



# Code of Conduct



## PURPOSE & VALUES

Our Purpose is to discover new potential by reimagining what AIG can do for you.

Our Values and how we bring them to life:

### TAKE OWNERSHIP

- We set clear **expectations**
- We are **proactive**
- We are **accountable**

### SET THE STANDARD

- We **deliver quality**—always
- We are **client-centric**
- We **lead** the industry

### WIN TOGETHER

- We are **stronger together**
- We are **aligned**
- We are **one team**

### BE AN ALLY

- We strive for **inclusion**
- We **listen** and **learn**
- We **speak** with our **actions**

### DO WHAT'S RIGHT

- We act with **integrity**
- We **lead** by example
- We **lift up** our **communities**

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When used in this Code of Conduct, 'AIG' refers to American International Group, Inc. and its subsidiaries worldwide. Business units and jurisdictions may have other codes consistent with or more stringent than this Code of Conduct. These codes may impose additional responsibilities on employees in those business units and jurisdictions. Concerns regarding potential conflicts between a provision of this Code of Conduct and local laws should be escalated to the compliance officer.

# A Message from Our Chairman & Chief Executive Officer



Dear colleagues,

Operating with ethics and integrity is a primary focus of everything we do at AIG, which is why our Code of Conduct is critically important. Always doing the right thing and maintaining a safe environment for colleagues to raise concerns is paramount to earning and preserving the trust of our stakeholders.

AIG's Purpose and Values statement guides how we act as a company and as individuals. At its core, the statement is centered around Discovering New Potential and Reimagining what AIG can do for you. Our Values—Win Together, Take Ownership, Set the Standard, Do What's Right and Be an Ally—set clear expectations for what it means to work at AIG and encourage the behaviors required to drive change and long-term success.

The AIG Code of Conduct outlines standards and policies that apply to all colleagues and provides guidelines about how we work with each other, as well as with our customers, distribution partners, regulators and other stakeholders. This Code, along with your very good judgment and decision making, will guide your actions.

As we work to create the AIG of the future, thank you for your commitment to upholding our Values and the highest levels of ethics and integrity.

A handwritten signature in black ink, reading "Peter Zaffino".

**Peter Zaffino**

Chairman & Chief Executive Officer

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# A Message from Our Global Chief Compliance Officer



Dear colleagues,

The AIG Code of Conduct contains the rules and guidelines that each of us should keep in mind as we engage in our daily activities.

The Code of Conduct reflects AIG's Purpose and Values and outlines the laws and regulations by which we as a corporation are governed. By complying with these standards, we uphold AIG's reputation for transparency and foster a culture of ethics and integrity.

This Code of Conduct is designed to help you do what's right. While it provides guidance for most situations, it is not an all-encompassing resource. If you have questions related to a specific situation, business or corporate group that may be unclear, please reach out to your manager,

HR business partner or Compliance Officer. Also, please speak up if you notice something that does not appear to align with the principles outlined in the Code.

Thank you for continuing to uphold AIG's strong culture of excellence and for your continued adherence with AIG's Code of Conduct. Our efforts create trust and give our customers, distribution partners, regulators, and other stakeholders confidence in the strength and reliability of AIG.

A handwritten signature in black ink, reading "Karen J. Nelson".

**Karen J. Nelson**

Senior Vice President  
Global Chief Compliance Officer

# Delivering on Our Commitments

At the core of AIG's business is a promise that we will stand behind our products and services. Personal and organizational integrity are critical to delivering on this promise and protecting our reputation.

Delivering on our commitments is vitally important to our employees, customers, distribution and other business partners, regulators, shareholders, and the communities in which we live and do business.



# Delivering on Our Commitments

## Why Do We Have a Code?

The AIG Code of Conduct (the “Code”) provides ethical guidelines for conducting business across AIG. The Code is a resource for all AIG officers and employees. This Code cannot address every issue that we may encounter, but it does provide guidance and resources for those times when the right choice is not clear. Additional information, including relevant rules and policies, may be found in links throughout this document as well as in our corporate policies.

This Code is organized based on the commitments we deliver to each of the following groups:

- Our fellow employees trust us to value and respect them.
- Our customers and our distribution and business partners trust our integrity.
- Our regulators expect us to be transparent and act with integrity.
- Our shareholders trust our stewardship.
- Communities around the world rely on us to be responsible corporate citizens.

## To Whom Does the Code Apply?

The Code applies to all AIG officers and employees. Certain AIG business partners, such as agents and consultants, who represent AIG to the public are also expected to adhere to the intent of the Code, as well as to applicable provisions of the AIG Third Party Code of Conduct, the AIG Supplier Code of Conduct and any contractual commitments, when working on behalf of AIG companies.

AIG is a large organization, and yet we are united by our commitment to deliver on our promises. Each of us has a responsibility to earn and uphold the trust that is placed in us.

The most current version of the Code can be accessed on AIG’s [Corporate Governance](#) website. The Code may be amended from time to time; such amendments will become effective immediately upon posting.



# Delivering on Our Commitments

## Individual Responsibilities

Meeting our responsibilities enables our business to succeed and grow, today and in the future. Each of us is expected to:

- Understand and act in accordance with this Code, AIG's policies, and applicable laws and regulations.
- Seek guidance from management, compliance personnel or AIG's legal counsel when you have questions.
- Promptly report concerns about possible violations of this Code, AIG's policies or applicable laws and regulations to management or to one of the resources listed on the next page.
- Participate in ethics and compliance training to keep up to date on current standards and expectations.
- Fully cooperate with any internal investigations.

No reason, including the desire to meet business goals, can ever be an excuse for violating this Code, AIG policies, laws, or regulations.

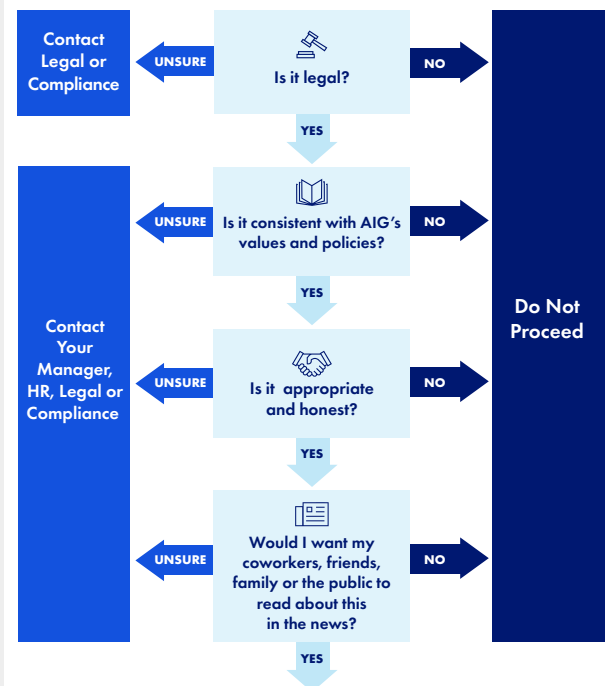
## Additional Responsibilities for Managers

Each manager is expected to fulfill the following additional responsibilities:

- Serve as a role model by demonstrating the highest ethical standards and create and sustain a culture of trust, honesty, integrity and respect.
- Be a resource for employees. Ensure that they are aware of, understand, and know how to apply this Code, AIG's policies and applicable laws and regulations in their daily work.
- Make yourself available to employees to present issues, complaints or grievances in a safe and secure environment and reinforce AIG's non-retaliation policy. Ensure such matters are addressed in a fair and timely manner.
- Seek assistance from other managers or AIG's legal counsel, compliance officers or human resource professionals when unsure of the appropriate response to any given situation or report it through the AIG Compliance Help Line.
- Be proactive. Take reasonable actions to prevent and identify misconduct. Report situations that might impact the ability of employees to act ethically on behalf of AIG.

## The Headline Test

### For Making Better Decisions



**Your decision appears to comply with the Code.**

If you have any further questions, you can always reach out to your manager, HR, Legal or Compliance.

# Delivering on Our Commitments

## Asking Questions & Raising Concerns

Most concerns likely to be faced at work can be resolved by talking to and working with management, Human Resources, Employee Relations or your designated compliance officer. In addition, employees may ask questions, raise concerns or report instances of non-compliance with this Code, AIG policies, or applicable laws and regulations by contacting any of the following:

- **AIG's Global Compliance Group** at + 1 646 857-1877 or email [corporatelegalcompliance@aig.com](mailto:corporatelegalcompliance@aig.com).
- **AIG Compliance Help Line** at + 1 877 244-2210, online at [www.aigcompliancehelpline.com](http://www.aigcompliancehelpline.com), or scan the QR code below, subject to local laws. The Compliance Help Line is staffed by an independent third party that provides written reports to AIG's Global Compliance Group. Communications to the Help Line may be made anonymously, subject to local laws, and may be made in all major languages.

For concerns related to accounting, internal accounting controls or auditing matters, employees may contact either of the above (anonymously through the Help Line, subject to local laws) or may bring the concern to the attention of the Chair of the Audit Committee of AIG's Board of Directors by email at [boardofdirectors@aig.com](mailto:boardofdirectors@aig.com) or in writing to: Chairman of the Audit Committee, American International Group, Inc., 1271 Ave of the Americas, Floor 41, New York, NY 10020-1304.





# Delivering on Our Commitments

## Q&A

Asking Questions and Raising Concerns

### **Q:** What happens when I make a report to the AIG Compliance Help Line?

**A:** After taking the call, an outside service provider will forward a report to AIG's Global Compliance Group. If the report is submitted online, the outside service provider will send the report directly to the Global Compliance Group.

1. If you request advice, you will be contacted about the issue and provided with guidance and interpretation so that you can make the right decision.
2. If you want to report a suspected violation, the outside service provider will take down any relevant information and will forward a report to the Global Compliance Group. Any reports regarding questionable accounting, internal accounting controls, and auditing matters will be reviewed with representatives of the Global Investigations Group and then, if necessary, reported to the Audit Committee of the AIG Board of Directors.
3. If the matter would be more appropriately addressed by another internal organization within AIG (e.g., Legal, Internal Audit, Global Security or Human Resources), the Global Compliance Group may send the report to that organization for handling.

### **Q:** Can I report a violation and still remain anonymous?

**A:** AIG encourages employees making reports to identify themselves so that the information can be investigated promptly and thoroughly. Our ability to directly contact an employee who has raised a concern will expedite any investigation. However, subject to local law or labor agreement, you may choose to remain anonymous when reporting a matter to the AIG Compliance Help Line.

### **Q:** What about confidentiality and retaliation?

**A:** Every reasonable effort will be made, consistent with law and AIG policy, to maintain the confidentiality of any employee who reports a violation or suspected violation in good faith. AIG prohibits retaliation against any employee for making a good faith report of actual or suspected violations of this Code, other AIG policy, or applicable laws or regulations. Violation of this non-retaliation policy may result in corrective action, up to and including termination.

# Delivering on Our Commitments

## Non-Retaliation Policy

AIG prohibits retaliation against any employee for making a good faith report of actual or suspected violations of this Code, other AIG policy, or applicable laws or regulations, and violation of this non-retaliation policy may result in corrective action, up to and including termination.

## Corrective Action

Violating this Code, other AIG policy, or applicable laws or regulations, or encouraging others to do so, puts AIG's reputation at risk and therefore may result in corrective action. Failing to promptly report known violations by others also may be a violation of this Code. Corrective action may include coaching, verbal or written warning, termination of employment and loss of employment-related benefits.

## Waivers of the Code

From time to time, AIG may amend or waive certain provisions of this Code. Any employee who believes that a waiver may be appropriate should discuss the matter with their designated compliance officer. Only the AIG Board of Directors or its Nominating and Corporate Governance Committee may grant a waiver of a specific provision of the Code for an executive officer of AIG.



# Delivering on Our Commitments

## Q&A

**Q:** My Business Unit sets various goals that we are supposed to achieve. Sometimes I feel pressured to violate the Code to achieve these goals. Is this acceptable?

**A:** No. While successful businesses often set high goals and strive to achieve them, you must never violate the Code or other AIG policies to achieve your goals. Our standard of integrity should never be compromised in order to meet business goals.

**Q:** Our manager typically does nothing when concerns about potential misconduct are brought to her attention. She has made things difficult for co-workers who have raised issues. Now I have a problem: a co-worker is doing something wrong. What should I do?

**A:** Speak up. Our Code says that you should report misconduct and that you can do so without fear of retaliation. While starting with your direct manager is often the best way to get concerns addressed, if you do not believe that is appropriate you should talk to another member of management, human resources, or to your designated compliance officer. Additionally, you may call or submit an online report to AIG's Compliance Help Line.

**Q:** If I think that a local law conflicts with this Code, what should I do?

**A:** If you believe local laws conflict with the Code, please discuss the issue with your compliance officer.

# Our Commitments to Each Other

AIG companies and their predecessors have been world leaders in insurance for over 100 years because we have always believed in the power of talented people to create value and perform for customers, distribution partners, shareholders and other stakeholders.

# Our Commitments to Each Other

## AIG Talent

AIG is committed to inclusion of all people, ideas, and skills, as described in the [AIG Global Human Resources Policy](#).

AIG seeks to hire and promote the best talent by providing a dynamic environment that brings people with exceptional skills and ideas together.

AIG relies on the contributions of local people who best understand the cultures in the countries and jurisdictions in which we do business. AIG has always been committed to hiring local expertise and providing local talent with a professional business environment, leadership opportunities, and fair compensation.

AIG provides employees with opportunities to learn, excel at their jobs, grow with the organization and profit financially.

## Respecting Others

Treating others with respect means that we do not discriminate on the basis of age, ethnicity, gender, gender identity or expression, language differences, nationality or national origin, pregnancy, 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 any other status that is protected under applicable local law.

Respect also means valuing each other's differences. We respect each other's opinions and treat all of our colleagues with fairness and dignity.

## Respecting Human Rights

AIG is committed to respecting human rights in the global communities we serve, conducting our business in accordance with internationally recognized human rights standards and ensuring that no practices of child labor, modern slavery or human trafficking take place within AIG.

## Delivering on Our Commitments

### Respecting Others

- Provide employees with opportunities based on performance and objective standards that are relevant to job performance.
- Abide by local labor and employment laws including those addressing discrimination, workplace bullying and harassment.
- Provide a work environment free of harassment, including sexual harassment, workplace bullying, and discrimination.
- Escalate concerns you may have regarding your workplace environment to Human Resources, Employee Relations or your designated compliance officer.



# Our Commitments to Each Other

## A Work Environment Free from Harassment and Intimidation

AIG will not tolerate intimidating or bullying behavior which can occur as a single instance or repeated inappropriate behavior. Bullying or intimidation can be direct or indirect, intentional, or unintentional conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Bullying or intimidation can manifest itself verbally, non-verbally, online/cyber, physically, in gestures, and in exclusionary behavior.

## Safe, Healthy and Secure Workplace

AIG is committed to conducting business in a manner that protects the health, safety, and security of employees and customers while they are on AIG premises. Situations that may pose a health, safety, security, or environmental hazard must be reported promptly to management or Global Security.

Maintaining a safe and secure workplace requires that all employees remain vigilant in the office and wherever they may be carrying out business on behalf of AIG. Notify management or Global Security of any issue that may impact AIG's security, emergency readiness, or fire and life safety preparedness.

AIG recognizes the health and wellness of our employees is essential to the organizational health of our Company and impacts how we better serve our customers, business partners, shareholders, community and each other. We are dedicated to fostering a workplace culture that promotes the physical, mental, and social well-being of our employees and will not tolerate actions that compromise this commitment.

## Alcohol and Drug Use

Using, selling, possessing, or working under the influence of illegal drugs at AIG is prohibited. Excessive or inappropriate use of alcohol while conducting business for AIG is also prohibited. Inappropriate behavior is not excused or justified due to being under the influence of alcohol or other substances.

### Prohibited Conduct

#### Harassment

- Unwelcome gestures or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Slurs, inappropriate jokes or disparaging comments (explicit or by innuendo).

#### Violence and Intimidation

- Acts or threats of intimidation and/or violence against employees, customers, or visitors either on Company premises or through its communications channels.
- Acts or threats of intimidation and/or violence committed by AIG employees while doing business on behalf of the Company.



# Our Commitments to Each Other

## Employee Privacy

AIG must take steps:

- to prevent, detect or investigate crime, money laundering, fraud, financial crime and/or other breaches of applicable law;
- to comply with applicable laws and regulations, and any applicable AIG policies and procedures, including this Code;
- to safeguard against the loss, theft, unauthorized or unlawful collection, use, disclosure, destruction or other processing or misuse of AIG Company Information;
- to prevent, detect or investigate unauthorized use of AIG Information Technology Systems (“IT Systems”) and AIG IT System data;
- to ensure the effective operation of AIG IT Systems (including telephones, email, and Internet);
- for security or health and safety purposes;
- for administration purposes;
- to assist with investigations, complaints, regulatory requests, litigation, arbitration, mediation or other legal proceedings or obligations or requests from individuals;
- to establish the existence of facts (e.g., keeping records of transactions);
- to ascertain compliance with regulatory or self-regulatory practices or procedures that relate to AIG;
- to ascertain or demonstrate standards that are achieved or ought to be achieved by persons using AIG IT Systems, including compliance with this Code and other AIG policies, standards, processes, guidelines or any terms of use associated with use of AIG IT Systems, including without limitation those relating to information security and cybersecurity; or
- in the course of the operational support and development of our businesses, such as to evaluate the quality of customer service, efficiency, cost, and risk management purposes.

For further information on the topic, please see the [Employee Privacy Notice](#).

For these referenced purposes, as permitted under applicable law and as disclosed in the AIG Employee Privacy Notice, AIG may monitor your access to and use of AIG IT Systems and any data moving through and residing on AIG IT Systems.

Subject to applicable law, employees should have no expectation of privacy with regard to their use of AIG’s IT Systems or with regard to any items or information within an AIG system, AIG’s premises or other facilities.

AIG may also monitor and review security video live footage and recordings, and access records, that may be associated with AIG premises and other facilities to which employees and visitors have access.

Additionally, AIG may inspect, review, copy and retain documents, and other items, within AIG premises and other facilities (such as at work stations, in offices, desks, filing cabinets, and other storage locations).

For further information, please see the AIG IT System Logon Notice (available for review and acceptance when you log on to the AIG IT System) and the [AIG Global Monitoring Notice](#).



# Our Commitments to Each Other

## What is AIG Company Information?

AIG's Company information refers to information that is classified as Highly Confidential, Confidential, or Internal, (defined in the [AIG Global Information Handling Policy](#) and [Standards](#)). These categories include both Personal Information and Business Information.

## Examples of AIG Company Information include but are not limited to the following:

### Highly Confidential

**Sensitive Personal Information:** Name and government-issued identification number, financial account number or medical or health information

### Business Information

- Non-Public AIG sensitive financial information
- Board of Directors meeting information
- Trade secrets
- Non-Public proposed business activities
- Attorney-client privileged communications, attorney work product and other privileged documents

### Confidential

**Personal Information:** Name and compensation data or personal contact details not made available for publication to the workforce

### Business Information

- Commercial customer list
- Insurance policy or claims information of a commercial insured or claimant
- Market research and risk analysis

### Internal

**Personal Information:** Name, Employee Identification Number

### Business Information

- Non-sensitive internal correspondence amongst workers
- Non-sensitive marketing plans or techniques
- Information maintained on the AIG intranet



# Our Commitments to Each Other

## Q&A

**Q:** My manager and several of my colleagues tell jokes with a sexual overtone that I find very offensive. I have not complained because I know they will tell me to mind my own business or that I'm making trouble over nothing. Would they be right?

**A:** No, they would be wrong. Offensive jokes of a sexual nature, even in private conversations that may be overheard by others, can be a form of harassment. First, you should try to talk to your manager and colleagues. If this does not work, or you are uncomfortable doing so, talk to a Human Resources representative, Employee Relations, contact your designated compliance officer, or contact HR Shared Services at [HRSharedServices@aig.com](mailto:HRSharedServices@aig.com).

**Q:** I overheard my manager discussing with one of her peers some private information contained in a co-worker's medical records. What should I do?

**A:** Medical or health information is Highly Confidential Sensitive Personal Information and must be kept strictly confidential. Inappropriate sharing of such information is a violation of the AIG Global Information Handling policy. You must raise this issue with the appropriate management personnel. If you are uncomfortable raising this issue with management, then report the matter to Human Resources, Employee Relations or your designated compliance officer. Additionally, you may contact AIG's Compliance Help Line, subject to local laws.

# Our Commitments in the Marketplace

AIG is known for being a market leader. We compete vigorously to create new opportunities for our customers and other stakeholders. We seek competitive advantages only through legal and ethical business practices.

# Our Commitments in the Marketplace

## Customer Privacy and Data Security

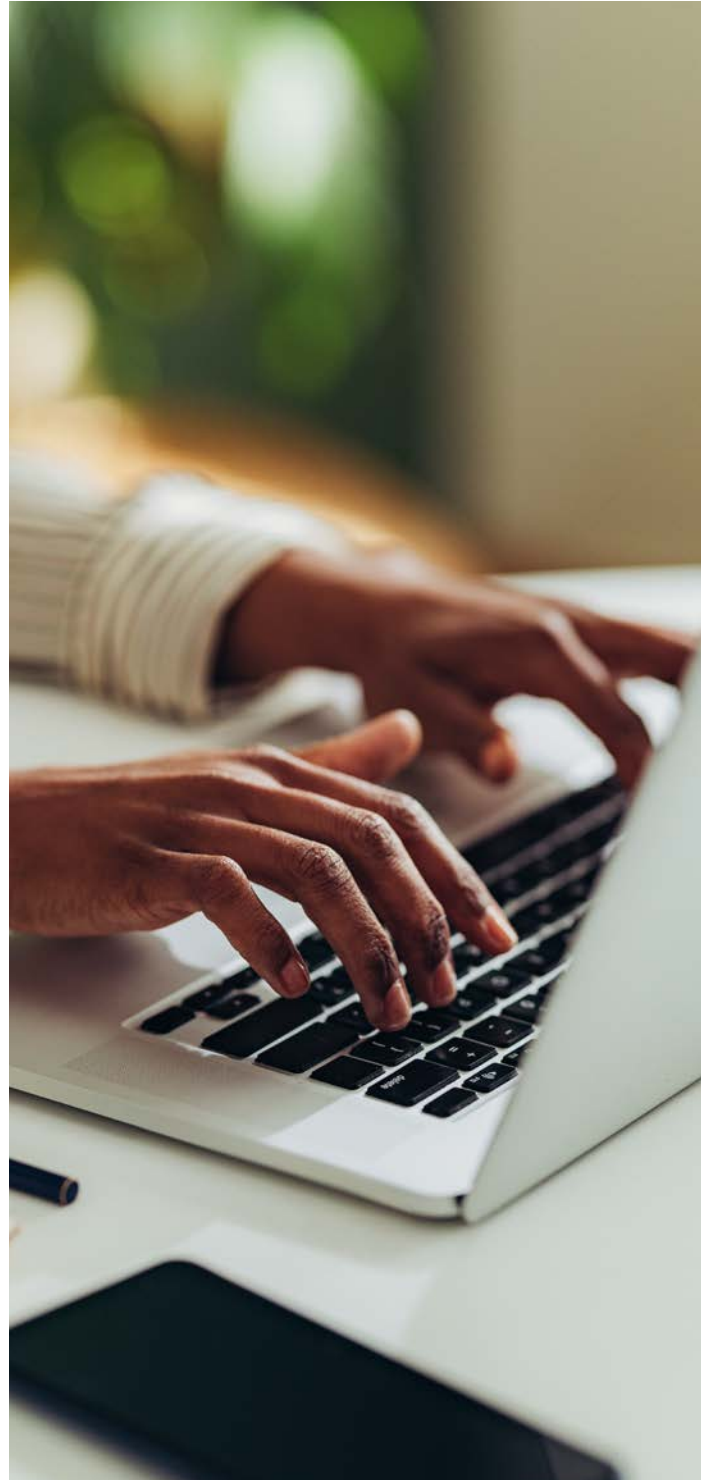
Our customers expect us to carefully handle and safeguard the information they share with us. Never compromise a customer's trust by disclosing a customer's Highly Confidential or Confidential Information, including Personal Information, in a manner contrary to AIG's Global Information Handling Policy and Standard or our customer facing privacy policy or to those without a legitimate business need for such information.

The classification of information as Personal Information may differ by country. Employees who handle customer information are responsible for knowing and complying with applicable data privacy and information security laws. In all cases we must maintain appropriate physical, administrative and technical safeguards for a customer's Highly Confidential or Confidential Information, including Personal Information.

We must be especially vigilant in following laws, regulations and policies when sharing Personal Information with other parties (even for legitimate business purposes) and transferring Personal Information across country borders, especially to law enforcement or government bodies in foreign jurisdictions. Employees must immediately notify the AIG Privacy Office if they receive such a request. If you have any questions about data privacy and/or information security, consult your manager, business unit legal counsel, privacy officer, designated compliance officer or the Privacy Office.

Employees must immediately report incidents involving the compromise of the confidentiality, integrity or availability of Personal Information, or the increased risk of such compromise ("Privacy Risk Incidents"), including those that involve Third Parties, to the appropriate AIG Privacy Team and, if the incident relates to IT, or could pose an information security risk to information other than just Personal Information, also the global Cyber-Risk Defense Center.

For additional information on this topic, please see the [AIG Global Information Handling Policy](#) and [Standard](#).





# Our Commitments in the Marketplace

## Conflicts of Interest

Your position at AIG cannot be used for inappropriate personal gain or advantage to you or a member of your family. Any situation that creates, or even appears to create, a conflict of interest between personal interests and the interests of AIG must be avoided. [AIG's Global Conflict of Interest Policy](#) outlines examples to assist employees in identifying potential conflicts and sets forth procedures for reporting such potential conflicts.

Potential conflicts of interest should be reported to management, who will work with your designated compliance officer to determine how best to handle the situation.

Employees must not engage in any action (e.g., accept the outside position, accept gift(s) or entertainment at issue, run for public office, etc.) until they receive written approval to do so by both their manager and the appropriate Compliance Officer, as specified in the Policy.

## Delivering on Our Commitments

### Conflicts of Interest

- Always make decisions in the best interest of AIG and our customers—not to advance personal interest.
- Remain aware of how personal activities can lead to potential conflicts, such as taking a second job with or making an investment in an AIG customer, vendor, or competitor.
- Discuss with your manager any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests or those of a family member or friend in potential conflict with AIG.

## Corporate Opportunities

Employees are prohibited from taking for themselves or directing to a third party a business opportunity that is discovered through the use of AIG corporate property, information or position, unless AIG has already been offered and declined the opportunity.

Employees are prohibited from using corporate property, information or position for personal gain to the exclusion of AIG and from engaging in an outside business that competes with any business of AIG.

## Personal Relationships

Employees are expected to manage personal relationships in the workplace (e.g., employment of relatives, intimate relationships) in a manner which avoids any actual or perceived conflict between personal/family relationships and work responsibilities and productivity.

Immediate family members, members of your household and individuals with whom you have a close personal relationship must never improperly influence business decisions.

For additional information on this topic, please see the [AIG Global Human Resources Policy](#), which must be read in conjunction with local employee handbooks and standards (where available). If you have any questions or disclosures, please contact Human Resources, Employee Relations or your designated compliance officer.

## Outside Activities

AIG respects the privacy of all its employees; however, unless you are located in a country where such reporting is prohibited by local law, you must disclose and receive both managerial and Compliance approval for engagement in specific types of outside activities, including, but not limited to, the following activities:

- **Service with an outside business or trade association, as an employee, owner, board member, officer, trustee, partner or consultant**, regardless of whether the business currently does or seeks to do business with AIG, the business competes or seeks to compete with AIG, or you are compensated; prior written approval from your manager and designated compliance officer is required before engaging in this type of outside activity. Managerial and Compliance approval must be renewed on an annual basis and at any point there is a change in relevant facts upon which the original approval was granted. This provision does not apply to service on the board of a co-op, condominium association



# Our Commitments in the Marketplace

or similar entity in which you reside, a holding company, trust or similar entity that is established solely for you or your family's estate or tax planning, or participation in any board of an entity on which AIG or a subsidiary of AIG has requested the employee to serve.

- **Service with a foundation, charity or non-profit organization where you will be paid for your service, or where you hold a position of financial or fiduciary responsibility** (e.g., serve as Treasurer, a member of the Audit Committee or a member of the Investment Committee of the organization's Board of Directors); prior written approval from your manager and designated compliance officer is required before engaging in this type of outside activity. Managerial and Compliance approval must be renewed on an annual basis and at any point there is a change in relevant facts upon which the original approval was granted. This provision does not apply to "Volunteer Time Off" activities which are subject to the AIG Volunteer Time Program Guidelines.
- **A presentation, talk, or service on a panel in which you are offered a fee, royalty, honorarium, or other payment;** only persons who are authorized to do so may speak on behalf of AIG, and in addition, speaking at an external talk, panel or event requires employees to follow AIG's guidelines and align with AIG's Global Communications Policy. Any materials to be used during the presentation, talk or panel may need to be reviewed before the presentation in accordance with corporate, business unit or AIG policies. Further, prior written approval from your manager and designated compliance officer is required before accepting any fees and you may be required to turn the fees received over to AIG.
- **Serving as a public official (e.g., member, officer, director or employee of a governmental entity including any agency, authority or advisory board), as an appointee of a governmental entity or running for elected office;** prior written approval must be obtained from AIG's Global Chief Compliance Officer or his/her designee as well as your manager. Approval must be renewed whenever the term expires and before reelection or reappointment is sought.

To avoid even the appearance of any conflict with AIG's interests, whenever you participate in community support efforts outside of AIG-sponsored programs you should never imply AIG endorsement of the effort.

## Gifts and Entertainment

Modest gifts and appropriate entertainment can help strengthen business relationships, but these business courtesies, whether given or received by employees, must never improperly influence business decisions.

A gift is any item of monetary value presented to or by an employee, for or from, a non-AIG employee where there is, or potentially may be, a business relationship between the parties. Entertainment is an event with a specific business purpose that includes the presence of both an AIG employee and a non-AIG employee. If only an AIG employee is present at the event, the AIG employee must consider the event a gift subject to the applicable monetary value limitations.

If you are offered a gift or entertainment that does not meet the criteria set forth in the [AIG Global Conflicts of Interest Policy](#), politely decline the gift or entertainment. If declining a gift would be offensive or hurt a business relationship, accept the gift on behalf of AIG and forward it to your manager who, together with your designated compliance officer, will determine the appropriate disposition of the gift.

Cash or cash equivalents, including gift certificates, checks, traveler's checks or money orders, investment securities, negotiable instruments, payment of credit card charges or similar items, cannot be accepted or offered as gifts—regardless of the amount.

Business units or regions/localities may impose additional gift and entertainment restrictions and reporting requirements. Employees are responsible for understanding and complying with all Policy documents applicable to them.



# Our Commitments in the Marketplace

## Appropriate gifts or entertainment, whether given or received, should:

- Have a specific business purpose.
- Be in good taste and not extravagant, excessive, or lavish.
- Be reasonable in frequency with the same source.
- Be permitted by AIG's and the recipient organization's policies.
- Be reasonable, ordinary, customary, and lawful in the country or region where they are exchanged.
- Not be intended to improperly influence business decisions.
- Not to be solicited by AIG employees.
- Not be cash or cash equivalents (e.g., gift certificates), regardless of amount.
- If a gift, not be valued greater than \$150 USD.

## Gifts and Entertainment to Government Officials

AIG engages in business with many government-owned or controlled customers. These may include central banks, finance ministries, pension funds and other enterprises (including airlines and commercial banks). Many of the representatives of these customers may be deemed to be government officials pursuant to applicable local or international anti-corruption laws. As a result, employees who have contact with government customers must be aware of the potential issues and risks that may arise in dealings with such customers.

Special care must be taken when providing gifts and entertainment to such customers. Any gifts, entertainment or travel must be consistent with the [AIG Global Anti-Corruption Policy](#) and local laws. Many of the countries with or in which AIG conducts business limit the value of gifts, entertainment and travel that their respective government officials may accept.

In addition to complying with the [AIG Global Anti-Corruption Policy](#), all travel, gifts, and entertainment provided to a government official must comply with the [AIG Global Expense Management Policy](#) and any applicable local business policies.

## Delivering on Our Commitments

### Gifts and Entertainment

- Never allow business gifts and entertainment, whether given or received, to improperly influence business decisions.
- Remember if the donor is not present, then the entertainment is subject to gifts policies.
- Respect local and cultural sensitivities when exchanging business gifts and entertainment.
- Never provide or accept extravagant gifts or lavish entertainment.
- Do not solicit gifts, favors or entertainment.
- Report any gifts offered to you or received that are valued at more than \$150 USD to your manager and designated compliance officer and turn it over to them for disposition.
- Prior written approval from your manager and designated compliance officer is required before providing a gift valued at more than \$150 USD to any non-government official.
- Never offer anything that would be considered a bribe or other improper payment or gift. When providing gifts or entertainment to government officials, comply with the [AIG Global Anti-Corruption Policy](#). Prior written approval from your manager and designated compliance officer is required before providing: a meal involving a government official valued at more than \$50 USD or a gift, travel or other hospitality to a government official of any amount.

# Our Commitments in the Marketplace

## Relationships with Our Business Partners

Our business partners serve as extensions of AIG. When working on behalf of AIG, business partners are expected to adhere to the intent of the Code, the [AIG Third Party Code of Conduct](#) and/or the [AIG Supplier Code of Conduct](#) and to any applicable contractual provisions.

Business partners must not act in a way that is prohibited or considered improper for an employee. We must all ensure that customers, producers, agents, and suppliers do not exploit their relationship with AIG or use AIG's name in connection with any fraudulent, unethical or dishonest transaction.

AIG business partners are expected not to create incentives for employees or others who do business with AIG to violate the Codes' standards.

Responsible selection and management of our business partners is core to our business practices. AIG employees must adhere to the [AIG Global Acquisition of Goods and Services Policy](#). Specifically, employees must engage [Global Sourcing and Procurement Services \("GS&PS"\)](#) before entering into an agreement, communicating any formal requests, and/or authorizing a supplier to provide goods and/or services.

If you have questions related to purchasing needs, inquiries should be directed to GS&PS. For assistance related to procuring products and services, employees may engage GS&PS through [AIG local support tools](#).

## Supplier Diversity

AIG is committed to the inclusion, consideration and engagement of small and diverse Suppliers, as defined and outlined in the AIG Supplier Diversity Policy.

## Delivering on Our Commitments

### Relationships with Our Business Partners

- Be aware of business practices of AIG agents and other representatives to ensure that proper means are used to deliver our services.
- Perform appropriate due diligence regarding potential agents, consultants, independent contractors, and suppliers prior to engaging their services.
- Never pressure or encourage AIG suppliers or agents to engage in improper activities.
- Treat suppliers, agents, and other representatives with respect and consideration.

# Our Commitments in the Marketplace

## Fair Dealing

AIG seeks competitive advantages only through legal and ethical business practices. Each of us must conduct business in a fair manner with our customers, service providers, suppliers, and competitors. Do not disparage competitors or their products and services. Improperly taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of material facts or any other unfair practice is not tolerated at AIG.

### Delivering on Our Commitments

#### Fair Dealing

- Conduct business with customers and suppliers in a manner that demonstrates our commitment to fair competition.
- Provide truthful and accurate marketing information.
- Gather information about competitors only according to legal and proper means and in a manner that reinforces AIG's integrity.
- Never use improper or questionable methods to gather information about competitors.
- Never misrepresent yourself or your purpose in business interactions with a potential or current AIG customer or business partner.

## Warning Signs

### Antitrust and Fair Competition

Antitrust and competition laws vary among countries and states. These variations result in certain actions being permitted in some countries or states and prohibited in others. If you encounter any of the activities set forth below and are not sure whether these activities are lawful, contact your designated compliance officer for advice on how to proceed:


- Attempts to dictate or control a customer's resale prices.
- Making the sale of any product or service conditional on a customer's purchase of another product or service.
- Offering a customer prices or terms more favorable than those offered to a similarly situated competitor of the customer.
- Restricting a customer or supplier from dealing with a competitor.
- Selling products or services below cost or other unfair pricing or promotion practices.

# Our Commitments in the Marketplace

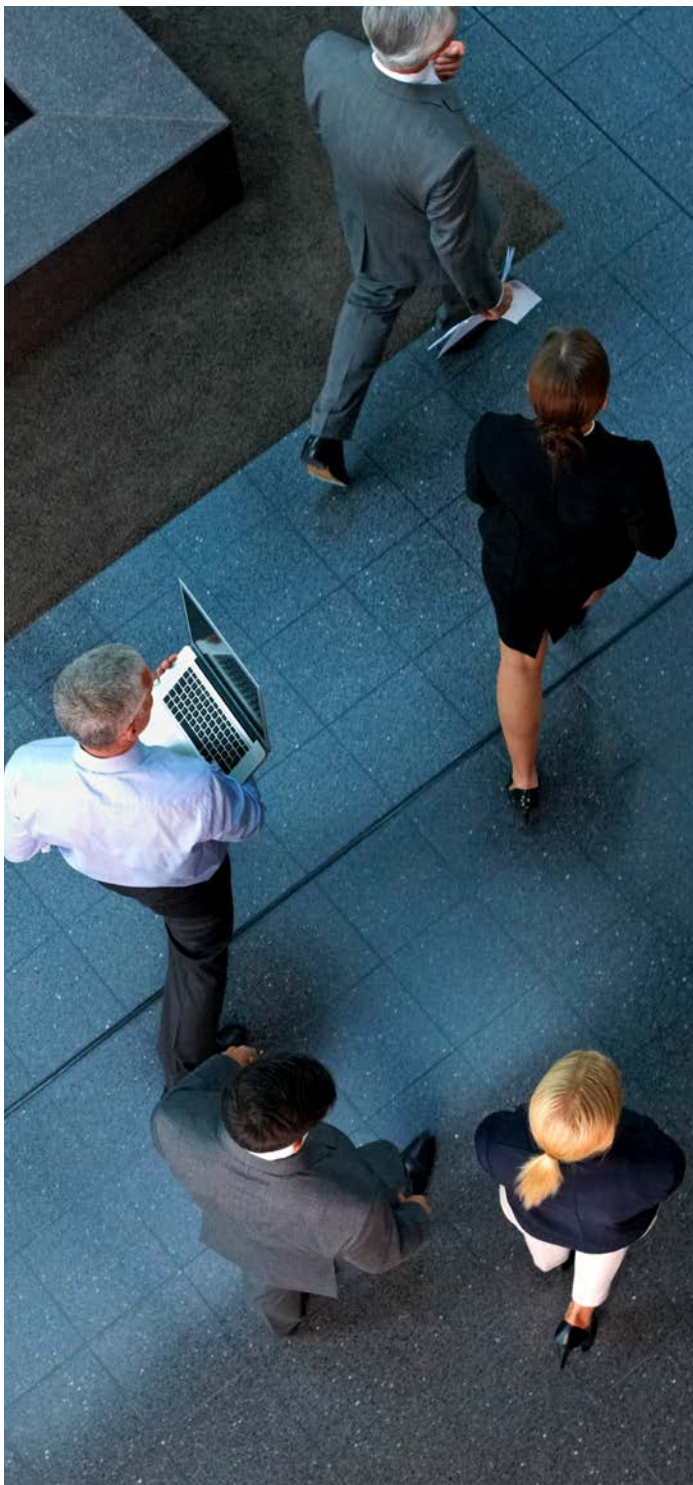
## Antitrust and Fair Competition

AIG competes vigorously and fairly around the world. We seek to maintain and grow our business through superior products and services—not through improper or anticompetitive practices. We strive to understand and comply with global competition and antitrust laws.

These laws are complex. Employees who are unsure of appropriate practices should consult with their designated compliance officer for additional information and clarification. The following guidelines will help ensure fair business conduct and appropriate competition. For additional information on this topic, please see the [AIG Global Antitrust and Competition Policy](#).

 DO	 DO NOT
<ul style="list-style-type: none"><li>• Compete vigorously and lawfully in every market in which AIG participates, making all business decisions in the best interest of AIG.</li><li>• Obtain information about AIG’s competitors only from lawful and appropriate sources.</li><li>• Comment on competitors or their products or services based only on factual information.</li></ul>	<ul style="list-style-type: none"><li>• Agree formally or informally with a competitor to fix prices or other terms of sale, rig bids, set production or sales levels, or allocate customers, markets, or territories.</li><li>• Discuss any of the following with a competitor: prices, bids, customer sales, commissions, and terms of sale, profits, margins, costs, production, inventories, supplies, marketing plans or other competitively sensitive information.</li><li>• Attend meetings with competitors at which sensitive information, including the subjects mentioned in the above two bullets, is discussed.</li><li>• Agree with others outside of AIG as to the suppliers or customers with which to do business.</li><li>• Make unsubstantiated or untruthful comparisons to competitors, their products or services.</li><li>• Obtain competitively sensitive information from AIG’s competitors or those known to have a duty of confidentiality to such competitors.</li><li>• Agree, formally or informally, with a third party not to recruit, solicit or hire each other’s employees.</li></ul>

# Our Commitments in the Marketplace



## Competitive Information

AIG prohibits using illegal or unethical means to obtain competitor or supplier confidential information, including trade secrets. You may obtain information about AIG's competitors only from lawful and appropriate sources. You must not obtain competitively sensitive information from AIG's competitors or those known to have a duty of confidentiality to such competitors.

Never improperly obtain, disclose or use others' trade secrets. Offers of confidential information that may have been obtained improperly must be immediately reported to your designated compliance officer.

## Warning Signs

**Use Caution when Obtaining Competitive Intelligence, such as:**

- Retaining documents or computer records from prior employers.
- Pressuring or encouraging new colleagues to discuss confidential information from previous employers.
- Obtaining information through any behavior that could be construed as "espionage" or "spying," or in a manner in which you would not be willing to fully disclose.
- Unreasonably relying on third parties' claims that business intelligence was obtained properly.



# Our Commitments in the Marketplace

## Q&A

**Q:** Do data privacy laws cover only Sensitive Personal Information, such as medical data, Social Security numbers, credit card numbers and financial account numbers?

**A:** No. Data privacy laws potentially apply to all information, including public information, that identifies or relates to an identifiable individual. For example, information about behaviors and lifestyle, contact details, preferences and internet protocol (“IP”) address, voice and image may be considered Personal Information protected by applicable data privacy laws when such information can be linked to an identifiable individual.

**Q:** What is meant by a valid business purpose for accepting gifts or entertainment?

**A:** Employees are paid by AIG to act in its best interests. An example of a valid business purpose for accepting entertainment would be lunch from a business partner to discuss business issues and build a stronger working relationship. In contrast, accepting gifts of personal items such as jewelry does not further a business interest of AIG. Such gifts should be declined as they may compromise employee loyalty or create an obligation to the giver.

**Q:** To help me do a better job at AIG, I kept several documents from my previous employer. These documents describe marketing initiatives my prior employer used. Can I use these documents at AIG?

**A:** If the documents contain your former employer’s confidential or proprietary information, then you cannot use or share this information. AIG expects all employees to honor any disclosure or use restrictions on confidential information obtained from former employers or other third parties. You may not use or share this information until you have consulted with your designated compliance officer.

**Q:** I want to purchase a new software solution for \$100,000. It is a leading product that is frequently used in the industry and will help AIG meet its business objectives. While I am unsure of contracting, I validated that the company offering this solution has an approved Category Based Risk Assessment (“CBRA”). Can I move forward with negotiations with the supplier?

**A:** No. AIG requires employees to adhere to the AIG Global Acquisition of Goods and Services Policy. Any new engagement or acquisition at this price point requires contracting. Prior to any communication with the vendor, GS&PS should be engaged through a sourcing request. If you are unsure of contracting, you must consult GS&PS.

# Our Commitments to Our Shareholders

Shareholders entrust their assets to us.  
AIG safeguards these assets by acting with  
integrity in all our business practices.

# Our Commitments to Our Shareholders

## Financial and Tax Reporting

Shareholders, business partners, regulators, analysts, and the general public rely on the integrity of our financial reports and tax records to evaluate the operational results and financial position of AIG and support their decisions.

Our financial reports must be truthful, complete, timely, fair, accurate and understandable. To ensure that we consistently meet these standards, only authorized employees may provide financial reports to external parties.

We must submit tax disclosures in compliance with applicable tax laws in the jurisdictions in which we operate, and they must be accurate and complete. We will not facilitate any activity by any person intending to breach applicable tax laws, which includes evading the payment of taxes or concealing information from tax authorities. Further, only authorized employees and agents may provide information regarding AIG's tax affairs to external parties.

## Accurate Business Records

Business records must always be prepared honestly and accurately. Information on business records must never be falsified or altered. We must never be dishonest or deceptive in maintaining AIG records, or otherwise attempt to mislead AIG's management, auditors, regulators or shareholders. Business records include information in any medium, including hard copies, electronic records, emails, instant messages, video and electronic storage media.

## Records Management

We must always comply with the [AIG Global Records & Information Management Policy](#) and all other applicable records and information management policies, standards, guidelines and procedures. These documents govern the retention and disposition of all information created, received or maintained by AIG in any medium, including but not limited to hard copies, electronic records, emails, instant messages, video and electronic storage media.

We must maintain information that has appreciable value to AIG operations and administration and/or information that is subject to legal, regulatory, or business retention requirements ("Company Records") for the period specified in the appropriate retention schedule ("Retention Schedule"). However, non-Company Records, including duplicates, drafts, transitory information and Company Records whose retention period has expired according to the applicable Retention Schedule, should be disposed of so long as they are not subject to a Preservation Notice.

A "Preservation Notice" (sometimes referred to as a legal hold) is a directive to employees from internal AIG legal counsel to preserve documents or information—whether in paper or electronic form and wherever stored or maintained—that concerns a pending or reasonably anticipated litigation.

When you receive a Preservation Notice you must take immediate steps to preserve—and must not delete, destroy, or otherwise alter in any manner—any documents and information that fall under the categories specified in the Preservation Notice until you receive written notice from internal AIG legal counsel that the Preservation Notice is no longer in effect, regardless of whether the retention period in the applicable Retention Schedule has expired. Questions about Preservation Notices should be directed to the individual who issued the Preservation Notice.



# Our Commitments to Our Shareholders

## Safeguarding AIG Resources

The protection of people and property are paramount to AIG. Global Security's role within the company was founded on principles designed to support the protection and safety of AIG personnel, customers, and physical assets.

### Physical Property

AIG property, including real estate, data, infrastructure, equipment and supplies, must be protected from misuse, damage, theft or other improper handling.

### Personal Security

Global Security works to identify and mitigate risk to AIG employees, assets and property through deterrence, detection, and response measures leveraged by a diverse regional security team positioned globally with backgrounds in law enforcement, military and private sector security.

The department's Global Security Operations Center (GSOC) operates 24/7, collecting and analyzing data while proactively responding to safety and security incidents wherever AIG conducts business, as well as providing business traveler assistance.

Employees should be vigilant with regards to security and should immediately report anything suspicious to Global Security. It is particularly important that any threats to employees and suspected cases of workplace violence are reported in a timely manner. In an emergency, always call your local emergency number as necessary.

### Travel Security

Global Security actively supports employees traveling on business to ensure appropriate risk mitigation measures are in place. Staff must comply with the [AIG Global Expense Management Policy](#) and book travel with the preferred AIG Online Booking Tools or Travel Management Companies. This enables the GSOC to be aware of employee travel plans; thus, enabling resilient response to provide assistance during an emergency.

Direct questions to +1 212-458-2020, or [gsoc@aig.com](mailto:gsoc@aig.com) or your respective Regional Security Manager for assistance.

## Intellectual Property

AIG intellectual property may include but is not limited to creative works, processes or inventions, typically having commercial value. There are five categories of intellectual property relevant to AIG's business: trademarks and service marks, copyrights, domain names, patents, and trade secrets. Each of us is required to safeguard the intellectual property belonging to AIG and its business partners and to respect the intellectual property of third parties.

Subject to local law, employees may be required to assign any invention (patented or not) developed at AIG or with AIG proprietary information, to AIG.

## Delivering on Our Commitments

### Intellectual Property

- Never improperly use AIG intellectual property.
- Never disclose non-public intellectual property, without approval.
- Protect AIG intellectual property by obtaining, or helping others obtain, patents, trademarks, service marks or copyrights as appropriate.
- Never use a previous employer's intellectual property without permission.
- Never use or copy software or documentation, except as specified in the licensing agreement. AIG respects the use restrictions placed upon software by the developer or distributor.

# Our Commitments to Our Shareholders

## Proprietary Information/Trade Secrets/Confidential Information

After you leave the Company, you may not use or disclose any proprietary information, trade secrets, or confidential information that you had access to or obtained as a result of being employed by the Company. This information includes, but is not limited to, business plans, customer information, vendor information, pricing information, competitive data and employee information.

You may not, for example, forward confidential information to your personal, non-AIG email address, computer or other device in anticipation of leaving AIG. You must return any confidential information before your termination of employment date. This provision supplements and does not supersede any confidentiality obligation you may have pursuant to any individual non-disclosure covenant in any agreement you have executed with AIG.

Your confidentiality obligation does not prevent you from raising actual or suspected Code, legal or regulatory violations to AIG or with a government agency (without notifying AIG) during or after your employment with AIG. You are not restricted from filing a complaint, communicating with, providing information to, or participating in an investigation or proceeding before a government agency.

## Warning Signs

### Avoid the following to Protect Our Sensitive Information

- Discussing confidential information loudly or openly when others might be able to hear.
- Discussing AIG proprietary information with third parties without authorization and a non-disclosure agreement in place.
- Discussing AIG proprietary information with customers or suppliers without proper approval and knowledge of the status of the relationship and whether the information is confidential or non-confidential.
- Improperly discarding confidential drafts and notes.

## Funds

AIG funds are to be used responsibly and solely for AIG business. Corporate credit cards issued to employees for payment of business expenses may not be used for personal expenses. Each of us has a responsibility to safeguard AIG funds from misuse or theft and ensure that AIG receives value when spending AIG funds. We may only seek reimbursement for actual, reasonable, and authorized business expenses in accordance with [AIG's Global Expense Management Policy](#).



# Our Commitments to Our Shareholders

## AIG Technology Resources

AIG's Technology Resources, and the information accessible through them, are valuable assets of AIG. Each of us has a responsibility to protect AIG's Technology Resources (whether the assets are used in an AIG office, at home or in any other location), and the information stored on them, from unauthorized access, damage, loss or theft, and to comply with all applicable AIG policies when using AIG Technology Resources. You are expected to use good business judgment when using AIG's Technology Resources, and to use AIG's Technology Resources in ways that promote ethical business practices.

**AIG Technology Resources** means and includes any (1) AIG-provided or approved computer, computer network, computer application, imaging device, storage device or media, mobile computing device or any other information technology hardware or software; and (2) other company information technology resources, such as telephones (including mobile phones), Internet access through an AIG network, Closed Circuit Television and building access systems, and, in each case, the data, information, files, and/or records contained on such resources. Examples of AIG Technology Resources include, but are not limited to, the following:

- Laptops, desktops and WYSE terminals
- AIG-provided or approved software applications
- AIG-provided or approved mobile phones, or the AIG container on personal mobile phones enrolled in AIG's BYOD program
- AIG-provided or approved tablets (e.g., iPads, Microsoft Surface tablets), or the AIG container on personal tablets enrolled in AIG's Bring Your Own Device (BYOD) program
- OneDrive and SharePoint
- Voice mail, email, SMS, text, and instant message services and messages
- Intranet (Connect) and Intranet
- Documents, spreadsheets, and other data, information, files, and/or records

When conducting business on behalf of AIG, employees must use only AIG's Technology Resources, and AIG Technology Resources must be used primarily for legitimate AIG business purposes. For the avoidance of doubt, non-AIG electronic messaging accounts and voice mailboxes must not be used for AIG-related business communications. Unless prohibited by AIG policy or applicable law or labor agreement, occasional, incidental, and appropriate personal use of AIG's Technology Resources (such as to make or receive a limited number of personal telephone calls) may be permitted if the use does not interfere with your work performance, have undue impact on the operation of AIG's Technology Resources, introduce additional risk to AIG, or violate any other AIG policy, guideline, standard or applicable law.

AIG's Technology Resources must not be used to:

- (1) create, store, or transmit information that is hostile, malicious, unlawful, sexually explicit, discriminatory, harassing, threatening, profane, abusive or derogatory;
- (2) intentionally access Internet web sites or other online services that contain similar content;
- (3) access an online platform to upload, provide, or otherwise use AIG Company Information unless the platform has been approved through the technology, legal, compliance, and other due diligence processes required by AIG's policies and standards;
- (4) upload or download any third-party intellectual property (e.g., software, movies, music, images, etc.) unless AIG has appropriate rights to such content;
- (5) conduct non-AIG related business or personal political activity.



# Our Commitments to Our Shareholders

## Q&A

**Q:** I think I found an error in a financial summary that will be submitted for inclusion in a public disclosure. How should I raise my concern?

**A:** It is critical that you notify someone with the authority to address the issue. The error could be serious. You have a responsibility to raise your concern with appropriate individuals immediately. If unsure, contact your manager, designated compliance officer, the Compliance Help Line at **+1 877-244-2210**, or email the Accounting Hotline at [accountinghotline@aig.com](mailto:accountinghotline@aig.com).

**Q:** My manager asked me to prepare a purchase order for services that cost \$30,000 USD. Her spending authority is only \$25,000 USD. Can I divide the order into two purchase orders to avoid getting higher-level approval?

**A:** No, you may not. Not getting the proper approvals violates AIG policy, which is designed to ensure that adequate internal accounting controls are maintained and operating effectively. If you are uncomfortable telling your manager, alert your designated compliance officer.

**Q:** I was attending a meeting with several other AIG managers in a hotel conference room. At lunchtime, everyone left their laptops in the unlocked room. I felt uneasy, but I did the same. Should I have done something else?

**A:** Yes, the situation should have been handled differently. The laptops and the information on them are AIG property and frequently include AIG Company Information. You have a responsibility to ensure that the equipment and information is protected from loss, theft or inadvertent disclosure. You and your co-workers should have either secured the equipment/ room or chosen someone to stay with the equipment.

**Q:** I just learned that employees of a vendor have been given broad access to our networks. I don't think they need that type of access to do their work. Isn't this putting AIG information at risk? What should I do?

**A:** You may be right, but you may not have all the information. You should first discuss the situation with your manager. If further actions are required, you or your manager should contact your designated compliance officer.

# Our Commitments as Corporate Citizens

Through our products, services and responsible business practices, AIG works to improve communities where we work, live and serve our customers. AIG complies with laws and regulations that apply to our businesses.

# Our Commitments as Corporate Citizens

## Sustainability

AIG's commitment to sustainability helps future-proof communities by addressing societal and environmental factors, while enabling economic progress. Driven by our Purpose and Values, we aim to take a holistic approach to deliver on our sustainability commitments, including achieving net zero emissions by 2050 or sooner across our underwriting and investment portfolios and our own operations. Our approach supports our business strategy and addresses expectations from many of our key stakeholders including investors, regulators, customers, distribution partners, suppliers, and employees.

Through AIG's Employee Sustainability Network, employees can support AIG's broader sustainability agenda and get involved in initiatives on a more local, grassroots level. The network provides a forum for employees to receive updates on global sustainability and climate-related efforts and connect with like-minded employees across the globe.

As a global insurer, AIG is well-positioned to leverage its risk expertise and data-driven philosophy to help mitigate greenhouse gas emissions and support our customers and communities in the transition to a low-carbon economy.

For additional information regarding AIG's Sustainability efforts, please visit the [AIG Sustainability website](#).

## Global Corporate Citizenship

AIG is committed to giving back to the communities we serve through programs and partnerships that leverage the skills, experience, knowledge and enthusiasm of our employees.

Through the AIG Volunteer Time Off Program, AIG employees can take up to 16 hours off per calendar year in hourly increments to volunteer with nonprofit/charitable organizations, including schools. AIG is also proud to support employees' generosity through the AIG Matching Grants Program. AIG matches employee donations 2:1 with a contribution up to \$10,000, per calendar year made by an eligible employee and/or their spouse/partner to a qualifying organization.

The AIG Compassionate Colleagues Fund (the "Fund") provides relief to help our employees overcome financial hardship due to unforeseen financial circumstances for qualified events and expenses. Employee donations to the Fund are eligible for a match through the Matching Grants Program.

AIG takes local partnerships and community investments seriously, and the range of our nonprofit collaborations reflects the diversity of our people. AIG helps global nonprofit partners advance their mission while connecting employees with the charitable sector. At this time, AIG does not accept unsolicited proposals for grants.

Employees participating in these programs or making contributions on behalf of AIG are responsible for certifying that they understand and abide by the requirements as outlined in the Program Guidelines and AIG's Employee Handbook. AIG treats employees' philanthropic endeavors as personal and private and no pressure should be applied to employees to volunteer, make donations, or utilize the Matching Grants Program. Any questions regarding these programs should be directed to AIG Global Corporate Citizenship. Global Corporate Citizenship Policies, Standards, Guidelines and Procedures apply to all employees to ensure we uphold the standards that best benefit AIG's brand and provide employees with the opportunity to drive meaningful societal impact.

For additional information regarding AIG's Corporate Citizenship efforts, please visit the [AIG Corporate Citizenship website](#).



# Our Commitments as Corporate Citizens

## Political Activities

Laws and regulations governing corporate political activities, lobbying, and contributions are complex. AIG's Government Affairs Groups (U.S. Federal, U.S. State, and International) ensure which activities are permitted and consistent with AIG's business strategy. The restrictions on political activities are detailed in the [AIG Policy on Lobbying and Political Activity](#).

- No employee should contact elected or appointed government officials in connection with political activities or lobbying on behalf of AIG without prior clearance from and coordination with the appropriate Government Affairs Group or legal department, as noted in the policy.
- AIG funds or assets are never to be used for political purposes without first consulting the appropriate Government Affairs Group.
- Only authorized representatives can contribute to candidates for public office on behalf of AIG.

Personal political activities or interests must not conflict with AIG responsibilities or imply AIG's support. Throughout voluntary political activity, no employee shall use AIG's name to imply sponsorship or endorsement or use corporate resources except as permitted by law. AIG employees considering candidacy for an elected public office must first obtain written approval from AIG's Global Chief Compliance Officer and should not use AIG's name other than identifying AIG as their employer.

## Trading in Securities

In conducting AIG business, employees often learn material information about AIG or other companies before the information is available to the public.

Transacting in securities while in possession of material nonpublic information, or "tipping" this information to others, is against AIG policy and violates the law.

The restrictions on the trading of securities—both AIG securities and those of other companies—are detailed in the [AIG Global Insider Trading Policy](#) (which applies to all employees and their immediate family members). Generally:

- You may not purchase, sell, or otherwise transact in AIG securities while in possession of material nonpublic information relating to AIG.
- You may not purchase or sell securities of another company, directly or indirectly, if you are in possession of material nonpublic information about that company obtained during the course of employment with AIG.
- When you are in possession of material nonpublic or confidential information about AIG, or about any other entity if such information was obtained in the course of your employment with AIG, you may not pass on (or "tip") that information to others or recommend that anyone purchase or sell the securities of AIG or that company.

All employees and immediate family members are prohibited from engaging in the following:

- Hedging transactions with respect to AIG securities;
- "Short selling" of AIG securities;
- Trading derivative securities, such as "put" or "call" options, forward contracts, equity swaps or collars related to AIG securities;
- Using AIG securities to support a margin debt, loan, or other extension of credit; and
- Pledging AIG securities.

There are additional restrictions on employees who are "Designated Officers" and "Access Persons" as those terms are defined in the [AIG Global Insider Trading Policy](#).

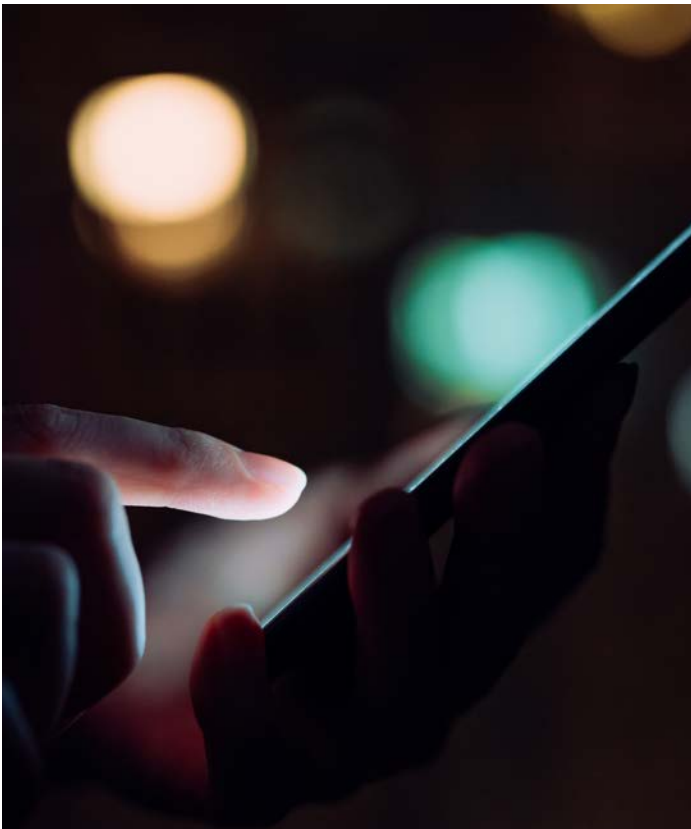
Prior to engaging in any securities trading activity, consult the [AIG Global Insider Trading Policy](#) to determine whether your transaction is permissible under the Policy. In addition, employees of certain AIG subsidiaries may also be subject to other insider trading policies, including pre-clearance and reporting obligations in regard to their personal trading activities.

Any questions about the [AIG Global Insider Trading Policy](#) or the rules and restrictions described above, should be directed to [AIGtradingpreapproval@aig.com](mailto:AIGtradingpreapproval@aig.com).

# Our Commitments as Corporate Citizens

## Money Laundering Prevention

AIG is committed to meeting its responsibilities to help prevent money laundering and terrorist financing. These responsibilities generally include identifying customers, monitoring customer activity and reporting suspicious or unusual activity consistent with applicable laws. Employees are required to abide by anti-money laundering policies established by AIG and its business units. Suspicious activity reporting requirements are time sensitive. Contact your manager or designated compliance officer as soon as you have a concern that an activity might be unusual or suspicious. For more information on this topic, please see the [AIG Global Anti-Money Laundering Policy](#).



## Economic Sanctions, Anti-boycott, and Export Control Laws

In compliance with U.S. and other applicable economic sanctions programs, employees are prohibited from conducting business with or benefiting:

- (1) designated individuals or entities (involved in or connected to certain activities, including global terrorism, weapons proliferation or narcotics trafficking);
- (2) certain countries, their governments (including government agents and government-owned entities) as well as nationals and private entities located in those countries; and
- (3) any entity in which one or more sanctioned persons—directly or indirectly—owns a 50% or greater interest. To determine if a party is subject to these prohibitions, consult with your designated compliance officer. Matters involving a confirmed sanctioned party, or where an employee is unsure, must be referred to Corporate Compliance's Financial Crimes Group ("FCG").

As a global organization, AIG employees may be required to follow economic sanctions or embargo laws of multiple jurisdictions. Because countries' laws may conflict, in such a situation it is important that you contact FCG.

Employees are prohibited from participating in boycotts that are not supported by the U.S. Government. If you are asked to participate in, or to provide information that may be used for the furtherance of such a boycott, report the matter immediately to your designated compliance officer.

Employees must also comply with applicable export control laws. To determine if exports or reexports, or insurance cover for such exports or reexports, are subject to controls or prohibitions, consult with your designated compliance officer.

For more information on these topics, please see the [AIG Global Economic Sanctions Policy](#), the [AIG Global Anti-Boycott Policy](#), and the [AIG Global Export Controls Policy](#).

# Our Commitments as Corporate Citizens

## Communicating with the Public

Only persons who are authorized to do so may speak on behalf of AIG, and the information they provide must be full, fair, accurate, timely and understandable. All requests from the media must be referred without comment to AIG's Corporate Communications Department or to the communications team supporting the Business Units in question. Employees are not permitted to make statements to or answer questions from the media without authorization.

All inquiries from broker-dealers, analysts, investment managers, other securities market professionals and security holders of AIG, must be immediately referred without comment to AIG Corporate Investor Relations.

If any material nonpublic information with respect to AIG is inadvertently disclosed in any external communication, the AIG General Counsel must be notified immediately so that public disclosure can be made promptly.

When communicating with the public on behalf of AIG, all AIG businesses and employees must promote accessibility of information and services to the public, including but not limited to, information provided through websites, forms or other communication devices. It is the obligation of each international country market, AIG Business Unit and Corporate Function to ensure compliance with this Policy through the implementation and maintenance of controls in accordance with applicable country, state and local accessibility laws, including the Americans with Disabilities Act of 1990.

## Communicating with Regulators and Other Government Officials

Inquiries from regulators and government officials—outside the normal course of AIG's regulatory relationships—must be reported immediately to a Global Legal Compliance & Regulatory representative (e.g., the designated compliance officer, assigned business unit lawyer or regulatory group) before a response is made. Responses to regulators must contain complete, factual and accurate information. During a regulatory inspection or examination, documents must never be concealed, destroyed or altered, nor should lies or misleading statements be made to regulators.

## Social Media

Social media usage can have an effect on AIG's reputation. Social media, or websites and online tools that allow users to interact with each other, may lead to disclosure of AIG's confidential or proprietary information, the transmittal of unlawfully harassing, threatening, defamatory or discriminatory comments about AIG, its employees and/or customers, or violate local, state, or federal laws, or the rules of self-regulatory organizations. Even though some social media sites are inaccessible through AIG's IT Systems, AIG has an interest in your use of social media both at and outside of work. Unless you have been expressly authorized by management to speak on behalf of AIG, when using social media you must make it clear that the views expressed are yours alone; in no event should you ever give the impression that you are speaking on behalf of AIG. Any questions about the use of social media, or the applicable [policies](#) or [guidelines](#) governing the use of social media, should be directed to your designated compliance officer, AIG Corporate Communications, or Global Employee Relations.

## Government Business

Doing business with governments may present different risks than business in the commercial marketplace. Laws relating to contracting with international, federal, state, and local agencies generally are more stringent and complex. Certain conduct and practices that might be acceptable in the commercial setting may be prohibited in the public sector. You should therefore consult with management or your designated compliance officer before you make any decision about doing business with government entities.





# Our Commitments as Corporate Citizens



## Anti-Corruption and Bribery

We must never use improper means to influence another's business judgment. No employee, agent or third party acting on AIG's behalf may provide bribes or other improper benefits to another person in order to obtain or retain business or an unfair advantage in any business interaction.

Payments or promises to pay something of value to obtain or retain business or otherwise secure an improper advantage must never be made to a government official or employee. Government officials may include employees of enterprises that are controlled or owned in whole or in part by a government.

Anti-Corruption laws also prohibit the creation of inaccurate or false books and records, and they require companies to develop and maintain adequate controls regarding corporate assets and accounting. All employees and officers, no matter where they are located, are required to comply with applicable U.S. anti-corruption laws such as the U.S. Foreign Corrupt Practices Act and the Foreign Extortion Prevention Act, and to any applicable non-U.S. anti-corruption laws such as, for example, the U.K. Bribery Act of 2010.

Any employee who has knowledge of, or in good faith suspects, a violation of any of these laws, regulations, or policies must report them promptly to their designated compliance officer. For more information on this topic, please see the [AIG Global Anti-Corruption Policy](#).

# Our Commitments as Corporate Citizens

## Q&A

**Q:** I heard from my manager that a new supplier is being used in connection with a newly-developed product that will be announced to the public in four weeks. Investing in that supplier seems like a great investment idea. Can I let others know?

**A:** No. This type of information is considered material nonpublic information. You cannot trade while possessing it, nor should you share it with others.

**Q:** An executive of a state-owned company has suggested that if we make a donation to a local charity, he believes our sales efforts in his country would be more favorably received. I'm uncomfortable with this. What should I do?

**A:** You are right to be uncomfortable. The payment may be a violation of anti-bribery laws. Discuss the situation with your designated compliance officer.

**Q:** If I am asked to comment about AIG's financial outlook by a member of the media, may I give my opinion if I state it as such?

**A:** No. You may not provide any comments or personal opinion to the press without prior approval from AIG Corporate Communications. Refer all media requests for information without comment immediately to Corporate Communications.



The AIG Code of Conduct is not an employment contract. Nothing in the Code of Conduct should be construed as a promise of any kind or as creating a contract regarding wages or any other working conditions. Employees have the unqualified right to terminate their relationship at any time for any reason, subject to any written employment arrangement. Likewise, subject to any applicable laws and any written employment arrangement, AIG has the right to discharge or discipline any employee with or without just cause or prior warning.

Employees can reference AIG Corporate Policies on AIG's intranet.