

Wolfsberg Group Financial Crime Compliance Questionnaire

1. Entity & ownership	
1 Full Legal Name	Aegon N.V.
2 Append a list of branches which are covered by this questionnaire	See attachment
3 Full Legal (Registered) Address	"Aegonplein 50 2591 TV The Hague the Netherlands"
4 Full Primary Business Address (if different from above)	"Aegonplein 50 2591 TV The Hague the Netherlands"
5 Date of Entity incorporation / establishment	23/05/1969
6 Select type of ownership and append an ownership chart if available	Listed company
6 a Publicly Traded (25% of shares publicly traded)	Yes
6 a1 If Y, indicate the exchange traded on and ticker symbol	"AEG - New York Stock Exchange AGN - Euronext"
6 b Member Owned / Mutual	No
6 c Government or State Owned by 25% or more	No
6 d Privately Owned	No
6 d1 If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	See annual report for details on shareholdings.
7 % of the Entity's total shares composed of bearer shares	N.a.
8 Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a If Y, provide the name of the relevant branch/es which operate under an OBL	N.a.
2. AML, CTF & sanctions program	
9 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a Appointed Officer with sufficient experience / expertise	Yes
9 b Cash Reporting	For most units the answer is 'Yes' - For Transamerica Life (Bermuda) Ltd, Kames Capital plc, Aegon Nederland N.V., Aegon Bank N.V., Aegon UK plc, Aegon Towarzystwo Ubezpieczeń na Życie S. A. Plc the answer is 'not applicable'
9 c CDD	Yes
9 d EDD	Yes
9 e Beneficial Ownership	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company local requirements for insurance companies do not have beneficial owner verification requirements for insurance companies here the answer is 'No'
9 f Independent Testing	Yes
9 g Periodic Review	Yes

9 h Policies and Procedures	Yes
9 i Risk Assessment	Yes
9 j Sanctions	Yes
9 k PEP Screening	Yes
9 l Adverse Information Screening	For most units the answer is 'Yes' - For Aegon Towarzystwo Ubezpieczeń na Życie S. A. the answer is 'No'
9 m Suspicious Activity Reporting	Yes
9 n Training and Education	Yes
9 o Transaction Monitoring	Yes
10 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No - All entities review their AML policies on an annual basis, however not all companies require board or committee approval on an annual basis
11 Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Aegon España, S.A.U. Seguros y Reaseguros, Transamerica Life (Bermuda) Ltd, Bermuda and Aegon Towarzystwo Ubezpieczeń na Życie S. A. 'No' - other units 'Yes'
11a If Y, provide further details	Aegon screens clients, counterparties (including for example issuers of Aegon investments), business partners and employees using a global sanction screening programme. Some business units delegate some components of AML, CTF and Sanctions programme. Proper due diligence and annual review are being performed as part of the selection process.
3. Anti bribery & corruption	
12 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
13 Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
14 Does the Entity provide mandatory ABC training to:	
14 a Board and Senior Committee Management	Yes
14 b 1st Line of Defence	Yes
14 c 2nd Line of Defence	Yes
14 d 3rd Line of Defence	Yes
14 e 3rd parties to which specific compliance activities subject to ABC risk have been outsourced	For most units the answer is 'Yes' or 'Not Applicable' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company, Transamerica Premium Life Insurance Company and Aegon UK plc the answer is 'No'
14 f Non-employed workers as appropriate (contractors / consultants)	For most units the answer is 'Yes' or 'Not Applicable' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company, Transamerica Premium Life Insurance Company and Aegon Towarzystwo Ubezpieczeń na Życie S. A., AEGON Hungary Composite Insurance Closed Company Limited by Shares (EN) and Aegon España, S.A.U. Seguros y Reaseguros the answer is 'No'
4. Policies & procedures	
15 Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a Money laundering	Yes

15 b Terrorist financing	Yes
15 c Sanctions violations	Yes
16 Does the Entity have policies and procedures that:	
16 a Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
16 c Prohibit dealing with other entities that provide banking services to unlicensed banks	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company, Transamerica Premium Life Insurance Company and the Aset Management Companies the answer is 'No'
16 d Prohibit accounts / relationships with shell banks	Yes
16 e Prohibit dealing with another Entity that provides services to shell banks	Yes
16 f Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 g Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
16 h Assess the risks of relationships with PEPs, including their family and close associates	Yes
16 i Define escalation processes for financial crime risk issues	Yes
16 j Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17 Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18 Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD	
19 Does the Entity verify the identity of the customer	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
20 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
21 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a Ownership structure	Yes
21 b Customer identification	Yes

21 c Expected activity	Yes
21 d Nature of business / employment	Yes
21 e Product usage	Yes
21 f Purpose and nature of relationship	Yes
21 g Source of funds	Yes
21 h Source of wealth	Yes
22 Are each of the following identified:	
22 a Ultimate beneficial ownership	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
22 a1 Are ultimate beneficial owners verified?	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
22 b Authorised signatories (where applicable)	Yes
22 c Key controllers	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
22 d Other relevant parties	Yes, e.g. trustees settlors and beneficiaries; cover providers (guarantors); parties involved in a trade transaction
23 Does the due diligence process result in customers receiving a risk classification?	Yes
24 Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
25 Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
26 Does the Entity have a process to review and update customer information based on:	
26 a KYC renewal	For most units the answer is 'Yes' - For Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company the answer is 'No'
26 b Trigger event	Yes
27 From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?	
27 a Non-account customers	EDD & Restricted on a risk based approach
27 b Offshore customers	EDD & Restricted on a risk based approach
27 c Shell banks	EDD & Restricted on a risk based approach
27 d MVTs/ MSB customers	EDD & Restricted on a risk based approach
27 e PEPs	EDD & Restricted on a risk based approach

27 f PEP Related	EDD & Restricted on a risk based approach
27 g PEP Close Associate	EDD & Restricted on a risk based approach
27 h Correspondent Banks	EDD & Restricted on a risk based approach
27 h1 If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i Arms, defense, military	EDD & Restricted on a risk based approach
27 j Atomic power	EDD & Restricted on a risk based approach
27 k Extractive industries	EDD & Restricted on a risk based approach
27 l Precious metals and stones	EDD & Restricted on a risk based approach
27 m Unregulated charities	EDD & Restricted on a risk based approach
27 n Regulated charities	EDD & Restricted on a risk based approach
27 o Red light business / Adult entertainment	EDD & Restricted on a risk based approach
27 p Non-Government Organisations	EDD & Restricted on a risk based approach
27 q Virtual currencies	EDD & Restricted on a risk based approach
27 r Marijuana	EDD & Restricted on a risk based approach
27 s Embassies / Consulates	EDD & Restricted on a risk based approach
27 t Gambling	EDD & Restricted on a risk based approach
27 u Payment Service Provider	EDD & Restricted on a risk based approach
27 v Other (specify)	EDD on a risk based approach: high cash turnover businesses, industries prone to terrorist financing, shipping businesses, pharmaceutical, healthcare, construction, state-owned corporations, high value consumer goods (art, real estate)
28 If restricted, provide details of the restriction	Prohibited: Virtual Currencies, Payment Service Providers, Unlicensed Online Gambling. Cluster Weapons, antipersonnel landmines, biological and chemical weapons, weapons containing depleted uranium. Mountain top removal, oil sands, thermal coal mining, confirmed links to terrorism/terrorist finance or when sanctions apply
6. Monitoring & reporting	
29 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30 What is the method used by the Entity to monitor transactions for suspicious activities?	
30 a Automated	Yes
30 b Manual	Yes
30 c Combination of automated and manual	Yes
31 Does the Entity have regulatory requirements to report currency transactions?	For most units the answer is 'Yes' - For Transamerica Life (Bermuda) Ltd, Bermuda, Aegon UK Plc and Kames Capital plc the answer is 'No'
31 a If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Where applicable 'Yes' except Aegon Magyarország Befektetési Alapkezelő Zárt Körűen Működő Részvénytársaság and Aegon USA Investment Management, LLC

32 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. Payment transparency	
33 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Aegon Pension and Insurance companies do not initiate banking payment transactions but adhere to transparency standards when relying on other parties to initiate payments.
34 Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a FATF Recommendation 16	Yes
34 b Local Regulations	Yes
34 b1 Specify the regulation	Included in attachment
34 c If N, explain	
8. Sanctions	
35 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	Yes
36 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	For most units the answer is 'Yes' - Transamerica Life Insurance Company, Transamerica Financial Life Insurance Company and Transamerica Premium Life Insurance Company do not have an explicit legal obligation to collect beneficial ownership information hence there the answer is 'No', these companies do screen the vast majority of its customers during onboarding and regularly thereafter
37 Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
37 a Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (see also the answer on question 36) and for filtering transactional data
37 b United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (see also the answer on question 36) and for filtering transactional data
37 c Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (see also the answer on question 36) and for filtering transactional data
37 d European Union Consolidated List (EU)	Used for screening customers and beneficial owners (see also the answer on question 36) and for filtering transactional data
37 e Other (specify)	Aegon N.V. has implemented a global sanction screening tool. Lists included cover a variety of different jurisdictions, including but not limited to UN, OFAC, OSFI, EU, Hong Kong, Singapore, Japan, SBN/FBI, DPL, OSFI, and NCCT.

38 Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. Training & education	
39 Does the Entity provide mandatory training, which includes:	
39 a Identification and reporting of transactions to government authorities	Yes
39 b Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
39 c Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
39 d New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes
40 Is the above mandatory training provided to :	
40 a Board and Senior Committee Management	Yes
40 b 1st Line of Defence	Yes
40 c 2nd Line of Defence	Yes
40 d 3rd Line of Defence	Yes
40 e 3rd parties to which specific FCC activities have been outsourced	Yes
40 f Non-employed workers (contractors / consultants)	Yes
10. Audit	
41 In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes

Alexander MacLean



Head of Regulatory Compliance Aegon N.V.
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Overview of entities covered by Wolfsberg - Aegon N.V. 2020	List of branches which are covered by this questionnaire
Aegon España, S.A.U. Seguros y Reaseguros	
Aegon Derivatives N.V.	
Transamerica Life (Bermuda) Ltd, Bermuda	Hong Kong Branch Singapore Branch
Aegon Bank N.V.	Knab
Aegon Magyarország Általános Biztosító Zrt.	
AEGON Hungary Composite Insurance Closed Company Limited by Shares (EN)	
Aegon UK plc	
Transamerica Financial Advisors Inc	
Transamerica Financial Life Insurance Company	
Transamerica Life Insurance Company	
Transamerica Premier Life Insurance Company	
Aegon Magyarország Befektetési Alapkezelő Zárt Körűen Működő Részvénytársaság	
Aegon USA Investment Management, LLC	
Aegon Investment Management B.V.	
Kames Capital plc	
AEGON Magyarország Pénztárszolgáltató Zártkörűen Működő Részvénytársaság	
Aegon Hungary Pension Fund Management Company	
Aegon Nederland N.V.	
Aegon Towarzystwo Ubezpieczeń na Życie S. A.	AEGON TOWARZYSTWO UBEZPIECZEŃ NA ŻYCIE S.A. VARSOVIA SUCURSALA FLORESTI (Aegon Towarzystwo Ubezpieczeń na Życie S.A. - Oddział w Rumunii)

34 b1 Specify the regulation

Antimoney Laundering Law 10/2010. Royal Decree on Antimoney Laundering 304/2014. Royal Decree-Law 11/2018 on the transposition of the AML Directive
Lei 83/2017 de 18 de agosto; Portaria 233/2018 de 21 de agosto
AML Laws in Bermuda, Hong Kong and Singapore
EU Regulation 2015/847 on information accompanying transfers of funds
Relevant local regulation (Hungaryan AML Act, and Regulatory ordinances and guidelines)
Money Laundering, Terrorist Financing and Transfer of Funds (information on the Payer) Regulations 2017 (MLR 2017)
Bank Secrecy Act and Patriot Act
Anti-money laundering and terrorist financing act of 1-st March 2018 (Ustawa o przeciwdziałaniu praniu pieniędzy oraz finansowaniu terroryzmu z 1 marca 2018 r.)