



AIG Life Limited

Modern Slavery and Human Trafficking Statement

This statement is made by AIG Life Limited (AIG Life). We continue in our commitment to ensure no practices of modern slavery or human trafficking take place within AIG Life, whether directly or within our supply chain, and we ensure that we continue to review our practices for consistency with best practice. This is AIG Life's second statement and supplements our first statement.

ORGANISATION STRUCTURE

AIG Life is a provider of life and protection insurance in the United Kingdom, Crown Dependencies and Gibraltar. We are a part of the wider AIG Group, and our ultimate parent company is American International Group, Inc. with its head office in New York, the United States of America. AIG Life are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority in the U.K. Our principal activity is to provide life insurance products and related services.

OUR BUSINESS AND SUPPLY CHAINS

Our business serves commercial and individual customers. We contract with suppliers of the following services, which is a non-exhaustive list:

- Consultancy services
- Education and training services
- Financial services (reinsurance)
- Insurance and reinsurance mediation
- Medical screening services
- IT equipment, software and hardware
- Maintenance services
- Marketing / media and related advertising and design services
- Professional services
- Property management services
- Travel and accommodation services
- Utilities

CONTINUING TO COMBAT SLAVERY AND HUMAN TRAFFICKING AND IDENTIFYING ANY RISKS

We have a zero-tolerance approach to modern slavery and human trafficking in our organisation and our supply chain and we oppose modern slavery and human trafficking in any form. AIG Life is committed to conduct its business in an ethical and lawful manner. AIG Life's commitment to ethical practices is set out in AIG Group's Code of Conduct ("Code"). Our employees are required to act in accordance with the Code and to certify their compliance with it. An employee's failure to comply with the Code will result in appropriate disciplinary action and may lead to termination of their employment. Employees were also required to attest to their general compliance with modern slavery law in accordance with AIG Group standards. We will be sharing this statement with all our employees.

AIG Life has a robust whistleblowing process, where employees can anonymously report concerns as to any violation of the Code and violations of any law, including modern slavery law. We have an established Board Audit and Risk Committee and its remit includes reviewing the performance of the internal control system and, in particular, the process for monitoring compliance with laws, regulations and guidance, which includes modern slavery law.

We are taking pro-active steps with respect to our procurement processes. We are in the process of recruiting a dedicated procurement resource, which will report in the Legal function (Assistant General Counsel). We will be taking steps to ensure that our suppliers self-certify that they do not endorse, enable or facilitate human trafficking or slavery within their business and work will be undertaken to build the self-certification requirement into our procurement processes.

Suppliers shall understand our approach to modern slavery and, in the future, suppliers will be provided with this statement, and subsequent statements. Since the appointment of our Assistant General Counsel in April 2018, we have been endeavouring to build anti-slavery and human trafficking clauses into our contracts, to include clauses regarding corrective action and remediation, as well as ensuring that there are appropriate provisions regarding compliance with applicable law generally. We will expect all suppliers within our supply chain to comply with our values. Failure by a new supplier to provide a positive affirmation as to compliance will disqualify them from becoming a supplier because of non-compliance with applicable law. With the recent appointment in September 2018 of our Chief Compliance Officer, the Compliance, Legal and Human Resources functions continue to work together to embed best practice in relation to compliance with modern slavery law.

DECLARATION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes AIG Life Limited's modern slavery and human trafficking statement for the financial year ending 31 December 2017. It was approved by the Board of Directors of the Company at the meeting on 6 December 2018.

Signed for and on behalf of AIG Life Limited.



Adam Winslow

Director and Chief Executive Officer
International Life & Retirement

Date: 10/12/2018

