

CODE OF CONDUCT

To All AIG Employees:

Our uncompromising commitment to act with integrity and conform to the highest ethical standards depends on individual decisions that we make every day. We are all responsible for the way that AIG conducts its business, as well as how it is perceived by our policyholders, customers, shareholders, business partners and employees.

I know that each of you will join me in complying with the policies in this Code of Conduct, as well as all other policies, laws and regulations that apply to your AIG company, profit center or unit. In addition, let me remind you that we have compliance officers throughout AIG who can help you address issues of ethics and lawful behavior.

In short, whatever our jobs may be, ethics and compliance must be everyone's responsibility.

A handwritten signature in black ink, appearing to be 'C. LaB...', is positioned at the bottom right of the page. The signature is fluid and stylized, with a long horizontal stroke extending to the right.

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Introduction

It is essential to the proper functioning of, and maintenance of public confidence in American International Group, Inc. and its subsidiaries worldwide ("AIG") that each AIG employee performs his or her duties with honesty and integrity.

All officers and other employees of AIG and its subsidiaries worldwide ("AIG employees") are subject to this Code of Conduct ("Code"), in addition to any other applicable policies or standards that have been established by any individual AIG subsidiary.

This Code provides principles of conduct for AIG employees. As a practical matter this document cannot cover every possible policy and procedure. AIG employees are expected to make themselves aware of all policies that apply to their job functions.

Additional information with respect to AIG's policies and procedures can be found at the AIG Corporate Legal Compliance Web site on the AIG Intranet at <http://aignetprod.aig.com/cfcompliance/index.cfm> or by contacting the AIG Corporate Legal Compliance Group at (212) 770-3625.

Officers and employees who are specifically designated by their company president or manager are required to complete an annual questionnaire to re-certify their compliance with this Code.

Important Notice: This Code is NOT a Contract. Nothing in this Code should be construed as a promise of any kind, or as creating a contract regarding wages or any other working conditions. AIG employees have the unqualified right to terminate their employment relationship at any time for any reason; likewise, AIG has the right to discharge or discipline any employee with or without just cause or prior warning.

This takes priority over any other provision in this Code and any promise, oral or written, made by any officer or employee of AIG.

If any provision of this Code of Conduct is not permitted by the local laws of a country or jurisdiction in which an employee works, then such local law shall supersede that provision of the Code of Conduct with respect to that employee.

This Code of Conduct and other AIG policies and procedures may be updated or amended from time to time. AIG employees are required to stay informed of any updates or amendments, and to comply with all provisions of this Code. This Code of Conduct can be viewed on AIG's Internet web site at www.AIG.com and on AIG's intranet site at <http://aignetprod.aig.com/cfcompliance/2003AIGcoc.pdf>.

Ethical Business Standards

AIG Employee Conduct

Non-Discrimination and Non-Harassment

- AIG employees must deal with policyholders, producers, prospects, suppliers, job applicants and other AIG employees without regard to race, color, religion, sex, national origin, age, disability, military service, marital status or sexual orientation. All business decisions shall be considered on their own merits without regard to any characteristic protected by applicable law. *AIG Employee Handbook*—<http://aignet.aig.com/corptran/handbook/hbook.htm>
- It is AIG's policy to maintain a working environment free from discriminatory harassment. Therefore, any form of unlawful discrimination, including harassment based on race, color, religion, gender, national origin, age, disability, military service, marital status, or sexual orientation or any other characteristic protected by law, is strictly prohibited.

Substance Abuse

- To protect employees and AIG from the abuses of illegal or controlled substances or alcohol, AIG's policy calls for disciplinary action up to and including termination for anyone who uses, sells, possesses or is under the influence of illegal drugs or inappropriate or excessive use of alcohol while conducting business for AIG, whether or not consumed during working hours or whether or not consumed on AIG's premises. AIG reserves the right, in certain circumstances, to test for the presence of illegal or controlled substances.

Health, Safety and Environmental Protection

- AIG is committed to conducting its business in a manner designed to protect the health and safety of its employees, its customers and the environment. AIG employees must comply with all relevant laws and regulations, and must promptly report to their management any conditions that may pose a health, safety or environmental hazard.

Conflicts of Interest

- AIG employees must not permit any business decision, such as a decision as to whether AIG will do business with an insured, producer, intermediary, reinsurer, prospect, counterparty or supplier to be influenced, or appear to be influenced, by interests unrelated to AIG. A decision to place AIG business with such entities and the volume of such business must be based solely upon business considerations.
- AIG employees owe a duty to AIG to advance AIG's legitimate business interests when the opportunity to do so arises. AIG employees are prohibited from taking for themselves (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless AIG has been already offered and declined the opportunity.
- AIG employees must not knowingly permit themselves to be placed in a position where their interest could be perceived as potentially or actually adverse to AIG's.
- Transactions involving AIG and a member of an AIG employee's immediate family (e.g., spouse, child, sibling, parent or in-law) or an individual who has a close personal relationship with an AIG employee must be brought to the attention of the AIG employee's manager to determine if the transaction poses a perceived, potential or actual conflict of interest.
- An AIG employee must maintain sound personal financial conditions so as to avoid any distractions that may prevent him or her from carrying out his or her responsibilities to AIG.

Duty of Loyalty

- An AIG employee must maintain the confidentiality of AIG's business information both during and after his or her employment with AIG. This includes, but is not limited to, human resources and employee salary and benefits information, business strategies and plans and other proprietary information, as outlined in this Code and the relevant AIG policies and procedures relating to confidentiality, privacy and theft of trade secrets.
- An AIG employee planning to leave AIG may not solicit or encourage another AIG employee to leave the employment of AIG.

Gifts and Entertainment

- In all matters related to gifts or entertainment, it is the responsibility of the AIG employee to exercise good judgment. Offering and/or accepting gifts and entertainment is appropriate provided there is a specific business purpose, the expenses incurred are ordinary and necessary and the gift or entertainment falls within the guidelines of the *AIG Travel and Entertainment Policy*, this Code and all relevant laws and regulations.

<http://aignet.aig.com/corpadm/domplcy/T&E Expenses>

- AIG employees may not accept or present a gift or entertainment (including, but not limited to, beverages, recreation, lodging, transportation and tickets) for the purpose of improperly influencing good business judgment in any business dealing or transactions involving AIG or any business or enterprise associated with AIG.
- A *gift* is any item of monetary value presented to an AIG employee by a non-AIG employee or any item of monetary value presented to a non-AIG employee by an AIG employee.
- *Entertainment* (including, but not limited to, beverages, recreation, lodging, transportation and tickets) is an event with a specific business purpose. Entertainment must include the presence of an AIG employee. AIG does not consider entertainment of a non-AIG employee as a gift, as long as both an AIG employee and a non-AIG employee are present during the event.
- *Minimal value* means retail value in the United States at the time of acceptance of \$150.00 or less.

Gifts

Accepting Gifts

■ An AIG employee may accept and retain gifts of minimal value, if the value of the gift is in line with accepted business practices and could not be construed as improperly influencing good business judgment. AIG employees may not receive gifts on a regular or frequent basis from the same source. The AIG employee is responsible for determining that a gift is of minimal value at the time of acceptance.

■ An AIG employee who has been offered a gift or entertainment that exceeds minimal value and therefore cannot be personally accepted under this Code, may accept the gift on behalf of AIG, if refusal, reimbursement at the fair market value or return would cause offense or embarrassment or would otherwise adversely affect the relationship of AIG to the gift giver. A tangible gift of more than minimal value is deemed to have been accepted on behalf of AIG and, upon acceptance, shall become the property of AIG.

■ If an AIG employee accepts a gift of more than minimal value, the employee must submit a written gift report to his or her manager within thirty days. Managers are responsible for collecting gift reports and filing them with the Internal Audit Department. Holiday season gift reports must be filed by February 1. *AIG Domestic Corporate Policy Guide, Business Expense Policy*—<http://aignet.aig.com/corpadm/domplcy>

Offering Gifts

■ Gifts must be in good taste and without excessive expense.

■ Prior written approval from a manager is required before purchasing a gift whose value equals or exceeds minimal value as established by this Code. Verbal approval by a manager is sufficient to order gifts whose costs are between U.S. \$25 and \$150; however, the expense must be approved in writing by a manager. *AIG Domestic Corporate Policy Guide, Business Expense Policy*—<http://aignet.aig.com/corpadm/domplcy/>

Entertainment

Accepting Entertainment

■ Invitations for excessive or extravagant entertainment or invitations for entertainment not in good taste and/or without a specific business purpose must be declined.

■ If a non-AIG employee is not present at an entertainment event paid for by a non-AIG employee, the entertainment should be regarded as a gift and subject to the monetary gift limitation discussed above.

Offering Entertainment

- Entertainment offered by an AIG employee must be for a specific business purpose and in good taste.
- If an AIG employee is not present at an entertainment event paid for by the AIG employee, the entertainment will be deemed a gift and subject to the monetary gift limitation discussed above.

Outside Business Activities*For-Profit*

- AIG employees must obtain written approval from their manager/department head before accepting outside employment or serving as a director, trustee, officer, owner, partner or consultant of a for-profit organization, regardless of whether compensation of any form is received. The AIG employee's manager should send a copy of the written approval to the AIG Corporate Legal Compliance Group.

Not-For-Profit

- AIG employees desiring to serve as a director, trustee, officer, owner or partner of a not-for-profit organization as a volunteer and without compensation (for example, on the board of a school, hospital, cooperative or social organization) need not obtain prior approval if there is no actual, potential or perceived conflict of interest. If an actual, potential or perceived conflict of interest does arise, AIG employees must avoid even the appearance of impropriety in association with their conduct. All conflicts of interest should be disclosed to the AIG Corporate Legal Compliance Group.

Honorariums

- An AIG employee who is compensated for making an oral presentation, writing a magazine article or engaging in similar activities prepared or conducted using the time or facilities of AIG must report that compensation in writing to his or her manager. Such compensation, other than nominal honorariums (\$150 or less) appropriate under the circumstances, will either be declined or paid to AIG.

Trading in Securities

- AIG employees, while employed by AIG, often learn of important information about AIG or other companies that has not been provided to the public. It is illegal and against AIG policy for an employee to buy or sell or otherwise speculate in securities on the basis of material non-public information. This type of illegal conduct is referred to as “insider trading.” Passing on or “tipping” material non-public information to someone who may buy or sell securities may also be a violation, by both the person who provides the information and the person who receives it.
- AIG employees are prohibited from engaging in speculative or “in and out” trading in the securities of American International Group, Inc. and its subsidiaries.
- AIG prohibits hedging and derivative transactions in the securities of American International Group, Inc. and its subsidiaries (other than transactions in employee stock options and other securities granted or awarded by AIG). These transactions are characterized by short sales, “put” or “call” options, swaps, collars or other similar derivative transactions.

Political Activities

- AIG employees are encouraged to participate in community affairs, and to support the political party or candidate of their choice.

Holding Political Office

- An AIG employee wishing to run for political office or accept a political appointment must obtain prior written approval from AIG’s General Counsel through the AIG Corporate Legal Compliance Group.
- AIG employees are not permitted to use AIG’s name in connection with any political campaign other than to state that they are employed by AIG.

Making Political Contributions

- No AIG funds or any other AIG asset may be used for political purposes without first consulting with the AIG Vice President–Corporate Affairs. This requirement does not prohibit political contributions through the AIG Political Action Committee (“PAC”).
- All corporate contributions to political candidates for public office must be made in strict compliance with governing law and the AIG Policy on Political Contribution and Political Activity. *AIG Policy on Political Contribution and Political Activity*–
<http://aigprod.aig.com/cfcompliance/polcontrib.pdf>
- Due to the complexity and diversity of laws and regulations governing corporate political activities and contributions, AIG employees must consult with the AIG Corporate Affairs Department in New York at (212) 770-6114 and/or the State Relations Group of the AIG Corporate Law Department at (212) 770-5235, to ensure such contributions and activities are permitted and that they fit within AIG’s overall business strategy for the region.

Communicating with Regulators and Others

- In the event of an inquiry from an industry regulator—via telephone, mail or personal visit—an AIG employee must contact his or her designated AIG attorney.
- Requests from regulators for information should be answered with complete, factual and accurate information. During an inspection or examination, AIG employees must not conceal, destroy or alter any documents, lie or make any misleading statements to any regulatory agency representative or cause another person to do the same.
- AIG employees must refer other external requests for information (e.g., press or media inquiries) to the AIG Corporate Communications Department in New York at (212) 770-3144 or, if more appropriate, to the AIG employee’s designated AIG attorney.
- If an AIG employee is served with legal documents (e.g., a subpoena), he or she must notify his or her designated AIG attorney immediately by telephone or e-mail, and the documents are to be sent to that designated AIG attorney without delay.

Use of AIG's Information Technology Systems

- AIG's computers, networking resources, electronic communications systems (including e-mail), telephone and voice systems and other computer-processed information (collectively, "AIG's information technology systems") are the property of AIG, and are provided as a tool to enhance and facilitate business-related communications. AIG employees, therefore, should use AIG's information technology systems to provide service to customers and for other business purposes. AIG employees should have no expectation of privacy when accessing and using AIG's information technology systems, and AIG retains the right to monitor, access, review, copy, delete and disclose such information or activity, even those marked private, without notice to or consent of the employee (unless not permitted by the local laws of a country or jurisdiction in which an AIG employee works). *AIG Employee Handbook*—<http://aignet.aig.com/corptran/handbook/hbook.htm>; *Information Systems Management Policies – PS 712 EMail and PS 713 Internet Security* - <http://aignet.aig.com/corpadm/dompolicy/>
- AIG's employees must treat e-mail messages and any other communications sent or received using AIG's information technology systems as official business correspondence.
- AIG's information technology systems may not be used to create, store or transmit information that is hostile, malicious, unlawful, sexually explicit, discriminatory, harassing, profane, abusive or derogatory towards others. AIG's information technology systems may not be used to intentionally access web sites which contain illegal, sexually explicit or discriminatory content.
- AIG employees are required to exercise the highest standards of corporate and social behavior in all of their information technology systems usage, language and communications.
AIG Employee Handbook—<http://aignet.aig.com/corptran/handbook/hbook.htm>

Business Information

Accurate Records

- AIG business records must always be prepared with accuracy and reliability. The details of AIG's relationships and transactions with those with whom it does business must be accurately entered in its books and records.
- AIG employees may not alter or falsify information on any record or document.
- Compliance with applicable generally accepted and statutory accounting principles and controls is expected at all times.
- No AIG employee shall take any action to fraudulently induce, coerce, manipulate or mislead AIG's independent auditors.

Document Retention

- AIG employees must comply with AIG's Records Management Policy and any relevant records management policies implemented by their companies, affiliates, corporate departments or business units. Documents, records and data must be preserved as required by those policies, and may be destroyed only as authorized by those policies. Destruction of documents, records or data in accordance with those policies may be suspended at any time upon notice of a litigation or threat of litigation, investigation (internal or external) or regulatory inquiry. If you believe that any documents, records or data in your possession or in your control are, or may be, the subject of litigation, audit, or investigation, you must notify and consult with your designated AIG attorney. The failure to maintain required documents, records or data may result in criminal and civil proceedings against AIG and the employee. *AIG Records Management Policy*-
<http://aignetprod.aig.com/cfcompliance/Executive%20Summary%20Records%20Retention.pdf>

Confidentiality, Customer Privacy and Data Security

- AIG employees must comply with applicable privacy and data security laws, as well as applicable contractual requirements, when handling personal information and business data collected in the course of conducting business. Failure to do so is, not only a breach of this Code, but also potentially a breach of civil and/or criminal laws relating to data protection.

Examples of information that may fall into these categories:

■ **Personal information** may include information about an individual's identity, such as: social security number, identity or passport numbers; personal financial information related to banking or credit information; business plans or health and family matters.

■ **Business data** may include information relating to the business plans, transactions and financial information of commercial clients, business associates and other third parties.

- The classification of information as **personal information** or **business data** will differ depending on the region of the world in which the information is collected or received. Consumer privacy laws are evolving rapidly on a global basis, and AIG employees involved in handling customer information are responsible for knowing and complying with applicable privacy and security laws. AIG employees should consult with their designated AIG attorney or the AIG Corporate Legal Compliance Group for guidance and to assure compliance with applicable laws.
- AIG employees must act in accordance with all AIG policies concerning the security and protection of personal information and business data, as well as AIG policies regarding the sharing or cross-border transfer of personal information and business data relating to AIG customers and business associates.

Confidentiality and Trade Secrets

- Trade secrets developed by AIG for use in its business are to be kept confidential. AIG employees must exercise discretion in using, discussing or otherwise transferring information regarding AIG's business.
- AIG does not condone the practice of improperly obtaining, disclosing or using the trade secrets of others. AIG employees must comply with the AIG Theft of Trade Secrets Policy (<http://aignetprod.aig.com/cfcompliance/executiv.pdf>) as well as all AIG policies and procedures relating to patents, trademarks, copyrights and trade secrets. *AIG Domestic Corporate Policy Guide*—<http://aignet.aig.com/corpadm/domplcy>
- Any AIG employee who entered into a nondisclosure agreement or any other contract that restricts the use of confidential information or trade secrets with a former employer must provide a copy of the agreement or contract to his or her human resources representative.
- An AIG employee may not disclose to any non-AIG employee who is not authorized to receive such information any of AIG's confidential or proprietary information or trade secrets whether in written, electronic or verbal form.
- In the event that an employee leaves AIG, he or she may not use or disclose to any non-AIG employee any of AIG's confidential or proprietary information or trade secrets whether in written, electronic or verbal form.

Intellectual Property

- Intellectual property, including, but not limited to, patents, trademarks and copyrights, developed or otherwise acquired by AIG employees, using AIG resources during their employment with AIG and which is related to AIG's business is the property of AIG. AIG employees with access to AIG intellectual property must not improperly disclose or use the intellectual property either during or after employment with AIG, unless proper authorization is received.
- AIG employees must cooperate with AIG in all efforts to secure its interest in intellectual property deemed to be the property of AIG.

- AIG employees may not use intellectual property obtained in the course of their employment with another company, without first obtaining permission from the other company.
- AIG respects the limitations placed upon software by the developer and/or distributor. AIG employees are not permitted to use or copy software or documentation, except as specified in the licensing agreement.
- AIG employees who are approached with any offer of confidential information that he or she believes may have been obtained improperly must immediately discuss this matter with their designated AIG attorney or the AIG Corporate Legal Compliance Group.

Marketing Practices

Competitive Practices

- AIG employees must not violate applicable competition or antitrust laws. *AIG Antitrust Policy*—<http://aignetprod.aig.com/cfcompliance/antitrust.pdf>

Agents/Consultants/Third Parties

- AIG employees must exercise appropriate business judgment when selecting a third party to represent AIG.
- AIG employees cannot use agents, consultants, independent contractors or other representatives to do indirectly that which an AIG employee could not do directly under the AIG Code of Conduct or applicable laws and regulations.
- AIG employees must be careful to ensure that insureds, producers, agents or suppliers do not exploit their relationship with AIG, and that such persons do not use AIG's name in connection with any fraudulent, unethical or dishonest transactions.

Trade Regulations/Export Controls

- AIG employees must fully comply with applicable laws related to export controls, embargoes, sanctions and international boycotts, including those relating to the export of technology and software. AIG employees should consult with their designated AIG attorney or the AIG Corporate Legal Compliance Group to ensure compliance with current law and regulation.

Anti-Money Laundering Controls

- AIG employees must fully comply with applicable laws and AIG policies and procedures related to the financing of terrorist activities, narcotics trafficking and anti-money laundering.

AIG Anti-Money Laundering Policy. <http://aignetprod.aig.com/cfcompliance/monlaund.pdf>

Customs, Laws and Regulations

- AIG employees are responsible for knowing and complying with the laws and regulations of the countries in which their businesses operate and which he or she may visit on AIG business.
- AIG employees should contact their designated AIG attorney for guidance, if there appears to be a conflict between applicable law and/or local custom of different jurisdictions.

Compensating Others

- The U.S. Foreign Corrupt Practices Act (FCPA) and similar laws of other nations make it unlawful for companies, their subsidiaries and their employees or agents to bribe foreign officials for the purpose of obtaining or retaining business or obtaining an unfair advantage in any business dealing or transaction.
- AIG employees must fully comply with applicable laws and AIG policies and procedures related to anti-corruption initiatives, including the *AIG Anti-Corruption Policy*.

<http://aignetprod.aig.com/cfcompliance/fcpa.pdf>

- No kickbacks, bribes or other payments (except for normal compensation) in any form whatsoever, whether or not such payment is secret or illegal, shall be made under any circumstances to obtain a benefit for AIG, its insureds or an AIG employee.
- No payment should ever be made to a government official, except in the very narrow circumstances permitted by AIG's policy on anti-corruption.

Waivers

- Under certain limited circumstances, waivers of any provision of this Code may be granted by AIG's General Counsel. However, in the case of an executive officer of American International Group, Inc., a waiver may be granted only by the Board of Directors or its Nominating and Corporate Governance Committee, and will be promptly disclosed to shareholders, as may be required by the New York Stock Exchange Rules and the federal securities, rules, laws and regulations.

Failure to Follow Code

Penalties

- Any AIG employee who compromises or violates the provisions of this Code may be subject to disciplinary action, up to and including, termination (and loss of employment-related benefits) and, if applicable, to criminal or civil proceedings.
- AIG prohibits retaliation against any employee who reports any suspected or potential violation of this Code, if made in good faith. AIG also prohibits retaliation for using any of AIG's complaint reporting procedures, if made in good faith, or for filing, testifying, assisting or participating in any investigation conducted by a governmental enforcement agency.
- Examples of conduct that may result in discipline include actions that violate an AIG policy; requesting others to violate an AIG policy; or failure to promptly report a known or suspected violation of an AIG policy.
- In all cases, it is the judgment of AIG and not the AIG employee as to whether a particular transaction violates this Code.

Concerns/Questions

Reporting Concerns

- AIG employees must promptly report any violation of this Code to their manager, their designated AIG attorney and/or the AIG Corporate Legal Compliance Group.
- Any AIG employee may call the AIG Compliance Help Line (toll-free) at 1-877-244-2210 with questions related to this Code, or to report a violation or suspected violation of any applicable law, rule, or regulation. An AIG employee may choose to remain anonymous when calling the AIG Compliance Help Line.
- Any complaints regarding questionable accounting, internal accounting controls or auditing matters reported to AIG directly or to AIG through the AIG Compliance Help Line will be forwarded to the Audit Committee of the Board of Directors of AIG.
- Any AIG employee who wishes to report an incident of discriminatory harassment should do so in accordance with the procedures set forth in the AIG Employee Handbook. *AIG Employee Handbook*—<http://aignet.aig.com/corptran/handbook/hbook.htm>

Asking Questions

- AIG employees who have questions about this Code may call the AIG Corporate Legal Compliance Group at (212) 770-3625 or send an e-mail to CorporateLegalCompliance@aig.com.
- For detailed information on the applicable laws and compliance policies and procedures underlying this Code, as well as AIG's other policies and procedures, an AIG employee can go to the AIG Corporate Legal Compliance Web site at <http://aignetprod.aig.com/cfcompliance/index.cfm> or contact the AIG Corporate Legal Compliance Group at (212) 770-3625. For detailed information on AIG policies, please refer to the following links:

- (i) *Anti-Money Laundering Policy*—<http://aignetprod.aig.com/cfcompliance/monlaund.pdf>
- (ii) *Theft of Trade Secrets Policy*—<http://aignetprod.aig.com/cfcompliance/executiv.pdf>
- (iii) *Anti-Corruption Policy*—<http://aignetprod.aig.com/cfcompliance/fcpa.pdf>
- (iv) *Antitrust Policy*—<http://aignetprod.aig.com/cfcompliance/antitrust.pdf>
- (v) *Telemarketing Policy*—<http://aignetprod.aig.com/cfcompliance/telepol.pdf>
- (vi) *Policy on Political Contribution and Political Activity*—
<http://aignetprod.aig.com/cfcompliance/polcontrib.pdf>

AIG Code of Conduct

Acknowledgement

I acknowledge that I have received the AIG Code of Conduct.

I acknowledge that as an AIG: (check one)

☐ Officer

☐ Employee

I am required to comply with the policies described in the AIG Code of Conduct, and failure to do so may subject me to disciplinary action, up to and including termination (and loss of employee benefits) and, if applicable, to criminal or civil proceedings.

I understand if I have a concern about a violation of the AIG Code of Conduct, I must promptly report the violation to my manager and/or the AIG Corporate Legal Compliance Group.

Signature: _____

Date: _____

Name: _____
(please print)

AIG Company: _____

Department: _____

Address: _____



American International Group, Inc.