

Frequently Asked Questions (FAQs)

For “Pillar 2” Policyholders

Frequently Asked Questions (FAQs) about the proposed transfer of life insurance policies from Aviva Life & Pensions Ireland DAC to Athora Belgium SA/NV.

20 January 2026

Section 1 – What’s happening

What are the proposed changes?

Aviva Life & Pensions Ireland DAC (**ALPI**) is proposing to transfer its portfolio of Belgian life insurance policies to Athora Belgium SA/NV (**Athora Belgium**) using an insurance business transfer (the **Transfer**). Your life insurance policy, which is referenced in the Policyholder Letter you received from us with this FAQ document, is included in this proposed Transfer. It is also important to note that your policy is currently managed on behalf of ALPI by Athora Belgium. "We" means ALPI.

Why are these changes happening?

We’re making changes to simplify things for you and for our business.

For you, your policy will be transferring to Athora Belgium which sees these policies as a key part of its business and is well placed to support them into the future. Athora Belgium is a Belgium based insurance company regulated by the National Bank of Belgium (**NBB**). The NBB is the equivalent of the Central Bank of Ireland. Furthermore, Athora Belgium already manages your policy on behalf of ALPI and is the reinsurer of the book of Belgian life insurance policies.

ALPI, it will allow us to focus more on the areas where we can offer the most value to our customers. By transferring this portfolio of Belgian life insurance policies, we’re simplifying how we operate and ensuring we stay focused on delivering our remaining services and products.

What is this process called?

The Transfer will be carried out by way of an Irish High Court (**Court**) process known as an insurance portfolio transfer scheme under Irish law being, Section 13 of the Assurance Companies Act 1909 Section 36 of the Insurance Act 1989 and Regulation 41 of the European Union (Insurance and Reinsurance) Regulations 2015 (the **Scheme**). The Transfer must be approved by the Irish High Court. This process is described further throughout this FAQ document.

Who is ALPI?

ALPI is a life assurance company, incorporated in Ireland and regulated by the Central Bank of Ireland (**CBI**). ALPI is part of the Aviva Group, which is headed by Aviva plc. Aviva plc is a British multinational insurance company headquartered in London, United Kingdom.

Who is Athora Belgium?

Athora Belgium is a life assurance company, incorporated in Belgium and regulated by the NBB. Athora Belgium is part of the Athora Group, a European company in savings and retirement products.

What is being transferred?

We are proposing to transfer your life insurance policy, details of which can be found in the Policyholder Letter you received from us with this FAQ document. It is proposed to transfer your insurance policy to Athora Belgium as part of the Transfer of a portfolio of insurance policies under the terms of the Scheme.

When will the Transfer take place?

If the Court approves the Transfer, the Transfer will take place on a date specified in the Court order (the **Effective Date**). Please see Section 4 for details of the Court hearing. If there are any changes to the process (such as the dates of the Court hearing or the time of the Transfer), we will provide details on the Transfer website at <https://transfer.aviva.com>.

Why are you writing to me?

As part of the insurance portfolio transfer process, we’re informing you about the Transfer and providing you with information on how to object to the Transfer, should you wish to do so. Our records show that you (or someone you represent) have an interest in one or more ALPI policies that will be included within the Transfer to Athora Belgium. This could be because:

- you (or someone you represent) took out a policy affected by the Transfer with an Aviva group company, such as Norwich Union Life & Pensions Limited (which was renamed Aviva Life &

Pensions UK Limited (**UKLAP**)) and that policy was subsequently transferred to ALPI; or

- you are dealing, or have dealt, with ALPI in relation to claim in respect of a policy affected by the Transfer.

You have the right to object to the Transfer. Please read Section 2 for more information. Objections can only be made until the Court hearing on 3 June 2026.

Please consider the information contained in this FAQ document and in the other documents included in the Communication Pack. Your own consideration of the information is important. If you require clarification, please contact us at the contact details outlined at the end of this FAQ document.

I took out my policy with Delta Lloyd Life / NN Belgium / Norwich Union. Why are Athora and Aviva writing to me?

Aviva is your policy provider

ALPI is the company that provides your policy. From inception, your policy has always been provided by an Aviva group company – initially by UKLAP, which was previously called Norwich Union Life & Pensions, and subsequently ALPI. Your policy was transferred from UKLAP to ALPI in 2019. We wrote to you at that time about the Transfer.

Athora Belgium manages your policy

Your policy is, however, currently administered by another company, Athora Belgium, on our behalf. Athora Belgium took over management of your policy from NN Belgium (previously Delta Lloyd Life) in October 2022. That is why both Athora Belgium and ALPI are writing to you. If the proposed Transfer takes place, Athora Belgium will become both the provider and administrator of your policy.

Section 2 – What this means for you

How does this affect my policy or claim?

The Transfer will change the insurance company responsible for paying and handling claims under your policy from ALPI to Athora Belgium. Broadly, the Transfer will transfer the rights and obligations under the policies from ALPI to Athora Belgium. This means that, after the Transfer, your policy contract will be between you and Athora Belgium, rather than between you and ALPI. There will be no change to your policy conditions, nor your rights and obligations under the policy as a result of the Transfer. You will not need a new policy document.

Athora Belgium already manages your policy on behalf of ALPI. This means that you will continue to use the usual contact details which can be found on your policy documentation if you need to make a claim or have a general question about your policy.

How does this affect the servicing of my policy or claim?

There will be no change to what you are able to claim for under the terms and conditions of your policy after the Transfer has taken place. Athora Belgium has confirmed its intention to ensure that administration and service levels will not be adversely affected by the proposed Transfer. ALPI is working closely with Athora Belgium to enable Athora Belgium to provide an unchanged level of service to you after the Transfer.

All claims, under the transferring policies, which Athora Belgium currently handle for ALPI will continue to be handled by Athora Belgium. You will not need to take any action, as they will transfer automatically to Athora Belgium under the Transfer.

If you have a claim in progress at the time of the proposed Transfer, please continue use the usual contact details which can be found on your policy documentation with any queries about your claim.

How do I know my interests are protected?

To ensure your interests are protected, we must follow a formal legal and regulatory process before the Transfer can take effect. This includes:

- Sending you (as a policyholder or representative of a policyholder) notice of the Transfer.
- Informing you that you may object to the Transfer and make representations at the Court hearing if you believe the transfer will adversely affect you. Further details on how to object or make representations are included in this FAQ document.
- Informing you that, in addition to the right to object to the Transfer, you may terminate your policy within three months of the publication of the NBB confirming that the Transfer has been sanctioned, under Article 18 of the Belgian law on insurances of 14 April 2014.
- A thorough review by an Independent Actuary who must report on the proposed transfer. The Independent Actuary is an experienced actuary, qualified to review transfers of this nature and has prepared a report on the transfer. This report concludes that the proposed Transfer to Athora Belgium is fair as between the interests of the different classes of persons affected. You can find a summary of this report in this Communication Pack you receive from us and a full report is available online at <https://transfer.aviva.com>.
- Consultation with regulatory bodies in Ireland and Belgium, the CBI and the NBB respectively, to ensure that they have no objections to the Transfer.
- Under the governing legislation, the Transfer cannot proceed unless the NBB has confirmed that, after the Transfer, Athora Belgium will have the assets necessary to meet the solvency capital requirement imposed under European Union law. This means that Athora Belgium will have more than sufficient assets to pay claims under Transferring Policies, together with its existing business.
- Approval by the Court. Please note that the Court will only approve the Transfer

if the Court is satisfied, having considered the views of the Independent Actuary, that it meets all of the necessary legal requirements is fair as between the interests of the different classes of persons affected and that no sufficient objection has been raised to the Transfer.

Which of my policies are transferring?

Your life insurance policy previously written or underwritten by ALPI (and identified at the top of the Policyholder Letter provided in this Communication Pack), will transfer to Athora Belgium. You can find your policy details in the Policyholder Letter accompanying this FAQ document.

What happens to payments I make?

If you currently make any payments, the amount you pay, and timing of your payments will not be affected by the Transfer.

Payments by SEPA direct debit will automatically become payable to Athora Belgium when your policy transfers.

What should I do next?

We recommend that you read the Communications Pack in full. The "**Communication Pack**" includes:

- a Policyholder Letter including your policy number,
- this FAQ document,
- a summary of the Independent Actuary's report (see Section 3 of this FAQ document for more detail),
- a summary of the proposed Scheme, and
- a copy of the legal notice setting out details of the proposed Scheme and the Court hearing, to be published in Irish and Belgian national newspapers (the **Legal Notice**).

You can find more information about the proposed Transfer, including summaries and full versions of the Petition (incorporating the Scheme), the Independent Actuary's report, and the Communication Pack, on the Transfer website at <https://transfer.aviva.com>.

These documents are also available for inspection during business hours 9.00am to 5.00pm (local time) at:

- Aviva Life & Pensions Ireland DAC, Building 12, Cherrywood Business Park, Loughlinstown, Co. Dublin, D18 W2P5, Ireland.
- Athora Belgium SA/NV, Rue du Champ de Mars 23, 1050 Brussels, Belgium.

If you represent someone, or if there is anyone else with an interest in, or entitlement to, the benefits under your policy (such as any members of the policy and their dependants/your employees), please make them aware of the proposed Transfer as soon as possible, and provide them with this Communications Pack you have been sent.

If you do not have any queries on the proposed Transfer and do not wish to object to it, you do not have to take any further action.

Will the transfer cost me anything?

The costs of the Transfer will be borne by Athora Belgium and ALPI. It will not cost you anything.

What should I do if I want to ask a question about the Transfer?

If you have a question or would like further information about the Transfer, you can contact us by email, telephone, post or using the online form at <https://transfer.aviva.com>. You can find our contact details on the front of the Policyholder Letter or at the end of this FAQ document– please quote the reference number shown at the top of the Policyholder Letter.

What should I do if I want to object?

You are entitled to object to the Transfer. If you wish to do so, you can contact us by email, telephone, post or using the online form at <https://transfer.aviva.com>. You can find our contact details on the front of the Policyholder Letter or at the end of this FAQ document – please quote the reference number shown at the top of the letter.

We will pass information about any objection to all relevant parties, including the Court and the Independent Actuary,

each of which will have an opportunity to consider your objection.

You also have the right to be heard at the Court hearing on 3 June 2026 either in person, by written representation or by legal representation. Objections can only be made up until this date. If the date or time changes, we will post the updated details on the Transfer website at <https://transfer.aviva.com>.

If you wish to be heard in Court, you should send a notice of your intention to appear, in writing, to:

A&L Goodbody LLP, solicitors for ALPI at 25 North Wall Quay, Dublin 1, D01 H104 Ireland (Ref: LMM/NJG) to arrive no later than 5.00pm on 20 May 2026 indicating whether you support or object to the proposed Transfer.

If you wish to make submissions to the Court hearing or rely on evidence at the Court hearing, you should file an affidavit in the Central Office of the High Court setting out those submissions or the evidence on which you propose to rely and serve a copy of that affidavit on A&L Goodbody LLP at the above address to arrive no later than 5:00 pm on 20 May 2026.

Will I receive a new policy schedule or updated terms and conditions?

No, your existing policy documents will not change. Your policy terms and conditions will not be affected by the Transfer.

What if I have a general question about my policy or claim?

Athora Belgium currently manages your policy on behalf of ALPI.

If you have submitted a claim and it is still being processed, you will continue to use your usual contact details which can be found on your policy documentation.

Why have I received more than one letter about the proposed Transfer?

If you hold more than one life insurance policy with ALPI that is transferring to Athora Belgium, you may receive notification of the proposed Transfer for each policy. You may also receive separate

notification of the proposed Transfer from your broker, or if you currently have a claim being dealt with by Athora Belgium.

Section 3. More about the Transfer

How will the Transfer be carried out?

The Transfer will be carried out using a Court process used to transfer insurance business. This is because ALPI is an Irish authorised insurance company. Section 4 of this FAQ document includes some important information regarding the Court hearing.

How are my interests protected?

Your interests and the interests of other policyholders and claimants are protected by the legal process ALPI and Athora Belgium are required to follow:

- We are writing to tell you what is proposed and to give you an opportunity to raise any objections before the Transfer takes effect.
- We have appointed an Independent Actuary who has reviewed the terms of the Transfer and produced a report for the Court. This report concludes that the proposed Transfer:
 - will not materially adversely affect the security of benefits to policyholders of either ALPI or Athora Belgium; and
 - will not have any impact on service standards experienced by the policyholders of either ALPI or Athora Belgium.
- We will seek approval for the Transfer from the Court. The Court will only approve the Transfer if it is satisfied that the Transfer meets all the necessary legal requirements, is fair as between the interests of the different classes of persons affected, and that no sufficient objection has been raised to the Transfer.
- The Court will consider the opinion of the Independent Actuary, the opinion of relevant regulatory authorities and any representations made by ALPI and Athora Belgium policyholders.
- We have been in consultation with the CBI, our industry regulator in Ireland, in relation to the proposed Transfer. We

have also consulted with the NBB, the industry regulator of insurance in Belgium

Who is the CBI?

The CBI is the Central Bank of Ireland, which is the Irish financial regulator, with responsibility for the regulatory supervision of Irish insurance companies such as ALPI.

Who is the NBB?

The NBB is the National Bank of Belgium, which is the Belgian financial regulator, with responsibility for the regulatory supervision of Belgian insurance companies such as Athora Belgium.

Who is the Independent Actuary?

The Independent Actuary is Michael Claffey. Mr Claffey is a Fellow of the Society of Actuaries in Ireland since 1998. He is a Principal with Milliman, a firm of actuaries and consultants. He is a consulting actuary based in the firm's Irish insurance practice. Mr Claffey has more than 30 years' experience in the insurance industry, including experience of acting as the Appointed Actuary and/or Head of Actuarial Function for a number of Irish life assurance companies and acting as the Independent Actuary in relation to a number of previous transfers of life assurance business in Ireland, the Isle of Man and Guernsey.

What is the role of the Independent Actuary?

As Independent Actuary, Mr Claffey has been appointed to report his opinion on the likely effect of the proposed Transfer on policyholders. The Independent Actuary's report is impartial, based on a thorough scrutiny of the proposed Transfer and the businesses of ALPI and Athora Belgium, each of whom has provided the Independent Actuary with access to key staff and private and public information requested.

What does the Independent Actuary think about the Transfer?

The Independent Actuary has reached the following conclusions about the Transfer.

- The security of benefits to policyholders of ALPI and Athora Belgium will not be materially adversely affected by the implementation of the Scheme on the Effective Date; and
- The Scheme will not materially adversely impact on the service standards experienced by the policyholders of ALPI and Athora Belgium.

The Independent Actuary will review his analysis and conclusions in the light of any updated information he receives prior to the Court hearing to sanction the Scheme. He will summarise his additional review and conclusions in a supplemental report.

Section 4: The Court Hearing

What country is the Court Hearing in?

Your policy is transferring from ALPI which is an Irish-incorporated company. Accordingly, the Court hearing will take place in Dublin, Ireland.

Why is there a Court Hearing?

Under Irish legislation, we are following a process set out in Section 13 of the Assurance Companies Act 1909, Section 36 of the Insurance Act 1989 and Regulation 41 of the European Union (Insurance and Reinsurance) Regulations 2015 to carry out the Transfer. This requires the approval of the Transfer by the Court.

When and where will the Court Hearing to consider approving the Transfer take place?

We expect that Court hearing to consider approving the Transfer will take place on 3 June 2026 at the Four Courts, Inns Quay, Dublin 7, Ireland. If there is any change to these arrangements, we will provide an update on the Transfer website at <https://transfer.aviva.com>.

What will happen at the Court Hearing?

The Court will consider whether it is appropriate to allow the Transfer to proceed, having regard to all the circumstances. The judge will review the evidence provided by ALPI and Athora

Belgium and consider the reports of the Independent Actuary.

The Court may allocate time to hear any representations made (whether in writing or in person) by any person who believes that they would be materially adversely affected by the Transfer. The judge must decide whether or not it is fair and appropriate to approve the Transfer, taking all of the evidence into account.

If the judge decides to approve the Transfer, then the Court will make an order which will provide that the Transfer will come into effect at a time specified in the Court Order.

Is there an opportunity to vote on the proposed Transfer?

There is no opportunity to vote on the proposed Transfer. However, if you consider you and/or your dependants may be materially adversely affected by the Transfer, you may make an objection and/or make representations to the Court. If you notify any objection to us, we will bring it to the Court's attention unless we can resolve that objection with you before the Court hearing. See Section 2 for more information.

Can I opt out of the Transfer?

You cannot opt out of the Transfer. If the Court approves the Transfer your policy will be transferred to Athora Belgium. However, you have an opportunity to object to the Transfer either by submitting your objection to us or raising it with the Court. You may also have the right to terminate your policy within three months of the publication of the NBB confirming that the Transfer has been sanctioned, under Article 18 of the Belgian law on insurances of 14 April 2014.

How will you let me know about any changes to the Court Hearing?

If there are any changes to the process (such as the date of the Court hearing to consider approving the Transfer or the time of the Transfer), we will provide details on the Transfer website at <https://transfer.aviva.com>.

How will I find out if the Court has approved the Transfer?

We will announce the outcome of the High Court process on the Transfer website at <https://transfer.aviva.com> following the Court hearing, due on 3 June 2026.

Any changes or information on the progress of the Transfer will be announced on the Transfer website at <https://transfer.aviva.com>. You should check this website for any changes or updates.

If the application is successful, then the Transfer will take place on the Effective Date. If the Transfer is not approved by the Court, your policy will remain with ALPI. In any event, you should contact Athora Belgium for any enquiries about your policy.

Will my policy transfer if the Court does not approve the transfer?

If the Court does not approve the Transfer, your policy will remain with ALPI.

Section 5: Additional information

Where can I find out more?

If, after reading this Communication Pack, you want to find out more about the proposed Transfer, please visit the Transfer website at <https://transfer.aviva.com>. You will find:

- example of the letter sent to each policyholder notifying them of the Transfer
- this FAQ document
- the Legal Notice
- a summary of the Scheme plus a copy of the full Scheme document
- a summary of the Independent Actuary's report plus a copy of the Independent Actuary's full report.

We will update the Transfer website as new information becomes available, for example the Independent Actuary's supplementary report, so please check back regularly.

How does this effect the use of my personal data?

If the Court approves the Transfer, data in respect of your policy will be transferred to

Athora Belgium. Athora Belgium will become the data controller of any personal data associated with your policy for the purposes of the European General Data Protection Regulation (**GDPR**). As Athora Belgium currently administers the policies which are proposed to be transferred, Athora Belgium is already acting as data processor and can access certain personal data. A link to the Privacy Notice of Athora Belgium is available here in French: <https://www.athora.com/be/fr/protection-des-donnees> and here in Dutch: <https://www.athora.com/be/nl/gegevensbescherming>. Please read this to understand how Athora Belgium will store and process any personal data and to understand what rights you or any parties you represent have and how you can exercise them.

How will you keep me informed?

If the Court approves the Transfer, or if there are any changes to the process (such as the date of the Court hearing or the date of the Transfer), we will update our Transfer website.

Can I receive the Policyholder Circular pack in other formats?

If you would prefer paper copies of the documents on the Transfer website, please contact Athora Belgium. You can find Athora Belgium's contact details on the front of the accompanying Policyholder Letter or at the end of this FAQ Document – please quote the reference number shown at the top of the Policyholder Letter.

Who do I contact once the Transfer has been completed?

If the proposed Transfer goes ahead, you will continue to contact Athora Belgium using your normal contact details for general questions about your policy or claim, as shown on your policy documents.

Section 6: Contact details

Contact us about the Transfer

We're here to help. If you have any questions not answered above, or if you want to object to the Transfer, you can contact us using the details below. Equally, if you would prefer paper copies of the documents on the Transfer website, please let us know – please quote the reference number shown at the top of the Policyholder Letter.

Please note that ALPI and Athora Belgium will aim to satisfy all requests for hard copies of documents that it receives before the date of the hearing but may not be able to do this in respect to requests received too close to the date of the court hearing due to the time it takes to prepare and mail documents.

Please continue to use your normal contact details for general questions about your policy or claim, as shown on your policy documents.

Please only use the contact details shown here for questions about the proposed Transfer.

Email: transferquestions.be@athora.com

Phone: 02 403 89 73 (Dutch) and
02 403 89 74 (French)

From outside Belgium:

+32 2 403 89 73 (Dutch) and
+32 2 403 89 74 (French)

Transfer website:

<https://transfer.aviva.com>