



AIG SUPPLIER CERTIFICATION PROGRAM

SUMMARY

A. Purpose and Scope

American International Group, Inc., and its Affiliates (collectively, “AIG”) have developed certain requirements to ensure that our Suppliers are qualified and reputable. This document is a summary of AIG’s screening program (the “Supplier Certification Program”), which was established to ensure that Suppliers and Supplier Personnel comply with those requirements.

AIG Global Security, in conjunction with a third-party vendor that conducts background screening for AIG (the “AIG Screening Provider”), administers the Supplier Certification Program. Suppliers and Supplier Personnel must complete the background screening before they can provide Services to AIG.

Unless defined herein, all capitalized terms have the meanings ascribed to such terms in the Master Agreement between AIG and a Supplier.

B. Requirements

1. *Supplier Screening.* Screening of Suppliers is a part of AIG’s third-party risk management process. AIG requires Company Background Check Due Diligence screening of all Third Party Privately Held Companies. AIG reserves the right to also require the background checks of all principal owners of a privately held company. AIG requires screening during onboarding and every five (5) years thereafter.

a. Exemptions

- 1) The company is publicly traded or owned by a public company
- 2) There is a Country exception – if the background check or specific elements thereof violates local laws, regulations, or customs
- 3) The company has a government-imposed licensing/certification requirement (e.g. agents, brokers, attorneys/law firms, physicians/hospitals, certified public accountants, banks, insurance companies, third party administrators, independent commissioners/directors, state/federal auditors, etc.)



2. *Worker Screening*. Background checks are required for the employees of Supplier or Supplier Personnel (collectively, "Workers") who require (i) routine, unescorted access to AIG's facilities (owned or leased) and/or (ii) access to AIG's Information Systems (collectively, "Access")
 - a. Labor Unions. Members of a labor union are not exempt from compliance with the Supplier Certification Program.
 - b. Prohibitions on Screening. If the background check (or elements thereof) of a Worker would violate local laws, regulations or practices, then AIG and the Supplier will discuss appropriate modifications to the background check that will preserve, to the greatest extent possible, the intent of the impermissible element(s)
 - c. Exemptions.
 - 1) Validated Third-Party Screening Programs. Screening by the AIG Screening Provider is not required if Supplier's screening program is approved in connection with the Validated Third-Party Screening Program discussed in Section D. below.
 - 2) Government-Imposed License. If a Worker (or his or her employer) holds a government-imposed license or certificate to lawfully perform Services for AIG (e.g., broker, attorney, physician, registered nurse, public accountant, accounting firm, third-party administrator), then such Worker is exempt from the background check by the AIG Screening Provider, provided that the Worker gives proof of that license or certification
 - 3) Facilities Personnel. In certain instances, and at AIG's sole discretion, certain services engaged by a property owner, such as cleaning personnel, security, engineers, property management staff, will be exempt from background screening

C. Worker Background Screening

1. *Website for Worker Applications*. Workers who require Access must visit the website designated by AIG (<https://aig.carcogroup.com/>) to prepare and submit their applications and all appropriate consent forms



2. *Worker Background Screening Process.* The AIG Screening Provider will be responsible for the following actions during the screening process, some of which will be in conjunction with AIG GlobalSecurity –
 - a. Obtaining appropriate consent forms (*e.g.*, in the United States, as required by the Fair Credit Reporting Act (“FCRA”) and applicable state law)
 - b. Comparing the results of the screening against a pre-approved decision matrix to identify adverse information (if any), and then providing such information to AIG Global Security, which will then adjudicate the background screening as either “pass” or “fail.”
 - c. Without disclosing the basis for the decision, notifying the AIG and Supplier points of contact—in accordance with applicable law (*e.g.*, the FCRA)—whether access was approved or denied.
 - d. Limiting access to the background results forms and the data contained therein to the AIG Screening Provider and AIG Global Security
 - e. Notifying the Worker (to the extent required by applicable law, *e.g.*, the FCRA) when adverse information results in the denial of access, in which case the Worker will have five (5) days to respond should he or she believe that the information received during the background check is not factual or accurate
 - f. If the Worker does not respond during the five-day period or if he or she fails to establish that the results of the background check are not factual or accurate, then, to the extent required by applicable law (*e.g.*, the FCRA), a second adverse notification will be sent to the Worker and to the Supplier and AIG POCs confirming that the Worker remains ineligible for Access
 - g. All pertinent data findings regarding Supplier and Worker screening, regardless of the results of the screening, will be maintained in the Supplier Certification Program database.

D. Participation in the Validated Third-Party Screening Program

1. Suppliers may use a Worker screening provider other than the AIG Screening Provider by participating in AIG’s Validated Third-Party Screening Program (as described below), provided that –



- a. The Supplier completes an application for each country in which it is seeking to implement the alternative screening program
- b. An audit by AIG determines that the Supplier's alternative program meets or exceeds AIG's standards and criteria for participation
- c. The Supplier's alternative program is approved to participate on a country-by-country basis by AIG Global Security
- d. The Supplier agrees in the Master Agreement or in another agreement with AIG to comply with the requirements of the Validated Third-Party Screening Program and to submit to a recertification of the alternative screening program every five (5) years

2. *Noncompliance with Validated Third-Party Screening Program*

- a. If AIG determines that a Supplier or its alternative screening provider is not compliant with the requirements of the Validated Third-Party Screening Program, then the Supplier will have ninety (90) days to remediate the deficiencies, during which time the validated status will remain in place as "under review"
- b. The Supplier will be removed from the Validated Third-Party Screening Program if it does not remediate the deficiencies within 90 days, in which case new Workers who require Access will be required to complete the screening described in Section C above

3. *Previous Denials.* If a Supplier's previous application to participate in the Validated Third-Party Program was denied, then the Supplier may reapply by correcting the identified deficiencies

E. Revocation

Access is a privilege that may be revoked at any time and for any reason by AIG Global Security.