

Essent Whistleblower policy for (suspected) violation of integrity, wrongdoing, fraud, violation of human rights or environmental law

Essent strives to have a corporate culture that is open, effective and inspiring. Open means that we work with integrity, fairness and transparency. Open also means that we can speak up and that we are responsible for the way we act. We are responsible for this.

Essent conducts business in a honest and reliable manner, in accordance with laws and internal regulations. Nevertheless, it may happen that we are faced with an undesirable situation. If that is the case, we believe it is important that employees can report any suspicion of a violation of integrity, wrongdoing, fraud, violation of human rights or environmental legislation at or by Essent in a clear and safe manner.

With this policy, Essent employees have the opportunity to report (suspected) undesirable situations of various kinds to Essent, without suffering any adverse consequences in their work.

We are personally and also collectively responsible for how we do our work and how we behave as Essent. By speaking out and reporting undesirable situations when necessary, they can be investigated and resolved. Serve as lessons learned for the future. In this way, you contribute to ensuring that Essent can continue to improve.

Executive Board

1. To whom does this scheme apply to?

These reporting regulations are intended for all employees and former employees of Essent N.V. and its subsidiaries and other persons who, in the course of their work, come into contact with or suspect an integrity violation, misconduct, fraud, violation of human rights or environmental legislation at or by Essent. Persons who can report also include self-employed workers, temporary workers, volunteers, trainees, job applicants, persons in managerial bodies (such as members of the Supervisory Board) and shareholders who have (had) dealings with Essent through their work. This regulation is also open to employees of other organisations such as suppliers, (sub)contractors and cooperation partners who wish to report (a suspicion of) an integrity violation, wrongdoing, fraud, violation of human rights or environmental legislation at or by Essent.

2. What can you report?

Under these reporting regulations, you may report in good faith (a suspected) breach of integrity, wrongdoing, fraud, violation of human rights or environmental legislation at or by Essent. The report may be made internally at Essent or through an external reporting channel. For clarity, some terms are explained in more detail below:

An **integrity violation** is a situation in which the integrity standards that apply within Essent are violated. These standards are set out in our E.ON Code of Conduct and in the E.ON Compliance Policy and Guidelines. They relate, for example, to conflicts of interest or receiving and offering gifts.

A **wrongdoing** is a (potential) violation of Union law, or an act or omission in which social interest may be harmed. This includes, for example, (1) a (potential) violation of a statutory provision or of Essent's internal rules containing a concrete obligation and established by an employer on the basis of a statutory provision, or (2) a danger to public health, to the safety of persons, to the deterioration of the environment or to the proper functioning of the public service or an enterprise as a result of improper acts or omissions. The public interest is at stake in any case if the act or omission does not only affect personal interests and there is either a pattern or structural character or the act or omission is serious or extensive.

Fraud is an intentional deception to obtain undue advantage. This can be done by internal Essent employees or by external parties.

Human rights risks include in particular violation of the prohibition of child labour, forced labour and all forms of slavery, disregard of health and safety regulations at work and work-related health risks, freedom of association and collective bargaining, violation of the prohibition of unequal treatment at work violation of the prohibition on withholding a fair wage, destruction of natural livelihoods through environmental pollution, unlawful violation of land rights and violation of the prohibition on hiring or using private/public security forces, which may lead to adverse effects due to lack of instruction or control.

Environmental risks occur in particular in relation to mercury, persistent organic pollutants (POPs) and hazardous waste.

Good faith means that you, the reporter, have reasonable grounds for your suspicion at the time of reporting, arising from the knowledge gained through your work or at your employer (Essent or another company or organisation). Unsubstantiated suspicions and rumours are therefore not covered. They may, however, include information about an attempt to conceal an integrity violation, wrongdoing, fraud, violation of human rights or environmental legislation. Having reasonable grounds for your suspicion is enough; you do not have to provide evidence to qualify for protection. Those who deliberately and knowingly report false or misleading information do not enjoy protection and may even be punished for doing so.

3. What is not covered by this scheme?

There are situations to which this reporting scheme does not apply. These are:

- complaints about Essent's services and products. These complaints can be reported to Essent's Customer Service;
- complaints about your assessment and/or career development at Essent. For these complaints, you can contact your manager or HR adviser (Concern Regulation on Assessment & Development; see Connect - HR Portal);
- (suspected) data breach. Report it as soon as possible via the Notify Tool;
- a report about sexual harassment, aggression, bullying, violence or discrimination. For these reports, you can contact your confidant or the Complaints Committee (Complaints procedure; see Connect - HR Portal).

4. If you can: make it negotiable

At Essent, we value an open and safe working environment and having an honest conversation. In doing so, it is important that, if you feel that something is not right, you discuss this with the person concerned. This creates the opportunity to improve the situation and prevent it from getting worse or repeating itself.

5. You can always ask for advice

Not sure if there is a violation of integrity, wrongdoing, fraud, violation of human rights or environmental laws? Does a situation or event make you uncomfortable? Is it not possible to start a conversation or does this not resolve the situation? Then discuss the situation with your manager or contact Essent's Compliance & Integrity department to seek advice on how best to deal with the situation.

The Compliance & Integrity department has an independent position within the Essent organisation. Compliance & Integrity advises on and monitors compliance with the integrity standards that apply within Essent and the prevention of corporate crime (e.g. bribery, corruption, money laundering, non-compliance with export control or sanctions legislation).

You can contact this department with questions on integrity regarding behaviour, policy and (internal) regulations. You can also come here with questions about making a report and what to expect. Your questions will be treated confidentially. You can reach the Compliance & Integrity department at compliance@essent.nl.

The integrity standards are also contained in our Code of Conduct and in the E.ON Compliance Policy and Guidelines and form the basis of our corporate culture. These standards are part of our daily work. You can find the Code of Conduct, E.ON Compliance Policy and Guidelines on Connect.

6. Reporting, how do you do it?

You can always report a (suspected) integrity violation, wrongdoing, fraud, violation of human rights or environmental legislation. You may report the situation internally at Essent, at our parent company E.ON or through an external reporting channel. It is up to you as reporter to decide at which level you submit your report. It is important that you substantiate your report where possible with facts and/or personal observations and that you provide as much information as possible. This may be in writing, or verbally via the telephone, a voice message or a physical or online conversation. Essent finds it important that you can report in a way that suits you. Therefore, there are different channels to place your report:

Via the Essent SpeakUp hotline

This is an internal hotline managed by the Compliance & Integrity department. All reports made to this hotline are handled carefully and confidentially by the BAC (see below). The Essent SpeakUp Hotline can be reached at:

speakup@essent.nl.

Would you prefer to make your report by phone? Please indicate this in your message to the SpeakUp hotline. You can include a phone number where you can be reached. You can also call one of the Compliance & Integrity team members directly.

Through the Essent Allegation Review Board (ARB)

You can email or call one of the members of the ARB directly to place a report or make an appointment. The ARB consists of Essent representatives from Compliance & Integrity (chairman), Internal Audit and Security. The ARB was established so that a team of experienced and knowledgeable officers can independently follow up the report carefully. One of the members of the ARB will act as your point of contact for information about the process. You will be informed accordingly. Their names, e-mail addresses and telephone numbers can be found at Connect: <https://connect.eon.com/pages/nl-legal/apps/content/meldregeling-speakup>.

Via the E.ON Whistleblower hotline

This hotline can be accessed via the internet (<https://www.eon.com/en/about-us/compliance/whistleblower.html>) and telephone (+31-203 232 345 and use the code 1838). All reports made here are handled carefully and confidentially by E.ON Group Compliance and are investigated in cooperation with E.ON Corporate Audit if necessary.

Through one of the external reporting channels of authorities

Preferably, you report internally through one of the above-mentioned channels. In addition, for reports relating to a violation of Union law, you can also contact the competent authorities directly in writing or verbally through their external reporting channel. These authorities include:

1. the Consumer and Market Authority;
2. the Financial Markets Authority;
3. the Personal Data Authority;
4. De Nederlandsche Bank N.V.;
5. the House of Whistleblowers*;
6. the Health and Youth Inspectorate;
7. the Dutch Healthcare Authority;
8. the Nuclear Safety and Radiation Protection Authority, and
9. other organisations and administrative bodies designated by order in council or ministerial regulation, or parts thereof.

* The Advice Department of the House for Whistleblowers provides independent advice to potential reporters (and those who assist them and third parties involved) who suspect wrongdoing and/or are in doubt whether to report it. The investigation department of the House for Whistleblowers can launch an investigation into suspected wrongdoing or the employer's conduct towards the reporter in response to a report.

7. You reported, so what?

Record of notification and acknowledgement of receipt

If you have made a report through the Compliance & Integrity department or the ARB, you will receive a confirmation of receipt within 7 days. This will also indicate who your contact is. This contact will inform you of the process regarding the handling of your report. Within three months after the confirmation of receipt, you will receive reasoned information on the follow-up given to your report, for example on planned or taken measures.

You may have made your report to the SpeakUp Reporting Point or the ARB by mistake (see article 3 of this Reporting Procedure). In that case, you will be advised where to go for your report.

If you have made a report to the external hotline and have indicated that you wish to remain anonymous, contact will continue to be made through the hotline.

Who is conducting the research?

Depending on the level where you have placed the report, that is where the investigation will be handled further. Both at Essent level and at E.ON level - our parent company - the reports can be filed and the investigation can be carried out. As notifier, it is up to you to decide at which level you submit your report and thus where it will be investigated. You may also decide whether your report filed with Essent may be shared with E.ON or vice versa. Is the investigation carried out by the ARB? Then the process is as follows.

Investigation by the Allegation Review Board (ARB)

The ARB consists of Essent representatives from Compliance & Integrity (chairman), Internal Audit and Security. They work closely together in investigating reports of suspected integrity violations, misconduct and fraud cases. If the investigation requires it, the BAC can make use of specific internal and/or external expertise, for example in the case of possible violations of human rights or environmental legislation.

The ARB has been established so that a team of experienced and knowledgeable officers can independently follow up the report carefully. One of the members of the ARB will act as your point of contact for information about the process.

The ARB decides whether the report is valid and whether conducting an investigation is appropriate. This may require more information. The BAC has 2 weeks after acknowledging receipt of the report to conduct a preliminary investigation. It may be decided that no follow-up investigation will be conducted. Your contact person will keep you informed of this.

If the ARB decides that an investigation into the report will be launched, the ARB will determine what the followup steps will be with regard to the report that has been made. During the investigation, various parties involved may be asked to provide information. Here, the principle of hearing both sides of the argument is always applied. The aim is to complete the investigation within eight weeks.

Once the investigation is complete, a report is prepared within two weeks. This contains the findings of the investigation conducted, the conclusion and what is advised as a result.

Does the outcome of the investigation give cause for action? Then advice on this is given to the manager/department concerned, whether or not in consultation with the manager and/or HR. A deadline for implementation of the measure is set. The implementation of the measure is monitored.

8. Objection

As a whistleblower, do you disagree with the handling of your report? Then you can lodge an objection with E.ON Group Compliance via the Whistleblower Hotline or with the House of Whistleblowers or one of the other external reporting channels (see point 6 of this Reporting Procedure).

9. Legal protection

Have you made a report in good faith in accordance with the provisions of these reporting regulations? Then Essent will not disadvantage you in any way in your position as a result of the report. Nor will Essent accept that you are disadvantaged by other employees as a result of the report. Essent also protects those who have assisted you as a reporter and your family members and colleagues if they have a working relationship with the person against whom the report is directed.

Others performing duties under this scheme in relation to the handling of the report shall also not be disadvantaged in any way as a result of their actions under this reporting scheme.

Is a report made about you? Then you will also be protected. Your identity as a defendant will be known only to those who are involved in handling the report from their position. You will always be given the opportunity to respond to the content of the report. If the report turns out to be unfounded, you will not be disadvantaged by the fact that a report has been made about you.

10. Report anonymously

When you make a report, your identity remains confidential unless you consent to the disclosure of your identity. This also applies to indirect information that could lead to disclosure of your identity. Given the legal protection you have as a reporter (see Article 9 of these Reporting Regulations), it is not necessary to report anonymously per se. If you still prefer to make a report anonymously, it is more difficult to conduct an investigation on the basis of hearing both sides of the argument. Also, as a reporter, you cannot then be kept informed of the outcome of any investigation.

Disclosure of your identity may also be necessary and proportionate under EU or national law for the purpose of investigation by national authorities or judicial proceedings, including to safeguard data subjects' rights. In such a case, you as notifier will be informed in advance of the disclosure of your identity, unless this would jeopardise the investigation or court proceedings. You as reporter will be informed in writing of the reasons for disclosure.

Essent naturally hopes that reports under this reporting scheme will not be made anonymously. Nevertheless, it is better to report anonymously than to decide not to report at all. Only then can the situation be investigated and thus improvement possible.

11. Personal data

Information received in the context of this reporting scheme will be treated confidentially. Personal data of both the reporter and others involved will be processed in compliance with the General Data Protection Regulation (AVG) and will be deleted after the investigation in line with Essent's privacy rules.

12. Report

The Compliance & Integrity Department shall inform at least annually the Essent Board of Management, the Supervisory Board and the Central Works Council, and quarterly the E.ON Group Compliance Department, of the number of reports and the nature of the reports that have been made, unless as a result the legal protection or requested anonymity of the reporting party cannot be guaranteed. The identity of the reporter shall not be disclosed without his or her consent.

Is a report about a member of the Essent Board of Management or is that unclear? If so, the Compliance & Integrity Department will not initially inform the Essent Board of Management and will contact E.ON's Group Compliance Department. If necessary, the Chairman of the Essent Supervisory Board will be informed.

13. Agreement and review

This Reporting Regulation was approved by Essent's Executive Board on 12 January 2024 with the consent of the Central Works Council obtained on 9 November 2023. This regulation is effective from 12 January 2024 and replaces the previous Integrity Violations and Abuses Reporting Regulation dated 5 December 2022.

The Compliance & Integrity department reviews at least every two years whether these regulations are up to date and whether they comply with applicable regulations. The Compliance & Integrity department adjusts the regulation if necessary. In case of material changes, the new regulation is submitted to the Executive Board for approval, after the Central Works Council has given its consent.