

**Statement
of Aegon Pensii S.A.F.P.P. S.A. Board
of Directors
regarding the conclusions of the
evaluation on risk management system
efficiency**

The Board of Directors is responsible for the risk management process and the internal control system.

The risk and internal control procedures are properly communicated within the company. Risk management for the Board of Directors is an ongoing process and is focused on the evaluation, management and monitoring the significant risks identify within company's activity. The Board of Directors is periodically informed about the significant risks identified, and about their evolution. The review of significant risks, risk management and internal control activities is performed annually. A structured risk management process has been implemented to ensure the consolidation of the portfolio of the pension funds managed for the benefit of our clients, for the efficiency of the processes carried out in the company, as well as for the development of human capital, in order to increase the operational and financial excellence.

The risks identified within the company are analyzed monthly, quarterly or semi-annually, a particular category being the investment risks that appear in the course of the asset management activity for managed pension funds. In order to minimize the risks within the company's activity, the ones related to the important processes were identified, evaluated and monitored and the application of the controls related to them was followed.

Existing controls consist in the implementation of working procedures and instructions, which include elements regarding: reporting lines, separation of employee's duties, establishing the approval frameworks for transactions, financial reporting and monitoring of process indicators, which provide information on the evolution of the activity over time. The investment risks that are identified in the activity of trading, evaluating and asset management are analyzed by both Investment Direction and the Risk Department through procedures that ensure the separation of the two activities and increasing the efficiency of the controls implemented. The internal procedures implemented ensure efficient and timely management of any conflict of interest situations that may arise during the course of the activity.

The procedures related to business continuity are reviewed with half-yearly reports, and the tests have shown the

**Declaratia
Consiliului de Administratie al Aegon
Pensii S.A.F.P.P. S.A. privind
concluziile evaluării eficienței
sistemului de administrare riscurilor**

Consiliul de Administrație este responsabil pentru procesul de administrare a riscurilor si sistemul de control intern.

Procedurile de risc si control intern sunt comunicate adecvat in cadrul societatii. Gestionarea riscurilor in Consiliul de Administratie este un proces continuu si este axat pe evaluarea, gestionarea si monitorizarea riscurilor semnificative din activitatea societatii. Consiliul de Administratie este informat periodic despre riscurile semnificative identificate in cadrul societatii, si despre evolutia acestora. Revizuirea riscurilor semnificative, precum si a activitatilor de administrare a riscurilor si de control intern se efectueaza anual. Un proces structurat de gestionare a riscurilor a fost implementat pentru a asigura consolidarea portofoliilor fondurilor de pensii administrate in beneficiul clientilor nostrii, pentru eficientizarea proceselor derulate in societate, precum si pentru dezvoltarea capitalului uman, in vederea cresterii excelentei operationale si financiare.

Sunt analizate cu frecventa lunara, trimestriala si semestriala riscurile identificate in societate, o categorie aparte fiind reprezentata de riscurile investitionale care apar in cadrul derularii activitatii fondurilor de pensii administrate. Pentru minimizarea riscurilor din cadrul activitatii societatii s-au identificat, evaluat si monitorizat riscurile aferente proceselor importante si s-a urmarit aplicarea controalelor aferente acestora.

Controalele existente constau in implementarea de proceduri si instructiuni de lucru, care cuprind elemente privind: linii de raportare, separarea responsabilitatilor angajatilor, stabilirea cadrelor de aprobare a tranzactiilor efectuate, raportari financiare si monitorizarea indicatorilor de procese, care ofera informatii despre evolutia in timp a activitatii societatii. Riscurile investitionale care se identifica in activitatea de tranzactionare, evaluare si gestionare a activelor din portofoliile de fonduri administrate sunt analizate atat de Directia Investitii, cat si de Departamentul Risc prin proceduri care asigura separarea celor doua activitati, crescand eficienta controalelor implementate. Procedurile interne implementate asigura gestionarea eficienta si in timp a oricaror situatii de conflict de interese care pot aparea in cursul desfasurarii activitatii.

Sunt revizuite cu periodicitate semestriala procedurile referitoare la continuarea activitatii societatii si desfasurarea

efficiency of these procedures. In the current situation, the business continuity plan has been revised by adding the scenarios related to the Covid-19 pandemic, their implementation and application ensuring the security and safety of the company's employees.

The teleworking system has been implemented at the company level, and the activity is carried out at the same quality level as in normal situations. In H2 2020 the scenarios regarding work from home were analyzed, being introduced a new indicator depending on which they change. The established indicator is the number of new Covid-19 infections per thousand inhabitants in Cluj County, for the last 14 days. At the end of 2020, scenario 1 was applicable.

In H1 2020 the revision of the register of operational risks generated by the use of information systems took place, as well as the revision of the risk register at the level of the company and of the managed pension funds. Taking into account the applicable legislative provisions regarding money laundering and terrorist financing, the identification and evaluation of money laundering / terrorist financing risks was carried out at the level of the company's processes. During H2 2020 no risk events were identified that would lead to the appearance of new risks or to the modification of the risks identified at the level of the company and of the managed pension funds, or to lead to the implementation of additional controls. In the mentioned processes, only low and medium value risks were identified, and the risk profile remained unchanged and is medium, at the level of 2020.

In the internal control missions, carried out during the same period, no deficiencies were identified that would lead to the identification of new risks

Considering that, all identified risks have values that fall within the risk tolerance established at the company level and no new risk mitigation controls have been implemented. It is concluded that the risk management activity has been carried out effectively.

testelor de continuitate a activitatii a demonstrat eficienta acestor proceduri. In contextul actual, planul de continuare a afacerii a fost revizuit, prin adaugarea scenariilor de Covid-19, aplicarea acestora asigurand securitatea si siguranta angajatilor societatii.

S-a implementat sistemul de telemunca la nivelul societatii, iar activitatea se desfasoara la acelasi nivel calitativ ca si in situatii normale. In semestrul II 2020 s-au analizat scenariile de lucru de acasa, fiind introdus un nou indicator in functie de care acestea se modifica. Indicatorul stabilit este numarul de noi infectari cu Covid-19 la mia de locuitori la nivelul judetului Cluj, pentru ultimele 14 zile. La finalul anului 2020, era aplicabil scenariul 1.

In semestrul I 2020 a avut loc revizuirea registrului riscurilor operationale generate de utilizarea sistemelor informatice, precum si revizuirea registrului riscurilor la nivelul societatii si a fondurilor de pensii administrate. Tinandu-se cont de prevederile legislative aplicabile activitatilor de spalare de bani si de finantare a terorismului, s-a efectuat si identificarea, si evaluarea riscurilor de spalare de bani la nivelul societatii. In cursul semestrului II 2020 nu au fost identificate evenimente de risc care sa conduca la aparitia de riscuri noi sau la modificarea riscurilor identificate la nivelul societatii si a fondurilor de pensii administrate, sau sa duca la implementarea de controale suplimentare. In procesele mentionate, au fost identificate doar riscuri de valoare mica si medie, iar profilul de risc a ramas neschimbat, fiind mediu, la nivelul anului 2020.

In activitatea de control intern, derulata in aceeasi perioada, in cadrul misiunilor de control intern nu au fost identificate deficiente care sa conduca la identificarea de riscuri noi.

Tinandu-se cont de faptul ca toate riscurile identificate au valori care se incadreaza in toleranta de risc stabilita la nivelul societatii si nu s-au implementat controale noi de mitigare a riscurilor, se concluzioneaza ca activitatea de management a riscurilor s-a desfasurat in mod eficient.

Data: 27.01.2021