

# GUIDELINES ON EFFECTIVE DIALOGUE WITH STAKEHOLDERS

## 1. INTRODUCTION

- 1.1. These are the guidelines of ABN AMRO Bank N.V. (**ABN AMRO**) and its affiliated enterprises in respect of ABN AMRO's effective dialogue with stakeholders (together: the **Stakeholders**). These guidelines have been developed in part to comply with best practice provision 1.1.5 (Dialogue with stakeholders) of the Dutch Corporate Governance Code 2025<sup>1</sup>.
- 1.2. ABN AMRO's purpose is 'Banking for better, for generations to come'. Our purpose is our compass in everything we do. To live up to our purpose, we aim to work closely with our stakeholders: clients, employees, investors and society at large.
- 1.3. Our strategy is aimed at creating sustainable long-term value for all our stakeholders. To this end, ABN AMRO's Executive Board takes both stakeholder feedback and the impact that the actions of ABN AMRO and its affiliated enterprises may have on people and the environment into account in its decision-making.

## 2. GENERAL

- 2.1. ABN AMRO engages in ongoing dialogue with its stakeholders. This dialogue takes place to ensure that the interests of relevant stakeholders are considered when defining the value-creating aspects of ABN AMRO's strategy. Dialogue may also take place to increase ABN AMRO's knowledge and understanding, to build social and relationship capital and to contribute to ABN AMRO's license to operate.
- 2.2. The goal of these guidelines is to set out the general principles for ABN AMRO's relations with its stakeholders. These general principles apply to ABN AMRO and all its group companies, branches, representative offices and employees. It applies everywhere, for all locations, roles and seniority levels.
- 2.3. ABN AMRO has specific guidelines on engaging with (potential) shareholders, holders of depositary receipts, bondholders and other providers of financial capital. These Guidelines on Bilateral Contacts with Shareholders can be found on our website [www.abnamro.com](http://www.abnamro.com).

## 3. TOPICS OF DIALOGUE

- 3.1. We are open for feedback on key topics that matter to our stakeholders. The topics on which our stakeholders wish to enter into dialogue with us include, but are not limited to, strategy, financial performance, products and services, sustainability (environmental, social and governance) related topics<sup>2</sup> and our overall role in society.
- 3.2. We carry out a regular assessment of our operating environment, allowing us to identify our strategic differentiators – the value-creating topics where we and our stakeholders believe ABN AMRO's strategy can create most value for our stakeholders. The topics on which we wish to enter into dialogue with our stakeholders include these (previously established) value-creating topics as well as new and emerging issues.

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<sup>1</sup> See: [Dutch Corporate Governance Code 2025 | Monitoring Commissie Corporate Governance](#)

<sup>2</sup> See the Annex for an overview of a number of examples of ESG-related topics.

## 4. STAKEHOLDERS

- 4.1. ABN AMRO interacts with a large group of stakeholders on an ongoing basis.
- 4.2. A stakeholder is defined as an individual or group who can affect the achievement of ABN AMRO's objectives or is affected by the achievement of ABN AMRO's objectives and actions. ABN AMRO identifies relevant stakeholders based on their potential to influence or be affected by ABN AMRO's and its affiliates' activities. The group of stakeholders ABN AMRO engages with is not static and can vary depending on the topics of dialogue and developments over time.
- 4.3. Using this definition, we recognise four main stakeholder groups:

**Clients** – *natural persons and enterprises served by ABN AMRO's client units and subsidiaries, as well as brokers, intermediaries, and other distributors.*

We have numerous interactions with our clients through one-on-one meetings, (video) calls, emails, letters, social media, and webchats and engage with our clients through surveys and customer panels. We maintain relationships with many partners in our value chain, including intermediaries and other entities linked to our operations, products and services. We have regular exchanges with consumer and business advocates and other client representatives to discuss topics and developments that matter to them and that are therefore directly relevant to ABN AMRO.

Our client units Personal & Business Banking, Wealth Management and Corporate Banking are responsible for all interactions with clients, client advocates and client representatives.

**Employees** – *all employees working for ABN AMRO and its affiliated enterprises, prospective employees, retirees.*

Keeping our employees engaged and informed is critical to our success. There are many ways in which ABN AMRO provides its employees with the opportunity to share their views. We carry out regular employee engagement surveys to understand employee sentiment. Frequent staff sessions are held with Executive Board members and senior management to give employees direct and regular access to its leadership team where leadership answers questions on issues of concern. ABN AMRO's management meets regularly with the bank's employee participation bodies - the bank's Employee Council (*centrale ondernemingsraad*) and European Staff Council, as well as the Commercial Council and Enablers Council and their subcommittees - to discuss a range of topics related to ABN AMRO's operations, employee welfare and workplace policies, ensuring that employees have a voice in the bank's decision-making<sup>3</sup>.

To further increase engagement between employees and the bank's senior management on particular staff-related topics, a number of informal networks are also active within the bank, including the Engagement 100, Women on the Move, Young ABN AMRO and the Diversity Network ABN AMRO.

Employees may also share their views on staff-related topics through the membership of one of the trade unions, with whom the bank negotiates about the Collective Labour Agreement (CLA) and holds regular talks on HR matters. To encourage employees to join a trade union, ABN AMRO pays for the first year's membership.

Our Human Resources (HR) department is responsible for all interactions with our employees, employee participation bodies, employee networks and the unions.

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<sup>3</sup> The relationship between ABN AMRO and its employees regarding employee participation is governed *inter alia* by the Works Councils Act ('Wet op de ondernemingsraden', 'WOR') and the European Works Councils Act ('Wet op de Europese ondernemersraden', 'WEOR').

**Investors** - *shareholders, depositary receipt holders, bondholders and other providers of financial capital.*

ABN AMRO recognises the importance of bilateral communication with our (potential) shareholders, holders of depositary receipts, bondholders and other providers of financial capital. In order to facilitate such bilateral communication, we have adopted the Guidelines on Bilateral Contacts with Shareholders. These guidelines have been developed in accordance with best practice provision 4.2.2 of the Dutch Corporate Governance Code and can be found on our website [www.abnamro.com](http://www.abnamro.com).

Our Investor Relations department is responsible for all interactions with shareholders, depositary receipt holders, bondholders and other providers of financial capital.

**Society at large** - *civil society, NGOs, and local communities (financial, scientific, etc), (local) politicians and governments, regulators, authorities and policy makers, suppliers, external consultants and other business partners, workers of companies in the bank's supply chain, (local) the general public, media, future generations.* Our interactions with civil society and non-governmental organisations (NGOs) covers a wide range of topics but is especially important to delivering on our sustainability commitments. We have established partnerships to build programmes to achieve our social missions. We have direct engagements with public decision-makers and regulators concerning regulatory and financial market related issues by way of exchanging relevant information, where appropriate, and discussing relevant policy developments. We often share our views with sector organisations such as the Dutch Banking Association and the Confederation of Netherlands Industry and Employers as well as with various national and European government bodies to outline our experience and our thinking on how to create positive impact in the future. At the same time we do not support or fund political parties, candidates or any groups that promote party-political interests. We work with numerous suppliers and vendors in various countries to provide critical services for us. We are committed to an open, accessible, and proactive relationship with the media worldwide.

In order to give the interests of future generations more weight in the decision-making of the bank and to anchor its purpose, 'Banking for better, for generations to come', even more deeply in the organisation, ABN AMRO has set up a Future Generations Board, composed of employees working in various parts of the organisation. The Future Generations Board collaborates closely with ABN AMRO's Chief Sustainability Officer. The chair of the Future Generations Board has, among others, a seat in ABN AMRO's Group Sustainability Committee.

Our Sustainability Centre of Excellence is responsible for ABN AMRO's interactions with NGOs. Our Public Affairs department coordinates the dialogues that our senior management has with legislators, government officials and sector organisations. Our Regulatory Office is responsible for all interactions with regulators. Our Procurement department and individual account managers are responsible for all interactions with our suppliers and vendors. Our Corporate Communications department is responsible for all interactions with the media.

## 5. DIALOGUE APPROACH

5.1. ABN AMRO's principles of effective dialogue with stakeholders include:

- entering into an open conversation with our stakeholders, allowing these stakeholders opportunity to voice concerns, be heard, and address important issues in a timely manner;
- responding to the legitimate interests of our stakeholders and ensuring that these interests are considered when defining the value-creating aspects of ABN AMRO's strategy;
- providing insight to our stakeholders into the way ABN AMRO considers the actual and potential effects of the actions of ABN AMRO and its affiliated enterprises on people and the environment;
- building trust among stakeholders in order to improve mutual understanding and foster long-lasting, stable, and robust relationships; and
- accounting in the management report on the vision on sustainable long-term value creation, the strategy to realise this and the objectives formulated to that end, the effects of the company on people and the environment, and how the interests of stakeholders have been considered.

- 5.2. ABN AMRO may start the process of entering into a dialogue with stakeholders by either accommodating or accepting requests or invitations to such dialogues from relevant stakeholders or by actively reaching out to relevant stakeholders to enter into a dialogue.
- 5.3. Individuals, groups, and organisations who wish to enter into a dialogue with ABN AMRO or one of its affiliate enterprises can contact ABN AMRO. In addition to other channels that may be available to such individuals, groups or organisations, ABN AMRO can be reached at [brand.marketing.communications@nl.abnamro.com](mailto:brand.marketing.communications@nl.abnamro.com) for this purpose. However, ABN AMRO may decide not to accommodate or accept requests or invitations to enter into a dialogue with stakeholders, or to accommodate or accept such requests or invitations under certain conditions.
- 5.4. ABN AMRO stimulates dialogue with stakeholders in all its business activities and via the various channels and activities that are available for such dialogues. The form that is chosen for each specific dialogue depends on the topic and the stakeholder(s) involved<sup>4</sup>. The representative on behalf of ABN AMRO or one of its affiliate enterprises shall determine the person(s) representing ABN AMRO (and/or one of its affiliates) during a specific dialogue with stakeholders, considering their expertise, background, seniority, and authority to take decisions.
- 5.5. To ensure an effective dialogue, the representative(s) on behalf of ABN AMRO or one of its affiliate enterprises shall disclose information in an accurate, transparent, and comprehensive manner. The relevant stakeholder(s) shall be requested to adhere to the same principles regarding the disclosure of information. Disclosure of information by representatives on behalf of ABN AMRO or one of its affiliate enterprises shall always comply with legal requirements, as well as with internal policies and standards. These representative(s) shall not disclose inside information as referred to in article 7(1) of the Market Abuse Regulation, commercially sensitive information or information that is confidential for other reasons to the relevant stakeholder(s).
- 5.6. Prior to entering into a dialogue with stakeholders, ABN AMRO shall assess the potential risks associated with this dialogue. Based on such assessment, the representative on behalf of ABN AMRO or one of its affiliate enterprises will determine whether the dialogue is in the best interest of ABN AMRO or the affiliated enterprise. If it is not, the dialogue will not be entered into.

## 6. REPORTING

- 6.1. ABN AMRO may publicly report on its dialogues with stakeholders to give insight into the scope and breadth of the outreach, and to demonstrate how the dialogue contributed value to ABN AMRO's strategy and operations, all subject to the reporting framework applicable to ABN AMRO.
- 6.2. As a condition to entering into a stakeholder dialogue, the representative on behalf of ABN AMRO may request the relevant stakeholder(s) to commit that he/she/they shall not publicly report on the dialogue without prior written consent on the part of ABN AMRO.

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<sup>4</sup> Our dialogues with stakeholders take many forms and include: interactions and regular feedback sessions with clients on our products and services; sessions with employees and meetings with employee participation bodies; meetings with (potential) shareholders and industry analysts; contacts with regulatory bodies, government agencies and other organisations (including NGOs, trade unions and sector organisations); surveys among various stakeholder groups; roundtables with policymakers, academics and peers, etc.

## **Annex:**

Presented below are a few examples of environmental, social and governance (ESG) related topics on which stakeholder dialogues can be conducted:

**Environmental.** Environmental topics refer to climate-specific and broader environmental issues. These topics include but are not limited to:

- ABN AMRO's (including its affiliated enterprises') own footprint
- ABN AMRO's (including its affiliated enterprises') own climate plan
- Climate & environmental risk management
- Biodiversity
- Renewable energy
- Deforestation
- Sustainable Finance
- Circularity
- Transition management

**Social.** Social topics refer to broad social issues, which include but are not limited to:

- Employees
- Social and human rights, including privacy
- Diversity & inclusion
- Anti-discrimination
- Future generations
- Supply chains
- Social Finance
- Communities and community investment

**Governance.** Governance topics refer to relevant governance mechanisms and related issues, which include but are not limited to:

- Stakeholder engagement
- Non-financial disclosures
- (Board) independence and remuneration
- Digitalisation and innovation
- Tax transparency
- Anti-bribery and corruption
- Anti-money laundering and terrorist financing