



[1.] PURPOSE

American International Group, Inc. is a global company, and wherever we operate, and across every part of our business, we strive to create an inclusive culture. We believe that valuing equal opportunity, belonging and inclusiveness is a competitive differentiator enabling us to achieve our vision to create unmatched value for our customers, colleagues, business partners and shareholders.

[2.] SCOPE

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

[3.] PHILOSOPHY STATEMENT AND REQUIREMENTS

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

Our Commitment

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

- Communication is respectful between all employees regardless of title or level.
- All perspectives and voices are valued; employees are not alienated or excluded because they don't fit into a set of cultural norms.
- A culture where employees feel that their background and lifestyle do not affect perceptions of them as a professional or affect their opportunities for development and promotion.

Managers and employees are expected to ensure that there is a work environment free of all forms of discrimination and harassment.

Managers Responsibilities

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

Employees Responsibilities

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

Equal Opportunity

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

Discriminatory Harassment and Bullying

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

Harassing conduct includes but is not limited to:

- epithets, slurs or negative stereotyping;
- threatening, intimidating or hostile acts;
- denigrating jokes;

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

Workplace Bullying includes but is not limited to:

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

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

Sexual Harassment

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

- The submission to or rejection of such conduct is made a condition of the employee's continued employment, or used as the basis for any employment decisions affecting the employee; or
- The conduct, if unwelcome and severe or pervasive, creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an employee's work environment.
- Examples of what may constitute sexual harassment, besides sexual advances and requests for sexual favors include, but are not limited to:
- Verbal: suggestive comments; statements or questions about personal sexual matters; insults, threats or jokes about personal or physical traits; or jokes of a sexual nature (including innuendos).
- Non-verbal: suggestive or insulting noises; obscene gestures; or the use of literature, e-mails or pictures which are sexually suggestive, revealing, demeaning or pornographic.
- Physical: touching, pinching, rubbing or massaging the body; coercing sexual relations; or assault.

Employee Resource Groups

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

ERGs are voluntary, Company-endorsed networks aimed at fostering an inclusive work environment aligned with the Company's mission, values, business practices and objectives. While ERGs often center around a specific dimension such as ethnicity, sexual orientation, disabilities, they are open to all employees. ERGs are also sometimes called affinity groups or network groups.

Religious Accommodation

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

Disabilities Accommodation

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

What is an Accommodation?

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

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

How to Report Discrimination or Harassment

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

[4.] CONTACT INFORMATION

Questions relating to this philosophy should be addressed to your local Human Resources or to your local Employee Relations professional. Employees may also ask questions, raise concerns or report instances of potential non-compliance with this philosophy 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 philosophy.

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