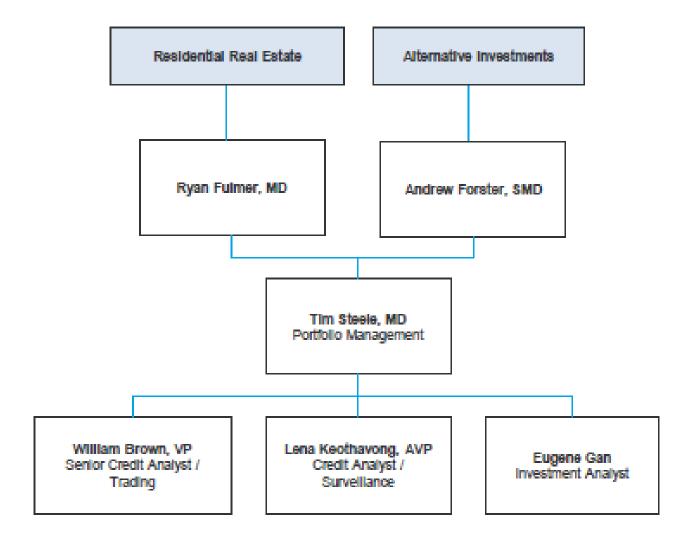
## Agenda

- Introduction of Team
- Structured Desks Trade Approval and Credit Impairment Purchase Identification
  - SOX Controls
  - Process Flows
  - Walkthrough Sample
- OTTI Process (RMBS, CMBS and CDO)
  - SOX Control
  - Process Flow
  - Walkthrough Sample
- MS CDO Reconciliation
  - SOX Control
  - Process Flow
  - Walkthrough Sample

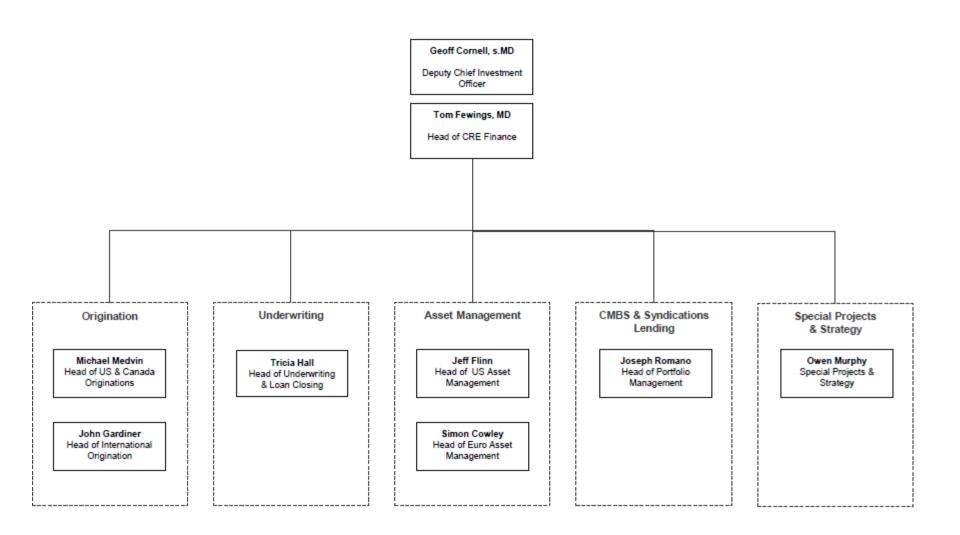


### **Introduction of Team - Non-US Residential Real Estate**





# Introduction of Team – Global Commercial Real Estate(CRE) Finance





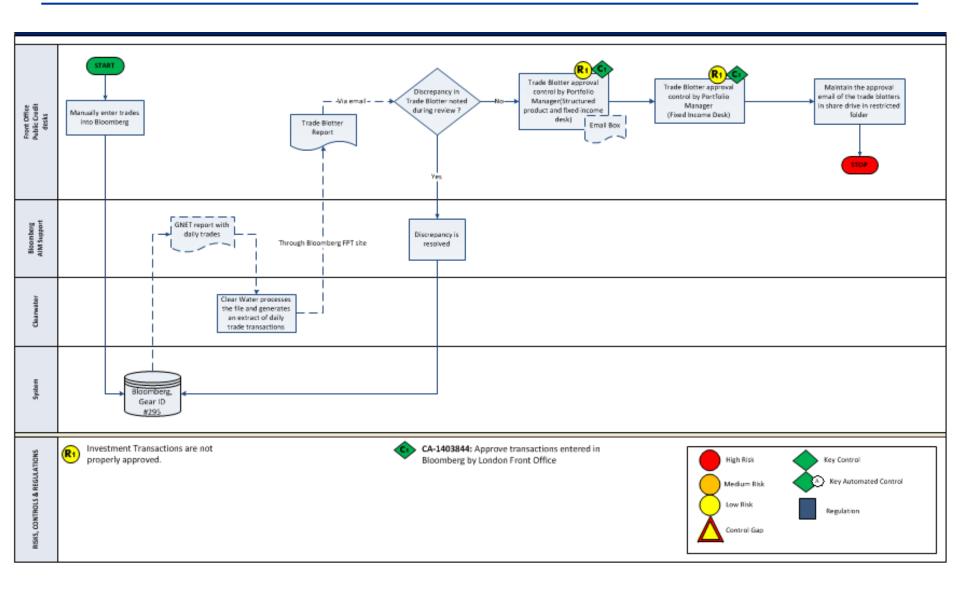
# **SOX Control – London Structured Desks Trade Approval and CIPI**

| Control CA-1403844   | (Risk – Low, Frequency – Daily)   |
|--|-----------------------------------|
| Description  | Additional Description            |
| Daily, London Portfolio Manager only (Structured Products group) and Senior Portfolio Manager and Senior Trader (non structured products group) approve transactions entered in Bloomberg AIM Trade Systems. The authorization of transaction is evidenced through email approval of trade blotters. |                                   |
| Control CA-1405209 (Ri   | isk – Low, Frequency – As needed) |
| Description  | Additional Description            |
| As needed, the Structured Products desks enter in Bloomberg trading system, at the time of purchase, whether or not a security is credit impaired based on pre-trade review of the credit analysis summary. The approval of whether each trade is designated as purchased credit                     |                                   |

On 04/04/2019, Lena Keothavong verified that the control descriptions are accurate for 2019.

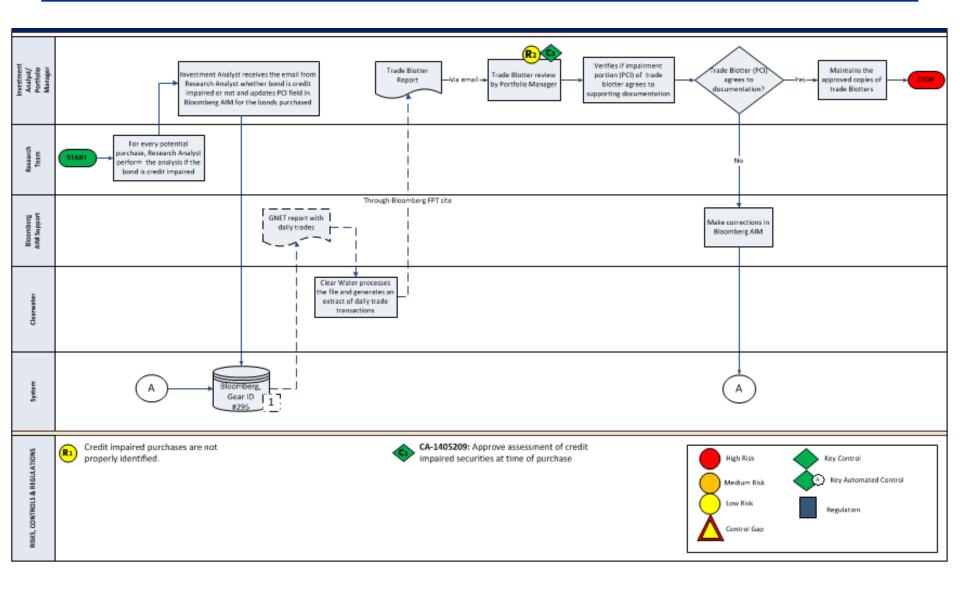


# **Process Flow – London Structured Desks - Trade Approval**





### **Process Flow – London Structured Desks - CIPI**





# Walkthrough Sample – London Trade Approval - CA-1403844

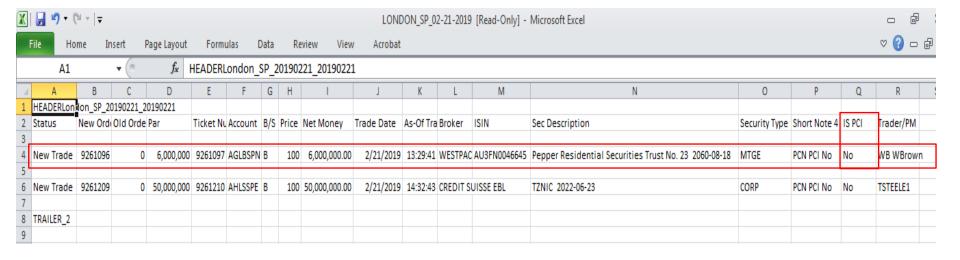
# Evidence of approval of trade blotter and email from Clearwater with Trade blotter for approval

| From:                                 | ☐ Keothavong, Lena <lena.keothavong@aig.com></lena.keothavong@aig.com>   | Sent: Fri 2/22/2019 12:17 PM |
|---------------------------------------|--|------------------------------|
| To:                                   | □ London_SP_Trade_Blotter; □ LNDProcedures   |                              |
| Cc:                                   |  |                              |
| Subject:                              | FW: London SP Trades are attached (for 02-21-2019)   |                              |
| ✓ Message                             | LONDON_SP_02-21-2019.csv (957 B)   |                              |
| From: sys<br>Sent: 22 F<br>To: Invest | nal Message sauto@aig.com [mailto:sysauto@aig.com] February 2019 03:42 tmentAPPSUPPORT; London_SP_Trade_Blotter London SP Trades are attached (for 02-21-2019) |                              |
| From:<br>To:<br>Cc                    | □ sysauto@aig.com □ InvestmentAPPSUPPORT; □ London_SP_Trade_Blotter  | Sent: Thu 2/21/2019 10:42 PM |
| Subject:                              | London SP Trades are attached (for 02-21-2019)   |                              |
|                                       | ■ LONDON_SP_02-21-2019.csv (957 B)   |                              |
| message                               |  | -<br>-                       |
|                                       |  | <u>-</u> □ 3                 |



## Walkthrough Sample – London Trade Approval - CA-1403844

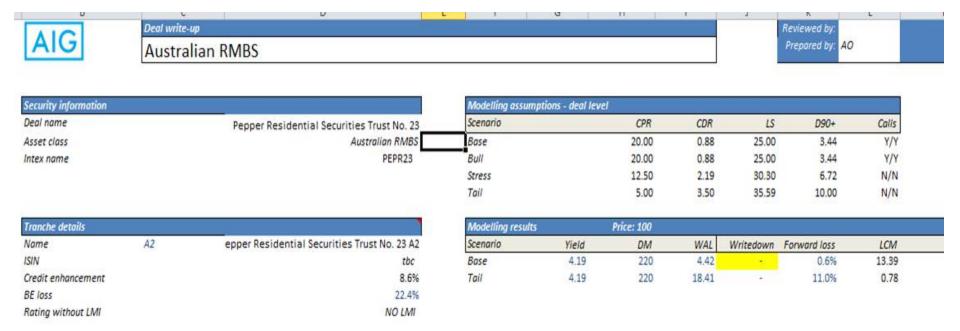
### **Approved Trade Blotter**





## Walkthrough Sample – London Structured Desks - CIPI - CA-1405209

# Support for Credit Impairment Purchase Identification assessment





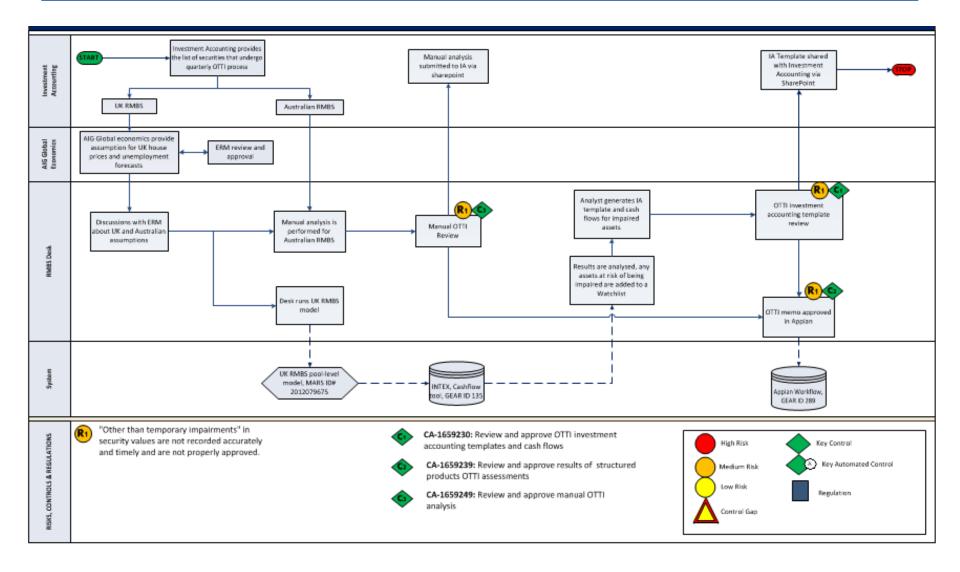
### **OTTI Process – SOX Controls**

| Control CA-1659239 (Risk – Me   | edium, Frequency – Quarterly) |
|---|-------------------------------|
| Description   | Additional Description        |
| Quarterly, the Structured Product Desk's Senior Management and AIG Investments Chief Credit Officer review the results of the Desk's OTTI assessments. The results of the assessments including key economic assumptions are summarized in an OTTI memo. Approval of results is evidenced via email or Appian workflow.                     |                               |
| Control CA-1659230 (Risk – Mo   | edium, Frequency – Quarterly) |
| Description   | Additional Description        |
| Quarterly, the Head of each Structured Products desk reviews and approves its OTTI Investment Accounting template that contains recovery values and related cash flow files prior to submission to Investment Accounting. Evidence of review and approval is documented via email or Appian approval of the investment Accounting template. |                               |
| Control CA-1659249 (Risk – M  | edium, Frequency – Quarterly) |
| Description   | Additional Description        |
| Quarterly, Senior Management of the Structured Products desks perform a secondary review of the manual OTTI analysis prepared by its analysts. Management review and approval is evidenced through email or Appian workflow tool approval of the OTTI analysis file.  |                               |

On 04/04/2019, William Brown (Non-US RMBS), Sam Roberts (European CMBS), Lena Keothavong (CDO) verified that the control descriptions are accurate for 2019.

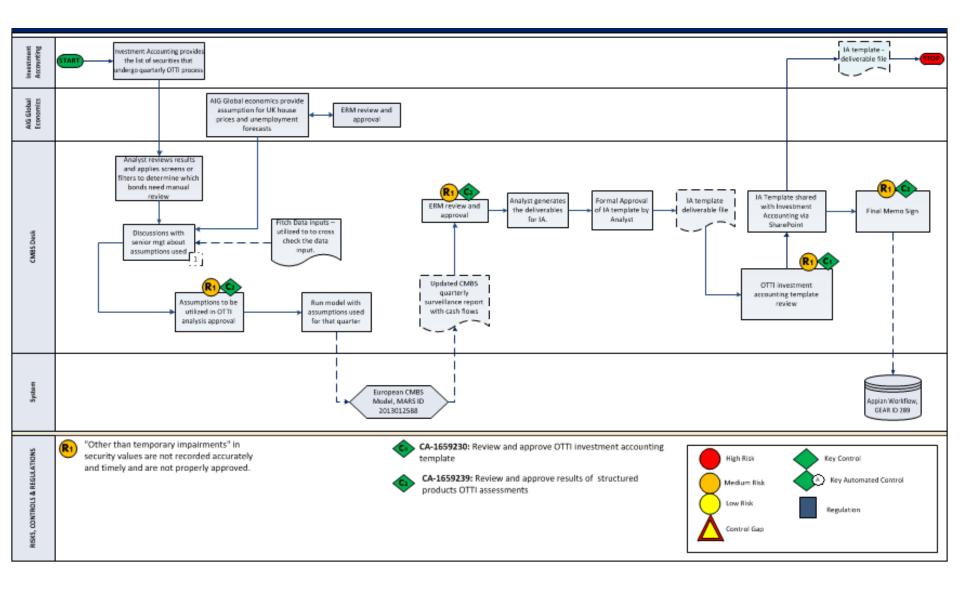


### **Process Flow - Non-US RMBS OTTI**



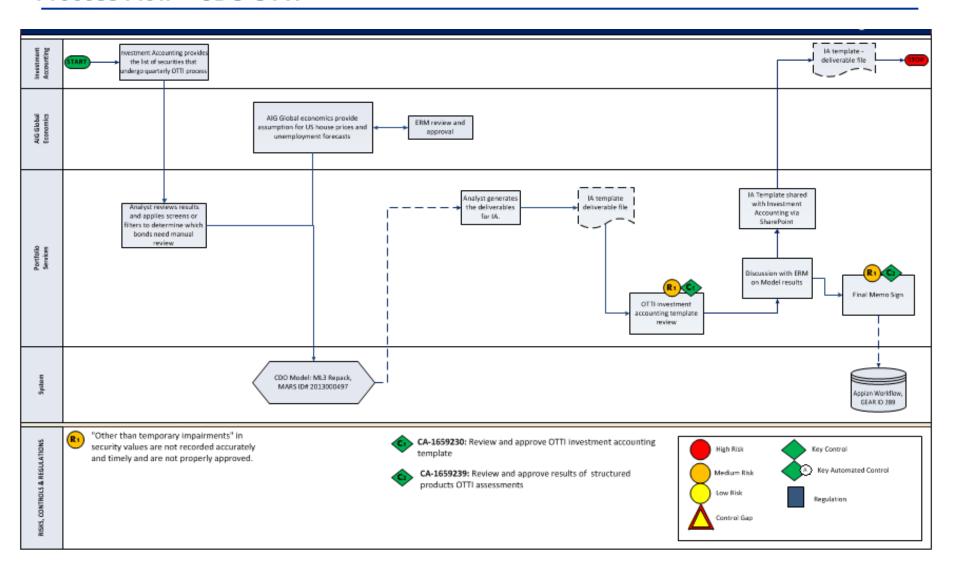


## **Process Flow - European CMBS OTTI**





### **Process Flow - CDO OTTI**





# Approval email from Head of desk for Q1 2019 Investment Accounting GAAP & STAT Templates

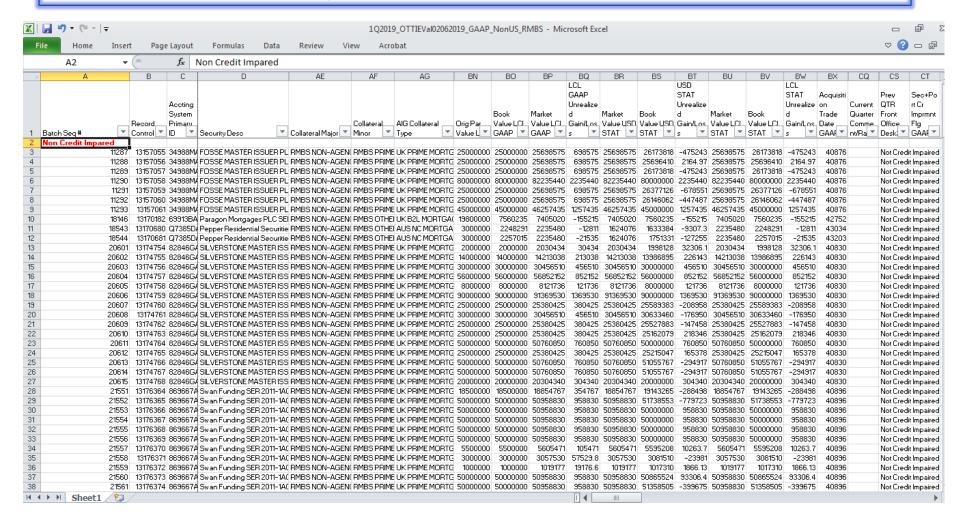
| From:                           | □ Steele, Tim  | Sent: Wed 2/27/2019 8:41 AM  |
|---------------------------------|--|--|
| To:                             | □ Levy, Jasmin   |  |
| Cc:                             | □ Brown, William   |  |
| Subject:                        | Q1 2019 Non-US RMBS OTTI   |  |
| Tim Stee                        | estments g Director – Structured Products  | have not identified any  |
| AIG Ass                         | et Management (Europe) Limited   |  |
| From:<br>To:<br>Cc:<br>Subject: | □ Brown, William □ Levy, Jasmin  RE: Q1 2019 NonUS RMBS OTTI Sign off  | Sent: Wed 2/27/2019 9:04 AM  |
| Subjecti                        | The Value of the State of the S | _  |
| Will Bro<br>AIG<br>58 Fend      | wn church Street, EC3M 4AB   | □       □    < |
| Sent: 27<br>To: Brow<br>Subject | evy, Jasmin<br>' February 2019 13:35<br>vn, William<br>: Q1 2019 NonUS RMBS OTTI Sign off  |  |
| Hi Will,                        |  |  |
| Please c                        | an you review and sign off on the following OTTI Investment Accounting Templates.  |  |
| Thank yo                        | ou,  |  |
|                                 | Levy estments et Management (Europe) Limited   |  |

# Approval email from Head of desk for Q1 2019 Investment Accounting Manual Template

| From:       | ☐ Steele, Tim <tim.steele@aig.com></tim.steele@aig.com>                     | 2019 1:22 PM |
|-------------|---|--------------|
| To:         | □ Brown, William  |              |
| Cc          | Levy, Jasmin  |              |
| Subject:    | RE: Q1 2019 NonUS RMBS OTTI Sign off - Manual analyis                       |              |
| ✓ Message   | e Manual analysis - Australian RMBS 19Q1.xlsx (2 MB)                        |              |
| Approved    | d.  | ©<br>        |
| Sent: Mon   | rown, William<br>onday, April 01, 2019 5:39 PM                              | ≡            |
| To: Steele  |   |              |
| Cc: Levy,   |   |              |
| Importan    | : FW: Q1 2019 NonUS RMBS OTTI Sign off - Manual analyis<br><b>nce:</b> High |              |
| I approve   | e the OTTI manual analysis for Q1 19, attached.                             |              |
| Tim, could  | ld you also approve, with the file attached to the email.                   |              |
| Thanks      |   |              |
| Will Brow   |   |              |
| AIG         |   |              |
|             | hurch Street,   |              |
|             | EC3M 4AB  |              |
| 20110011, 2 |   |              |



## Example of Investment Accounting Template Q1 2019 - Non-US RMBS GAAP - extract



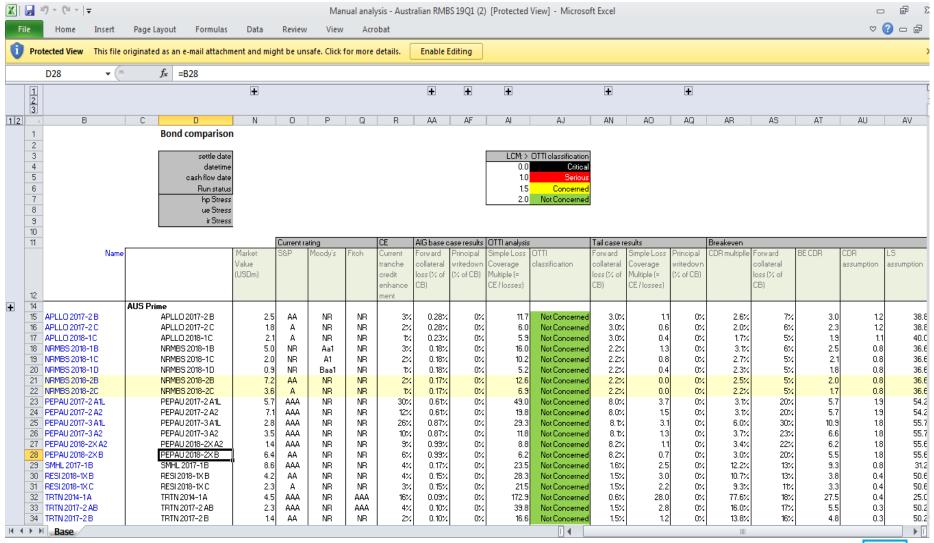


# Example of Investment Accounting Template Q1 2019 – Non-US RMBS STAT – extract

| <b>X</b> | IQ2019_OTTIEVal02062019_STAT_NonUS_RMBS - Microsoft Excel □ |         |         |                  |                        |           |           |            | _ 6        | 2 Σ                    |                     |                      |                      |           |           |           |         |          |  |            |            |       |
|----------|---|---------|---------|------------------|------------------------|-----------|-----------|------------|------------|------------------------|---------------------|----------------------|----------------------|-----------|-----------|-----------|---------|----------|--|------------|------------|-------|
| Fil      | e Home  | Insert  | Pag     | ge Layout        | Formula                | s Data    | Reviev    | w View     | Acrob      | at                     |                     |                      |                      |           |           |           |         |          |  |            | ♡ 🕜 ⊏      | - F   |
|          | A2  | ▼ (     | (-      | f <sub>x</sub> N | Ion Credit             | Impared   |           |            |            |                        |                     |                      |                      |           |           |           |         |          |  |            |            |       |
|          | А   |         | В       | С                | D                      | Е         | F         | G          | Н          | 1                      | J                   | K                    | L                    | M         | N         | 0         | CQ      | CR       | CS                                     | СТ         | CU         |       |
|          |   |         |         |                  |                        |           |           |            |            |                        |                     |                      |                      |           | USD GAAP  |           |         |          |  |            |            |       |
|          |   |         |         | Accting          |                        |           |           |            |            |                        |                     |                      |                      |           | Unrealize |           | Current | Prev QTR |  |            | Perior     |       |
|          |   |         |         | System           |                        |           | Accountin | Accountin  |            |                        |                     | Orig Par             | Book                 | Market    | d         |           | Quarter | Front    |  |            | Period     |       |
|          |   |         |         |                  | Security               |           | gsysportf |            |            | Lot                    |                     | Value                |                      | Value USD |           |           | Comment |          | Prev QTR Front                         | GAAP       | STAT       | IsN   |
|          | Batch Seq #   | _       | ntrol 💌 | ID 💌             | Desc 💌                 | GL Grot ▼ | olioID 💌  | oliona(*   | Portfoli * | Number *               | Quantit 🐣           | USD 💌                | GAAP _               | GAAP 💌    | S ¥       | pct. ▼    | /Rank 💌 | _Desk _▼ | Office Desk2                           | Comme      | ▼ Scoping  | ▼ nt  |
|          | Von Credit Impare   |         |         |                  |                        |           |           |            |            |                        |                     |                      |                      |           |           |           |         |          |  |            |            |       |
| 3        |   |         |         |                  | FOSSE MAS              |           |           |            |            | 182718966              |                     | 25000000             |                      |           |           | 102.7943  |         |          | Not Credit Impa                        |            |            |       |
| 4        |   |         |         |                  | FOSSE MAS              |           |           |            |            | 191016764              |                     | 25000000             |                      |           |           | 102.7943  |         |          | Not Credit Impa                        |            |            |       |
| 5        |   |         |         |                  | FOSSE MAS              |           |           |            |            | 182718994              |                     | 25000000             |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 6        |   |         |         |                  | FOSSE MAS              |           |           |            |            | 190563819              | 25000000            |                      |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 7        |   |         |         |                  | FOSSE MAS<br>SILVERSTO |           |           |            |            | 190563818<br>182728531 | 25000000<br>2000000 |                      | 25000000<br>2000000  |           |           |           |         |          | N Not Credit Impa<br>N Not Credit Impa |            |            |       |
| 9        |   |         |         |                  | SILVERSTO              |           |           |            |            | 182728514              |                     |                      |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 10       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563826              |                     | 25000000             |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 11       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563831              |                     | 3000000              |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 12       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563828              |                     | 25000000             |                      |           |           | 101.5217  |         |          | Not Credit Impa                        |            |            |       |
| 13       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563829              |                     | 25000000             |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 14       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563830              |                     | 25000000             |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 15       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563825              | 50000000            |                      |                      |           |           |           |         |          | Not Credit Impa                        |            |            |       |
| 16       |   |         |         |                  | SILVERSTO              |           |           |            |            | 190563832              |                     | 50000000             |                      |           |           | 101.5217  |         |          | N Not Credit Impa                      |            |            |       |
| 17       | 2   |         |         |                  | Swan Fund              |           |           |            |            | 182722143              | 18500000            |                      |                      |           |           | 101.91766 |         |          | Not Credit Impa                        |            |            |       |
| 18       | 2   | 1552 13 | 3176365 | 869667AA3        | Swan Fund              | 0         | 129300    | AIG-NUF-1  | AIG-NUF-1  | 182722376              | 50000000            | 50000000             | 50000000             | 50958830  | 958830    | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 19       | 2   | 1557 13 | 3176370 | 869667AA3        | Swan Fund              | 0         | 129197    | AIG-LEX-10 | AIG-LEX-10 | 210910250              | 5500000             | 5500000              | 5500000              | 5605471.3 | 105471.3  | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 20       | 2   | 1558 13 | 3176371 | 869667AA3        | Swan Fund              | 0         | 129197    | AIG-LEX-10 | AIG-LEX-10 | 191016796              | 3000000             | 3000000              | 3000000              | 3057529.8 | 57529.8   | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 21       | 2   | 1559 13 | 3176372 | 869667AA3        | Swan Fund              | 0         | 129197    | AIG-LEX-10 | AIG-LEX-10 | 210910248              | 1000000             | 1000000              | 1000000              | 1019176.6 | 19176.6   | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 22       | 2   | 1560 13 | 3176373 | 869667AA3        | Swan Fund              | 0         | 129197    | AIG-LEX-10 | AIG-LEX-10 | 210910242              | 50000000            | 50000000             | 50000000             | 50958830  | 958830    | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 23       | 2   | 1561 13 | 3176374 | 869667AA3        | Swan Fund              | 0         | 129197    | AIG-LEX-10 | AIG-LEX-10 | 191016829              | 50000000            | 50000000             | 50000000             | 50958830  | 958830    | 101.91766 |         | RMBS NO  | Not Credit Impa                        | red RMBS N | ON RMBS NO | ON-AG |
| 24       |   |         |         |                  | Swan Fund              |           |           |            |            | 210910244              |                     | 17000000             |                      |           |           | 101.91766 |         |          | Not Credit Impa                        |            |            |       |
| 25       |   |         |         |                  | Pepper Re              |           |           |            |            | 181847261              | 3000000             | 3000000              |                      |           |           | 101.96655 |         |          | Not Credit Impa                        |            |            |       |
| 26       |   |         |         |                  | Pepper Re              |           |           |            |            | 181847270              | 5000000             | 5000000              |                      |           |           | 102.35829 |         |          | Not Credit Impa                        |            |            |       |
| 27       |   |         |         |                  | The Super              | 0         |           |            |            | 181847260              | 6000000             | 6000000              |                      |           | 145838.39 |           |         |          | Not Credit Impa                        |            |            |       |
| 28       |   |         |         |                  | La Trobe F             |           |           |            |            | 181847264              | 1650000             | 1650000              |                      |           | 37030.26  |           |         |          | Not Credit Impa                        |            |            |       |
| 29       |   |         |         |                  | La Trobe F             |           |           |            |            | 181847258              | 2100000             | 2100000              |                      |           |           | 99.792849 |         |          | Not Credit Impa                        |            |            |       |
| 30       |   |         |         |                  | Resimac S              |           |           |            |            | 181899572              | 1050000             | 1050000              |                      |           |           | 102.59846 |         |          | Not Credit Impa                        |            |            |       |
| 31       |   |         |         |                  | Towd Poin              |           |           |            |            | 182769718              |                     |                      |                      |           | -701778.4 |           |         |          | Not Credit Impa                        |            |            |       |
| 32       |   |         |         |                  | Towd Poin              |           |           |            |            | 182770232              |                     | 15000000<br>11000000 | 16292673<br>15541036 |           | 3406005.4 |           |         |          | Not Credit Impa                        |            |            |       |
| 34       |   |         |         |                  | Towd Poin              |           |           |            |            | 182770067<br>182770150 |                     | 25000000             |                      |           | 1795846.1 | 92.951957 |         |          | Not Credit Impa<br>Not Credit Impa     |            |            |       |
| 35       |   |         |         |                  | Towd Poin              |           |           |            |            | 182770150              | 25000000            |                      |                      |           | 1795846.1 |           |         |          | N Not Credit Impa<br>N Not Credit Impa |            |            |       |
| 36       |   |         |         |                  | Towd Poin              |           |           |            |            | 182770108              |                     |                      |                      |           | 1667006 0 |           |         |          | Not Credit Impa                        |            |            |       |
|          | ▶ ► Sheet1  | ( 💝 /   |         |                  |                        |           |           |            |            |                        |                     |                      | 31.180.153           |           |           |           |         |          |  |            |            | •     |



### Example of Investment Accounting Template Q1 2019 – Australian(Manual) RMBS – extract



# Email to Investment Accounting communicating the deliverables of Q1 2019 – Non-US RMBS OTTI Analysis

| From:                 | Levy, Jasmin Sent: Wed 2/27/2019 1:1   | 2 DM   |
|-----------------------|--|--------|
| To:                   | □ McIntyre, Steve@InvestACCT; □ Silva, Rosa@InvestAcct   | Z FIVI |
| Cc                    | ☐ Fan, Hui; ☐ Destro, Anthony; ☐ McGloin, Kenneth; ☐ Kogan, David S; ☐ Petitto, James M; ☐ Forster, Andrew; ☐ Fewings, Tom; ☐ RMBS_investments; ☐ Horsford, Colin; ☐ Kang, Samuel; ☐ Yu, Connie  |        |
| Subject:              | Q1 2019 RMBS NON US OTTI Submission  |        |
| ✓ Message             | e ☑ Q1 2019 Non-US RMBS OTTI (18 KB)   |        |
| Good afte             | zernoon,   |        |
|                       | reviewed the Foreign RMBS securities identified by Investment Accounting for possible impairment and do not have any new impaired securities in accordance with asset class specific credit policies and res which are approved by AIG Credit Risk Management.   |        |
| Please fin            | nd our 1Q 2019 file titled 2019Q1_OTTI NonUS RMBS, with a time/date stamp of 2/27/2019 10:10 AM at the following link:   |        |
| 2D%20Str              | share.connect.aig/teams/InvFixedIncome/Summary%20Reports/Forms/AllItems.aspx?RootFolder=%2Fteams%2FInvFixedIncome%2FSummary%20Reports%2FOTTI%2FOTTI%20Analysis%2FQ1%202019%20% tructured%20Analysis&FolderCTID=0x0120004255556918E20B4FA774FFE9D60A9C66&View=%7BD703CECD%2D7F06%2D47D2%2D988D%2DB286ECF0E1FD%7D&InitialTabId=Ribbon% | ≡      |
| Please als            | lso see attached our Portfolio Manager's declaration.  |        |
| Kind Rega             | ards,  |        |
| Jasmin                |  |        |
| Jasmin L<br>AIG Inves | ·  |        |



# Appian approval for Non-US RMBS OTTI analysis memo

### General Document Approval

General Information

Request ID: 9886

Subject: Process Memo: Europe - Q1/2019 for Non-US RMBS Europe

Submission Date: 2/28/2019 1:11 PM EST

Final Approval Due Date: 3/27/2019 11:30 PM EDT

Initiator : Jasmin Levy Second Initiator :

Documents Approved: 19Q1\_OTTI - International Resi\_v3\_version1

Initiator Comments

| Comments                 | Comments made by | Comments made on  |
|--------------------------|------------------|-------------------|
| For review and approval. | Jasmin Levy      | 2/28/2019 1:18 PM |
|                          | _                | EST               |

#### Reviewers Comments

| Reviewer<br>level | Reviewer Name   | Reviewed Documents<br>Name                       | Comments  | Decision            | Assigned<br>On              | Completed<br>On             |
|-------------------|-----------------|--|---|---------------------|-----------------------------|-----------------------------|
| 1                 | Andrew Forster  | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Approved.   | Completed<br>Review | 2/28/2019<br>1:19 PM<br>EST | 2/28/2019<br>1:23 PM<br>EST |
| 2                 | Tim Parsons     | 19Q1_OTTI -<br>International<br>Resi v3 version1 |   | Completed<br>Review | 2/28/2019<br>1:23 PM<br>EST | 3/5/2019<br>10:12<br>AM EST |
| 2                 | Tim Parsons     | 19QI_OTTI -<br>International<br>Resi_v3_version1 |   | Completed<br>Review | 3/6/2019<br>4:49 AM<br>EST  | 3/6/2019<br>4:56 AM<br>EST  |
| 2                 | Kenneth Mcgloin | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Review<br>complete  | Completed<br>Review | 3/6/2019<br>4:49 AM<br>EST  | 3/6/2019<br>7:49 AM<br>EST  |
| 3                 | Andrew Payne    | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Review<br>complete.   | Completed<br>Review | 3/6/2019<br>7:49 AM<br>EST  | 3/8/2019<br>11:50<br>AM EST |
| 2                 | Kenneth Mcgloin | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Review<br>time<br>expired<br>and was<br>returned to<br>initiator. | Skipped             | 2/28/2019<br>1:23 PM<br>EST |                             |

Approvers Comments

| Approval<br>level | Approver Name    | Approved Documents<br>Name                       | Comments  | Decision | Assigned<br>On              | Completed<br>On             |
|-------------------|------------------|--|-----------|----------|-----------------------------|-----------------------------|
| 1                 | Andrew Forster   | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Approved. | Approved | 3/8/2019<br>11:50 AM<br>EST | 3/8/2019<br>11:52<br>AM EST |
| 2                 | Tim Parsons      | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | -         | Approved | 3/8/2019<br>11:52 AM<br>EST | 3/8/2019<br>11:56<br>AM EST |
| 2                 | Kenneth Mcgloin  | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Approved  | Approved | 3/8/2019<br>11:52 AM<br>EST | 3/8/2019<br>1:10 PM<br>EST  |
| 3                 | Andrew Payne     | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Approved. | Approved | 3/8/2019<br>1:10 PM<br>EST  | 3/8/2019<br>4:50 PM<br>EST  |
| 4                 | Geoffrey Cornell | 19Q1_OTTI -<br>International<br>Resi_v3_version1 | Approved  | Approved | 3/8/2019<br>4:50 PM<br>EST  | 3/9/2019<br>11:29<br>AM EST |



### Approved Non-US RMBS OTTI analysis memo – Excerpt

# AIG Asset Management

#### Memorandum

TO: Andrew Payne, Tim Parsons, Ken McGloin, Geoffrey Cornell, Ryan Fulmer

FROM: International Residential Real Estate Team

DATE: February 2019

#### Residential Real Estate Asset Tower

European and Australian Residential Real Estate Risk (non-construction/development)

#### Results summary:

- OTTI: We have reviewed the RMBS securities identified by Investment Accounting for possible impairment and do
  not have any new impaired securities this quarter.
- ALLL: No allowances for loan and lease losses this quarter.

#### Holdings summary and modelling approaches

| #  | Process | Collateral Type         | #ISINs | Book Value<br>(GAAP)<br>(\$m) | Modelling approach         |
|----|---------|-------------------------|--------|-------------------------------|----------------------------|
| 1. | ΟΤΤΙ    | UK Prime RMBS           | 8      | 1,921                         | UK RMBS model              |
|    |         | UK Non-Conforming (NCF) | 41     | 250                           | UK RMBS model              |
|    |         | UK Buy-to-Let (BTL)     | 12     | 213                           | UK RMBS model              |
|    |         | Irish Prime RMBS        | 7      | 43                            | UK RMBS model              |
| 2. | ΟΠΙ     | Australian RMBS         | 52     | 212                           | Expert assumptions + Intex |
| 3. | ΟΤΤΙ    | UK Student Loans        | 2      | 186                           | Expert assumptions + Intex |
| 4. | ALLL    | Irish NPL (Java)        | 1      | 57                            | Expert assumptions         |
| 5. | ALLL    | Spanish REO             | 2      | 384                           | Expert assumptions         |
|    |         | Total                   | 125    | 3,266                         |                            |

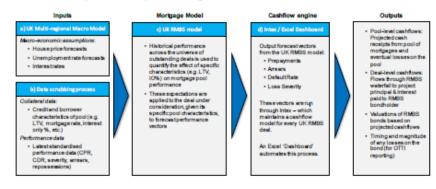
- Manual analysis is required for the following:
  - The Australian RMBS deals are modelled using an expert approach, whereby assumptions are based on historical performance of the assets with penalties for higher risk sectors, e.g. investor loans, apartments and regional concentrations. This is described further in section 5.
  - UK student loans securitisations are modelled using expert assumptions for earnings growth, RPI, Bank of England base rate and inactivity rates. The model is a deterministic translation of these assumptions to deal cash flows; it was prepared by the Government Actuary's Department and UK Government Investments, and has been validated by AIG Model Validation.
  - Irish NPL deals are modelled using expert assumptions based on past performance for mortgage pay-rates and foreclosure rates. Assumptions are run in the Irish residential mortgage model, which has been validated by AIG Model Validation.
  - Spanish REO deals are modelled using expert assumptions based on property valuations and recent performance for sales timelines and prices. Assumptions are run in the Spanish REO model.

#### I. OTTI Process

#### 1. UK and Irish RMBS

#### a) Modelling Approach

- The diagram below summarises the approach used to model UK RMBS.
- The document "OTTI Process Manual International RMBS" provides further detail of the steps involved in the process including SOX controls.



#### UK Multi-regional Macro Model:

 The macro-economic assumptions are the only user-defined inputs to the model. These are specified below:

| Assumptions        | Definition        | Regional   | Base case  |
|--------------------|-------------------|--|--|
| House prices (HPI) | Nationwide Index  | Nationwide regions<br>(UK spit Into 13 regions)        | Produced by AGE using UK Multi-regional<br>Macro Model |
| Unemployment       | ONS headline rate | Government Office Regions<br>(UK spit Into 12 regions) | Produced by AGE using UK Multi-regional<br>Macro Model |
| Interest rates     | GBP LIBOR 3mo     | n/a  | Forward curve  |

- AIG Global Economics (AGE) produce base case forecasts for HPI and unemployment using the UK Multi-Regional Macro Model
  - AGE are the model owners and manage the process to generate forecasts; these are discussed and agreed with ERM and the process is documented in a memo entitled 'UK Forecast Memo'.
  - AGE also produce stress scenarios which are shown and discussed in section 0: Stress Sensitivities.

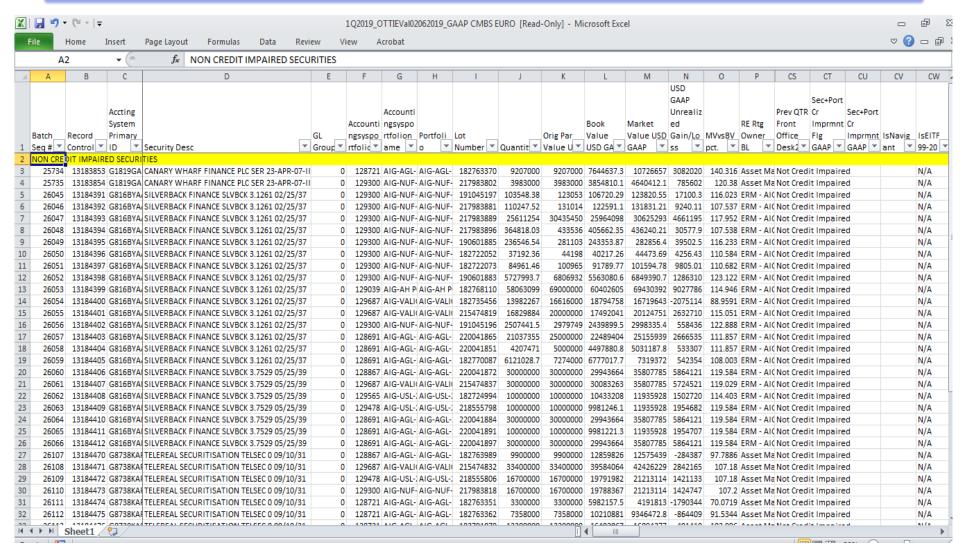


# Approval of European CMBS OTTI Investment Accounting templates

| From:    | Fewings, Tom <tom.fewings@aig.com></tom.fewings@aig.com>  | Sent:   | Sat 2/23/2019 6:42 AM |
|----------|---|---------|-----------------------|
| To:      | Roberts, Sam  |         |                       |
| Cc:      | Levy, Jasmin; Cowley, Simon   |         |                       |
| Subject: | Re: Q1 2019 O∏  |         |                       |
| Confirm  |   |         | -<br>-<br>-           |
| Continu  | ed .  |         | _                     |
| On 22 Fe | eb 2019, at 10:57, Roberts, Sam < <u>Sam.Roberts@aig.com</u> > wrote:   |         |                       |
|          | Dear Tom .  |         |                       |
|          | Please can you confirm the below for this quarters OTTI.  |         |                       |
|          | As Portfolio Manager of the Non-US CMBS deals I have reviewed the composition of the CMBS portfolio contained in the Q1 2019 foreign OTTI files provided by Investment Accounting and I have not identified any securities where I have intent to sell at this time. While all portfolios may be subject to periodic rebalancing, no specific securities have been identified for planned sale at this time." | the pos | sitive =              |
|          | Kind regards,   |         |                       |
|          | Sam   |         |                       |
|          |   |         |                       |
|          | Sam Roberts   |         |                       |
|          | AIG Investments Commercial Real Estate Finance  |         |                       |
|          | Commercial Real Estate Finance  |         |                       |

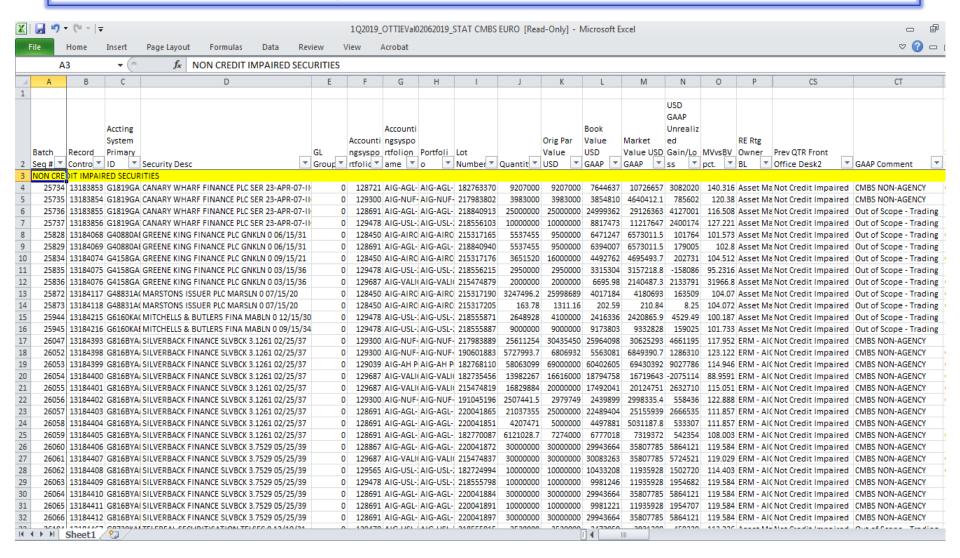


### Example of Investment Accounting Template Q1 2019 – European CMBS GAAP – extract





### Example of Investment Accounting Template Q1 2019 - European CMBS STAT - extract





# Email to Investment Accounting communicating the deliverables of Q1 2019 – European CMBS - Extracts

| From:                | ☐ Roberts, Sam <sam.roberts@aig.com></sam.roberts@aig.com>   | u 2/28/2019 6:08 AM |
|----------------------|--|---------------------|
| To:<br>Cc:           | □ Levy, Jasmin; □ McIntyre, Steve@InvestACCT; □ Sapia, Joseph Hidden on 30-12-2018, 17:47:06 SCTASK1964718; □ Silva, Rosa@InvestAcct □ Fan, Hui; □ Destro, Anthony; □ McGloin, Kenneth; □ Kogan, David S; □ Petitto, James M; □ Forster, Andrew; □ Fewings, Tom; □ CMBS_investments; □ Horsford, Colin; □ Kang, Samuel; □ Yu, Connie |                     |
| Subject:             | Q1 2019 CMBS NON US OTTI Submission  |                     |
| Message              | e ☑ Re: Q1 2019 Oπ1 (21 KB)  |                     |
|                      | e reviewed the Foreign CMBS securities identified by Investment Accounting for possible impairment and do not have any new impaired securities in accordance with asset class specific credit policientes which are approved by AIG Credit Risk Management.  | ies and             |
| Please fin           | ind our 1Q 2019 files in the link below, with a time/date stamp of 2/28/2019 2:41 AM at the following link:  |                     |
| https://sha          | hare.connect.aig/teams/InvFixedIncome/Summary%20Reports/OTTI/OTTI%20Analysis/Q1%202019%20-%20Structured%20Analysis/1Q2019 OTTI CML CMBS.zip  |                     |
| Please als           | lso see attached our Portfolio Manager's declaration.  |                     |
| Kind rega            | ards,  |                     |
| Sam                  |  |                     |
| Sam Rob<br>AIG Inves |  |                     |



# Appian approval for European CMBS OTTI memo

### **General Document Approval**

General Information

Request ID: 9826

Subject: Process Memo: Europe - Q1/2019 for CMBS and CML Europe

Submission Date: 2/25/2019 5:37 AM EST

Final Approval Due Date: 3/29/2019 11:30 PM EDT

Initiator : Sam Roberts Second Initiator : Jasmin Levy

Documents Approved: Q1 2019 OTTI European CMBS Memo FINALv1\_version1; Q1 2019 ALLL European

CML Portfolio FINALv2\_version1

Initiator Comments

| Comments                | Comments made by | Comments made on         |
|-------------------------|------------------|--------------------------|
| For review and approval | Sam Roberts      | 2/25/2019 5:42 AM<br>EST |

#### Reviewers Comments

| Reviewer<br>level | Reviewer Name | Reviewed Documents<br>Name  | Comments  | Decision            | Assigned<br>On              | Completed<br>On             |
|-------------------|---------------|---|---|---------------------|-----------------------------|-----------------------------|
| 1                 | Tom Fewings   | Q1 2019 OTTI European CMB'S Memo FINALV1 version1, Q1 2019 ĀLLL European CML Portfolio FINALV2_version1 | approved  | Completed<br>Review | 2/28/2019<br>3:37 AM<br>EST | 2/28/2019<br>3:53 AM<br>EST |
| 2                 | Tim Parsons   | Q1 2019 OTTI European CMB'S Memo FINAL's version1, Q1 2019 ĀLLL European CML Portfolio FINAL's version1 |   | Completed<br>Review | 2/28/2019<br>3:54 AM<br>EST | 2/28/2019<br>7:10 AM<br>EST |
| 3                 | Andrew Payne  | Q1 2019 OTTI European CMB'S Memo FINAL's version1, Q1 2019 ĀLLL European CML Portfolio FINAL's version1 | Review<br>complete.   | Completed<br>Review | 2/28/2019<br>7:10 AM<br>EST | 2/28/2019<br>3:30 PM<br>EST |
| 1                 | Tom Fewings   | Q1 2019 ÖTTI European CMB'S Memo FINALVI version1, Q1 2019 ÄLLL European CML Portfolio FINALV2_version1 | Review<br>time<br>expired<br>and was<br>returned to<br>initiator. | Skipped             | 2/25/2019<br>5:43 AM<br>EST |                             |

#### Approvers Comments

| Approval<br>level | Approver Name    | Approved Documents<br>Name   | Comments  | Decision | Assigned<br>On              | Completed<br>On             |
|-------------------|------------------|--|-----------|----------|-----------------------------|-----------------------------|
| 1                 | Tom Fewings      | QI 2019 OTTI European CMBS Memo FINALv1_version1, QI 2019 ÄLLL European CML Portfolio FINALv2_version1 | Approved. | Approved | 2/28/2019<br>3:30 PM<br>EST | 3/4/2019<br>8:35 AM<br>EST  |
| 2                 | Kenneth Mcgloin  | QI 2019 ÖTTI European CMBS Memo FINALVI version1, QI 2019 ÄLLL European CML Portfolio FINALV2 version1 | Approved  | Approved | 3/4/2019<br>8:35 AM<br>EST  | 3/6/2019<br>7:50 AM<br>EST  |
| 3                 | Geoffrey Cornell | Q1 2019 OTTI European CMBS Memo FINALv1_version1, Q1 2019 ALLL European CML Portfolio FINALv2_version1 | Approved  | Approved | 3/6/2019<br>7:50 AM<br>EST  | 3/6/2019<br>3:20 PM<br>EST  |
| 3                 | Andrew Payne     | QI 2019 OTTI European CMBS Memo FINALv1_version1, QI 2019 ALLL European CML Portfolio FINALv2_version1 | Approved. | Approved | 3/6/2019<br>7:50 AM<br>EST  | 3/8/2019<br>11:50<br>AM EST |



### Approved European CMBS OTTI memo



#### Asset Management

#### Memorandum

Andrew Payne, Ken McGloin, Tim Parsons, Tom Fewings & Geoff Cornell

FROM: Sam Roberts & Simon Cowley European CMBS/CML Team

DATE: February 2019

Q1 2019 - European Pub ABS & CMBS OTTI

Pub ABS Portfolio ('ABS Other')
There are no impairments on our Pub ABS portfolio for this quarter's analysis; all deals in our portfolio are categorized as 'Not Concerned'.

#### European CMBS Portfolio

There are no impairments on our CMBS portfolio for this quarter's analysis; all deals in our portfolio are categorized as 'Not Concerned'.

#### Pub ABS & CMBS Portfolio changes since last quarter.

AIG bought \$126.8m of AAA and AA rated bonds in Morgan Stanley's Salus Eloc 33 - an origination of a £354 million 5 year (3-1-1), floating rate interest-only mortgage to Brookfield in connection with their pre-owned property known as City-Point, a 38-story, 709,000 sq ft class B office tower located in the City of London, adjacent to Moorgate station. The AAA and AA class of notes, represent £391 psf or 48% LTV based on the current valuation of £800 million (£845 psf).

#### Summary of positions

Following the 2018 review, this Memorandum has simplified information into the table below. Deal descriptions are in the appendix. Our quarterly OTTI analysis covers 8 deals, none of which are currently in default and are all still current in interest payments. Summarized as follows, the in-scope portfolio book value currently stands at \$722m.

#### Canary Wharf Finance II Plc

Canary Wharf Finance II Plc has had its class B, B3, C2 and D2 notes upgraded by Moody's by one notch to Aa3, Aa3, A3 and Baa3 respectively. The ratings action reflects the continued deleveraging of the transaction from scheduled amortization, the high proportion of offices let on a long term basis to highly rated tenants, the stable high occupancy of the two multi-let offices and the steady improvement in Canary Wharf as a viable long term office location.

The transaction benefits from strong medium term cash flows from Barclays Bank Ptc, The Secretary of State for Community and Local Government, Morgan Stanley and Citibank; tenants who respectively occupy four of the assets and account for over 60% of in place rent, having leases with expiry dates that range from 2026 to 2032. The occupancy rates of the two multi-let assets, One Canada Square and 40 Bank Street, have been high and currently stand at 93%.

#### Maretone

Amid challenging market conditions, Marston's PLC-the ultimate parent, which consolidates Marston's Pubs-reported relatively robust results, with like-for-like sales up 0.6% in the financial year ending Sept. 22, 2018. This compares favorably with Greene King, who reported like-for-like declines of 1.7% over a similar period, but is behind M&B at 1.2%. This modest sales growth reflects strong like-for-like performance in the group's wet-led estate—which benefitted. from the World Cup and warm summer weather--offset by declines in the groups more food-led pubs. Lastly, their leased segment reported like-for-like sales growth of 2.0%.

That said, Marston's Pubs' margins over the same period remained under pressure amid cost inflation, stemming from increases in the National Living Wage, higher food and drinks costs, and business rates. As such, overall profitability has weakened. Despite these headwinds, S&P only expect a moderate contraction in margins in each of the next two years as Marston's Pubs continues to benefit from longer-term contracts with suppliers, somewhat delaying the impact of this cost inflation. S&P also give some credit to the company's ability to pass a portion of these cost increases through to customers, supported by modest (about 2%) inflation in the U.K. and Marton's Pubs' recent focus on improving the quality of its estate and driving a more food-led offering. They also expect a similar, albeit slower, contraction in margins in the group's tenanted segment, as tenants are likely to seek mechanisms of passing some of the inflation in these costs. onto their suppliers, including their landlords. Therefore S&P have downgraded the A and B class notes by one notch to BB+ and BB respectively.

Table 1: Summary of CMBS OTTI Analysis

|                                 |       | AIC Exposure<br>(Suck Volum)<br>(ESS) * |        | Bote<br>Solorofination<br>(1985) | Cading<br>MOR | Flating<br>587 | Rating<br>Fried |                 | Capt.<br>Lorenes |       | EKR (Ve<br>Cev) |                          |  | Doment<br>AIG<br>Classificatio |
|---------------------------------|-------|---|--------|----------------------------------|---------------|----------------|-----------------|-----------------|------------------|-------|-----------------|--------------------------|--|--------------------------------|
| PIEAES                          |       |   |        |                                  |               |                |                 |                 |                  |       |                 |                          |  |                                |
| Creene King                     | .83   | 5 4,492,000                             | 49.7%  | \$1,007,522,900                  | UK.           | 100            | H80+            | L+125 tox       | 5 -              |       | 1.01            |                          | UK Pub Engrapes, 1,409 sasets. Net Worth of 6960 (imageinst a covenant.  |                                |
| Greene King                     | At    | 3 12,000,000                            | 18.7%  | \$1,279,967,100                  | NR.           | 555            | 5884            | 1.+60 396       | 1 .              | 200   | 0.100           | Corpurate Securitation   | of itsim   | 196 Concern                    |
| Greene King                     | 82    | \$ 532,077                              | 68.5%  | 5 -                              | 100           | 55+            | 555-            | L+365 tops      | 3 -              |       | 0.7440          |                          | UTLI EDIT  |                                |
| Michell & Bulletin              | 439   | 3 2,816,297                             | 21.2%  | \$1,237,990,800                  | 4.1           | a.             | See.            | US L + Oligina  | 1 .              | 200   | 1.86            | Corporate Securitization | UK Pub Eugmeure - NOTE DED-exposure                                      | 196 Concern                    |
| Withhele & Sofere               | C2    | \$ 9,173,364                            | 47.9%  | 5 YHUHUU00                       | SR.           | 55             | 555             | L + 188 tops    | 5 -              |       | (7.100)         | Codmera Decreasion       | UK Pub Exposure - 1,420 assests flet North at 42,111 in vs.4511 in cov.) | Het Corcern                    |
| Varsions                        | .45   | \$ 6,017,310                            | 15.1%  | \$ 736,143,900                   | 100           | 554            | 088             | L + 135 tops.   | ¥ .              | 2006  | 1.64            | Corporate Securitation   | DC Pub Expression 1,176 assaults, fair North of 65/7m vs. 656m cov       | 16d Concern                    |
| Sale Tetal                      |       | 5 35,256,463                            |        | \$4,303,034,300                  |               |                |                 |                 | ş .              |       |                 |                          |  |                                |
| CMSS                            |       |   |        |                                  |               |                |                 |                 |                  |       |                 |                          |  |                                |
| Conery Wherf II                 | 83    | \$ 0,016,746                            | 20.7%  | \$ 394,662,800                   | A43           | Ar             | 44.             | L+39 tops       | a -              |       |                 |                          |  |                                |
| Canary Wharf II                 | CE    | \$ 36,486,502                           | 41,150 | \$ (21,1111,000)                 | A3-           |                | A               | L + 135 lare    | 1 -              | 2007  | 2.98x           | Single Loan              | Large Contribute (London) of the portion - 95.2% recognised              | Het Concern                    |
| Canary Wharf II                 | 100   | \$ 56,496,502                           | 44.3%  | 5 -                              | Bes?          | A.             | 088             | L+210 tops      | 3 -              |       |                 |                          |  |                                |
| Skebed                          | .41   | \$ 165,400,500                          | 49.5%  | 5 475.9HL000                     | 68            | 500            | *               | Dol-212 ten     | 1 -              | 203   |                 | Shok Loan                | 754 bank transfers in Spain. Rating improved from A. In A. this quarter. | Het Concern                    |
| Séverback                       | A2    | \$ 150,308,767                          | 67.1%  | 5 -                              | 100           | NR.            | A               | Fiel-375 tox    | 5 -              | 20.00 |                 | or ge com                | 734 dans transmer in open, warry exproved from A-10 A tree-garder.       | rest Concern                   |
| Terrinal cases that ind (memb)  | 84    | \$ 16,600,600                           | 80.7%  | \$ 379,600,000                   | 555           | Sec2:          | 088             | FAIR , MARRIAGE | 1 .              |       |                 |                          | IX particles of ET offices & specialist introducer exchanges. Second     |                                |
| Telerali Asset Backet (teleral) | 87    | \$ 124,516,766                          | 56.5%  | 5 186,241,800                    | 980           | HACT.          | 999             | L+52 tops       | 5 -              | 2021  | 1.47            | Single Loan              | valuation increase conservatively not attributed to AIC analysis         | Hist Concern                   |
| Terrinal Secured Finance (Seese | Fixed | \$ 20,281,010                           | 28.6%  | 1 -                              | RAKE          | N.             | 100             | L + THR GOS.    | 1 -              |       |                 |                          | reason to the control of the second to the second to                     |                                |
| Salve Circ 33                   |       | \$ 70,000,000                           | 35.2%  | \$ 107,025,000                   | No.           | AAA            | 145             | L + 150 tops    | 5 -              | 2921  | 2.58s           | Single Loan              | City of Landon office - 705/000 sq ft multi let                          | Het Concern                    |
| Selan Circ III                  |       | \$ 50,258,216                           | 45,3%  | \$ 71,500,000                    | NT.           | AA             | 107             | L+200 ton       | 1 .              |       |                 | or proces                | and a country and a series at  | THE COLUMN                     |
| Salo Total                      |       | \$488,717,412                           |        | \$1,341,861,000                  |               |                |                 |                 | \$ .             |       |                 |                          |  |                                |
| Total                           |       | \$ 170,000,046                          |        | 16/84429.300                     |               |                |                 |                 | 1 .              |       |                 |                          |  |                                |

Where relevant, our analysis reflects the updated PPR1 forecasts following the UK's vote to leave the EU. The breakdown of our current portfolio can be seen in the charts below and are weighted based on deal exposure:

#### Portfolio breakdown by Geography/Sector/Vintage

| Geography             | Q1 2019 | Q4 2918 | Sector                    | Q1 2019 | Q4 2018 | Vintage | Q1 2019 | Q4 2018 |
|-----------------------|---------|---------|---------------------------|---------|---------|---------|---------|---------|
| Germany & Netherlands | 0%      | 0%      | Pubs                      | 5%      | 7%      | 2004    | 8%      | 0%      |
| Spain                 | 44%     | 53%     | Office                    | 29%     | 14%     | 2005    | 0.56%   | 1%      |
| UK                    | 56%     | 47%     | Retail                    | 44%     | 53%     | 2005    | 16%     | 19%     |
| Total                 | 100%    | 100%    | Multifamily               | 0%      | 0%      | 2007    | 4%      | 0%      |
|                       |         |         | Legistics                 | 0%      | 0%      | 2015    | 66%     | 0%      |
|                       |         |         | Light Industrial          | 0%      | 0%      | 2015    | 18%     | 88%     |
|                       |         |         | Office/Telephone Exchange | 22%     | 26%     | Total   | 100%    | 100%    |
|                       |         |         | Total                     | 4886    | 4000    |         |         |         |



PPR- part of the Co-Star Group, a leading US & European Real Estate Research and Data company

# **Walkthrough Sample – CDO OTTI**

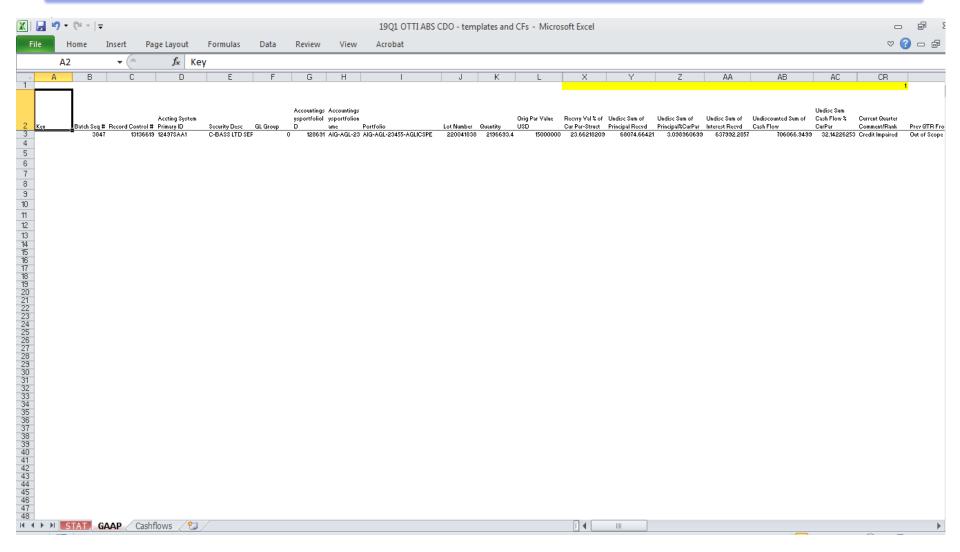
# Approval email from Head of Structured product for CDO

| From:     | ☐ Steele, Tim <tim.steele@aig.com></tim.steele@aig.com>  | Sent | Thu 3/7/2019 12:32 PM   |
|-----------|--|------|-------------------------|
| To:       | ☐ Keothavong, Lena   |      |                         |
| Cc:       | □ Brown, William   |      |                         |
| Subject:  | RE: CDO OTTI Deliverables Q1 2019 - Please Approve   |      |                         |
| Approve   | d.   |      | -<br>-<br>-<br>-        |
| From:     | □ Keothavong, Lena <lena.keothavong@aig.com></lena.keothavong@aig.com>                         | Sent | : Thu 3/7/2019 12:30 PM |
| To:       | □ Steele, Tim  |      |                         |
| Cc        | □ Brown, William; □ Keothavong, Lena   |      |                         |
| Subject:  | CDO OTTI Deliverables Q1 2019 - Please Approve   |      |                         |
| Message   | ■ 19Q1 OTTI ABS CDO - templates and CFs.xlsx (2 MB)  |      |                         |
| Tim,      |  |      | <b>□</b>                |
| Please se | ee attached the CDO OTTI Q1 2019 Investment Accounting template deliverable file for approval. |      |                         |
| Following | g our call with ERM too, we confirm there are no new credit impaired assets this quarter.      |      |                         |
| Thanks,   |  |      |                         |
| Lena      |  |      |                         |
| Lena Ked  |  |      | =                       |
|           | et Management (Europe) Limited   |      |                         |



## Walkthrough Sample – CDO OTTI

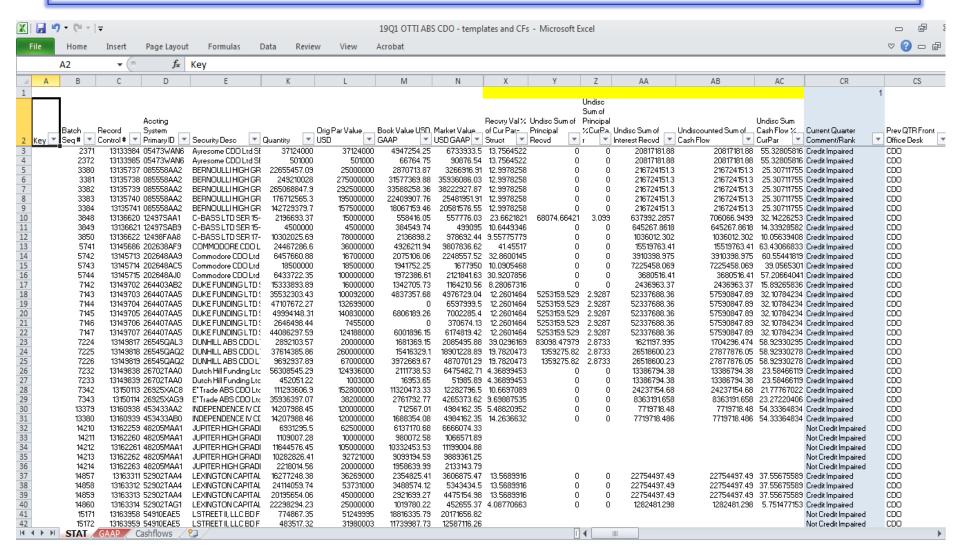
# Example IA template of CDO OTTI analysis - GAAP





## Walkthrough Sample - CDO OTTI

### Example IA template of CDO OTTI analysis - STAT





# **Walkthrough Sample – CDO OTTI**

# Submission of CDO OTTI analysis IA templates to Investment Accounting

| From:         | ☐ Keothavong, Lena <lena.keothavong@aig.com></lena.keothavong@aig.com>   | .9 PM |
|---------------|--|-------|
| To:           | ☐ Kang, Samuel   |       |
| Cc:           | □ Payne, Andrew; □ Parsons, Tim; □ McGloin, Kenneth; □ Fan, Hui; □ Destro, Anthony; □ Kogan, David S; □ Petitto, James M; □ Brown, William; □ Levy, Jasmin; □ Steele, Tim; □ Fulmer, Ryan; □ Sapia, Joseph Hidden on 30-12-2018, 17:47:06 SCTASK1964718; □ McIntyre, Steve⊚InvestACCT; □ Silva, Rosa⊚InvestAcct; □ Yu, Connie  |       |
| Subject:      | Q1 2019 ABS CDO OTTI File Posted   |       |
|               | ave reviewed the ABS CDO securities identified by Investment Accounting for possible impairment and do not have any new impaired securities in accordance with asset class specific credit policies and edures which are approved by AIG Credit Risk Management.   |       |
| Please        | se find our Q1 2019 file titled 19Q1 OTTI ABS CDO, with a time/date stamp of 03/07/19 10:15 at the following link:   |       |
| 2D%2          | s://share.connect.aig/teams/InvFixedIncome/Summary%20Reports/Forms/AllItems.aspx?RootFolder=%2Fteams%2FInvFixedIncome%2FSummary%20Reports%2FOTTI%2FOTTI%20Analysis%2FQ1%202019%20%20Structured%20Analysis&FolderCTID=0x0120004255556918E20B4FA774FFE9D60A9C66&View=%7BD703CECD%2D7F06%2D47D2%2D988D%2DB286ECF0E1FD%7D&InitialTabId=Ribbon%ad&VisibilityContext=WSSTabPersistence |       |
| Thank<br>Lena |  | ≡     |
| AIG II        | Keothavong Investments Asset Management (Europe) Limited   |       |



# **Walkthrough Sample – CDO OTTI**

# Appian approvals for Q1'19 CDO OTTI memo

### General Document Approval

General Information

Request ID: 9934

Subject: Process Memo: Europe - Q1/2019 for ABS CDO +ML3 Repack Europe

Submission Date: 3/12/2019 9:31 AM EDT

Final Approval Due Date: 3/28/2019 11:30 PM EDT

Initiator : Jasmin Levy Second Initiator :

Documents Approved: 19Q1 OTTI - ABS CDO and ML3 Repack\_final\_version2

Initiator Comments

| Comments                | Comments made by | Comments made on         |
|-------------------------|------------------|--------------------------|
| For review and approval | Jasmin Levy      | 3/12/2019 9:52 AM<br>EDT |
| For review and approval | Jasmin Levy      | 3/13/2019 5:17 AM<br>EDT |

#### Reviewers Comments

| Reviewer<br>level | Reviewer Name   | Reviewed Documents<br>Name                              | Comments   | Decision               | Assigned<br>On              | Completed<br>On              |
|-------------------|-----------------|---|--|------------------------|-----------------------------|------------------------------|
| 1                 | Ryan Fulmer     | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version1 | Please<br>incorporate<br>the<br>discussed<br>clarification<br>regarding<br>HPI<br>scenarios. | Return to<br>Initiator | 3/12/2019<br>9:52 AM<br>EDT | 3/12/2019<br>10:23<br>AM EDT |
| 1                 | Ryan Fulmer     | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | reviewed   | Completed<br>Review    | 3/13/2019<br>5:17 AM<br>EDT | 3/13/2019<br>9:41 AM<br>EDT  |
| 2                 | Tim Parsons     | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | -  | Completed<br>Review    | 3/13/2019<br>9:41 AM<br>EDT | 3/13/2019<br>10:36<br>AM EDT |
| 2                 | Kenneth Mcgloin | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | Review<br>complete   | Completed<br>Review    | 3/13/2019<br>9:41 AM<br>EDT | 3/13/2019<br>6:53 PM<br>EDT  |
| 3                 | Andrew Payne    | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | Review<br>complete.  | Completed<br>Review    | 3/13/2019<br>6:53 PM<br>EDT | 3/14/2019<br>6:01 PM<br>EDT  |

#### Approvers Comments

| Approval<br>level | Approver Name   | Approved Documents<br>Name                              | Comments  | Decision | Assigned<br>On               | Completed<br>On              |
|-------------------|-----------------|---|-----------|----------|------------------------------|------------------------------|
| 1                 | Ryan Fulmer     | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | approved  | Approved | 3/14/2019<br>6:01 PM<br>EDT  | 3/18/2019<br>11:26<br>AM EDT |
| 2                 | Tim Parsons     | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | approved  | Approved | 3/18/2019<br>11:26 AM<br>EDT | 3/19/2019<br>12:14<br>PM EDT |
| 2                 | Kenneth Mcgloin | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack final version2 | Approved  | Approved | 3/18/2019<br>11:26 AM<br>EDT | 3/19/2019<br>1:59 PM<br>EDT  |
| 3                 | Andrew Payne    | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | Approved. | Approved | 3/19/2019<br>1:59 PM<br>EDT  | 3/22/2019<br>3:41 PM<br>EDT  |
| 4                 | Geoffrey Comell | 19Q1 OTTI - ABS<br>CDO and ML3<br>Repack_final_version2 | approved  | Approved | 3/22/2019<br>3:42 PM<br>EDT  | 3/25/2019<br>9:35 PM<br>EDT  |



## Walkthrough Sample - CDO OTTI

### Approved CDO OTTI memo



#### Asset Management

FOR INTERNAL USE ONLY

TO: Andrew Payne, Ken McGloin, Tim Parsons, Geoff Cornell, Ryan Fulmer,

Tim Steele

FROM: Will Brown, Lena Keothavong

DATE: March 2019

SUBJECT: 2019 Q1 OTTI – ABS CDO & ML3 Repack

#### Executive Summary

The scope of this memo is ABS CDO assets held on Statutory balance sheets by AIG Ins Cos which totals \$2.433bn Book Value across the following categories:

- ABS CDOs held directly by AIG Ins Cos (~\$342.8mm Book Value), which can be split into:
  - Not Purchase Credit Impaired (full principal recovery expected at purchase): \$59.8mm
     Book Value
  - Purchase Credit Impaired: \$283mm Book Value
     Note that 'credit impaired' refers to securities where we did not expect 100% recovery of principal at the time of purchase. It is an accounting classification only and does not refer to the expected yield.
- Senior Notes from the ML3 (LStreet) Repack Transactions (~\$2.090bn Book Value)

This memo does not cover the following:

The multi-sector CDO – CDS positions held at AIG-DIB are not in scope for the OTTI process.
 MLIII Repack Junior notes are also not in scope for OTTI.

Key changes to portfolio since the previous OTTI review are summarized below:

- Non-Credit Impaired ABS CDOs: No new exposures.
- Credit Impaired ABS CDOs: No new exposures.
- ML3 repack Senior Notes: No new repacks. Continuing analysis on the book to potentially conduct a further round of repacks in 2019.

This memo incorporates results from the ABS CDO Model developed by AIG Investment Analytics.

#### **OTTI Analysis & Results**

#### Accounting treatment for OTTI

- In this analysis, we project principal recovery on all bonds. If less than full recovery is projected in base
  case, then the bonds are classed as Credit Impaired. Once a bond is classed as Credit Impaired, it will
  remain as such going forward, even if principal recovery projections recover. If a bond is not Credit
  Impaired, then no OTTI is recorded.
- If the bond is not in an unrealized loss at quarter end (i.e. if market price exceeds book price) then no OTTI is recorded. This analysis is completed by Investment Accounting.
- If the bond is in an unrealized loss at quarter end, it will be written down to the Recoverable Value (the present value of expected future cash flows). The desk performs the calculation of Recoverable Value and provides to Investment Accounting.

#### Purchased Non-credit Impaired CDOs

The table below shows the yield and WAL by scenario for the ABS CDOs that were not credit impaired at the point of purchase.

|               |           |                    |        |            |            | BULL  |          |     | IASI  |          |     | TAIL  |          |     |           |
|---------------|-----------|--------------------|--------|------------|------------|-------|----------|-----|-------|----------|-----|-------|----------|-----|-----------|
|               |           |                    |        |            |            |       |          |     |       |          |     |       |          |     |           |
|               |           |                    |        |            |            |       |          |     |       |          |     |       |          |     |           |
|               |           |                    |        |            |            |       | Prin     |     |       | Prin     |     |       | Prin     |     | Credit    |
| CDO Deal Name | CLISIP    | <b>Current Par</b> | OPV    | Book Value | Book Price | Yield | Recovery | WAL | Yield | Recovery | WAL | Yield | Recovery | WAL | Impaired? |
| LAKESOS       | SIZIOTAKE | 29.6               | 624.00 | 14.0       | 47.1       | 5%    | 2%       | 9.0 | 5%    | 9%       | 9.0 | 5%    | 6%       | 9.2 | Yes       |
| JUPHS         | 48205MAJ2 | 13.7               | 113.80 | 12.1       | 99.5       | 16%   | 300%     | 1.9 | 10%   | 100%     | 2.0 | 15%   | 100%     | 2.2 | No        |
| JUPHG         | 48205MAA1 | 32.2               | 290.22 | 29.5       | 89.6       | 16%   | 100%     | 1.9 | 10%   | 100%     | 2.0 | 15%   | 100%     | 2.2 | No        |
| GRAND TOTAL   |           | 75.5               |        | 54.6       |            | 13.5% |          | 3.5 | 13.3% |          | 3.5 | 12.2% |          | 1.7 |           |

IP ASSET

|               |           |                    |      |            |            |       | BULL     |      |       | MSE      |      |       | TAL      |      |           |
|---------------|-----------|--------------------|------|------------|------------|-------|----------|------|-------|----------|------|-------|----------|------|-----------|
|               |           |                    |      |            |            |       | Prin     |      |       | Prin     |      |       | Prin     |      | Credit    |
| CDO Deal Name | CLEAP     | <b>Current Par</b> | OFV  | Book Value | Book Price | Yield | Recovery | WAL  | Yield | Recovery | WAL  | Yield | Recovery | WAL  | Impaired? |
| EABLIK        | G33294AD4 | 6.5                | 6.50 | 5.2        | 80.0       | 5%    | 100%     | 10.4 | 5%    | 100%     | 10.4 | 5%    | 100%     | 10.5 | No        |
| GRAND TOTAL   |           | 6.5                |      | 5.2        |            | 4.7%  |          | 10.4 | 4.7%  |          | 10.4 | 4.7%  |          | 10.5 |           |

These securities are split across 3 deals: Lakeside 2003-1A (1 cusip), Jupiter High Grade (2 cusips) and Fab-UK 2014-1 (1 cusip). For deals above with more than one cusip, these are all pari passu tranches which share similar economics (although coupons, book price and thus exact yield may differ by tranche).

<u>Lakeside 2003-1A</u>: We forecast a principal loss on this bond, and as such it is classified as Credit Impaired. This deal is backed by c.54% inner CDOs of which c.24% are trust-preferred CDOs. Investment Analytics have revisited modelling assumptions in recent months and concluded they are reasonable given the limited collateral information available.

No OTTI is expected on this bond as it is not currently in a position of unrealized loss (market price = 80.9, provided by Markit, exceeds book price = 47.1). If the market price were to decline below book price, then the bond would be written down to its Recoverable Value (55.6).

<u>Jupiter High Grade CDO I, II and III</u>: On 26th February 2019, Dock Street Capital Management succeeded Harding Advisory as the Collateral Manager across all three of the Jupiter High Grade CDO deals we have exposure to. Dock Street will assume all the responsibilities, duties and obligations of the Collateral Manager under the Amended Agreements and under the applicable terms of the Indenture.



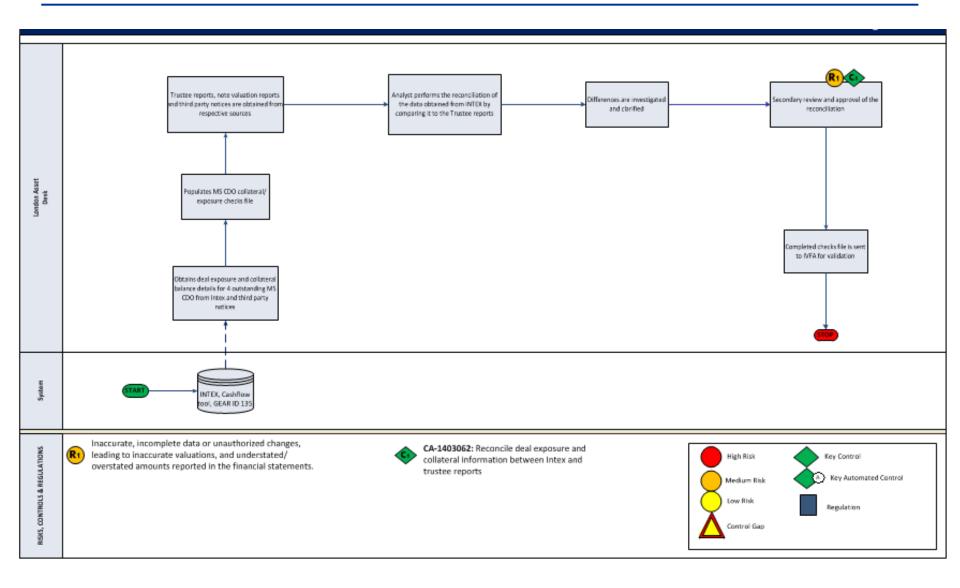
### **MS CDO Reconciliation – SOX Controls**

| Control CA-1403062 (Risk – Me   | edium, Frequency – Quarterly) |
|---|-------------------------------|
| Description   | Additional Description        |
| Quarterly, the Front Office Structured Products team reviews and reconciles details of the outstanding 4 Multi-Sector CDO transactions and track the USD deal exposures and collateral balance information between Intex output file and the Trustee Reports/Notices. Differences are investigated and resolved. Also, the quarterly change is reviewed for reasonableness. Evidence of review and sign off is via email approval of the reconciliation file. |                               |

On 04/04/2019, Lena Keothavong verified that the control description is accurate for 2019.



### **Process Flow – MS CDO Reconciliation**



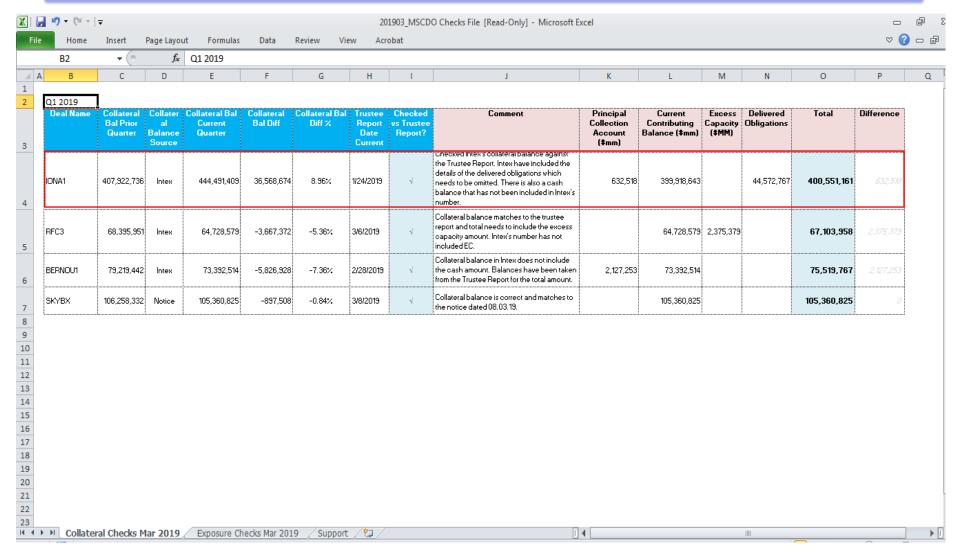


# Evidence of review and approval of collateral balance and exposure reconciliation

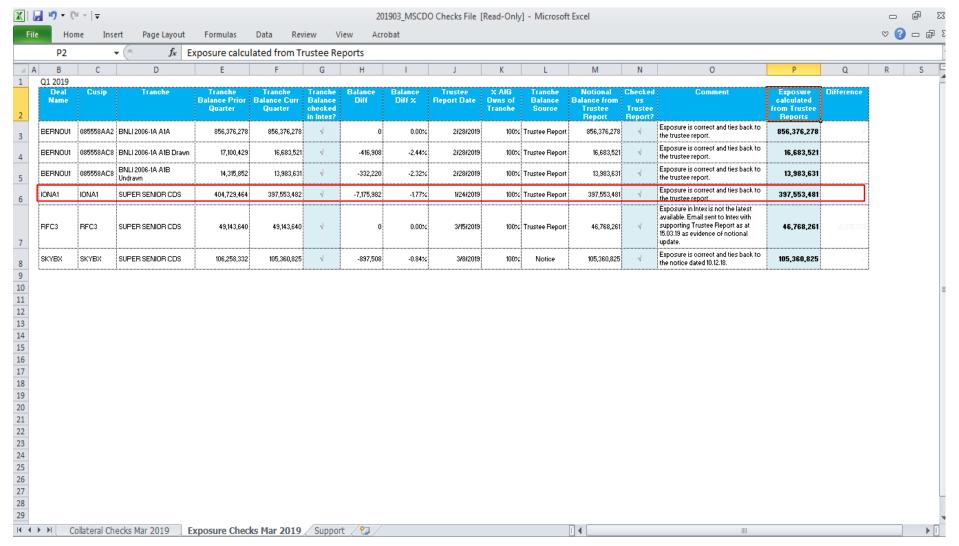
| From:  | ☐ Keothavong, Lena <lena.keothavong@aig.com></lena.keothavong@aig.com> | Sent:   | Fri 3/29/2019 6:44 AM  |
|--|--|---------|------------------------|
| To:  | □ Levy, Jasmin   |         |                        |
| Cc:  |  |         |                        |
| Subject:   | RE: MS CDO - Q1 2019   |         |                        |
| Thanks Ja<br>Lena  | asmin, this is approved.   |         | <u>-</u> □             |
|  |  |         |                        |
| From:  | Levy, Jasmin < Jasmin.Levy@AIG.com >                                   | Sent: 1 | Thu 3/28/2019 12:54 PM |
| To:  | □ Keothavong, Lena   |         |                        |
| Cc:  | Levy, Jasmin   |         |                        |
| Subject:   | MS CDO - Q1 2019   |         |                        |
| ✓ Message  Mess | ge 🔊 201903_MSCDO Checks File.xlsx (2 MB)                              |         |                        |
| Pleases  | see attached the Q1 2019 checks file for the MS CDO positions.         |         | <b>□</b>               |
| Please o   | can you review and approve the file.                                   |         |                        |
| Thanks,<br>Jasmin  |  |         |                        |
|  | Levy<br>vestments<br>set Management (Europe) Limited                   |         | ≡                      |



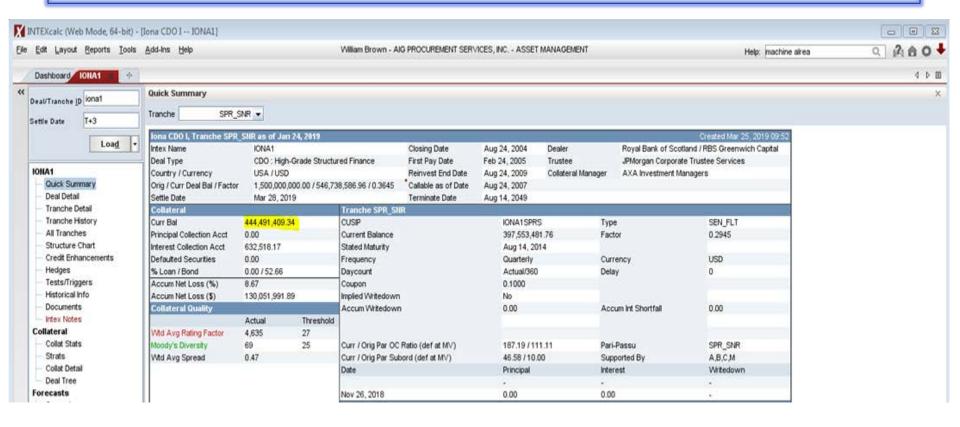
### Evidence of Collateral Balance reconciliation between Intex and Trustee



### Evidence of Exposure Balance reconciliation between Intex and Trustee



### Intex Screenshot evidencing Collateral Balance for a sample





# Trustee report evidencing Collateral Balance for a sample

Value (USD)

#### IONA CDO I

### Monthly Report for the period 25 Dec 2018 to 24 Jan 2019

Aggregate Loss Amount

#### **Outstanding Principal Balance**

| Cidos   | value (USD)   |
|---|---------------|
| Class A Secured Floating Rate Credit-Linked Notes       | 78,000,000.00 |
| Class B Secured Floating Rate Credit-Linked Notes       | 40,500,000.00 |
| Class C Deferrable Interest Secured Floating Rate Notes | 17,058,044.24 |
| Class M Subordinated Secured Variable Rate Notes        | 13.500.000.00 |

#### **Collateral Quality Tests**

| Test   | Initial      | Prior  | Current | Trigger | Result |
|--|--------------|--------|---------|---------|--------|
| (a) Minimum Weighted Average Spread Test*          | 0.53%        | 0.47%  | 0.47%   | 0.48%   | BREACH |
| (b) Moody's Min Weighted Average Recovery Rate T   | est 69.9%    | 68.0%  | 68.0%   | 67.5%   | PASS   |
| (c) S&P Min Wtd Average Recovery Rate Test - Cl    | ass A 69.54% | 71.96% | 71.98%  | 68.50%  | PASS   |
| - CI   | ass B 75.97% | 78.29% | 78.31%  | 75.00%  | PASS   |
| - CI   | ass C 85.07% | 86.43% | 86.44%  | 84.50%  | PASS   |
| (d) Moody's Minimum Diversity Test                 | 22.49        | 69.24  | 69.24   | 25.00   | PASS   |
| (e) Moodys Maximum Rating Factor Test              | 22           | 4615   | 4635    | 27      | BREACH |
| (f) S&P CDO Evaluator Test - Class A Loss Differen | ntial 7.65%  | 5.14%  | 5.14%   | 0.00%   | PASS   |
| - Class B Loss Differer                            | ntial 5.71%  | 3.13%  | 3.13%   | 0.00%   | PASS   |
| - Class C Loss Differer                            | ntial 4.87%  | 1.94%  | 1.94%   | 0.00%   | PASS   |
| (g) Maximum Weighted Average Life Test             | 5.8          | 5.5    | 5.5     | 7.0     | PASS   |
| (h) Forward Minimum Weighted Average Spread Tes    | t N/A        | N/A    | N/A     | N/A     | N/A    |
| (i) Single A Moody's Maximum Rating Factor Test    | 152          | 6109   | 6136    | 158     | BREACH |

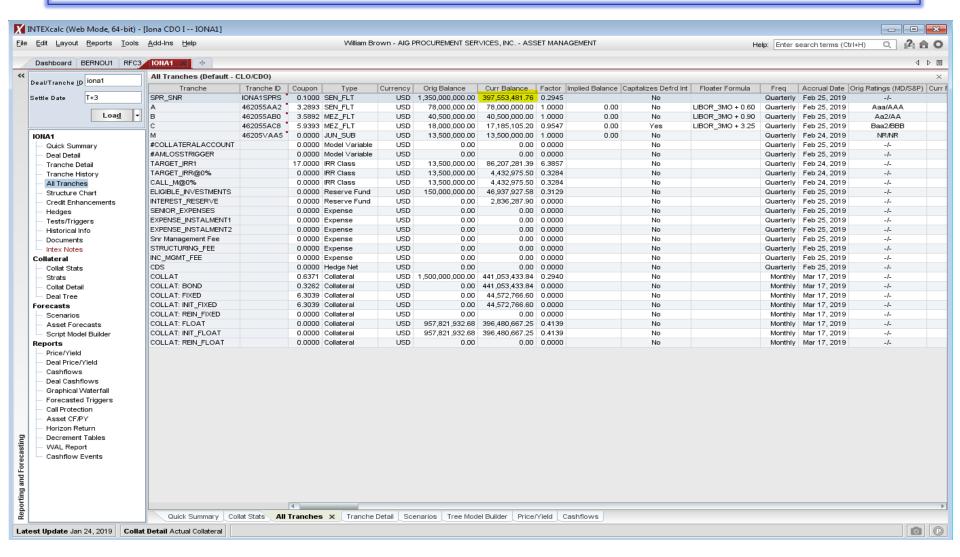
<sup>\*</sup> WAS amendment (20/05/2006) incorporated into current score

| Value (USD)      |
|------------------|
|                  |
| 399,918,642.76   |
| 1,500,000,000.00 |
| 17,473,139.79    |
|                  |
| 2,365,161.65     |
|                  |
| 632,518.17       |
| 968,332.95       |
| 2,836,287.90     |
| 0.00             |
| 0.00             |
|                  |
|                  |



130,051,991.89

### Intex screenshot evidencing Exposure Balance for a sample





# Trustee report evidencing Exposure Balance for a sample

#### IONA CDO I

### Monthly Report for the period 25 Dec 2018 to 24 Jan 2019

#### **Outstanding Principal Balance**

| Class   | Value (USD)   |
|---|---------------|
| Class A Secured Floating Rate Credit-Linked Notes       | 78,000,000.00 |
| Class B Secured Floating Rate Credit-Linked Notes       | 40,500,000.00 |
| Class C Deferrable Interest Secured Floating Rate Notes | 17,058,044.24 |
| Class M Subordinated Secured Variable Rate Notes        | 13,500,000.00 |

#### **Collateral Quality Tests**

| Test  | Initial    | Prior  | Current | Trigger | Result |        |
|---|------------|--------|---------|---------|--------|--------|
| (a) Minimum Weighted Average Spread Test*     | 0.53%      | 0.47%  | 0.47%   | 0.48%   | BREACH |        |
| (b) Moody's Min Weighted Average Recovery R   | 69.9%      | 68.0%  | 68.0%   | 67.5%   | PASS   |        |
| (c) S&P Min Wtd Average Recovery Rate Test    | - Class A  | 69.54% | 71.96%  | 71.98%  | 68.50% | PASS   |
|   | - Class B  | 75.97% | 78.29%  | 78.31%  | 75.00% | PASS   |
|   | - Class C  | 85.07% | 86.43%  | 86.44%  | 84.50% | PASS   |
| (d) Moody's Minimum Diversity Test            |            | 22.49  | 69.24   | 69.24   | 25.00  | PASS   |
| (e) Moodys Maximum Rating Factor Test         |            | 22     | 4615    | 4635    | 27     | BREACH |
| (f) S&P CDO Evaluator Test - Class A Loss Dit | ferential  | 7.65%  | 5.14%   | 5.14%   | 0.00%  | PASS   |
| - Class B Loss Dit                            | fferential | 5.71%  | 3.13%   | 3.13%   | 0.00%  | PASS   |
| - Class C Loss Di                             | fferential | 4.87%  | 1.94%   | 1.94%   | 0.00%  | PASS   |
| (g) Maximum Weighted Average Life Test        |            | 5.8    | 5.5     | 5.5     | 7.0    | PASS   |
| (h) Forward Minimum Weighted Average Spread   | d Test     | N/A    | N/A     | N/A     | N/A    | N/A    |
| (i) Single A Moody's Maximum Rating Factor Te | st         | 152    | 6109    | 6136    | 158    | BREACH |

| _       |            |
|---------|------------|
| General | Statistics |

| Portfolio                             |                  |
|---------------------------------------|------------------|
| Outstanding Portfolio Notional Amount | 399,918,642.76   |
| Maximum Portfolio Notional Amount     | 1,500,000,000.00 |
| Market ∀alue of Delivered Obligations | 17,473,139.79    |
| Collateral Portfolio                  |                  |
| Collateral Portfolio Balance          | 2,365,161.65     |
|                                       |                  |

#### Account Balances

| 632,518.17   |
|--------------|
| 968,332.95   |
| 2,836,287.90 |
| 0.00         |
| 0.00         |
|              |

#### Loss Amount

Aggregate Loss Amount 130,051,991.89

399,918,643 2,365,162 397,553,481



\* WAS amendment (20/05/2006) incorporated into current score

# Communicating the reconciliation results to IVFA

