabled longer, the former employee and the reintegration consultant assess the prospects of getting back to work.

Report changes

Changes in the former employee's circumstances may affect the amount or duration of his/her benefits. This is why the former employee must report any change to us as soon as possible.

The most common changes can be divided into the following categories:

- changes in work or income: if the former employee has any income, this will be fully or partly deducted from their sickness benefits;
- changes in health: the former employee's health improves or deteriorates
- the employee is temporarily admitted to hospital or a nursing home;
- changes in living conditions

The former employee must report these changes to the Health&Vitality department via email to Health@nn.nl.

6.4 Report holidays

Even while the former employee is disabled or ill, he/she is allowed to go on holiday. Under Dutch law, the former employee is entitled to 4 weeks of holiday per calendar year. If the former employee wants to go on holiday, he/she must request permission from the company doctor. The company doctor will assess whether the holiday is medically safe and will not obstruct the reintegration process.

Sickness benefits discontinued after recovery

As soon as the former employee has recovered, he/she must report this to Health&Vitality by telephone as soon as possible, and in any case within 48 hours. If the former employee reports his/her recovery late, he/she will have to repay the excess benefits to NN.

6.5 Measures and sanctions

The process of sick leave and reintegration is based on mutual cooperation by and between all parties. Under Dutch law, the former employer has several options for imposing measures and



sanctions if the former employee fails to cooperate. The UWV has issued regulations for measures ("Beleidsregel Maatregelen") stating in which cases sickness benefits will be cut back, suspended or terminated if the former employee fails to meet his/her obligations. If NN decides to impose a measure or sanction, it must request permission from the UWV to do so .

6.6 Accessing and rectifying the file

At the former employee's request, he/she is allowed to access the sick leave file kept by NN. If the file contains incorrect information, the former employee is entitled to have this rectified by sending us a written request for rectification. NN will then assess whether the request can be followed up on.

7. Made redundant while on sick leave

Employees on sick leave may be made redundant. In some cases, the employee becomes ill or disabled during the redundancy support period, i.e. after he/she has been made redundant. Neither the CLA nor NN's Social Plan contain specific terms for situations where redundancy and sick leave coincide.

If such situations arise, tailor-made agreements are made with regard to reintegration and support from job to job, depending on the employee's level of disability and in line with legal frameworks.

Reintegration requirements

Being made redundant does not alter NN's and the employee's duty to carry out the reintegration process. The reintegration requirements laid out in this policy will remain in full force and effect. Redundant employees on sick leave are usually unable to go back to their own jobs. If possible, NN will provide the employee with a different job that will facilitate his/her reintegration.

8. Employment conditions

8.1 Prevention

NN wants to prevent or mitigate risks affecting safety, health and psychosocial work pressure as much as possible, with a focus on "prevention" .

The HR Health & Vitality Expert is the designated prevention officer. The prevention officer carries out prevention tasks and inspections in accordance with the Health & Safety Act. In line with the Health & Safety Act, a prevention officer is appointed with the approval of the works council.

The Health&Vitality department informs the senior management at least quarterly on developments with regard to absenteeism.

Vitality

On the SAM page for Health&Vitality, NN provides information and support with regard to the risks of physical and mental strain related to the employee's work and vitality.

Preventive conversation with the company doctor, company doctor assistant or work-life coach

The employee does not need permission from his/her manager for this conversation and can make an appointment anonymously if he/she wants to. If the employee has not been reported sick, the manager does not need to be informed about the employee's visit and does not receive feedback.

Information about the workstation

The company physiotherapist advises about properly adjusting and using the workstation at home



and at the office. Information on this can be found on the Health&Vitality page on SAM. Upon request, the company physiotherapist provides workstation advice to individual employees or entire teams.

Psychosocial strain

The work-life coach, company doctor and counsellor advise on matters relating to psychosocial strain. Workshops on this topic are also organised and NN has multiple tools for measuring psychosocial strain. Information on this can be found at [SAM Health&Vitality](#).

NN has a protocol on dealing with aggression, violence, and sexual and other forms of intimidation, and in-house and external counsellors are available for all employees of NN.

Information on caregiving

For employees who work as informal caregivers, the Health&Vitality page on SAM gives information on institutions that provide support in this respect.

Information for vulnerable groups

NN focuses special attention on informing and supporting vulnerable groups within the organisation, such as youngsters, pregnant employees and older employees.

8.2 Risk Inventory and Evaluation Method (RI&E)

In collaboration with the employees and management, NN draws up a list of all risks at the workplace. In the Risk Inventory and Evaluation (RI&E) and corresponding action plan, NN sets out the risks in a structured manner. This approach reduces the risks of work-related health issues and injuries to a minimum. Where possible, the RI&E action plan makes use of the solutions provided by the Health & Safety catalogue of the Dutch Association of Insurers, which is available at <http://www.gezondverbond.nl/>. Our RI&E has additional provisions regarding several topics which are not included in the catalogue, such as inappropriate conduct, special groups, and aspects of safety and occupational hygiene. The procedures and work methods of the RI&E are set out on [SAM Health&Vitality](#).

8.3 Periodical examinations regarding the employee's health (PAGO)

PAGO focuses on all risks related to work. These risks are described in the RI&E. NN provides eye-sight tests and has a scheme for computer glasses. When setting up the RI&E and conducting the employee satisfaction survey, we ask about the presence of psychosocial stress (PSA). Measures regarding the risks of eye strain and psychosocial strain are reflected in the RI&E action plan.

8.4 Company first-aiders

NN establishes a company first-aid plan and appoints company first-aiders at each office location. This task is carried out by Facility Management. FM ensures that company first-aiders are properly trained and that the company first-aid plan is executed and evaluated. An evacuation drill based on the company first-aid plan is held at least once a year.

8.5 Aggression, intimidation and violence

NN has in place a policy against sexual and other forms of intimidation, aggression, violence, bullying and racist behaviour. This includes NN's Complaints Procedure, Code of Conduct and the appointment of a counsellor. These are published on [SAM Health&Vitality](#) and can be viewed by all employees.

8.6 Working hours

NN complies with the Working Hours Act and the CLA when establishing working hours and/or work schedules. When scheduling the work, personal circumstances are taken into account where possible.

8.7 Registration of work-related accidents

NN reports accidents which are required to be reported to the Social Affairs and Employment Inspectorate (SZW). Accidents which are required to be reported are work-related accidents which result in the death, permanent injury or hospitalisation of the employees concerned. The Health&Vitality department has in place a procedure for reporting work-related accidents, which can be found on the SAM communities of FM and Health&Vitality.

8.8 The workplace

NN organises the work in such a way that work processes are effective and efficient. All jobs within the organisation are designed to enable employees to work in a happy, safe and healthy manner. One of the tools for this is list of 'Arbo requirements'. Where needed, the HR Health & Vitality Expert performs an in-depth assessment and advises on how to further optimise the organisation and its work methods and work tools.

NN also ensures that changes such as the redesign of work systems/processes and the purchase of resources are carried out according to ergonomic requirements and in such a way that they are effective from the start.

NN provides Workload Analyser tests. These tests are part of the RI&E, but they are also available to departments where management and employees need to get a grip on their workload pressure and stress issues.

8.9 The workstation

NN lets its employee choose when and where they do their work (working from any location at any time), bearing in mind the type of work they do, their personal situation, stakeholders and the interests of the team and NN.

NN ensures its office workplaces meet the requirements of the Dutch Health & Safety Act (Arbowet). If the employee doesn't work at an office workplace, the employee must ensure he/she has a proper workplace where he/she can work in a healthy manner. NN considers it important that all employees know how to adjust and use their workstation properly (at the office, at home or anywhere else). It is also important that the employee is aware of the risks involved. NN's Way of Working scheme provides a list of tools and information on the allowances for working from home and using the internet. NN offers these tools to meets its [duty of care](#) under the Health & Safety Act.

9. System for absenteeism

NN uses a special system for absenteeism in relation to its sick leave support programme. The system monitors the steps required by law and keeps records of NN's sick leave support programme. Where possible, NN optimises the system on a continuous basis.

10. About this policy

This Health & Safety, Sick Leave and Vitality Policy is effective as from 30 June 2022. NN retains the right to modify or cancel all or part of this policy, for example following policy changes or new legislation, in consultation with the Central Works Council.