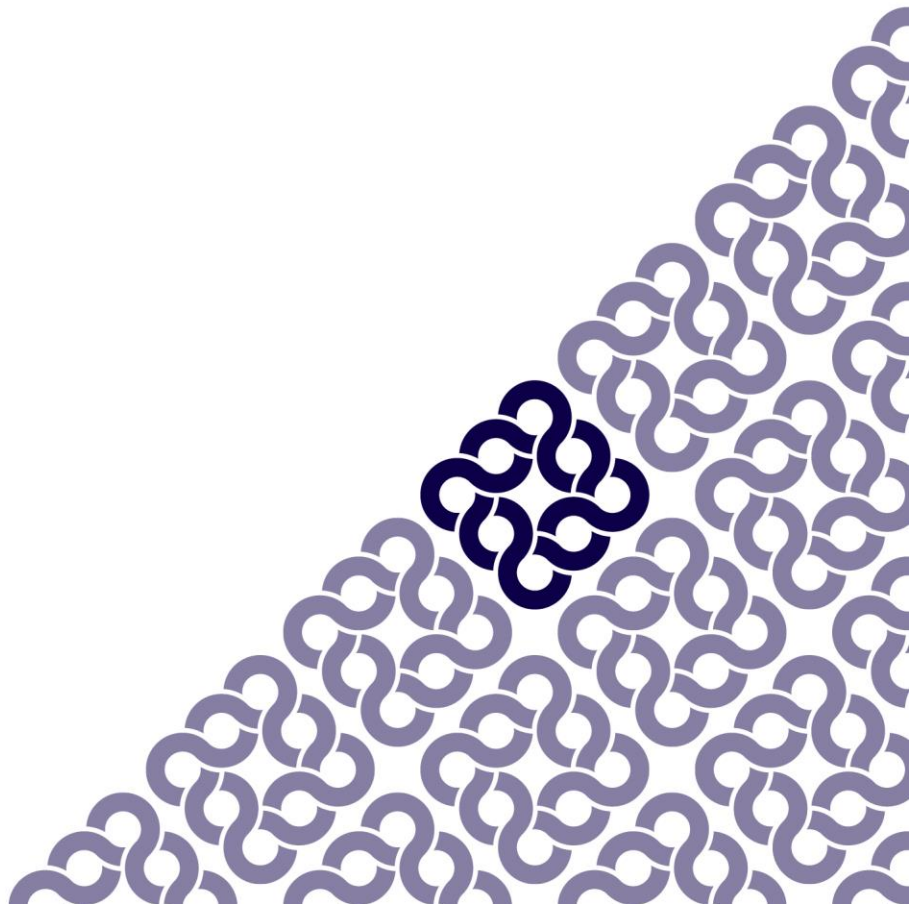




February 2025

SPEAKING UP



Why it matters

Speaking up is critical to our culture and an example of our core Values. Speaking up when something doesn't seem right demonstrates our integrity and shows we have the courage to do the right thing. Raising a concern is critical to acting with integrity and building trust.

Each of us, no matter what our level or role, is empowered to speak up when dealing with inappropriate behaviour, or faced with a situation that doesn't seem right. Each of us has a responsibility to report and express our concerns, and do so fairly, honestly, professionally and without fear of recrimination.

How we do it

- Raising a concern should be as easy as possible. At Athora, there are several ways to tell us when something doesn't feel right or makes you uncomfortable. Use the reporting channel you are most comfortable within confidence that your confidentiality will be protected.
- While all of us are actively involved, our managers have a key role to play by encouraging everyone within our organisation to freely express their views, participate in decisions, and speak up when they believe something is not right.
- We suggest you start by talking to your manager. They will know most about your work, and can answer questions, resolve something that does not seem right, or know where to get a resolution.
- If you are not comfortable speaking to your manager, or if they are not able to address your concern, you can speak to or email:
 - Your HR Business Partner; or
 - A trusted leader in your business; or
 - Your local Compliance team; or
 - The Group Compliance team at GroupCompliance@athora.com; or
 - The Group Internal Audit Team at internalaudit@athora.com; or
 - The Group Audit Committee at auditcommittee@athora.com
- Where you feel you cannot approach any of the above, you can contact our anonymous integrity line.

Reporting a concern	What do I do if...?
<p>We understand that reporting a concern can be a tough thing to do. That is why we do not tolerate retaliation in any form. If your concern is raised in good faith, even if it turns out you were mistaken, you will not face negative consequences for speaking up.</p> <p>When a concern is raised, Athora will investigate promptly and appropriately. If it turns out that a misconduct has occurred, we will take appropriate action.</p>	<p>I experienced something that I don't think is right, but I don't want people to find out I raised it. Should I stay quiet?</p> <p>No. We all have a role to play in protecting our company's integrity and you should always speak up if something makes you feel uncomfortable. You have every right to choose to remain anonymous when raising concerns; and at Athora we have put mechanisms in place to protect anonymity, such as the anonymous integrity line.</p>