



essent

WHISTLEBLOWER POLICY

For (suspected) dishonest behaviour, misconduct, fraud,
violation of human rights or environmental legislation.

When your gut feeling tells you that something is not right.



📌 BRIEF OVERVIEW OF THE POLICY

Essent complies with the law. We conduct our business in an honest and reliable manner. Essent encourages (former) employees and business partners to report (anonymously) any dishonest (unethical) or illegal behaviour at or within Essent. Report it when your gut feeling tells you that something is not right.

You can do this in the following ways, among others:

- Speakup@essent.nl,
- you can also report via our parent company E.ON SE, at their [Whistleblower channel](#).

This reporting procedure provides detailed information about what you can report, the various reporting channels, what happens to your report, and how you are protected as a reporter.



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INTRODUCTION

Essent wants to be an organisation with an open, clear and motivating working atmosphere. This means that we work honestly, fairly and transparently. It also means that we dare to say what we think and that we are responsible for what we do.

Sometimes, however, something may happen that does not feel right. That is why we believe it is important that you can report any concerns you may have in a clear and safe manner (anonymously) when your gut feeling tells you that something is not right. This could be in relation to fraud, dishonest behaviour, misconduct, or violations of human rights or environmental regulations at or by Essent.

Employees who report something in good faith (this means honestly) will not be disadvantaged. Employees who are accused of something will also be treated fairly.

Everyone is jointly and personally responsible for how we behave within Essent. If you see something that is not right, it is important to report it (anonymously). An independent team can then investigate and resolve the issue, and we can learn from it. In this way, you help Essent to continuously improve.

Board of Directors

? TO WHOM DOES THIS POLICY APPLY?

This reporting procedure is for anyone who works or has worked at Essent. This applies to employees and former employees of Essent N.V. and its subsidiaries. But it also applies to people who are or have been involved with Essent in some other way in their work.

This includes:

- independent contractors,
- temporary workers,
- volunteers,
- interns,
- job applicants,
- managers (such as members of the supervisory board),
- shareholders,
- employees of other organisations such as suppliers, contractors, subcontractors and business partners.

What can you report?

This policy is intended for anyone who wishes to report (suspected) dishonest behaviour, malpractice, fraud, human rights violations or breaches of environmental regulations at or by Essent.

Unethical behaviour is behaviour at work that is not honest or trustworthy. It concerns things that do not comply with Essent's rules and agreements or Code of Conduct. Below, we explain a few concepts in more detail to clarify what is meant by them.

In short, **misconduct** is a situation in which something important to our society goes wrong. This could be, for example:

- a violation of European Union rules and laws,
- a violation of the law or Essent's Code of Conduct,
- a danger to human health or safety,
- damage to the environment,
- problems that prevent Essent from functioning properly.

Misconduct occurs when the problem:

- affects not only you, but also others,
- occurs frequently or is structural,
- is serious or significant.

Fraud means that someone deliberately does something to gain an advantage for themselves or someone else, when this is not allowed.

For example:

- pretending to have done something that is not true,
- stealing money, goods or data,
- hiding or altering important information in order to gain an advantage.

Fraud is a crime. It has serious consequences for individuals, businesses and the economy.



Human rights violations. Sometimes people are not treated fairly or safely. We call this a human rights violation. For example:

- children are forced to work. This is not allowed,
- people are forced to work, sometimes even as slaves,
- the work is dangerous, and there are no proper health and safety regulations,
- employees are not allowed to form a trade union or discuss their rights together,
- people are treated unequally, for example because of their origin, gender or religion,
- employees are paid too little, or their wages are withheld,
- pollution damages nature and the living environment, causing people to lose their income or food,
- land is taken away without permission or according to the law,
- security guards are deployed without proper explanation or supervision. This can be dangerous.

Breach of environmental regulations. Sometimes companies do not comply with environmental regulations. This happens, for example, when using:

- **mercury** (a toxic substance),
- **POPs** (substances that remain in the environment for a very long time and are harmful),
- or if **hazardous waste** is handled incorrectly.

In **good faith** means that you report something because you genuinely believe that something is wrong. You have a good reason for your suspicion. You do not need to have proof, but your suspicion must be logical. For example, because you saw or heard something at work at **Essent**.

What is not covered?

- **rumours or gossip** without evidence.
- a **feeling** without any apparent reason.

What is within the scope of this scheme?

- Attempts to **conceal** a problem, such as:
 - fraud,
 - violation of human rights,
 - environmental regulations that are not followed,
 - or other serious forms of misconduct.

You are **protected** if you report what you think is wrong honestly (in good faith). You do not have to provide evidence. However, if you **deliberately tell a lie** or falsely accuse someone, you are **not protected**.



What is not covered by this policy?

Sometimes you cannot report a problem through this scheme.

Below are examples of situations that **are not covered**:

- if you have a complaint about Essent's service or a product, please contact Essent Customer Service,
- if you are unhappy with your appraisal and/or your career, please discuss this with your line manager or HR. A different policy applies in this case: the Group Appraisal & Development Policy. You can find this on Compass – HR Portal,
- if you suspect a data breach, report it as soon as possible via the Notify Tool.
- you wish to report (sexually) **inappropriate behaviour**, such as:
 - sexual harassment,
 - aggression,
 - bullying,
 - violence,
 - or discrimination.

In that case, you can contact the **confidential advisor** or the **Complaints Committee**. This is covered by the **Complaints Procedure**, which can also be found on the **HR Portal**.

TALK ABOUT IT, IF YOU CAN

At Essent, we want everyone to feel **safe** at work. We believe it is important that you can speak **openly and honestly** with one another.

Have you noticed something that doesn't seem right?

Or do you feel that something is going wrong? Try talking to the person concerned first. That way, you give them a chance to sort it out. It helps to minimise problems or even prevent them altogether.

You can always ask for advice

Are you unsure about something?

For example:

- breach of integrity (dishonest or unethical behaviour),
- misconduct or fraud,
- failure to respect human rights or the environment,
- failure to follow rules,
- or does the situation just feel wrong?

Talk to your manager first. Or contact Compliance.

What does Compliance do?

Compliance is an independent function within Essent that you can contact with questions about working ethically and safely.

Compliance can provide advice and verify that the appropriate rules are being followed. In addition, Compliance can help prevent risks. These risks may include:

- bribery,
- corruption,
- money laundering, or
- violation of sanctions laws.

What can Compliance help you with?

You can contact Compliance if you have any questions about the Essent Code of Conduct and the rules that apply at Essent. You can also ask Compliance for help with filing a report or if you want to know what happens after you've filed a report.

Every report and all related information will be treated **confidentially**.

Do you have any questions? Comments? Would you like to discuss a report? You can contact us at compliance@essent.nl

Where can you find the rules?

Our Essent Code of Conduct and the E.ON Policies & Guidelines form the foundation of our corporate culture. You can find all relevant information on Compass.

HOW DOES REPORTING WORK?

You can always report an issue if you think something isn't right.

For example:

- someone is not following the rules (breach of integrity),
- there is fraud or another misconduct,
- human rights are being violated,
- environmental regulations are being violated.

You can choose where to file your report:

- at **Essent**,
- via our parent company **E.ON**,
- through an **external reporting channel**.

To help us investigate a report as thoroughly as possible, it would be helpful if you could provide as much information as possible, such as:

- facts you know,
- what you have seen or heard yourself.

Through the Essent SpeakUp Hotline

The **SpeakUp Hotline** is a channel within Essent where you can report (anonymously) concerns. Compliance manages this hotline. All reports are handled **carefully** and **confidentially** by the **Allegation Review Board** (more details below). You can reach the hotline at: speakup@essent.nl

Would you prefer to report this by phone? You can send an email to the SpeakUp Hotline. You can also include a phone number where you can be reached. Alternatively, you can call a Compliance colleague directly.

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Through the Essent Allegation Review Board (ARB)

The ARB is responsible for handling reports properly and independently. The ARB consists of:

- **Compliance** (Chair),
- **Internal Audit**,
- **Information Security**.

You can reach the ARB members at speakup@essent.nl.

Employees can also call the ARB members. The phone numbers are listed on the page about the Speak Up Reporting Policy on Compass. One of the members will be assigned as your designated contact person. This person will keep you informed about the process.

Through the E.ON Whistleblower hotline

You can also contact Essent Compliance via the [E.ON hotline](#). Further information on the E.ON reporting scheme is available [online](#). All reports are handled **carefully** and **confidentially** by E.ON Group Compliance.

Through one of the authorities' external reporting channels

Does your report concern a violation of European Union rules and laws? If so, you can also contact the relevant authorities directly. You can do this in writing or verbally through their external reporting channel. These authorities include:

- the Consumer and Markets Authority;
- the Financial Markets Authority;
- the Personal Data Authority;
- de Nederlandsche Bank N.V.;
- the House of Whistleblowers;
- the Health and Youth Inspectorate;
- the Dutch Healthcare Authority;
- the Nuclear Safety and Radiation Protection Authority, and
- other organisations and administrative bodies designated by order in council or ministerial regulation, or parts thereof.

The House of Whistleblowers

The [House of Whistleblowers](#) is an independent organisation in the Netherlands. It helps people who want to report misconduct (something that is wrong or goes wrong) at their workplace.

What does the House of Whistleblowers do?

- it provides **guidance** if you're unsure whether to report something,
- it ensures you receive **protection** if you file a report,
- it can launch an **investigation** into the misconduct.

Why does the House of Whistleblowers exist?

You can file a report with the House of Whistleblowers because it can sometimes be **difficult or stressful** to report a mistake or wrongdoing to your employer. The House of Whistleblowers ensures that you can do so **safely and fairly**.



RECORDING OF THE NOTIFICATION AND ACKNOWLEDGMENT OF RECEIPT

Have you filed a report with Compliance or the ARB? If so, you will receive a confirmation within **seven (calendar) days** that your report has been received. That message will also include the name of your **contact person**. This person will keep you informed about how your report is being handled.

Within **three months** of receiving this message, you will be informed about the status of your report. We will explain the steps that have been taken or are still to be taken. Of course, we will try to do this as quickly as possible, but a thorough investigation takes time.

Did you report the issue to an **external reporting channel**? If so, all communication will go through that channel.

Q WHO IS CONDUCTING THE INVESTIGATION?

That depends on where you filed your report.

- if you report an issue to Essent, **Essent** will investigate it,
- unless you explicitly (and with justification) state that E.ON should carry out the investigation, **Essent** will carry it out.

Investigation by the Allegation Review Board (ARB)

Is the investigation being conducted by the **ARB**? If so, the process will follow their procedures.

The ARB members (Compliance, Internal Audit, and Information Security) work together to thoroughly investigate reports of potential errors, fraud, or violations of rules.

The ARB decides whether a report provides sufficient grounds to launch an investigation. Sometimes they need more information to do so. After receiving your report, the ARB has two weeks to conduct a preliminary investigation. They may also decide that no further investigation is necessary. You will always be informed of this through your contact person.

If an investigation is launched, the ARB will determine what next steps are necessary. During the investigation, they may ask various people for information. In doing so, they will always hear **both sides of the story**. The goal is to complete the investigation **within eight weeks**.

Within **two weeks** of the investigation, the Health and Safety Committee will issue a **report**. It will include:

- what was investigated,
- the conclusions,
- and the recommendations made.

Will the investigation lead to corrective actions?

If so, the ARB will issue a recommendation to the manager or department. A **deadline** will also be set for implementing the corrective action. The ARB will ensure that this is actually carried out.



OBJECTION

If you disagree with how Essent handled your report, you can take the following steps:

You can always file a report externally

You can contact:

- **House of Whistleblowers**,
- a **regulatory authority** (e.g., the Inspectorate, the Dutch Data Protection Authority, the AFM).

European or national

Does this involve **European Union** law? Report this to the competent authority in the Netherlands or Europe.



LEGAL PROTECTION

As a whistleblower, you have the right to protection. No one may treat you unfairly because you filed a report.

Did you file a report in accordance with the rules—that is, honestly and in good faith? If so, Essent may **not treat you unfairly in any way**. Other employees may not treat you unfairly either because you filed a report.

Essent also protects:

- people who helped you file the report,
- your family members and colleagues, if they work with the person who is the subject of the report.

If a report is filed against you, you are still protected. Only those involved in the case are allowed to know your name. You will always have the opportunity to respond to the report. If the report turns out to be **unfounded**, you must not suffer any adverse consequences as a result.

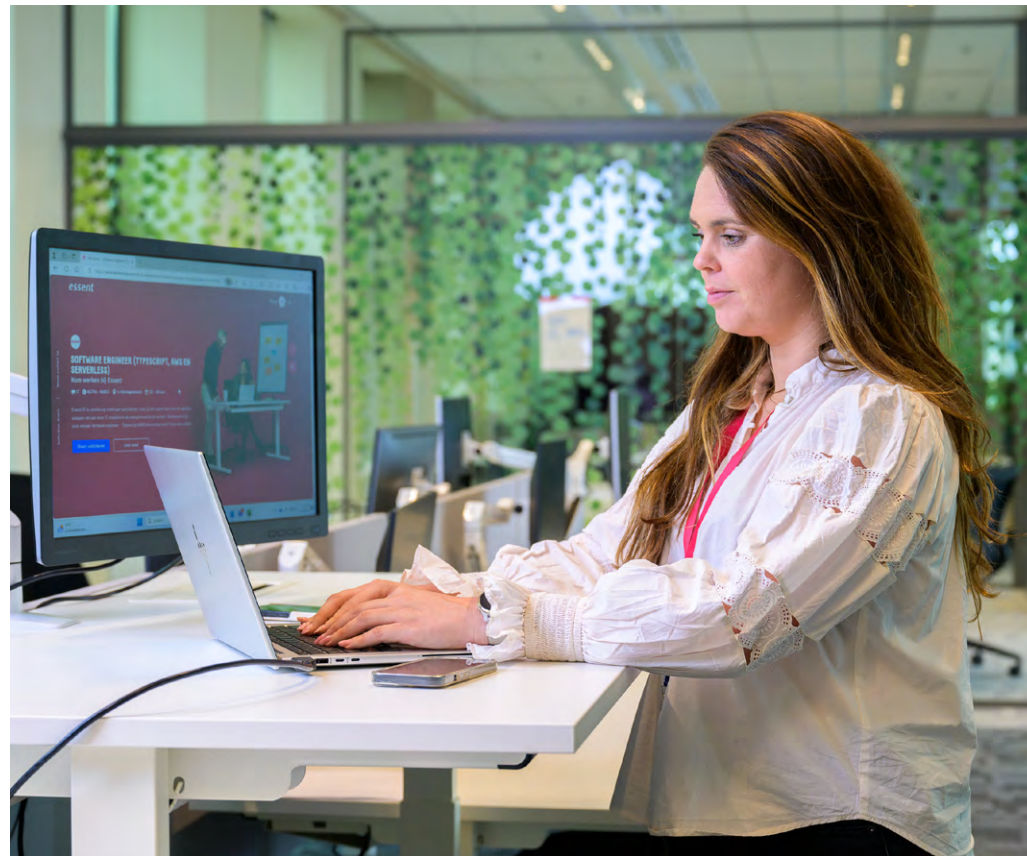
REPORT ANONYMOUSLY

If you file a report, your name will remain confidential. Your identity may only be disclosed with your consent. This also applies to any information that could indirectly identify you.

Would you prefer to report anonymously?

Then you must submit your report through the [E.ON Hotline](#). Reporting via E.ON allows you to exchange information anonymously. Would you like to report anonymously directly to Essent instead? That makes it harder to conduct a proper investigation, because we can't hear both sides of the story. You also won't be kept informed of the outcome of the investigation.

Sometimes it is necessary for your name to be disclosed. This may happen if Dutch law or European **regulations require** it. For example, in connection with an investigation by the authorities or a legal proceeding. In such cases, you will **always be notified in advance**, unless doing so would jeopardize the investigation or legal proceeding. You will also receive a **written explanation** of why your name must be disclosed.



Personal data

All information received through this reporting scheme will be treated confidentially. Your personal data, as the reporter, and that of other parties involved will be processed in accordance with the provisions of the **GDPR** (data protection legislation). This is set out in Essent's [privacy statement](#). Following the investigation, this data will be deleted in accordance with **Essent's privacy policy**.

REPORT

Compliance reports regularly on the reports received:

- at least **once a year** to Essent's Executive Board, Supervisory Board and Works Council,
- at least **once a quarter** to E.ON's Group Compliance department.

This concerns the **number of reports** and the **subject matter** of the reports. Your name will never be mentioned in a report **without your consent**. Nor will anything be shared that could jeopardise your anonymity or protection.

If a report concerns a member of **Essent's Executive Board**, the Compliance department will not immediately pass this on to the Executive Board. Instead, it will contact **E.ON's Group Compliance**. If necessary, the chair of Essent's Supervisory Board will also be informed.

✓ AGREEMENT & REVIEW

This reporting procedure was approved by Essent's Executive Board on 30 January 2026 and was consented to by the Essent Works Council. The procedure comes into effect on 30 January 2026 and replaces the previous reporting procedure of 12 January 2024.

Compliance assesses at least once every two years whether this policy is still up to date and whether it complies with the regulations. If necessary, the policy will be amended. If the changes are substantive, the **Essent Works Council** must first give its consent, after which **Executive Board** must approve the new policy.

