

Aegon N.V.

Attachment to Form 8937, Report of Organizational Action Affecting Basis of Securities Section 368(a) Reorganization of Aegon N.V.

Disclaimer: The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to consider any shareholder's specific circumstances. Shareholders are urged to consult their own tax advisors regarding the U.S. tax consequences of the transaction described herein and the impact to tax basis resulting from the transaction.

Form 8937, Part II, Line 14

Effective September 30, 2023, Aegon N.V. redomiciled to Luxembourg and subsequently to Bermuda (the "Redomiciliation").

The Redomiciliation occurred in two principal steps which took place on the same day: (1) the conversion of Aegon N.V. into Aegon S.A., a Luxembourg public limited liability company (société anonyme), pursuant to which (A) Aegon N.V. retained its legal personality without interruption and continued to exist as Aegon S.A., and (B) the common shares of Aegon N.V. remained issued and outstanding, and became common shares of Aegon S.A., and (2) on the same day as step (1) the subsequent conversion of Aegon S.A. into Aegon Ltd., a Bermuda exempted company with liability limited by shares, pursuant to which (A) Aegon S.A. retained its legal personality without interruption and continued to exist as Aegon Ltd., and (B) the common shares of Aegon S.A. remained issued and outstanding, and became common shares of Aegon Ltd. As a result of the steps described above, a holder of common shares of Aegon N.V. became the holder of the same number of common shares of Aegon Ltd.

Form 8937, Part II, Line 15

The Redomiciliation qualifies as a tax-free reorganization within the meaning of section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"). Under such treatment, a U.S. shareholder will have the same tax basis in each of its shares following the Redomiciliation as the U.S. shareholder had immediately prior to the Redomiciliation.

Form 8937, Part II, Line 16

As the Redomiciliation qualifies as a tax-free reorganization within the meaning of section 368(a) of the Code, a U.S. shareholder's basis in the common shares of Aegon S.A. and subsequently Aegon Ltd. is the same as the U.S. shareholder's basis in the common shares of Aegon N.V. immediately before the Redomiciliation.

U.S. shareholders should consult their own tax advisors regarding the tax consequences of the Redomiciliation.

Form 8937, Part II, Line 17

Sections 354, 358, 368(a), and 1223 of the Code.

Form 8937, Part II, Line 18

The Redomiciliation qualifies as a tax-free reorganization within the meaning of section 368(a) of the Code. Under such treatment, a U.S. shareholder will not recognize any gain or loss solely as a result of the Redomiciliation.

Form 8937, Part II, Line 19

The Redomiciliation is reportable in tax year 2023.