



[1.]¹ PURPOSE

American International Group, Inc. is a global company, and wherever we operate, and across every part of our business, we strive to create an inclusive environment which embraces difference and fosters inclusion. We believe that valuing diversity and inclusiveness is a competitive differentiator enabling us to achieve our vision to create unmatched value for our customers, colleagues, business partners and shareholders.

[2.] SCOPE

This Diversity and Inclusion Policy applies to all AIG employees and consultants, agents, representatives, contractors and contract workers when they act on behalf of AIG. It is intended to complement local statutory provisions.

[3.] POLICY STATEMENT AND REQUIREMENTS

AIG embraces and support our employees' differences in age, ethnicity, gender, gender identity or expression, language differences, nationality or national origin, family or marital status, physical, mental and development abilities, race, religion or belief, sexual orientation, skin color, social or economic class, education, work and behavioral styles, political affiliation, military service, caste, and other characteristics that make our employees unique.

Our Commitment

Our commitment to diversity and inclusion aligns with our values of People and Respect, and is reflected in our global Code of Conduct. Diversity and inclusion are sponsored at the highest levels in the Company and initiatives are applicable—but not limited—to our practices and policies on global mobility, recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of equity that ensures:

- Diversity is recognized as a business interest, with every level of the organization holding responsibility.

¹ Depending upon the length and complexity of the Policy, a Policy's major sections may or may not be numbered. It is the policy author/owner's choice.

- Communication is respectful between all employees regardless of title or level.
- Insights of diverse groups are sought and welcomed; employees are not alienated or excluded because they don't fit into a set of cultural norms.
- An environment where employees feel that their background and lifestyle do not affect perceptions of them as a professional, or affect their opportunities for development and promotion.
- Flexible working practices are available where appropriate, as there is an appreciation that not everyone can and will work the same hours or in the same way. This removes disadvantage and discrimination to participation in work.
- The diversity of our workforce is visible at every level of the organization and in every business area.
- Employees are aware of their own unconscious and conscious bias and know how to ensure this does not manifest itself at work.

In respecting and valuing the diversity among our employees, and all those with whom we do business, managers and employees are expected to ensure that there is a work environment free of all forms of discrimination and harassment.

Managers Responsibilities

- Implementing this Policy as part of their day-to-day management of employees and in applying policies and practices in a fair and equitable way.
- Recognizing unacceptable behavior and taking immediate appropriate action.

Employees Responsibilities

- Implementing this Policy in their day-to-day work and their dealings with colleagues and customers.
- Notifying their line manager or senior management of any concerns with regard to the conduct of other employees.

Equal Opportunity

Candidacy for employment or advancement is based solely on the relevant qualities the candidate would bring to the job position. Equal opportunity extends to all aspects of the employment relationship, including but not limited to hiring, promotions, training and development, working conditions, compensation and benefits. All such decisions are made by using objective standards based on the individual's qualifications as they relate to the particular job.

Discriminatory Harassment and Bullying

Discriminatory harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by statute, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual's work performance, or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes but is not limited to:

- epithets, slurs or negative stereotyping;
- threatening, intimidating or hostile acts;
- denigrating jokes;
- written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

Workplace Bullying includes but is not limited to:

- Verbal, Written or Electronic Bullying: slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; and abusive remarks
- Gesture Bullying: non-verbal threatening gestures, glances which can convey threatening messages
- Exclusion: socially or physically excluding or disregarding a person in work-related activities

The harassment and bullying may come from a supervisor, co-worker, or a non-employee who has a business relationship with the Company.

Sexual Harassment

Sexual harassment includes, but is not limited to, unwelcome or unwanted sexual advances, requests for sexual favors, as well as other conduct of a sexual nature when:

- The submission to or rejection of such conduct is made a condition of the employee's continued employment, or used as the basis for any employment decisions affecting the employee; or
- The conduct, if unwelcome and severe or pervasive, creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an employee's work environment.

- Examples of what may constitute sexual harassment, besides sexual advances and requests for sexual favors include, but are not limited to:
- Verbal: suggestive comments; statements or questions about personal sexual matters; insults, threats or jokes about personal or physical traits; or jokes of a sexual nature (including innuendos).
- Non-verbal: suggestive or insulting noises; obscene gestures; or the use of literature, e-mails or pictures which are sexually suggestive, revealing, demeaning or pornographic.
- Physical: touching, pinching, rubbing or massaging the body; coercing sexual relations; or assault.

Employee Resource Groups

The company recognizes the strategic value of allowing groups of employees with common interests to formalize their professional relationship by creating an Employee Resource Group (ERG).

ERGs are voluntary, Company-endorsed employee groups dedicated to fostering a diverse and inclusive work environment within the context of the company's mission, values, business practices and objectives. An ERG typically forms around a specific dimension of diversity such as ethnicity, sexual orientation, disabilities, etc. ERGs are also sometimes called affinity groups or network groups. Currently, the groups for which an ERG has been established include the following constituencies:

- Women
- Hispanics/Latinos
- Black or African descent
- Asian and Pacific Islander
- People with Disabilities
- Military Veterans
- Working Families
- Multiple Generations
- Lesbian, Gay, Bisexual and Transgender

Benefits of ERG's to AIG and Employees

The ERG can provide cultural expertise to the company's employees and businesses in ways that can enable the company to improve recruiting and retention, build cultural competence and leadership effectiveness, facilitate relationships between our organization and external communities and constituencies, and support specific business projects and initiatives. The ERG can enable employees at all levels to enhance their personal and professional development through direct participation in ERG activities and by voluntarily pursuing leadership roles in the ERG of their choice.

Eligibility and Participation

You may become a general member or leader of an ERG without regard to age, race, sex, ethnicity, physical ability, sexual orientation, or grade level. Membership is open only to current employees of the organization. Contractors and Consultants are not eligible for ERG membership.

Participation in ERG events or leadership activities during your normal work hours must be approved by your manager. Participation during non-work hours does not require such approval.

Manager's Responsibilities

To the extent possible, managers are expected to support employees who wish to participate in ERG activities. An employee who desires to pursue a leadership role within an ERG should be encouraged, if he or she is in good standing in their current job. A commitment to a leadership role should be viewed as part of the employee's personal/professional development, and consideration should be given to exceptional leadership accomplishments as part of the employee's year-end evaluation.

Oversight and Administration

AIG's Office of Diversity & Inclusion, is responsible for the administration of this policy as well as for the general oversight and governance of the ERGs. ERGs interested in sponsoring programs such as a speaker series or other initiatives will forward such proposals to the Office of Diversity & Inclusion for review, to ensure that the proposed program fosters and supports the values and business objectives of the Company. The purpose of an ERG is not to represent or act as an advocacy group for employees with respect to terms and conditions of employment. An ERG that seeks to engage in conduct that is illegal or inconsistent with the Company's policies, guidelines, and Code of Conduct will be dissolved. Programs and events proposed by the ERGs should align with Company values and business practices as determined by the AIG Office of Diversity & Inclusion.

Religious Accommodation

AIG respects the religious beliefs and practices of all employees and will make, on request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on the company's business.

Requesting a Religious Accommodation

An employee whose religious beliefs or practices conflict with his or her job, work schedule, or with the standard or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation should make a request for the accommodation to his or her

immediate supervisor. The request should include the type of religious conflict that exists and the employee's suggested accommodation.

Disabilities Accommodation

AIG values the contributions of persons with differing abilities. We are committed to the inclusion of persons with disabilities in our workforce. We do not discriminate on the basis of any known mental or physical disability that is protected by law, a history of disability, a perceived disability or an association with someone with a known disability. Our policy applies to job application procedures, hiring, termination, advancement, compensation, job training, relocation and other aspects of employment. We recognize that at some time during your employment you may require a reasonable accommodation to perform the essential functions of your job.

What is an Accommodation?

- An accommodation is a modification or an adjustment to a job, the work environment or the way things usually are done, which enables a qualified individual with a disability to perform the essential job functions of his/her job or to enjoy equal benefits and privileges of employment.
- A reasonable accommodation is one that does not cause an undue hardship to the company or pose a significant risk to the health or safety of the qualified individual or others.
- A qualified individual is a disabled employee who meets the legitimate skill, experience, education or other requirements of a position that he or she holds or seeks, and who can perform the essential functions of the position with or without reasonable accommodation.

Examples of accommodations include, but are not limited to: workplace modifications, leave time, specialized equipment, or reassignment to a vacant position for which you are qualified. You may request an accommodation at any time. We may request medical information to certify that you have a covered disability. In the event that it is necessary to do so, the information will be evaluated by Human Resources or an appropriate designee.

Requesting a Disabilities Accommodation

Requests for accommodations are voluntary and confidential. If you think you require an accommodation during your employment, please inform your manager or Human Resources. We will work with you to determine whether an accommodation will enable you to perform the essential functions of your job. Additionally, there may be times when we recognize that you may need an accommodation and will offer one accordingly. You may obtain a description of your position for your physician's review upon request to your manager or Human Resources. You may be requested to provide information from your doctor in order to determine what reasonable accommodations may be available to you. Any information you provide will remain confidential. The information should be provided to Human Resources or an appropriate

designee and not to your manager. If you are given an accommodation, it will be documented in your Human Resources file.

Note: If you are a qualified individual with a disability and believe you have not been provided the appropriate accommodation, been discriminated against, or been retaliated against, please contact Human Resources or Employee Relations.

How to Report Discrimination or Harassment

In support of the above policy, the company expressly prohibits any form of discrimination, harassment or bullying. It is the responsibility of each employee to respect the rights of co-workers. Employees should report any problems to their manager or their Human Resources or Employee Relations Representative.

[4.] GLOSSARY

Diversity

The quality of being different or unique as an individual or group. This includes but is not limited to age, ethnicity, gender, gender identity or expression, language differences, nationality or national origin, family or marital status, physical, mental and development abilities, race, religion, sexual orientation, skin color, socio-economic status, education, work and behavioral styles, political affiliation, veteran status; the perspectives of each individual shaped by their nation, experiences and culture—and more. Even when people appear the same on the outside, they are different.

Inclusion

The act of including; a strategy to leverage diversity. Diversity always exists in social systems. Inclusion, on the other hand, must be created. In order to leverage diversity, an environment must be created where people feel supported, listened to and able to do their personal best.

[5.] CONTACT INFORMATION

Employees may ask questions, raise concerns or report instances of potential non-compliance with this Policy by contacting any of the following:

AIG's Global Compliance Group at 646-857-1877 or email corporatelegalcompliance@aig.com.

AIG Compliance Help Line at 877-244-2210 or via Internet at www.aigcompliancehelpline.com. Communications to the Help Line may be made anonymously, subject to local laws.

AIG prohibits retaliation against any employee for making a good faith report of actual or suspected violations of laws, regulations, or this Policy.

Failure to comply with this Policy may be grounds for disciplinary actions, up to and including termination.