



AIG Asset Management (Europe) Limited

Modern Slavery Statement

This statement is made by AIG Asset Management (Europe) Limited (“AAMEL”), pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”), and constitutes its slavery and human trafficking statement for the financial year ended 31 December 2018.

Modern Slavery

The Act prohibits “slavery, servitude and forced or compulsory labour” and “human trafficking” (collectively, “Modern Slavery”). As a financial services company, AAMEL believes that the risk of Modern Slavery occurring within its business is relatively low. However, AAMEL is committed to ensuring that no practices of Modern Slavery take place involving AAMEL, whether directly or within its supply chain.

Organisation structure

AAMEL, a company registered in the UK, is authorised and regulated by the UK Financial Conduct Authority. AAMEL is a subsidiary of, and is ultimately 100% owned by, American International Group, Inc., which has its head office in New York, the United States of America. AAMEL is the non-US arm of the wider AIG Investments group, with a front office located in London and a branch office located in Dublin which is focused on the provision of back/middle office support activities for AAMEL and AIG’s wider global investments business.

AAMEL’s business and supply chains

AAMEL’s business provides investment management services to its institutional customers, which are primarily AIG-affiliated group companies. Its investment services include: managing and trading investments and derivatives, arranging and managing debt investments and real estate equity investments, and arranging loans, structured funding, and similar transactions. AAMEL services its clients’ needs pursuant to discretionary mandates.

AAMEL’s supply chains include third party suppliers of IT services; telecoms; facilities management services (including, for example, cleaning, security and stationery); and professional services, such as accountancy, legal and HR services.

AAMEL’s policies on Modern Slavery

AIG’s Code of Conduct, group-wide policies and both group and specific company governance processes are key tools in the journey to meet commitments under the Act. All AAMEL employees are subject to the AIG Code of Conduct and AIG Investments’ Code of Ethics and are required to certify compliance with these codes on an annual basis. AAMEL continues to review and refine its policies and procedures to be consistent with best practice and to update its approach in order to prevent Modern Slavery.

Combating Modern Slavery by identifying and assessing risks and conducting due diligence

AIG continues to conduct internal assessments to ensure that slavery and human trafficking are not taking place in any part of its business or supply chains. AAMEL has not identified any evidence of existing slavery or human trafficking in its supply chains and intends to continue focusing on this area.



AIG has in place systems to identify and assess potential risk areas in its supply chains and to protect whistle blowers.

Supplier adherence to AAMEL values

AAMEL strives to act in accordance with all applicable laws and adhere to the highest ethical standards with respect to all of its suppliers and business partners and to ensure the same high standards in their dealings with AAMEL.

In addition, the AIG group has in place various internal vendor and supplier policies which are designed to ensure all those in its supply chains comply with AIG values and policies.

AIG also has dedicated internal vendor management teams whose roles include ensuring that the systems and controls described above function appropriately.

Specific steps, including staff training

AAMEL has:

- Shared this statement with all of its staff members and included it within its joining materials for new employees;
- Updated its internal whistle-blowing policy;
- Provided employees with Modern Slavery Act training on complying with the Act and associated AIG group policies.

Actions for 2019

- Continue to measure effectiveness of AAMEL's processes and policies;
- Continue to work with internal vendor management teams to remind them of AAMEL's responsibilities under the Act;
- Continue to raise awareness of AAMEL's responsibilities under the Act throughout AIG.

Approval

This statement was approved by a majority of the directors of AAMEL on or prior to the date below and is expected to be ratified at the next quarterly meeting of the AAMEL board of directors, which is scheduled to occur on April 16, 2019.

A handwritten signature in black ink, appearing to read 'Charlie Carlton', written in a cursive style.

Charlie Carlton
CEO and Director of AIG Asset Management (Europe) Limited
28th March 2019