

At Aegon N.V. (**Aegon**) – including all Aegon wholly owned subsidiaries and Aegon-controlled joint-ventures – we are committed to conducting business with the highest level of integrity, and compliance with applicable laws, regulations and standards in each of the markets and jurisdictions in which we operate.

As a global financial institution, Aegon is at risk of being used to launder proceeds of crime, to finance terrorism and/or to be involved in transactions related to sanctioned persons, entities and/or countries as well as trade-controlled exports and proliferation financing. Aegon defines these as Financial Economic Crime (FEC) risks.

Aegon has implemented several policies on FEC to prevent its businesses from involvement in money-laundering and terrorist financing, fraud and/or bribery. For Aegon entities it is mandatory to comply with the policies and set (key) requirements. Aegon's FEC policies include:

- Anti-Fraud Policy (covering internal fraud, intermediary fraud, external fraud);
- Anti-Money laundering & Terrorist financing Policy;
- Sanctions Policy; and
- Anti-Bribery & Corruption Policy– (including Gifts & Entertainment).

These policies are based on international laws and regulations, e.g.:

- The EU Directives and Regulations in the area of prevention of money laundering and terrorist financing;
- The Dutch Money Laundering and Terrorist Financing Prevention Act (Wwft);
- The Recommendations from the Financial Action Task Force (FATF);
- The Basel Committee on Banking Supervision Guidelines on Sound management of risks related to money laundering and financing of terrorism;
- The Bank Secrecy Act, as amended by Title III of the USA PATRIOT Act;
- Dutch, EU, US and UN sanctions laws and regulations; and
- Industry and market standards such as the Wolfsberg Principles.

Local Aegon management is responsible for the implementation of and compliance with the policies. In countries where Aegon's Financial Economic Crime policies are stricter than local rules, Aegon's policies apply.

The FEC policies contain key requirements that local Aegon management and / or operations should adhere to. Periodic attestation of these key requirements is part of the Aegon Policy Attestation process. Aegon will continue to closely monitor the developments and will revisit the current policies and procedures if and when appropriate – FEC policies have an evaluation and review cycle of maximum three years. This statement will be reviewed annually.



Alexander MacLean
Head of Regulatory Compliance Aegon N.V.
March 2021