Introduction

You can use this handout to prepare yourself for raising a concern – from noticing a problem and having a conversation to what to expect if you call the Aegon Speak Up Helpline or if your concern is investigated. You can easily click through the different stages of the Speak Up process.
I have a concern
What can you Speak Up about?

You should raise a concern when you suspect or observe

- unlawful,
- unethical, or
- otherwise improper conduct

that involves Aegon.

Something that may result in a serious violation of applicable

- laws and regulations,
- our Code of Conduct,
- internal policies and procedures.

Particularly, when such conduct may harm

- you and your colleagues,
- our financial position and, reputation, or
- our customers and shareholders.

or when such conduct represents a danger to

- life and property
- the financial system, or
- the public interest.
Speak up in whichever way you feel most comfortable

Speaking up means raising your concern in whichever way you feel most comfortable. It should ideally be part of regular work dialogue and should begin with a conversation with your direct or higher manager, HR, Compliance, Risk or Internal Audit. If this is not possible, you can safely raise your concern, confidentially or anonymously, via Aegon Speak Up.

**Call the helpline**

To speak to someone outside the company, you can call a dedicated 24/7 toll-free helpline and make a report over the phone with a trained (external) Compliance Operator. Go to [www.aegon.com/speakup](http://www.aegon.com/speakup) for the phone numbers.

**Report online**

If you do not feel comfortable speaking with a live operator, you can use online reporting. You can type information into an online form and take the time to think about and review what you have written. Visit [www.aegon.com/speakup/report](http://www.aegon.com/speakup/report).

**Report in person, by-proxy** (open-door reporting)

When you share your concerns directly with your manager, HR or Compliance, they can make a report on your behalf.
Making a report

What are the steps?

**Report**

After you make a report, you receive
- a confirmation email within 48 hours that your report has been received, and
- more information about what you can expect throughout the process.

**Assess**

The Speak Up Coordinator will assess:
- which issues are raised by your report to determine the right response
- the risk that your identity might become known during an investigation
- whether there is a risk of retaliation for you or other persons in relation to your report.

Depending on the outcome, the Speak Up Coordinator will discuss with you if additional measures for support or protection are required.
If there are sufficient grounds to proceed, Aegon will:
- conduct or commission a formal investigation or independent inquiry; or
- refer the matter to the appropriate authority for further investigation.

Once the facts have been established, the person investigating your concern will prepare a written report which outlines:
- the issues which were investigated,
- the evidence collected,
- the findings,
- whether there were any concerns about, or any evidence of, detrimental action taken against you or other persons involved in the investigation.

If it is concluded that the reported concern is found to be (partially) substantiated, management will decide on appropriate remedial and/or disciplinary measures to stop it and prevent it from happening again.
After I have spoken up
What will happen?

You will receive regular updates on what is being done in response to your report.

After the investigation is completed, we will inform you of the outcome and what management action was taken or proposed in respect of your report.

However, sometimes the need for confidentiality may prevent us from giving you specific details.

Speaking up may provoke a mix of emotions. It can be complex and feel daunting. Counselling or coaching is available to you. Please contact your HR department for more information.
If you experience something that doesn’t feel right, it is important that we hear about it. A problem we do not know about at Aegon, is a problem we cannot address. And by speaking up, you can prevent an issue from becoming a bigger problem. In return, Aegon promises to listen, act and protect you.

**Prepare with the Speak Up Toolkit**

We recommend you use the Aegon Speak Up Toolkit when you are considering making a report. The toolkit is both a website and an app – which you can download on your personal or business phone, tablet or other device – and gives you great detail about Aegon Speak Up. It guides you through every step of the Speak Up process, while focusing on your emotions, to offer the appropriate guidance and information.

**Why speaking up matters**

If you experience something that doesn’t feel right, it is important that we hear about it. A problem we do not know about at Aegon, is a problem we cannot address. And by speaking up, you can prevent an issue from becoming a bigger problem. In return, Aegon promises to listen, act and protect you.

**Useful links**

Scan the QR code to download the app

- Aegon Code of Conduct
- Aegon.com/speakup
- Speak Up Policy
- Speak Up Service

**I have a concern**

- Speaking to someone
- Making a report
- An investigation is underway

**After I have spoken up**