

# Aegon N.V. Disclosure Policy

The Hague, October 2017

## Introduction

Aegon strives to enhance knowledge and understanding of its business by making information about the company readily available and by giving investors, analysts and the media access to senior management. The purpose of Aegon's disclosure policy (the "Policy") is to ensure that clear, complete, and accurate information relating to the company's operations and financial results is disclosed in a timely, transparent and consistent way, and in accordance with all legal and regulatory requirements. This Policy also covers Aegon's bilateral contacts with analysts and investors. It applies to all Aegon employees and subsidiaries worldwide.

### General principles

Aegon subscribes to the principles and best practice provisions of the Dutch Corporate Governance Code in relation to shareholders and shareholders' meetings. Aegon drafted this Policy to achieve the following objectives:

- ♦ Compliance with rules and requirements associated with its listing on stock exchanges in Amsterdam (Euronext) and New York (NYSE);
- ♦ Provision of clarity about how Aegon discloses information and how it discusses this information with investors, analysts and the media;
- ♦ Raising of awareness among executives and employees of requirements and customs in relation to disclosing information.

This Policy applies to all Aegon employees, including members of the Management Board and the Supervisory Board, employees of subsidiaries, and to any other person(s) affiliated with Aegon in a professional capacity. It relates not only to employees' duties at Aegon, but also to any other activity that might affect Aegon's reputation (e.g. sitting on the Board of a sector association). Acting in contravention of the rules and requirements of this Policy could lead to considerable financial loss and/or reputational damage to Aegon and/or employees involved.

The Policy governs any written and oral communications with investors, analysts and the media. It applies to written messages (e.g. documents filed with the Securities and Exchange Commission (SEC), the Annual Report, the Annual Review, press releases, presentations and any other information posted on the corporate website, Aegon.com), oral messages (press conferences, group meetings and one-on-one meetings with investors, analysts and/or the media) and to social media.

### Spokespeople

Any contacts with investors, analysts and the media are channeled through the Management Board, Investor Relations and/or Media Relations. As part of the day-to-day running of Aegon's business, employees and executives communicate regularly with customers and suppliers, for instance via presentations at conferences and articles in professional journals. This Policy in no way prevents employees or executives from doing so.

### Price-sensitive information

Incorrect procedures for communicating price-sensitive information or other messages that might harm Aegon's reputation must, however, be avoided. Aegon employees should always contact Investor Relations or Media Relations if they have any doubt regarding the information provided or to be provided.

Aegon does not provide any price-sensitive information to a person or group before a press release has been publicly issued. If however, for any reason, price-sensitive information has been inadvertently disclosed, it is Aegon's policy to issue a press release without delay.

### Communication with shareholders, investors and analysts

Communication with shareholders is primarily maintained through press releases, financial reports, meetings and the General Meeting of Shareholders.

The Management Board and the Supervisory Board provide the General Meeting of Shareholders with any requested information unless the providing of that information were to potentially harm Aegon. If the Management Board and Supervisory Board decide not to provide requested information, their reasons for doing so should be documented. The latest information regarding the General Meeting of Shareholders can be found on Aegon.com.

English is the leading language for Aegon's press releases, financial reports and communication with investors, analysts and the media.

### Semi-annual results and analyst & investor conferences

Semi-annual results presentations and the main presentations at Aegon analyst & investor conferences are preannounced on Aegon.com in the financial calendar. These presentations can be followed live via audio or video webcast on the corporate website. The webcast is subsequently archived on the website. Presentation materials for analysts and investors are also disclosed on the Aegon website.

### Bilateral contacts with analysts and investors

Aegon's investor relations program seeks to provide investors with clear, transparent, accurate and timely information they require to make sound investment decisions. Aegon endorses the view of the Dutch Monitoring Committee Corporate Governance Code that dialogue with shareholders outside the context of a formal shareholder meeting is useful for both investors and the company.

Management presentations at broker-sponsored conferences are preannounced on Aegon.com. Other meetings with analysts and investors are usually not preannounced, and it is not possible to follow them via a webcast or other means online. During such meetings, Aegon only discusses information that has already been published. Information that has been published by Aegon and is therefore already in the public domain can be discussed by the designated spokespeople on an individual basis. Non-price-sensitive, non-public information can be provided if it serves to enhance insight into the business. This information is generally factual and non-speculative in nature.

Requests for one-on-one meetings with the Management Board should be made through Investor Relations. Acceptance of the request is dependent on factors such as the number of Aegon shares an investor holds, how knowledgeable the analyst or investor is regarding Aegon and the sector in which Aegon operates, and the extent to which the analyst or investor has previously been granted access to the Management Board.

Any requests from shareholders that the Supervisory Board be present at, or participate in, investor meetings, will be forwarded to the Chairman of the Supervisory Board who will decide whether or not to accede to the request. Requests for meetings with the Chairman of the Supervisory Board, without a member of the Executive Board being present, will be considered by the Executive Board and decided upon in accordance with the guidance provided by the Corporate Governance Code Monitoring Committee's "advisory report on the company-shareholder relationship and on the scope of the Corporate Governance Code".

Aegon, under no circumstances, withholds an analyst or investor access based on an adverse opinion on the share or the decision to sell Aegon shares.

### Analyst reports

Aegon encourages analysts to pay close attention to developments at Aegon and in the industry in order to ensure that investors have the best possible understanding of Aegon's operations and financial results. When requested, Aegon checks draft analysts' reports for factual errors in publicly known information only, and offers its comments. Investor Relations, management, or any other employee under no circumstances comments on an outlook or other financial forecast apart from pointing out facts or referring to the outlook already published by Aegon.

Aegon does not pay any fees to parties for conducting research for analysts' reports, or for the production or publication of analysts' reports. As analysts' reports are the property of the issuing institution, Aegon does not disseminate these reports externally or via the website.

Aegon is covered by various domestic and international financial analysts. Aegon collects estimates among these analysts prior to announcing its semi-annual results. The analyst consensus is published on the website before the publication of the semi-annual results.

### Closed periods

Aegon observes closed periods prior to announcing its semi-annual results during which certain restrictions, including trading restrictions, apply for the company and its employees (see Aegon Insider Dealing Rules). During these closed periods no road shows or meetings with investors and analysts can take place. The closed periods are posted on the Aegon website in the financial calendar.

### Disclosure of price-sensitive information

As a listed company, Aegon is required to publish any price-sensitive information without delay by issuing a press release. Price-sensitive information is information that is concrete and not publicly known, and that might have a significant effect on the share price. The semi-annual results would, by definition, be considered price-sensitive information. Other examples include key facts relating to corporate strategy, capital and control.

Aegon discloses information that it considers to be price-sensitive in press releases. Press releases are issued to investors, analysts and the media, and are also made available via the Netherlands Authority for the Financial Markets, and other sources. They are also published on Aegon's corporate website so that all stakeholders have simultaneous access to them.

Aegon postpones the publication of price-sensitive information only in accordance with applicable legislation: if it is in its legitimate interest; if the general public does not have a misguided view of the company as a result; and if its confidentiality is safeguarded. If the confidentiality of price-sensitive information can no longer be safeguarded, the information is communicated to the public without delay.

### Policy with respect to rumors

As a general rule, Aegon will not comment on market speculation. There may be instances, however, where a different response might be required when rumors have a considerable impact on the share price.

The Policy outlined above was adopted by the Executive Board of Aegon on October 31, 2017.