



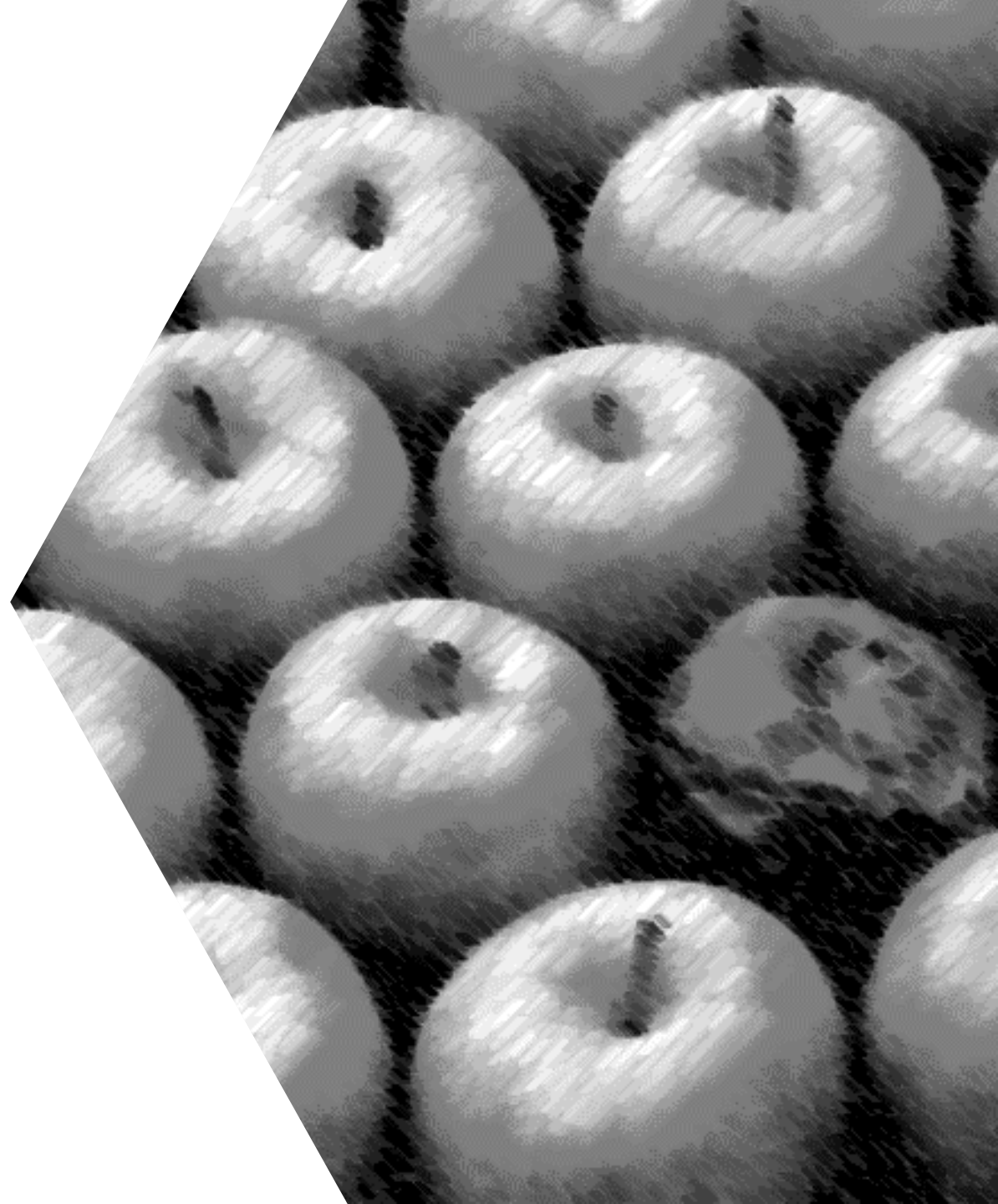
Aegon Speak Up

How to build and maintain an effective
Speak Up program (and culture)

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Gezond en Veilig Werken Dag 2024
A&O Fonds Waterschappen



Agenda

3.

Whistleblowing: an introduction

10.

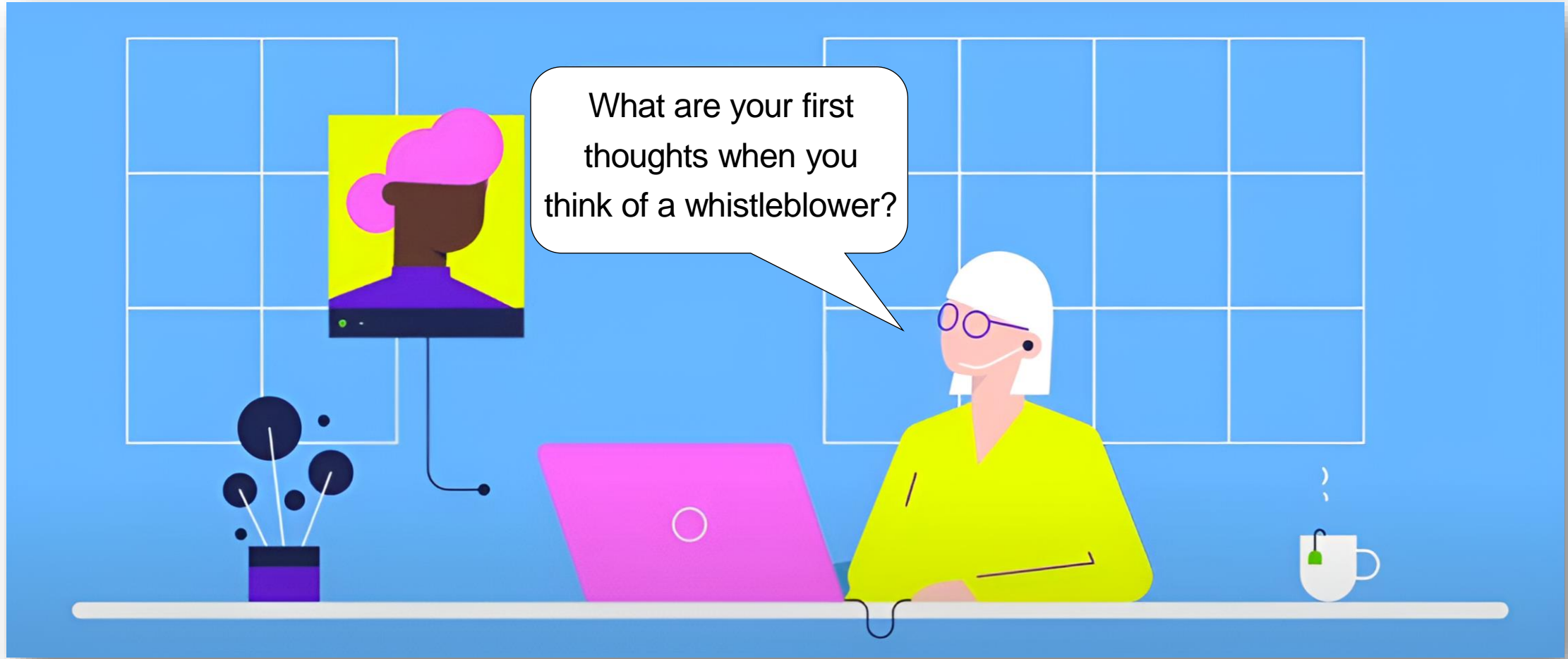
Aegon's global Speak Up program

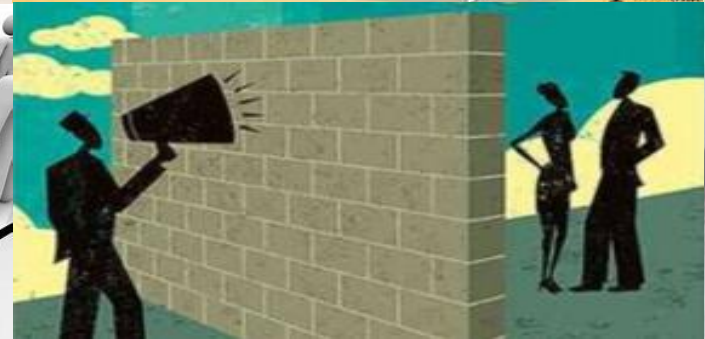
21.

Challenges and best practices for successful implementation of your speak up program

Whistleblowing: An introduction

Let's start with a question...

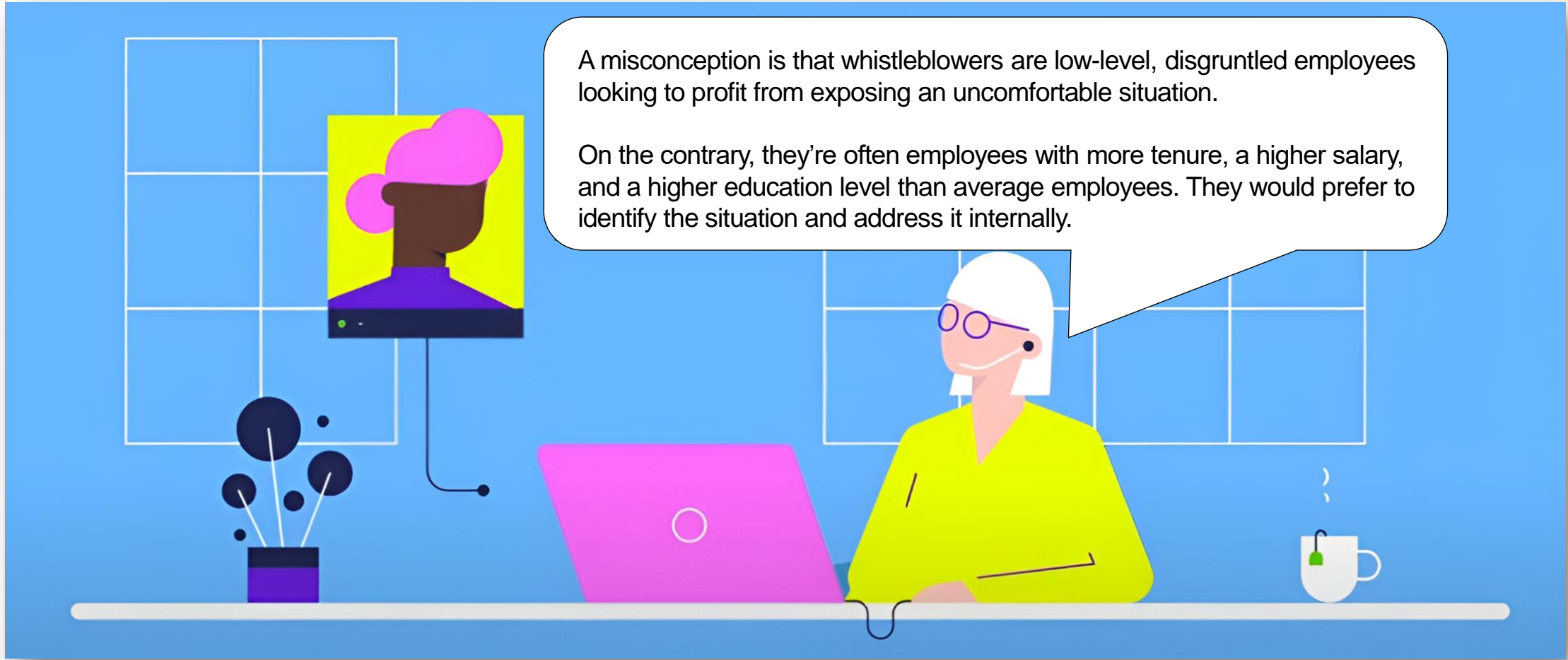




Did you know...

A misconception is that whistleblowers are low-level, disgruntled employees looking to profit from exposing an uncomfortable situation.

On the contrary, they're often employees with more tenure, a higher salary, and a higher education level than average employees. They would prefer to identify the situation and address it internally.



Why support a speak up program?

- It aligns with our purpose (helping people live their best lives)
- It's the right thing to do
- It's a matter of good governance
- High profile whistleblower cases
- Compliance with public interest disclosure and whistleblower protection laws
- Society expects the right attitude towards creating a sustainable and ethical business
- Increased attention regarding our ability to prevent harm to the company and its stakeholders

Bij wie zou je de coördinatie van de interne meldregeling voor misstanden binnen de organisatie leggen?

The author can see how you vote. [Learn more](#)

Vertrouwenspersoon

Juridische afdeling

HR afdeling

Compliance

Our view on whistleblowing and speaking up...

Is there a difference?

The term 'whistleblowing' and 'speaking up' are often used interchangeably and can cover disclosure of a wide range of legal and ethical issues.

Within Aegon we differentiate between the two:

WHISTLEBLOWING

Blowing the whistle means raising a concern externally and may be considered a last resort.

It occurs when concerns have not been listened to or acted upon internally, or when we have failed to create a safe environment for our employees to speak up.

SPEAKING UP

The term 'speak up' has more positive and constructive connotations.

Speaking up implies raising a concern internally so that it can be remedied, hopefully before it becomes a bigger problem.

Within Aegon we use this term for raising concerns about suspected or observed unlawful, unethical or otherwise improper conduct. In short: 'misconduct' or 'wrongdoing'

Introducing...
Aegon Speak Up

Whether you work for Aegon or do business with us

Anyone can report a concern that involves Aegon

I have a concern

What can you Speak Up about?

You should raise a concern when you suspect or observe

- unlawful,
- unethical, or
- otherwise improper conduct that involves Aegon.

Something that may result in a serious violation of applicable



- laws and regulations,
- our Code of Conduct,
- internal policies and procedures.

Particularly, when such conduct may harm






- you and your colleagues,
- our financial position and,
- reputation, or
- our customers and shareholders.

or when such conduct represents a danger to

- life and property,
- the financial system,
- or
- the public interest.



Aegon Speak Up

-  [I have a concern](#)
-  Speaking to someone
-  Making a report
-  An investigation is underway
-  After I have spoken up

The building blocks of our Speak Up program

Designed to put the reporter at the center of the program, not the organization

The goal of the program is to:

- set the right tone
- create confidence in the program, and
- build an effective speak up culture

The program offers:

- fairness
- organizational justice, and
- protection against unfair or negative treatment



The program consists of the following components:

1. Aegon Speak Up Policy
2. Aegon Speak Up Infographic
3. Aegon Speak Up Toolkit
4. Aegon Speak Up Service
5. Aegon Speak Up Training Program
6. Aegon Speak Up Animated Promotion Video
7. Local Speak Up landing pages
8. Other supporting material to help those involved in the program*
9. Support site for Speak Up Coordinators

-) Support material consists of Aegon Guidance on Ethical Decision Making, Aegon Triage and Assessment Guidelines, Aegon Investigation Manual, and Aegon Retaliation Monitoring Guidelines, Standardized text to update other policies that refer to alternative means to report issues*

Introducing Aegon Speak Up <https://youtube.com>

We promise to listen, act and protect – 2020/2021 Campaign



How we make the difference with Aegon Speak Up

We promise to listen, act and protect ...



This is not just a policy but also a procedure and guidance in one. It is available for those who wish to know every detail of the Speak Up Process.


Following the EU directive on the Protection of Whistleblowers we provide a more detailed and robust program. We want to be open and clear about how we deal with concerns.

- Why and how to speak up about something that concerns you
- Who to speak to in a confidential or anonymous manner (if preferred)
- How we assess reports and how we respond to them?
- When we investigate a concern and how?
- How we keep reporters informed of the progress and possible outcomes of a report intake or subsequent investigation (to the extent possible)?
- How we support and protect reporters and those involved in the speak up process against unfair or negative treatment?
- What the alternatives are should a reporter consider to report externally?

Download at www.aegon.com/speakup/policy


Interactive Aegon Speak Up Infographic

www.aegon.com/speakup/infographic



Speak Up

We promise to listen, act and protect



Introducing Aegon Speak Up

We want you to feel safe to speak up when you experience something that doesn't feel right. You can use this handbook to prepare yourself for raising a concern - from noticing a problem and having a conversation to what to expect if you call the Aegon Speak Up Helpline or if your concern is being investigated. You can easily click through the different stages of the Speak Up process.

- I have a concern
- Speaking to someone
- Making a report
- An investigation is underway
- After I have spoken up

I have a concern

What can you speak up about?

- Non-safety related concerns
- Health and safety concerns
- Service quality
- Compliance
- Other concerns

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

Speaking to someone

Speak up in the way that feels most comfortable to you. You can speak up to your manager, a colleague, or someone you trust. You can also speak up to the Aegon Speak Up Helpline.

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

Making a report

What are the steps?

Report

Review

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

An investigation is underway

What can you expect?

If there are sufficient grounds to proceed, an investigation will be carried out. This will involve gathering information, talking to people involved, and reviewing the evidence. The investigation will be completed as soon as possible.

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

After I have spoken up


What will happen?

Speak up if you notice a problem or if you have a concern about:

- Service quality
- Health and safety
- Compliance
- Other concerns

Speak Up

We promise to listen, act and protect



Aegon Speak Up Toolkit www.aegonspeakup.com

Aegon launches innovative app to support employees who speak up

The Aegon Speak Up Toolkit is there to offer support and guide staff through every step of their Speak Up Journey

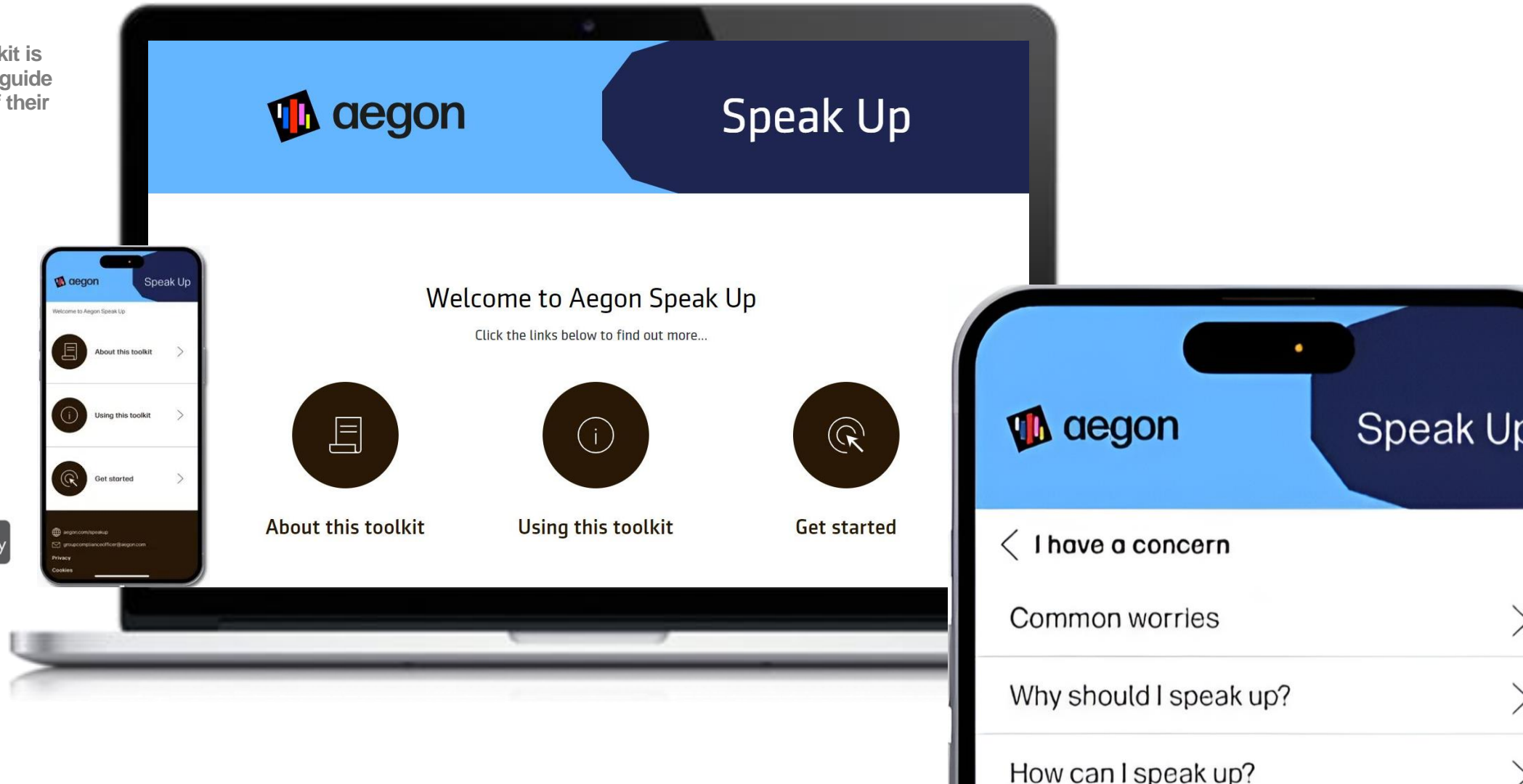
It is developed using first-hand experience and shared good practices

It offers flexibility to support our staff in the best possible way.

It sends a powerful message to staff about the importance of speaking up in the workplace



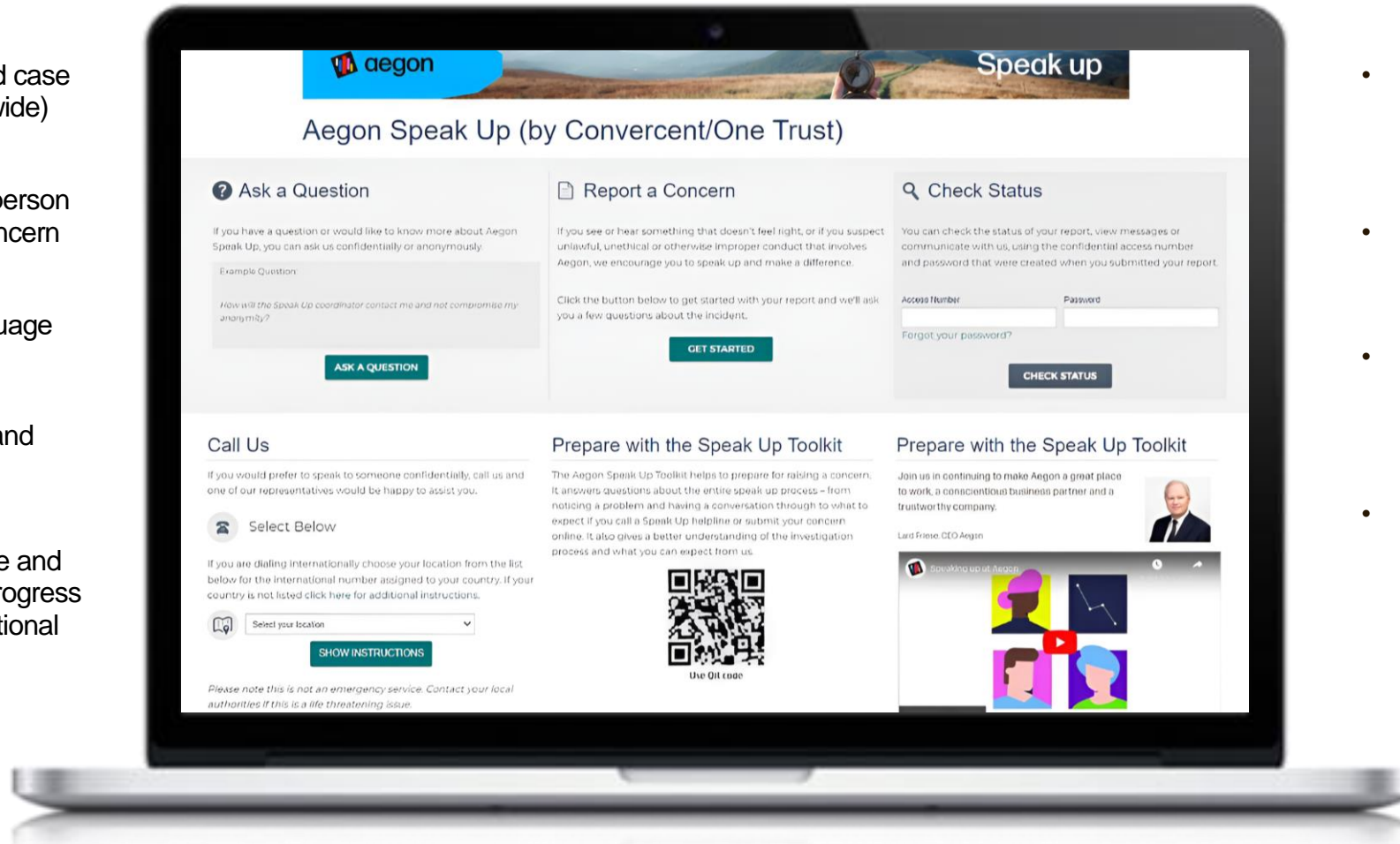
Use QR code



Aegon Speak Up Help Line & Case Management

Issue intake, management, reporting and resolution redefined

- Integrated hotline and case management (worldwide)
- 24/7 access for any person with a question or concern
- In the reporter's language of choice
- Offers confidentially and allows anonymity
- A unique access code and password to check progress and answer any additional questions



- It promises prompt and systematic intake and investigation
- Timebound and effective resolution
- Statistical data enables benchmarking and trend analysis
- An early warning system for management about problems that may be hiding in the shadows, or may be out in the open, but nobody wants to openly talk about

POWERED BY OUR INDEPENDENT THIRD-PARTY HELPLINE AND CASE MANAGEMENT PROVIDER:

WWW.CONVERCENT.COM/REPORT OR

WWW.AEGON.COM/SPEAKUP/REPORT



Aegon Speak Up e-learning modules

Our award-winning training program

It is part of our mandatory compliance training program and will be provided to new employees at induction, as well as periodically, as part of a refresher training for existing employees.

Aegon Speak Up introduction training

All staff receive training to ensure that they know:

- how to identify wrongdoing
- what action to take when they suspect wrongdoing
- how their reports will be dealt with, and
- What kind of support and protection is available to them

Aegon Speak Up manager training

Managers receive training in:

- recognizing when a matter falls within the scope
- what action they should take, including ensuring that staff are supported and protected against reprisals

Aegon Speak Up system training

Staff with responsibility for the program are trained on:

- report intake and triage
- case management, and
- providing support and protection for those who reported or are otherwise involved in the speak in (resolving) the issue

Aegon Speak Up Program leadership training

The leadership training provides:

- context regarding whistleblowing
- legal developments and challenges
- the Aegon Speak Up program, and
- how to build and maintain an effective speak up culture



Speak up, so we can do better!

Speaking up is the right thing to do - 2022 Campaign



Licensed material. Not for public use.

Speaking up is the only right thing to do

'The power of your voice' – 2024 Campaign



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The deep dive

Tips and best practices

Exercise A

What works well and should you keep doing (more)?



Exercise B

What isn't going well and what are you going to do about it?



Food for thought

Our tips & tricks to implement and maintain a successful speak up program

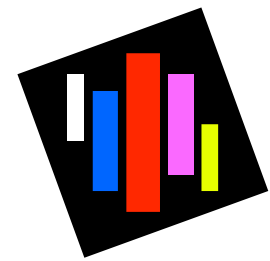
1. Follow the law or create a business opportunity?
2. Put the reporter at the center of the program, not the organization
3. Go beyond the scope and requirements of whistleblower legislation (not only public interest issues, but everything that is harmful to the company, its employees and other stakeholders)
4. Make support and protection unconditional. Don't let it depend on a legal interpretation of the matter. It creates uncertainty and undermines your program
5. Be transparent about the entire speak up journey (there are no secrets).
6. Simplify as much as possible (complexity is killing your program)
7. Do not use language or words with a negative connotation (e.g. whistleblower, complainant)
8. Show/prove that management has a vested interest in the program
9. Use professional reporting channels and case management system to manage the speak up journey
10. Make filing a report a pleasant experience: easy and intuitive. Don't over-ask your reporter
11. Setup multiple reporting channels available 24/7 in the reporter's preferred language
12. A simple open question like "Tell us what happened" will result in more reports and more useful information, than an intake form/questionnaire. Don't ask what YOU want to know. Ask what THEY want to share.
13. Involve leadership by establishing an 'Ethics Committee' for the most serious cases, embed the program in your governance structure. Promise and deliver quarterly reports and an annual report (year in review and preview).
14. Do not create a stand-alone program, embed it in other policies, procedures, training, leadership messages, annual report, etc.
15. Think of how the speak up program fits into your privacy policy (redaction vs deletion of information)
16. Do not forget to get endorsement from your (NL) works council (art. 27(m) Works Councils Act). It is now explicitly required by law.
17. Repeat, repeat, repeat. Be consistent in your messaging. Always the same type of language/wording (it helps to make it part of the speak up culture you are trying to build)
18. Walk the talk... you have to act in accordance with your program or you will lose trust
19. Build your speak up policy around the technology that supports the entire speak up process
20. Choose your speak up coordinators carefully. Train them intensively on the system and every step of the speak up process
21. Think of something that has not been done before...

When you find a way to institutionalize your speak up program, it will not become a one-person show, but something that is recognized, supported, promoted and carried forward by people at all levels in your organization.

It becomes part of your culture and helps create a culture in which speaking up becomes the new normal.



Source: Dilbert by Scott Adams, appeared in the New York Times on 22 September 2017



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