

Diversification Compliance Report and Certification

Name of fund: American Century VP International

Total Market Value as of	3/31/2021	222,261,414
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	Four Largest Investments	Market Value as of 3/31/2021	Cumulative % of Assets	I.R.C. Limitations
1	ASML HOLDING NV	5,605,337.38	2.514%	55%
2	LVMH MOET HENNESSY LOUIS VUITTON SE	5,091,230.46	4.797%	70%
3	RECRUIT HOLDINGS CO LTD	4,863,088.93	6.978%	80%
4	INFINEON TECHNOLOGIES AG	4,663,991.35	9.069%	90%

Total Assets	\$222,985,476
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Note: For purposes of diversification testing, all securities of the same issuer, all interests in the same real property project, and all interests in the same commodity are each treated as a single investment. In the case of government securities each government agency or instrumentality is treated as a separate issuer. See Treas. Reg. 1.817-5 for additional information.

Special Test for Variable Life Insurance

Where the only contracts based on the account are life insurance contracts (i.e., no annuity contracts), an account is adequately diversified to the extent it is invested in Treasury securities. Treasury securities held through a custodial arrangement that is treated as a grantor trust (e.g. CATs and TGRs) will be treated as Treasury securities if substantially all of the assets of the trust are represented by Treasury securities. Options on Treasury securities are not considered Treasury securities. Where an account is invested in part in Treasury securities, revise the above general diversification test percentage limits by adding to them a product of .5 and the percentage of the value of the total assets invested in Treasury securities. For example, if an account is 60% invested in Treasury securities, the percentage limit would be increased by 30% (0.5 x 60%) and would be applied to the assets of the account other than Treasury securities.

Alternate Test

If the alternative test under IRC Section 851 is used, those testing results should be attached.

Certification

The undersigned certifies that this Report and Certification, and any related attachments, have been prepared accurately and provide a true representation of account assets as of the last day of the quarter indicated above, and that the fund complies with IRC Section 817(h).

Mati Worku

Signed by Mati Worku
Senior Tax Specialist

4/15/2021

Date

