



AIG SUPPLIER DIVERSITY POLICY

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[1.] PURPOSE

To establish and maintain the governance framework and controls for providing the opportunity for Diverse Suppliers to compete for consideration and use by AIG for the Acquisition of Goods and Services in the United States (U.S.).

This Policy may be supplemented by Standards, Procedures, Guidelines or other policy-related documents, in which case this Policy must be read in conjunction with them, see [Related Information](#).

Defined terms in this Policy are capitalized and defined at the end of the document, see [Glossary](#).

[2.] SCOPE

This Policy applies to all Employees of AIG in the U.S. engaged in the Acquisition of Goods and Services from Vendors.

[3.] POLICY STATEMENT AND REQUIREMENTS

This Policy provides the minimum requirements to establish and maintain a governance framework and controls for the consideration and engagement of qualified Diverse Suppliers for the Acquisition of Vendor Goods and Services in the U.S.

3.1 Roles and Responsibilities

3.1.1 Global Sourcing and Procurement Services

The Chief Procurement Officer is responsible for establishing and overseeing the governance and controls framework for supplier diversity in the U.S. This includes the establishment and ongoing monitoring of metrics and analytics to evaluate and assess the effectiveness of the AIG Supplier Diversity Program (the Program) and compliance with this Policy.

Global Sourcing & Procurement Services (GS&PS) is responsible for:

- Developing and maintaining category strategies that take into consideration opportunities for Diverse Suppliers where feasible;
- Collaborating with Business Units and Corporate Functions in setting the sourcing strategy, including the identification, consideration and use of Diverse Suppliers;
- Engaging with Diverse Suppliers to inform them of contracting opportunities; and

- Identifying Vendors who should be encouraged in the competitive sourcing process (i.e., request for information (RFI), request for quote (RFQ) and request for proposal (RFP)) and contracting process to utilize diverse-owned businesses where possible.

3.1.2 AIG Supplier Diversity

The Head of AIG Supplier Diversity is responsible for the ongoing management and maintenance of the Program and for:

- Engaging sourcing professionals from Global Sourcing and Procurement Services (GS&PS) and Business Units and Corporate Functions with U.S. generated expenditures for the purposes of fulfilling the requirements of the Program;
- Coordinating outreach to Diverse Suppliers with GS&PS; and
- Establishing and maintaining metrics and analytics to measure the effectiveness of the Program.

3.1.3 Business Units and Corporate Functions

Business Units and Corporate Functions must collaborate with GS&PS in the identification, consideration, and use of Diverse Suppliers, including:

- Engaging GS&PS as soon as a business need is identified which requires goods and services to be purchased from a Vendor, as specified in and to comply with the **AIG Acquisition of Goods and Services Policy**, as well as, to provide sufficient time to determine potential opportunities for Diverse Suppliers to fulfill such needs.

3.2 Minimum Requirements

3.2.1 Supplier Diversity Program

AIG shall maintain a Supplier Diversity Program in the U.S. to promote a diverse supplier pool and to:

- Identify business opportunities for Diverse Suppliers in AIG's Acquisition of Goods and Services;
- Match opportunities to Diverse Suppliers who can meet AIG's requirements for cost, service and scale;
- Conduct outreach to Diverse Suppliers and inform them of contracting opportunities for these businesses to participate in the Acquisition of Goods and Services by AIG; and
- Promote the utilization by AIG's Vendors of diverse-owned businesses where possible.

3.2.2 Certification

In order to ensure engagement with legitimate Diverse Suppliers, AIG requires diverse-owned businesses to be certified by an independent third party. Only those businesses with a current certification from any of the following organizations will be counted as part of AIG's Supplier Diversity Program:

- [National Minority Supplier Development Council \(NMSDC\)](#)
- [Women's Minority Business Enterprise National Council \(WBENC\)](#)
- [National Gay and Lesbian Chamber of Commerce \(NGLCC\)](#)
- [US Department of Veteran Affairs](#)
- [United States Business Leadership Network \(USBLN\)](#)
- State and local municipalities

Additional requirements such as Federal, State and Municipal government certifications may be specified in Program Guidelines, as will the timing and methodology for the submission by Diverse Suppliers of any required certifications to AIG.

3.2.3 Metrics and Analytics:

Metrics and analytics must be developed and maintained to a) evaluate and assess AIG's United States supplier diversity and the effectiveness of the Program, and b) monitor compliance with this Policy.

[4.] CONTACT INFORMATION

Questions relating to this Policy should be addressed to: supplierdiversity@aig.com

Employees may also 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.

Requests for exceptions to this Policy must be sent to the policy document owner or authorized designee. No exception will be valid until the receipt of written approval of such exception.

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

[5.] RELATED INFORMATION

- **Corresponding Policies, Standards, Procedures, Guidelines or other documents**
 - [AIG Global Acquisition of Goods and Services Policy](#)
- **Forms/Appendices**
 - N/A

[6.] GLOSSARY

For purposes of this Policy, the following definitions apply:

Acquisition - The sourcing, procurement, contracting, engagement and/or ordering (including via purchase orders) of Goods and Services from Vendors.

American International Group, Inc. / AIG / Company - These terms refer to American International Group, Inc. and its consolidated subsidiaries.

Business Unit - Any individual business division, unit, segment, subsidiary or collection thereof of AIG that is intended to generate revenue as a profit center.

Corporate Function - Any department or division of AIG the purpose of which is to provide functional or other support to AIG and/or a Business Unit.

Diverse Suppliers – US-based, for-profit enterprises that are at least fifty-one percent (51%) owned and operated by one of the following groups:

- Minority
 - African-American
 - Latino/Hispanic (origins from Mexico, Central and South America or the Spanish speaking countries of the Caribbean basin)
 - Asian (includes Asian Indian)
 - Native American (includes Native Pacific Islander, Eskimo)
- Women
- LGBT (Lesbian, Gay, Bisexual, Transgender)
- Veteran
- Disabled

Employee - A full-time or part-time employee, eligible for some or all benefits and paid on AIG payroll. This includes internal agents and intern/trainees or apprentices who are paid on AIG payroll.

Goods - Tangible products and items provided by a Vendor.

Guidelines - Guidance or recommended best practices that: 1) support implementation or interpretation of policy requirements; or 2) address areas not covered by existing policy documents since the organization is not ready to set mandates.

Operated – Exerting day-to-day management of a vendor including strategy and P&L management.

Owned – Having legal authority as having full claim, authority, power, dominion, etc. over the vendor company.

Policy - Formal statements of principles or rules that explain legal, regulatory and/or organizational requirements and that regulate organizational actions and employee conduct (what can and cannot be done, as well as what decisions or activities are appropriate).

Procedures - Steps (sequence of actions and instructions) necessary or that help implement and/or support policy requirements.

Services - Activities or processes provided by a Vendor.

Standards - Detailed requirements that support a Policy, including how to comply/follow the principles or rules set out in a Policy.

Vendor - A third party that sells Goods and, or Services to AIG.

Key Policy Document Information:

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