



Financial Economic Crime Statement

April 2025

At Aegon Limited (**Aegon**) – including all wholly owned subsidiaries and Aegon-controlled joint-ventures ('business units') – 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, finance terrorism or be involved in transactions related to sanctioned persons, entities, countries, trade-controlled exports, and proliferation financing. We define these as Financial Economic Crime (FEC) risks.

To prevent our business units from engaging in financial crimes such as money laundering, terrorist financing, fraud, bribery, or sanctions violations, Aegon has implemented several policies on FEC. Compliance with these policies and their key requirements is mandatory for all Aegon entities. Our FEC policies include:

- **Anti-Fraud Policy** (covering internal fraud, intermediary fraud, external fraud)
- **Anti-Money Laundering & Counter Terrorist Financing Policy**
- **Sanctions Policy**
- **Anti-Bribery and Corruption Policy** (including Gifts and Entertainment)

These policies are based on international laws and regulations, such as:

- The Recommendations from the Financial Action Task Force (FATF)
- Bermuda anti-money laundering and anti-terrorist financing regulations
- USA, EU, United Nations, United Kingdom, Bermuda, and Dutch sanctions laws and regulations
- Industry standards such as the Wolfsberg Principles

Business unit management team are responsible for the implementation of and compliance with the FEC policies. In countries where Aegon's FEC policies are stricter than local rules, Aegon's policies apply.

The FEC policies contain key requirements that Aegon business unit management and operations must adhere to. Periodic attestation of these key requirements is part of the Aegon Policy Attestation process. Additionally, FEC standards have been developed to ensure consistent implementation of FEC policies in day to-day operations.

Aegon continues to closely monitor the relevant developments and will revisit the current policies and standards if and when appropriate. FEC policies have an evaluation and review cycle of maximum two years. This statement will be reviewed annually.

Caroline Macefield

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