

AIG Employee Handbook

United States

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Welcome to AIG

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Welcome to AIG



Introduction

This is the American International Group, Inc. (AIG) Employee Handbook, which has been prepared to provide all U.S. employees with the policies and practices of employment with AIG. The Company has developed these standards to provide an AIG work environment that is conducive to both personal and professional growth.

Welcome to AIG

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Welcome to AIG (continued)

In furtherance of the AIG Global Human Resources Policy, this Handbook describes policies and practices that govern the workplace, it also explains many of your responsibilities as an employee. For this reason, please review the Handbook and familiarize yourself with its contents to ensure that your employment is both productive and successful.

Please note: When we refer to “AIG” in this Handbook, we mean American International Group, Inc. and all of its wholly-owned subsidiaries. This Handbook supersedes any prior, AIG-wide Employee Handbooks, but is in addition to the AIG Code of Conduct, which remains in effect.

As you review the Handbook, please take note of these important provisions:

Your Employment with AIG is “at-will”.

This means that employment with AIG is not guaranteed and either you or AIG may end your relationship with AIG at any time, with or without cause and with or without advance notice, unless you are otherwise subject to a contractual notice period. You understand that AIG has the right to change your position, title, job responsibilities or compensation, or discipline you, at any time, for any reason. You also understand that your at-will employment relationship may only be modified with the express written approval of a senior officer of American International Group.

This Handbook is Not a Contract.

You understand that this Handbook is neither a contract of employment, nor a legally binding agreement and does not create a contract for wages or any other working conditions. AIG may, in its sole discretion, alter or amend these policies at any time, with or without notice. You are responsible for being aware of, and abiding by, all of the Handbook’s policies, including any of its future modifications and understand that the current version of the Handbook is available for review at any time on AIG’s intranet.

This Handbook Does Not Modify AIG’s Benefit Plans.

The Handbook includes some information about employee benefits that may appear in other AIG employee materials such as summary plan descriptions or plan documents. The descriptions of policies and benefit plans in this Handbook are not intended as substitutes for the documents that legally govern each policy and benefit plan. If there is any conflict between the employee benefits programs described in this Handbook and the information contained in other AIG materials, the respective formal legal plan documents and current laws will govern.

Applicable Law Governs Over This Handbook.

The policies in this Handbook do not supersede any law. Where an applicable federal, state or local law provides more favorable benefits or treatment for you than a particular policy in this Handbook, then that law applies.

If You Have Questions About This Handbook.

We want to make sure you understand the Handbook’s policies, so if you have questions, you should consult with your manager or Human Resources.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Table of Contents



Welcome to AIG	2	Accommodations	12
Introduction	2	Religious Accommodation	12
Your Employment with AIG is “at-will”	3	Protection Against Retaliation	13
This Handbook is Not a Contract	3	Open Door Work Environment	13
This Handbook Does Not Modify AIG’s Benefit Plans	3	Employment Dispute Resolution (EDR) Program	14
Applicable Law Governs Over This Handbook	3	Reporting a Potential Violation	15
If You Have Questions About This Handbook	3	Your Pay	15
Table of Contents	4	Hours of Work and Overtime	16
Working Together	7	Solicitation and Distribution	18
Diversity and Inclusion	8	Substance Free Environment	19
Equal Opportunity	9	Alcohol Use	19
Discriminatory Harassment and Bullying	9	Drug Use	19
Sexual Harassment	10	Tobacco-Free Workplace	20
Employee Resource Groups	11	If You Believe There Has Been a Violation	20
		Help for Employees Experiencing Substance Abuse Issues	20



Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Table of Contents (continued)

- Criminal Offenses..... 21
- Theft 21
- Attendance 22
 - Absenteeism and Tardiness 22
 - What You Need to Do 23
- Falsification of Timesheet Records 23
- Personal Presentation 24
 - Dress Code 24
 - Definitions 25
- Personal Tidiness Standards 26
- Visitors in the Workplace 26
- Children in the Workplace 27
- Animals in the Workplace 27
- Personal Relationships in the Workplace 28
 - Employment of Relatives 28
 - Intimate Relationships 29
 - When There May Be an Actual or Potential Conflict of Interest 29
- Insubordination 29
- Disruptive Behavior 30
- Violence, Threats, and Intimidation 30
 - Workplace Violence 30
 - Workplace Bullying 32
- Workplace Search 32
- Corrective Action 33

- Work-Life Balance** 34
- Flexible Work Arrangements 35
- Volunteer Time Off 35
- Lactation Accommodation 38
- Paid Time Off (PTO) 39
- Paid Sick Leave 42
- AIG Holidays 44
- Civic Duty 45
- Bereavement Leave 46
- Family and Medical Leave Act (FMLA) 47
- Service Member Family and Medical Leave 52
- Domestic Partner Leave 53
- Parental Leave 54
- Bonding Leave 57
- Uniformed Service (Military) Leave of Absence 58
- Unpaid Personal Leave 61
- Your Career** 63
- Performance Management 64
- Access to Personnel Files 64
- Global Mobility Program 64
- Internal Career Opportunities 66



Welcome to AIG

Table of Contents

- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Table of Contents (continued)

Leaving the Company 67

- Separation of Employment 68
- Voluntary Separations 68
- Involuntary Separations 69
- Proprietary Information/Trade Secrets/ Confidential Information 69
- Exit Survey 69
- Severance Plan 70
- Other Termination Payments or Benefits 70
- Employment Verification and Reference Checks 71

Our Facilities 72

- Emergency Conditions 73
 - Offices Remaining Open During Emergency Conditions 73
 - Office Closings 74

Information Technology, Intellectual Property and Media 75

- Electronics and their Use in the Workplace 76
 - Telephone Use 76
 - E-mail Use 76
 - Electronic Recordings in the Workplace 77
 - Video Conferencing 70
- Internet Security and Usage 78
- Confidential Information 81

- Trade Secrets 81
- Media Relations 83
- Social Media 84

Your Benefits 86

- Global Benefits Philosophy 87
- Disability and Reasonable Accommodations 88
- Short Term Disability (STD) 89
- Workers' Compensation 94
- Occupational Safety 98
- Unpaid Medical Leave of Absence 99
- Unapproved Leave of Absence 103
- Adoption Assistance Program 104
- Employee Assistance Program 105
- Employee Service Awards 105
- Learning and Development 107
 - Tuition Reimbursement 108

Appendix 109

- State Discriminatory Harassment Information 110
- State Leave Information 117
- State Paid Time Off (PTO) Regulations 124
- State Paid Sick Leave for PTO Eligible Employees 125
- State Paid Sick Leave for Employees not eligible for PTO 126
- Paid Sick Leave: Specific State Requirements 127

[Welcome to AIG](#)

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Working Together



The Company is committed to maintaining a positive, professional, discrimination-free workplace. We foster an environment where individuals are treated with dignity and respect so we can all work together comfortably and productively. This section provides expectations and rules of your workplace on how we interact with each other, and steps to take if a problem occurs.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Diversity and Inclusion

American International Group, Inc. is a global Company, and wherever we operate, and across every part of our business, we strive to create an inclusive environment which embraces difference and fosters inclusion. We believe that valuing diversity and inclusiveness is a competitive differentiator enabling us to achieve our vision to create unmatched value for our customers, colleagues, business partners and shareholders.

This Diversity and Inclusion Policy applies to all AIG employees and consultants, agents, representatives, contractors and contract workers when they act on behalf of AIG. It is intended to complement local statutory provisions.

AIG embraces and supports our employees' differences in age, ethnicity, gender, gender identity or expression, language differences, nationality or national origin, family or marital status, physical, mental and development abilities, race, religion or belief, sexual orientation, skin color, social or economic class, education, work and behavioral styles, political affiliation, military service, caste, and other characteristics that make our employees unique.

Our commitment to diversity and inclusion aligns with our values of People and Respect, and is reflected in our global Code of Conduct. Diversity and Inclusion are sponsored at the highest levels in the Company and initiatives are applicable—but not limited—to our practices and policies on global mobility, recruitment and selection; compensation and benefits; professional

development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of equity that ensures:

- diversity is recognized as a business interest, with every level of the organization holding responsibility;
- communication is respectful between all employees regardless of title or level;
- insights of diverse groups are sought and welcomed; employees are not alienated or excluded because they don't fit into a set of cultural norms;
- an environment where employees feel that their background and lifestyle do not affect perceptions of them as a professional, or affect their opportunities for development and promotion;
- flexible working practices are available where appropriate, as there is an appreciation that not everyone can and will work the same hours or in the same way. This removes disadvantage and discrimination to participation in work;
- the diversity of our workforce is visible at every level of the organization and in every business area; and
- employees are aware of their own unconscious and conscious bias and know how to ensure this does not manifest itself at work.

In respecting and valuing the diversity among our employees, and all those with whom we do business, managers and employees are expected to ensure that there is a work environment free of all forms of discrimination and harassment.

Click here to learn more: https://live.contact.aig.net/cltr/dvrs/Pages/Diversity_Homepage.aspx

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Roles and Responsibilities

Employees:

- ensure that the work environment is free of all forms of discrimination and harassment;
- be knowledgeable of and follow all Company policies, standards, and procedures;
- implement this Policy in their day-to-day work and their dealings with colleagues and customers; and
- notify their line manager or senior management of any concerns with regard to the conduct of other employees.

Managers:

- ensure employees are aware of and follow all Company policies, standards, and procedures;
- ensure that the work environment is free of all forms of discrimination and harassment;
- implement this Policy as part of their day-to-day management of employees;
- applying policies and practices in a fair and equitable way; and
- recognize unacceptable behavior and take immediate appropriate action.

Equal Opportunity

It has been and will continue to be the policy of the Company to be an Equal Opportunity Employer. The objective of the Company is to recruit, hire, train and promote into all job levels the most qualified applicants without regard to race, color, religion, gender, nationality or national origin, ethnicity, age, disability, genetic information, family or marital status, military service, gender identity or expression or sexual orientation, or any other characteristic protected by federal, state or local law. All such decisions should be made by utilizing objective standards based on the individual's qualifications as they relate to the particular position.

All other employee decisions including, but not limited to, compensation, benefits, transfers, company-sponsored training and tuition assistance are made without regard to race, color, religion, gender, nationality or national origin, ethnicity, age, disability, genetic information, family or marital status, military service, gender identity or expression or sexual orientation, or any other characteristic protected by federal, state or local law.

Discriminatory Harassment and Bullying

It is the policy of the Company to maintain a working environment free from discriminatory harassment, including sexual harassment, and bullying. Discriminatory harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual based on race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by statute, and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, (b) has the purpose or effect of unreasonably interfering with an individual's work performance, or (c) otherwise adversely affects an individual's employment opportunities.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Harassing conduct includes but is not limited to:

- epithets, slurs or negative stereotyping;
- threatening, intimidating or hostile acts;
- denigrating jokes;
- written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on Company time or using Company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

Workplace Bullying includes but is not limited to:

- Verbal, Written or Electronic Bullying: slandering, ridiculing or maligning a person or his/her family, persistent name calling that is hurtful, insulting or humiliating, using a person as butt of jokes, and abusive remarks;
- Gesture Bullying: non-verbal threatening gestures, glances which can convey threatening messages; and
- Exclusion: socially or physically excluding or disregarding a person in work-related activities.

The harassment and bullying may come from a supervisor, co-worker, or a non-employee who has a business relationship with the Company.

NOTE: For more information, refer to the Workplace Bullying section.

Sexual Harassment

Sexual harassment includes, but is not limited to, unwelcome or unwanted sexual advances, requests for sexual favors, as well as other conduct of a sexual nature when:

- the submission to or rejection of such conduct is made a condition of the employee's continued employment, or used as the basis for any employment decisions affecting the employee; or
- the conduct, if unwelcome and severe or pervasive, creates an intimidating, hostile or offensive working environment, or unreasonably interferes with an employee's work environment.

Examples of what may constitute sexual harassment, besides sexual advances and requests for sexual favors include, but are not limited to:

- Verbal: suggestive comments; statements or questions about personal sexual matters; insults, threats or jokes about personal or physical traits; or jokes of a sexual nature (including innuendos);
- Non-verbal: suggestive or insulting noises; obscene gestures; or the use of literature, e-mails or pictures that are sexually suggestive, revealing, demeaning, or pornographic; and
- Physical: touching, pinching, rubbing or massaging the body; coercing sexual relations; or assault.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Employee Resource Groups

The Company recognizes the strategic value of allowing groups of employees with common interests to formalize their professional relationship by creating an Employee Resource Group (ERG).

ERGs are voluntary, Company-endorsed employee groups dedicated to fostering a diverse and inclusive work environment within the context of the Company's mission, values, business practices and objectives. An ERG typically forms around a specific dimension of diversity such as ethnicity, sexual orientation, disabilities, etc. ERGs are also sometimes called affinity groups or network groups. Currently, the groups for which an ERG has been established include the following constituencies:

- Women
- Hispanics/Latinos
- Black or African descent
- Asian and Pacific Islander
- People with Disabilities
- Military Veterans
- Working Families
- Multiple Generations
- Lesbian, Gay, Bisexual and Transgender

Benefits of ERG's to AIG and Employees

The ERG can provide cultural expertise to the Company's employees and businesses in ways that can enable the Company to improve recruiting and retention, build cultural competence and leadership effectiveness, facilitate relationships between our organization and external communities and constituencies, and support specific business projects and initiatives. The ERG can enable employees at all levels to enhance their personal and professional development through direct participation in ERG activities and by voluntarily pursuing leadership roles in the ERG of their choice.

Eligibility and Participation

You may become a general member or leader of an ERG without regard to age, race, sex, ethnicity, physical ability, sexual orientation, or grade level. Membership is open only to current employees of the organization. Contractors and Consultants are not eligible for ERG membership.

Manager's Responsibilities

To the extent possible, managers are expected to support employees who wish to participate in ERG activities. An employee who desires to pursue a leadership role within an ERG should be encouraged, if he or she is in good standing in their current job. A commitment to a leadership role should be viewed as part of the employee's personal/professional development, and consideration should be given to ERG leadership accomplishments as part of the employee's year-end evaluation.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Oversight and Administration

AIG's Office of Diversity & Inclusion, is responsible for the administration of this policy as well as for the general oversight and governance of the ERGs. ERGs interested in sponsoring programs such as a speaker series or other initiatives will forward such proposals to the Office of Diversity & Inclusion for review, to ensure that the proposed program fosters and supports the values and business objectives of the Company. The purpose of an ERG is not to represent or act as an advocacy group for employees with respect to terms and conditions of employment. An ERG that seeks to engage in conduct that is illegal or inconsistent with the Company's policies, guidelines, and Code of Conduct will be dissolved. Programs and events proposed by the ERGs should align with Company values and business practices as determined by the AIG Office of Diversity & Inclusion.

Accommodations

- An accommodation is a modification or an adjustment to a job, the work environment or the way things usually are done, which enables a qualified individual with a disability to perform the essential job functions of his/her job or to enjoy equal benefits and privileges of employment.
- A reasonable accommodation is one that does not cause an undue hardship to the Company or pose a significant risk to the health or safety of the qualified individual or others.
- A qualified individual is a disabled employee who meets the required skill, experience, education or other requirements of a position that he or she holds or seeks, and who can perform the essential functions of the position with or without reasonable accommodation.

Examples of accommodations include, but are not limited to: workplace modifications, leave time, specialized equipment, or reassignment to a vacant position for which you are qualified. You may request an accommodation at any time. We may request medical information to certify that you have a covered disability. In the event that it is necessary to do so, the information will be evaluated by AIG Benefits Service Center at 1-800-265-5054 or the HR Shared Services ER Advisor Team at 1-800-265-5054.

NOTE: For more information on Accommodations, refer to the Disability and Reasonable Accommodations section.

Religious Accommodation

AIG respects the religious beliefs and practices of all employees and will make, on request, a reasonable accommodation for such observances provided the accommodation does not create an undue hardship on the Company's business.

Requesting a Religious Accommodation

An employee whose religious beliefs or practices conflict with his or her job, work schedule, or with the standard or practice on dress and appearance, or with other aspects of employment, and who seeks a religious accommodation should make a request for the accommodation to his or her immediate supervisor. The request should include the type of religious conflict that exists and the employee's suggested accommodation.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

How to Report Discrimination, Harassment or Bullying:

The Company expressly prohibits any form of discrimination, harassment or bullying. If you believe you have been either discriminated against, harassed or bullied in violation of the Diversity and Inclusion policy you should immediately report the incident to any of the following:

- your immediate manager or senior department manager;
- the HR Shared Services ER Advisor Team at 1-800-265-5054; or
- the Office of General Counsel at 80 Pine Street, New York, NY 10005.

Protection Against Retaliation

AIG depends upon your assistance to ensure the Company's policies are upheld. You will not be retaliated against for honestly reporting any concerns regarding violations of Company policy. You are further protected from being retaliated against when called upon to participate in an investigation conducted by Employee Relations or other AIG investigatory departments. Retaliation will not be tolerated, and acts of retaliation should be reported immediately to an HR Shared Services ER Advisor at 1-800-265-5054 to be promptly investigated.

Open Door Work Environment

Your opinions are valued by the Company. We are committed to creating an environment which encourages open communication, feedback, and discussion about any matter of importance to you.

AIG's Open Door Work Environment means that every manager's door is open to you so that you are free to talk with any manager at any time. By listening to you, the Company is able to improve, to address complaints, and to foster employee understanding of the rationale for policies, practices, processes, and decisions. AIG provides multiple avenues for employees to present issues, complaints, or grievances, in a safe and secure environment and ensures issues are addressed in a fair and timely manner. These include management, Employee Relations and Human Resources.

Manager's Responsibilities

In support of our Open Door Work Environment, managers should:

- create a work environment where employees' input is welcome, advice is freely given, and issues are surfaced early and shared without the fear of retaliation when this input is shared in good faith;
- be available for employees to present concerns and issues and;
- provide an outlet/resource/information to facilitate a resolution to the issue or offer advice to the employee about how to address the situation.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Employment Dispute Resolution (EDR) Program

The Employment Dispute Resolution (EDR) program provides a four-step procedure to resolve disputes between you and AIG or between you and another employee. The four (4) steps of the procedure are:

Step One: Open Door Work Environment

Step Two: Employee Relations Review

Step Three: Mediation

Step Four: Arbitration

If any area of your work is causing you concern, you have the responsibility to address your concern with a manager. As a first step, you are encouraged to present concerns to your immediate manager. You may present your concern verbally or in writing. Most problems can and should be solved at this level.

If you are uncomfortable discussing an issue with your manager, or not entirely satisfied with the response, you are encouraged to speak with a more senior member of your management or the division head. If you seek resolution of your concern at the most senior management level in your division, then you are encouraged, but not required, to present your case in writing.

Employee Relations Review

If you are still not satisfied with the result, or if you have elected to bypass your management, you may initiate a review by Employee Relations. An Employee Relations representative will look into the situation and work with you and the appropriate member of management to resolve your concerns.

This process may take anywhere from a few days to several weeks, depending on the complexity of the concern. The information gathered is reviewed only by those who have a need to know about the particular situation.

If your dispute does not involve a legally protected right, the Employee Relations review is the final step in the Employment Dispute Resolution (EDR) Program. If your dispute does involve a legally protected right, you may elect Mediation.

Mediation

If an issue cannot be resolved by management or Employee Relations you may choose to take issues related to legally protected rights to Mediation. Mediation is a confidential meeting in which an outside, neutral third party, called a mediator, assists you and the Company or you and another participating employee in finding a solution to resolve a dispute. The role of the mediator is to open up communication, make suggestions and assist the parties in developing their own resolution. The mediator does not render a decision or make a judgment. If an agreement is reached, the parties will enter into a written settlement agreement.

Arbitration

If your concern was not settled in Mediation, then you or the Company may elect Arbitration. Arbitration is a process in which the parties' employment-related dispute is presented to an outside, neutral third party; the arbitrator, for a final decision that is binding for both you and the Company.

For further information on the EDR Program, please see materials about the program on Contact: [https://contact.aig.net/US-Employee-Dispute-Resolution_1246_478505.html]

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Reporting a Potential Violation of Law, the AIG Code of Conduct or Other AIG Policy:

Most concerns likely to be faced at work can be resolved by talking to and working with management, Human Resources and/or the local compliance officer.

In addition, employees may ask questions, raise concerns or, where permitted by law, report instances of potential non-compliance with AIG policies or applicable laws and regulations by contacting any of the following:

- AIG's Global Compliance Group at 1-646-857-1877 or email corporatelegalcompliance@aig.com.
- AIG Compliance Help Line at 1-877-244-2210 or via Internet at www.aigcompliancehelpline.com. Communications to the Help Line may be made anonymously, subject to local laws.

AIG prohibits retaliation against any employee for making a good faith report of actual or suspected violations of laws, regulations, or AIG policies. In addition, employees may also contact Employee Relations at 1-800-265-5054 for further assistance.

Your Pay

Performance-based pay is the core of AIG's compensation plans and supports our pay-for-performance culture which enables us to attract and retain the best talent for the various needs of our businesses. AIG provides a market-competitive, performance-driven Total Direct Compensation (TDC) structure that is applied to employees from every level of the organization, including senior executives, working towards the same AIG-wide goals. TDC consists of an employee's base salary and annual incentives that reward employees for their individual performance as well as AIG's business performance. For designated employees, typically grades 24+, TDC also includes long-term incentives.

To ensure fair, compelling, competitive and consistent compensation opportunities throughout AIG, with few exceptions, each non-sales job is assigned a grade based on the position's responsibilities (internal equity) and compensation is administered under a structure that is anchored on competitive market data (external equity).

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Hours of Work and Overtime

It is AIG’s policy to pay for all time worked in accordance with applicable law. The following policies meet or exceed federal regulations. For specific information concerning this policy, including questions regarding recording work time, please contact HR Shared Services at 1-800-265-5054.

Deviations from this policy present regulatory risk and must be pre-approved. If you feel a deviation is required, please contact your Compensation Partner.

Applicability

Most non-exempt employees who work a regular workweek are paid for time worked in accordance with this policy. Exempt employees are not covered by this policy. Exempt employees are paid a salary pursuant to our regular payroll practice. Unless otherwise provided in a written policy issued by Global Compensation, this salary will compensate an exempt employee for all hours worked.

Time Worked

Generally, time worked includes all time an employee spends performing his/her job duties, regardless of where the work takes place. For non-exempt employees, time worked also includes certain work-related time, including:

- rest periods which last twenty (20) minutes or less;
- mandatory attendance at business meals, lectures, meetings and training programs;
- time spent on-call, if the employee is required to remain on-call on Company premises or so close that he/she cannot use the time effectively for his/her own purposes; and
- travel time other than normal commutation time in accordance with applicable state laws.

Overtime

- All hours worked in excess of forty (40) hours in a workweek are considered overtime hours and normally are paid at a rate of one and one-half times the employee’s regular rate of pay.
- When a non-exempt employee is scheduled to work fewer than forty (40) hours per week, he/she is paid at a straight hourly rate for all time worked (including time in excess of the normal workweek) up to and including forty (40) hours.
- Overtime will also be paid for time worked in accordance with applicable state law, if its requirements exceed federal requirements.

Holidays

For non-exempt salaried employees time worked on Company-designated holidays normally is paid at a rate of one and one-half times the regular hourly rate of pay in addition to straight time pay for the holiday itself.

In calculating overtime, time paid (but not worked) on a holiday is considered to be “time worked.”

Hourly employees are paid only for time actually worked, at either straight time or overtime rates, as applicable.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Early Closure Before an AIG Holiday

For non-exempt salaried employees, time worked before or after the shortened work day is paid at either straight time or overtime rates, based on the number of hours worked in the workweek. This extra time worked is paid in addition to straight time pay for regularly scheduled time.

Hourly employees are paid only for time actually worked at either straight time or overtime rates, based on the number of hour actually worked in the workweek.

NOTE: For more information on AIG Holidays, refer to the AIG Holidays section.

Pay During Emergency Conditions

When the Office Remains Open

If you are an exempt or salaried non-exempt employee and if government-sanctioned travel restrictions have been issued or a state of emergency has been declared by your city, state, or local agencies, and you are unable to report to work or remain at work for the duration of your scheduled workday due to unavailable public transportation and/or unsafe travel conditions, you will be paid. You will not be required to use PTO nor subject to Corrective Action.

Hourly employees are paid only for time actually worked, at either straight time or overtime rates, as applicable.

When the Office Closes

If you are an exempt or salaried non-exempt employee and you were scheduled to work and your office closes you will be paid for your regularly scheduled time. If you are able to work from an alternate AIG work facility, or from home, you are expected to do so. You will not be required to use a PTO day.

Hourly employees are paid only for time actually worked, at either straight time or overtime rates, as applicable.

Unauthorized Overtime

Non-exempt employees must obtain authorization prior to working any time in excess of the regular work schedule. However, not obtaining prior management approval is not sufficient reason for denying payment for time worked.

Corrective Action may be initiated to address incidents of time worked in excess of the regular schedule without prior management approval.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Solicitation and Distribution

To ensure a productive work environment, solicitation between you and your co-workers is generally prohibited during work time. Distribution of non-business related materials in working areas is prohibited at all times. Further, non-AIG employees are not permitted to solicit or distribute literature on AIG premises at any time for any purpose unless the solicitation/distribution relates to products or services offered by AIG's business partners and is approved by AIG management.

You are not permitted to use AIG resources, such as e-mail, bulletin boards, supplies, equipment, or facilities for solicitation or distribution.

Small-scale employee collections or sale of items for the benefit of non-profit organizations, such as schools, scouts and other youth clubs, or certain persons in need of charitable assistance, such as local families or employees in distress, are permitted provided that you:

- receive advance approval from your manager;
- raise funds to serve primarily charitable (vs. social) purposes and events;
- do so within your own work area during non-working time and before or after the department's work hours;
- do not pressure other employees to participate;
- do not use corporate resources (including e-mail and printers); and
- do not interrupt other employees during their work time.

You may not sell items to generate a profit for any other purpose, such as running a business. Unapproved solicitation materials may be removed from Company property without notice and may be cause for Corrective Action.

For questions about a specific solicitation, you should contact your manager or an HR Shared Services ER Advisor at 1-800-265-5054.

NOTE: The Solicitation and Distribution standard does not apply to Company-sponsored volunteerism or charitable events. Likewise, individual solicitations of a charitable (e.g., cookie sales or raffles) or personal (e.g., car for sale) nature may be permitted, provided they are not excessive or do not otherwise interfere with work. Solicitations for the commercial sale of non-AIG products or services (e.g., cosmetics or landscaping services), gambling activities or on behalf of an outside organization are prohibited.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Substance Free Environment

The Company is committed to providing you with a safe and healthy environment. To promote this commitment, we require that our workplace be a substance-free work environment. AIG asks you, its clients, contractors, and visitors to keep AIG workplaces and offices substance-free environments. It is prohibited to excessively consume alcohol or to be under the influence of controlled substances or illegal drugs while acting on behalf of, or conducting business for, AIG.

Any violation of this policy will be grounds for Corrective Action up to and including immediate termination.

Alcohol Use

The unauthorized use of alcohol while on Company premises, conducting work on behalf of AIG, or during working hours is prohibited.

Authorized use of alcohol may include Company-sponsored events, such as holiday parties, in which the Company provides alcohol for a limited and reasonable amount of consumption. Even in these rare occurrences, you are expected to be mindful that you are in a work environment and should refrain from consuming enough alcohol that you, and your judgment, become impaired.

Drug Use

The illegal possession, use, sale, distribution, purchase or transportation of any controlled substances or illegal drugs while on Company premises, conducting work on behalf of AIG, or during working hours is prohibited.

Controlled Substances and Illegal Drugs

Controlled substances and illegal drugs are those that are non-medically prescribed and include all forms of narcotics, hallucinogens, depressants, stimulants and other drugs whose possession, use or transfer is restricted or prohibited by law.

Drug Testing

AIG reserves the right to request you to undergo appropriate tests where it has reason to believe that you have used or may be under the influence of alcohol, illegal drugs, prescription drugs or other controlled substances.

If you experience significant work performance problems or have become involved in significant incidents or accidents where there is reason to believe that such incidents may be the result of substance abuse, you may also be required to undergo appropriate tests.

Such tests will be conducted by appropriate personnel and submitted to an independent laboratory for analysis. Employee acknowledgment and acceptance of this policy is a term and condition of employment. Refusal to consent to such testing may result in Corrective Action up to and including termination.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Searches of Company Property

AIG reserves the right to conduct searches of all Company property including, but not limited to, offices, desks, lockers and files, while investigating an alleged violation or when the Company has reason to believe that an employee is in violation of the Company's policies. The Company shall have the right to search with or without advance notice or consent, at any time. Refusal to cooperate during such search constitutes gross misconduct and may result in Corrective Action up to and including termination.

Tobacco-Free Workplace

The use of tobacco in all forms including but not limited to pipes, cigarettes, electric cigarettes, smokeless cigarettes, cigars, snuff and chewing tobacco is strictly prohibited within the workplace, except for in special designated areas. The workplace is defined as inside all AIG Company-owned or leased facilities, as well as inside Company-owned or leased vehicles.

This policy does not prohibit the use of tobacco products outside of the workplace. This policy does not apply to smoke-free products prescribed by a health care provider, such as products to assist with smoking cessation such as nicotine gum.

Failure to follow this policy may result in Corrective Action up to and including termination.

If You Believe There Has Been a Violation

If you observe behavior or receive information that suggests a violation of AIG's Substance-Free Environment, you must contact your manager or an HR Shared Services ER Advisor at 1-800-265-5054.

Help for Employees Experiencing Substance Abuse Issues

If you are experiencing problems relating to substance and/or alcohol abuse, you are encouraged to seek assistance through the AIG Employee Assistance Program (EAP). The EAP is a strictly confidential program and can be contacted by calling 1-800-774-6742 or guidanceresources.com and use AIG Web ID: AIG918 at any time.

You will not be subject to Corrective Action for seeking assistance in correcting a drug, substance or alcohol abuse problem. However, violation of our Substance-Free Environment or deterioration of work performance will not be excused or condoned because an employee has sought assistance.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Criminal Offenses

AIG respects your privacy outside of the work environment. If you are convicted of or charged with a crime, however, a negative public image of the Company and/or the impression of unethical practices within the Company may result. While AIG wishes to protect itself against activities that might be detrimental to its positive image, we also comply with laws that regulate the treatment of employees with certain convictions. For that reason, you are required to report certain charges and all convictions occurring during your employment, under the following guidelines.

Charges of criminal behavior or criminal convictions offenses, including those outside the course and scope of your employment with AIG, must be immediately reported to HR Shared Services ER at 1-800-265-5054. You need not disclose a conviction that is sealed, pardoned, dismissed or expunged or was issued or adjudicated by a youthful offender court. You need not disclose a speeding ticket or other similar traffic offenses. Your failure to immediately report a conviction or charge pursuant to this policy may result in corrective action up to and including termination.

The fact that you have reported a conviction or charge will not, by itself, result in your discharge or other disciplinary action. Instead, upon receipt of your report, AIG will determine whether such action is warranted by considering if the charge or conviction will, in any way:

- require action by AIG under relevant state and federal laws;
- impair your ability to fulfill all responsibilities and perform to the required standard;
- impact the Company's reputation; or
- damage the relationship of trust between you and AIG, or the Company's clients or other stakeholders.

Theft

AIG works to foster a safe and trusting work environment. This includes protecting the Company, you and the Customer from theft of personal identity and property, and intellectual property.

Theft is the unauthorized removal or misappropriation (i.e. unauthorized storage, transfer or use) of Employee, Company or Customer property. Such property may include, but is not limited to:

- personal possessions;
- personal identifying information;
- software;
- waste material;
- equipment; and
- trade secrets.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the
Company

Our Facilities

Information
Technology,
Intellectual Property
and Media

Your Benefits

Appendix

Working Together (continued)

You will not participate in any form of Theft or Misappropriation. Incidents of Theft or Misappropriation will be investigated and handled on a case-by-case basis. To prevent the theft of your personal items and identifying information, you should lock your belongings before you leave your workstation. In the event of separation of employment from AIG, all Company property is to be returned unless stated otherwise.

If you suspect a theft or misappropriation of personal, intellectual, Company or Customer property, you should report the theft to an HR Shared Services ER Advisor at 1-800-265-5054.

Employees found guilty of theft may be subject to Corrective Action up to and including termination, criminal charges and/or legal actions.

Attendance

Your contributions are vital to the success of our Company. Because your colleagues and our customers depend upon you, you are expected to be at work regularly and on time. Absenteeism, tardiness and early departures reduce the efficiency of operations and place a hardship on other employees.

Absenteeism and Tardiness

You should arrive to work at the agreed upon start time, return from all breaks at the agreed upon time and remain for the duration of the work day. Even if there is a legitimate reason for each absence, tardy, or early departure occurrence, a high rate of these incidents may affect your job performance or your ability to meet the requirements of your position.

Managers should monitor employee attendance.

Attendance and punctuality are important considerations when evaluating employees for pay-for-performance and career development. Recurring absences, tardiness, and early departures, unless corrected, shall be addressed by your manager and/or an HR Shared Services ER Advisor 1-800-265-5054 and may be cause for Corrective Action up to and including termination of employment.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

What You Need to Do:

- If you are going to be late or absent for any reason, call and notify your manager as soon as possible. In the case of an absence, you must call each day you are absent, unless you are on an approved leave of absence.
- If your immediate manager is not available, contact his/her designee.
- Notify your manager of your absence or late arrival prior to your scheduled start time so that alternate arrangements can be made to cover your work.
- In the isolated event that you are unable to use the phone, an e-mail will be considered notification.

Violations include, but are not limited to, predictable patterns of absences, increased frequency of absences or consecutive days of absences with no communication as set forth above. Failure to provide notification of absence for three (3) consecutive workdays may be considered job abandonment, and may subject you to Corrective Action, up to and including termination.

Your department may have a specific attendance policy that you may be expected to follow.

NOTE: Extended absences due to illness of eight (8) or more consecutive calendar days are excluded from this. Further, tardiness or absences protected by Federal, State, or local law or unscheduled time off as permitted by Company policy (bereavement, civic duty etc.) will not be counted toward any Corrective Action process. In the event that you will be absent due to illness for eight (8) or more consecutive calendar days, please contact your manager and HR Shared Services at 1-800-265-5054.

Falsification of Timesheet Records

Effective time management is crucial for any business to run efficiently and successfully. AIG expects you to accurately report the amount of time you work, including all time worked outside of the office, and any time taken as Paid Time Off (PTO).

Managers should determine if any falsifications or misrepresentations of amount of time worked are accidental or unintentional and help the employee correct any singular, unintentional mistake that may be found. Managers should report any intentional or consistent falsifications, misrepresentations or errors that are found to an HR Shared Services ER Advisor at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Behaviors considered falsifications of a time sheet record include, but are not limited to:

- willful or intentional falsification;
- misrepresentation;
- omission;
- inaccurate timekeeping or time recording;
- failure to report time;
- unapproved documenting of time on a time-keeping system from smart phone or internet when not at work station;
- unapproved documenting of time on a time-keeping system for another employee;
- not reporting overtime or gaining approval as required;
- failure to log out of a time-keeping system;
- working without documenting time on a time-keeping system;
- logging into a time-keeping system and then leaving workstation for extended periods of time outside of breaks; or
- failure to report exception time.

Corrective Action may be taken to address any consistent errors or intentional falsifications and misrepresentations that are present in the reporting of time worked.

Personal Presentation

To maintain a professional environment each employee's appearance must be appropriate for the setting and in accordance with local custom. Following is the definition of what is considered proper office attire, and what management's role is in determining proper office attire and setting rules for particular business units.

Dress Code

AIG has a business casual dress code. Business casual attire has become the new standard of dress in the business world. It is more comfortable, allows employees to show more personality and creativity, and makes for a more pleasant working environment. AIG has adopted a business casual dress code because we want you to feel more comfortable in the workplace.

How you present yourself is a reflection on our Company. You are the face of AIG to our customers, local communities and potential future employees. Your dress and appearance should always reflect the highest standard of professionalism. Business casual is different from at-home or weekend wear and should reflect the highest standard of professionalism. Casual clothing – clothing that may work well for sporting events, the beach or yard work – is not acceptable.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

There may be business units where the business casual dress code does not apply at any time; your manager will advise you of local dress requirements. Further, there may be times when you will need to dress in more traditional business attire, such as, when meeting with clients or customers, or representing the Company at an outside function. Nothing in this standard is intended to interfere with any employee's religious observance or medical condition requiring special clothing or outfitting. Therefore, we expect you to use common sense and good judgment at all times in your approach to dress.

Definitions

The following is a list of clothing items that are not considered business casual. This list is not all inclusive:

- denim jeans (Jeans may be permitted with appropriate management approval);
- leggings/stretch pants;
- revealing attire;
- slippers;
- sneakers;
- hats;
- shorts;
- gym attire;
- miniskirts;
- flip flops;
- beach wear/shoes;
- clothing that is stained, wrinkled, frayed or torn; or
- clothing that contains suggestive or inappropriate statements.

Refer all questions about appropriate clothing to your manager. Management generally refers to business unit or function senior leadership.

NOTE: Your manager may determine that additional items of clothing not listed above or your appearance in general is not appropriate for work. If your manager determines you are wearing clothing that is inappropriate for work your manager will explain to you why you have been deemed to be dressed inappropriately. Further, you may be sent home and subject to Corrective Action in accordance with the Company's policy. If you need a special accommodation that requires deviation from this policy, contact your manager or an HR Shared Services ER Advisor at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Personal Tidiness Standards

It is important that your appearance, including your personal tidiness, reflect the highest standard of professionalism. When conducting work on behalf of AIG, you should maintain social standards of proper tidiness for your clothing, body, hair, and mouth.

This policy is not intended to interfere with any employee's religious observance or medical condition. If you have any questions or concerns, contact your manager or an HR Shared Services ER Advisor at 1-800-265-5054.

Consistent untidiness may be subject to Corrective Action up to and including termination.

Visitors in the Workplace

AIG recognizes that you may need to bring outside visitors into our Company offices to conduct business or for personal needs. These standards are intended to maintain the safety and security of our facilities by protecting corporate and personal assets against theft and misuse. Further, it limits potential distractions and disturbances in the workplace.

Visitors conducting business with, or on behalf of, AIG will be allowed on site for a reasonable amount of time for the business to be conducted. All visitors should be treated with the same respect given to your AIG colleagues.

For personal visitors, you must obtain approval from your direct supervisor each time you invite a visitor into the workplace. Visits of a personal nature should be brief and infrequent. Your supervisor has responsibility for enforcing this standard and ensuring that visitors stay for only limited and non-disruptive periods of time.

All visitors must follow the check in and security protocols prior to entrance into any AIG office or building. Security reserves the right to deny entrance to anyone who does not have a legitimate reason to be on site or appears to be threatening in nature.

All visitors will be the responsibility of the AIG employee or associate who signed the visitor in.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Children in the Workplace

AIG recognizes that work/life balance is important to the health and overall well-being of our employees and their families. We want to maintain that balance and believe in a work environment that is conducive to productivity and customer focus; therefore, the workplace should not be used in lieu of childcare.

Children and other minor relatives are generally not permitted in the workplace because their presence can be a distraction and result in a decrease in employee productivity and focus. You are discouraged from bringing your children and other minor relatives to the workplace. We understand that there may be a time when you wish to bring a child or other minor relative to the workplace for a brief visit. These visits should be brief and infrequent. Further, you must obtain permission from your manager prior to the visit. If approved, the child or other minor relative must be accompanied by you at all times and all workplace security and safety procedures must be followed.

If management determines that your preapproved visit with your child or other minor relative has become a distraction to the other employees, your manager may request you end the visit earlier than scheduled.

NOTE: Children and other family members, including other minors, may be allowed to be in the workplace during Company-sponsored events.

Animals in the Workplace

While AIG recognizes that animals and pets are important to the overall well-being of our employees, we also strive to provide a safe and healthy work environment that is conducive to productivity and customer focus.

In accordance with this, animals are prohibited from the workplace with the exception of authorized service animals and working animals. For the purposes of this policy, the following definitions apply.

- The workplace is defined as all AIG Company-owned or leased facilities, parking areas and grounds as well as inside Company-owned or leased vehicles.
- Service animals (primarily dogs) refer to animals specifically trained to do work or perform tasks for the benefit of an individual with a physical, sensory, psychiatric or other disability. The work or task(s) performed by the animal must be directly related to the person's disability.
- Working animals refers to animals engaged in authorized service to the corporation (e.g., guard dogs, pest control animals, police dogs).

Employees who are in need of a service animal should follow the process to request an accommodation by contacting an ER Advisor at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

In all cases, only clean, trained, well-behaved, non-aggressive animals are allowed, and they are to be leashed and under control at all times. It is the responsibility of the employee who has been granted the accommodation to ensure that the service animals relieve themselves outside and the employee is responsible for cleaning up after his or her animal. Employees should not call upon co-workers or facilities staff to assist with caring for their service animals. Working animals are permitted under the direction of Corporate Security.

Employees are reminded not to touch, feed or pet a service or working animal when the animal is working as it distracts the animal from the task at hand.

NOTE: For more information, see the Disability and Reasonable Accommodations section of this handbook.

Personal Relationships in the Workplace

AIG is committed to maintaining a work environment free from favoritism and conflicts of interest, whether actual or perceived. This policy defines the manner in which AIG addresses employee relationships of a personal nature.

AIG understands the need for privacy in your personal life. However, you must avoid personal, romantic or sexual relationships with other employees that create actual or perceived conflicts of interest, potential charges of sexual harassment, discord or distractions that interfere with other colleagues' productivity.

Employment of Relatives

The Company may employ relatives (see definition below) of current employees, as long as it does not create an actual or perceived conflict of interest. Generally, relatives may work in the same business unit or location given the following guidelines:

- no direct reporting relationship may exist between relatives;
- no indirect reporting relationship may exist where relatives have influence over one another's conditions of employment, such as compensation, promotion, transfer, job assignment, performance assessment and/or termination; and
- there must not be any potential problem related to security, confidentiality, conflicts of interest or morale created by the hiring of a relative or co-habitant or transfer into a position.

The term "relative" includes spouse, domestic partners, parents, children, brothers, sisters, nieces, nephews, in-laws (brother, sister, mother, father, son, daughter) aunts, uncles, cousins, step-relatives as well as any person sharing the same household.

If a relationship does exist as defined above, the Company will make every effort to transfer one of the employees, at their choice, into any suitable vacancy. If there is no agreement between the employees as to who will seek a transfer, the Company will exercise its right to make the choice. If a transfer cannot be effectuated within thirty (30) days the employment relationship of one of them could be terminated.

NOTE: Exceptions can only be made by AIG's Board of Directors and the Senior Vice President of Global Human Resources.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Intimate Relationships

An employee who is involved in an intimate relationship with another employee may not occupy a position in the same department or zone of influence as, supervise, or work directly for the employee with whom he or she is involved. Such relationships give rise to an actual conflict of interest. The senior person in the relationship is referred to as the “Manager” and the junior person in the relationship is referred to as the “Subordinate,” and the “same zone of influence” means that the Manager is in a position to affect the terms and conditions of the Subordinate’s employment. Further, “Manager” does not necessarily refer to your direct manager.

Co-workers are not prohibited from engaging in an intimate relationship, provided that neither co-worker involved occupies a position where a reporting relationship or zone of influence exists. However, AIG reserves the right to take appropriate action if the personal relationship of such co-workers gives rise to an actual or potential conflict of interest or if it negatively impacts the work environment.

When There May Be an Actual or Potential Conflict of Interest

If an actual or potential conflict of interest arises as a result of a personal relationship, even if there is no line of authority or reporting involved, it is the responsibility and obligation of the employees involved to disclose the existence of the relationship with their managers or an HR Shared Services ER Advisor at 1-800-265-5054. In cases presenting an actual or potential conflict of interest, the individuals concerned will be given the opportunity to decide who is to be transferred to another position. If the decision is not made within thirty (30) calendar days, management will make an appropriate decision up to and including transfer or termination when necessary. Any violation may result in Corrective Action up to and including termination.

Insubordination

AIG strives to create a respectful and productive workplace where employees can perform to the best of their ability. It is important that there is an effective working relationship between you and your manager.

AIG’s expectation is that when speaking or interacting with your manager and/or supervisor you will do so with respect.

Insubordination includes, but is not limited to:

- verbal or nonverbal refusal or an unreasonable delay to complete work;
- cursing;
- verbal or physical intimidation;
- speaking loudly or argumentatively to or about your supervisor; or
- violations of authority.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

There may be some instances in which your refusal to follow your manager's instructions may be justified, including but not limited to the following:

- actions that would endanger your health, welfare, or safety and/or that of other employees; or
- actions that involve an illegal act.

Acts of insubordination toward your manager are subject to Corrective Action up to and including termination.

Disruptive Behavior

AIG strives to create an environment that is free from threats and acts of disruptive behavior. You should not disrupt, obstruct or impede the productive work environment of our Company.

You should refrain from activities or actions that will be distracting to your colleagues. Examples of disruptive behavior include, but are not limited to:

- yelling;
- excessive noise, such as using loud speaker phones in open areas; you are encouraged to make use of headphones or headsets for such activities;
- hosting group meetings or conference calls in non-designated areas, such as workstations; you are encouraged to make use of meeting rooms designated for this purpose;
- non-professional communication including cursing between colleagues;
- pounding fists; or
- throwing items.

Violence, Threats, and Intimidation

AIG is committed to providing you with a safe work environment. It is the policy of AIG to maintain a workplace free of violence, threats of violence or intimidation of others. The Company provides reasonable precautionary and reactionary measures to guard the safety of AIG employees from violence, physical or verbal threats, or intimidation.

AIG will not tolerate any acts or threats of intimidation and/or violence, no matter how minor, against its employees, customers or visitors either on Company premises or through its communications channels. Additionally, any acts or threat of intimidation and/or violence committed by AIG employees while doing business on behalf of the Company will not be tolerated.

Workplace Violence

The possession of weapons in the workplace or while conducting Company business, menacing behavior and stalking are all prohibited actions. Weapons are understood to be firearms, knives or any other device or item capable of inflicting serious bodily injury or used in a manner that threatens to bring serious bodily injury to others.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Threatening Behavior

Any person who exhibits threatening behavior, threatens or actually commits a violent act on Company property or while conducting Company business or is found to be carrying a concealed weapon on Company property should be removed from the worksite as safety permits and may be asked to remain away from the worksite pending the outcome of an investigation into the incident. For security reasons, there are times when employees have to obtain restraining orders that name the workplace. In those instances, employees are strongly encouraged to notify local Human Resources and/or Security personnel so risk situations can be managed proactively.

Acts of Violence

Violent behavior can include fighting, extreme verbal abuse, vandalism, bodily injury, destruction of property, etc. All acts of violence must be reported to your manager or Human Resources/HR Shared Services ER Advisor at 1-800-265-5054.

Reporting a Violation

The only way to prevent a potentially dangerous situation is if the appropriate people within the Company are notified. It is everyone's responsibility to report violations of this policy. Individuals who become aware of any violations should immediately notify Human Resources or their manager, local onsite security and/or Global Security. If there is an emergency where the severe threat is occurring or is imminent, immediately contact 911.

Once notified, the Company will take steps to immediately intervene and defuse a situation that involves threats or violence. All reports will be kept as confidential as possible.

If a determination is made that an act of violence has occurred, appropriate Corrective Action, which may include a mandatory psychiatric fitness-for-duty examination or termination of the offender, will be taken. The severity of the Corrective Action will be determined by the degree and/or frequency of the offense.

NOTE: For further guidance on workplace incidences that do not rise to the level of workplace violence, please review the following section, Workplace Bullying.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Workplace Bullying

AIG is committed to providing you with a healthy and safe environment in which to work, and will not tolerate any instance of bullying in the workplace. Workplace bullying is the unwelcome and humiliating treatment of Company employees while on Company property or while conducting Company business. If you believe workplace bullying has occurred, you should report it immediately to an HR Shared Services ER Advisor at 1-800-265-5054. All complaints of workplace bullying will be investigated promptly and appropriate action will be taken based on the investigation. Any employee found to have engaged in workplace bullying will be subject to appropriate Corrective Action, up to and including termination of employment.

Bullying Can Include, But is Not Limited to:

- Verbal, Written or Electronic Bullying: slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; and abusive remarks;
- Gesture Bullying: non-verbal threatening gestures, glances which can convey threatening messages; and
- Exclusion: socially or physically excluding or disregarding a person in work-related activities.

NOTE: Where an allegation of bullying is made, the intention of the alleged bully is irrelevant; what is important is the effect of the behavior upon the individual. Further, in the event you are concerned the bullying may or has resulted in workplace violence, please refer to the previous Workplace Violence Policy.

Any employee found responsible for violence, physical or verbal threats, intimidation, or workplace bullying will be subject to immediate Corrective Action.

Workplace Search

AIG is committed to providing you with safe working conditions. In order to do so, we may, from time to time, need to conduct workplace searches. Specifically, AIG reserves the right to conduct searches of all Company property including, but not limited to, offices, desks, lockers and files, while investigating an alleged violation or when the Company has reason to believe that an employee is in violation of the Company's policies. The Company shall have the right to search with or without advance notice or consent, at any time.

Refusal to cooperate during such search constitutes gross misconduct and may result in Corrective Action up to and including termination. Any manager who believes a search should be conducted must contact an HR Shared Services ER Advisor at 1-800-265-5054 for specific procedures regarding implementation. You may also contact the Global Security Operations Center (GSOC) at 1-212-458-2020.

Guidelines for Conducting a Workplace Search:

- Inspection of employees' property due to the possible possession, sale or use of any illegal or unauthorized substances or alcohol or for any other reason, must be based on reasonable suspicion.
- Generally, information supporting the need to conduct a search must be provided by a credible source with corroborating information.
- Observations and sources of information must come from legal methods and/or procedures.
- All searches will be performed with concern for each employee's personal privacy and confidentiality.
- All actions regarding a search will be documented appropriately.
- All searches require the prior approval of Employee Relations and Global Security.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Working Together (continued)

Corrective Action

The Company is committed to creating an environment in which you can perform your job duties to the best of your abilities. To maintain this commitment there will be occasions when we may need to address performance or inappropriate conduct or behavioral issues with our employees. Pursuant to this policy the business may take Corrective Action when performance issues or inappropriate conduct are identified to resolve them in a manner that gets an employee back on track. Corrective Action may include counseling, verbal warning or written warning. If your manager issues a Corrective Action warning you may be presented with a written document. Any of the Corrective Action avenues are intended to identify what the issues are and what may happen if you do not improve your performance or conduct.

Performance issues include anything related to your work performance that your manager deems an issue including but not limited to failing to satisfactorily perform your job duties. Inappropriate conduct includes any conduct that is considered a violation of Company policy, practice or code of conduct and may be subject to Corrective Action. Examples of inappropriate conduct include but are not limited to excessive absenteeism, dress code violations and inappropriate use of Company property, along with not adhering to other expectations outlined in the AIG Code of Conduct.

Failure to improve your performance or conduct and meet the expectations identified in the Corrective Action may result in the termination of your employment. In addition, there may be performance or inappropriate conduct issues that warrant immediate termination. Further, compliance violations may be disciplined pursuant to the Company discipline procedure for compliance violations. Note, your employment with the Company remains on an “at-will” basis and can be terminated at any time for any reason, with or without notice.

Management must consult with an HR Shared Services ER Advisor at 1-800-265-5054 prior to either placing an employee on a warning or terminating an employee absent extraordinary circumstances.

[Welcome to AIG](#)

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Work-Life Balance



The Company recognizes that from time to time aspects of your personal life may impact you at work. This section contains policies that help you obtain a work-life balance and provide you with options for dealing with time off, a leave of absence, a workplace accommodation or a flexible work arrangement.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Flexible Work Arrangements

AIG recognizes the growing demands on our employees' time, both personally and professionally. In recognition of these demands, employees who are meeting the performance expectations of their current role may be eligible for a Flexible Work Arrangement (FWA). A FWA is an agreement between the Company and an employee that allows the employee to perform his/her job outside of the traditional work hours and/or office locations.

Why FWAs are Being Offered

AIG is offering FWAs to provide its employees with greater flexibility in when and where work is performed. FWAs can reduce commuting time, allow employees to work during hours that may be more productive for them and ultimately allows employees to better balance their work and home life. Further, FWAs are essential to improving employee recruitment, productivity, retention, diversity and morale.

FWAs allow employees to alter when and where their work is performed that both support the business and an employee's job duties. Work locations may include an employee's home or alternate office. It is important to note that in the engagement of any FWA, the adherence to all business requirements, performance and production standards, and Company policies are essential and a requirement to make all FWAs successful.

Eligibility

To learn more about the FWA Program, your eligibility, and to read the Program Guides and Applications, visit the FWA Program page of Life & Career. Please note that a FWA must be discussed with, and approved, by your manager.

NOTE: Not all positions or business areas can support FWA due to the type or manner of work performed. A request for a FWA may be declined based on the needs of the business.

Volunteer Time Off

AIG established the "Giving Back" Volunteer Time Off (VTO) program to support activities that enhance and serve communities in which employees live and work, while enriching employees' lives.

Not all volunteer activities are identical in time and structure. Therefore, VTO has been designed to enable you to use full days (up to eight [8] hours) or half days (up to four [4] hours) to fulfill your VTO requests.

Manager Approval Required

All VTO requests must be approved by your manager in advance of a volunteer activity. You must submit a completed VTO request form at least one (1) week prior to the anticipated volunteer activity, and you must work with your manager to ensure that proper coverage and work responsibilities are handled during your VTO.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Up to Sixteen (16) Hours

Employees can utilize up to sixteen (16) hours of work time towards Volunteer Time Off (full or half days) each calendar year to volunteer with 501(c)(3) charitable organizations, in accordance with AIG's volunteering guidelines. Utilizing volunteer time for more than one (1) organization is permitted.

This time is refreshed at the beginning of each calendar year, unless the program is amended or discontinued. Time does not accrue from year to year and is not paid out when employment terminates. Use of VTO does not affect time off balances in an employee's Paid Time Off (PTO) bank.

Expenses

You are responsible for any expenses you incur in connection with a volunteer activity.

Eligibility

All full and part-time, regular employees of AIG and its businesses are eligible to participate in this program. There is no minimum service requirement for participation.

Employees must be meeting the performance expectations of their current role to participate in the VTO program. Employees not performing at a quality level, determined at the sole discretion of their manager will be deemed "not eligible to participate" until performance meets the level set by their manager. The benefits of this program are not available for interns, temporary agency employees, contractors, vendors, or retirees.

VTO may be used on projects and with organizations that benefit the community at large. Organizations are generally eligible if they are a charitable 501 (c)(3) organization. Employees can select a charity of their choice or volunteer with other AIG employees as a team at a qualifying, not-for-profit organization.

Eligible volunteer activities include:

- general organizational assistance;
- administrative work;
- pro bono work;
- manual labor;
- participation on a board or committee;
- fundraising events;
- mentoring, tutoring, coaching, chaperoning;
- social service support; or
- community building.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Ineligible organizations include those that:

- pose a potential conflict of interest for the Company and its employees;
- are not aligned with AIG’s Code of Conduct;
- have policies or practices, which unlawfully discriminate against a person or group on the basis of race, color, religion, gender, national origin, ethnicity, age, disability, genetic information, marital status, military service, sexual orientation, gender identity, gender expression or any other characteristic protected by federal, state or local law;
- place employees in unsafe situations;
- raise funds for individuals, rather than registered charities; or
- are considered veteran, labor, religious, political, fraternal, membership associations, or athletic groups, unless the activity is providing a benefit or service to the community at large (e.g., serving the homeless at a soup kitchen of a religious organization or registering citizens to vote through a local political group).

VTO Step-by-Step

- Employee notifies his or her manager at least one week before requested time off. The email must include information about the charitable organization, as well as date, time, and brief explanation of volunteer activity. Each time VTO is requested, a separate email must be approved and submitted. Both employee and manager retain a copy for their records.
- Employee submits request by logging into the “**Employee Giving System**” via *Life & Career*. The request serves as employee’s acceptance of the program’s guidelines. Once volunteering is completed, employee enters time on timesheet for that payroll period (select “volunteer” from drop-down list). While VTO is recorded using same process as vacation and sick time, it does not affect time off balances in an employee’s PTO bank. For questions about AIG’s VTO Program or about the eligibility of an organization, contact GlobalCorporateCitizenship@aig.com

NOTE: This program supersedes any previous employee volunteer programs of AIG and its subsidiaries. AIG reserves the right to suspend, amend, or terminate this program at any time. The interpretation and implementation of this program shall be determined by AIG Corporate Communications. All decisions will be final.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Lactation Accommodation

If you are an employee who has recently given birth, you are eligible for the following Lactation Accommodation for up to one (1) year from the date of the child's birth.

The Lactation Room

Lactation Rooms provide a private, comfortable place where breastfeeding mothers can express breast milk during the workday. In some business locations a Lactation Room will be designated on a continuous basis while other locations will designate a private space on an as needed basis. Every business and/or office location will evaluate their available space and determine whether a "Lactation Room" may be designated on a continuous basis. If designated, the Lactation Room will be private, sanitary, ventilated, locked, with comfortable seating and an electrical outlet. The room may also include a refrigerator. If no refrigerator is available in the room, you can either bring your own cooler or store expressed breast milk in a shared refrigerator (e.g. refrigerator in break room).

The room will be available on a first come, first serve basis. If the room is not available you should consult with HR Shared Services and/or Facilities to locate an additional space for lactation purposes. If there is currently no designated room at your particular business and/or office location, HR Shared Services and/or Facilities will provide you with a private space until such time that a designated Lactation Room is available. If you have a personal, unshared office space that has adequate privacy, you can use your office in place of the designated Lactation Room. Restrooms are not considered an appropriate space for a Lactation Room.

Frequency of Use

While you are breastfeeding, you can take a reasonable amount of break time to express milk as frequently as needed.

If you are a non-exempt employee, the time spent using the Lactation Room may run concurrently with your paid break time and meal period. A Flexible Work Arrangement may also be available to accommodate your breastfeeding schedule. For further guidance see the FWA Program.

What You Need to Do

Upon returning from Parental Leave or beginning your employment, notify your manager that you will need access to a Lactation Room. If you have any additional questions or concerns regarding an accommodation for lactation, contact an HR Shared Services ER Advisor at 1-800-265-5054.

NOTE: Some states have enacted leave legislation that may supersede this policy. You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Paid Time Off (PTO)

AIG recognizes the importance of helping you balance your work and personal life. To that end we provide Paid Time Off (PTO), which enables you to take time for yourself and your family when you need it.

PTO gives you the flexibility and the responsibility to manage your time off in a way that makes sense for you and the Company. Our PTO program gives you an allotment of days that encompasses vacation, sick and personal days. You are in control of how you use those days. You will have the flexibility to manage your time outside of the office, ensuring those absences that are unscheduled are not excessive. PTO can be used for, among other things:

- vacation;
- personal illness or illness of a family member;
- doctor visits or sick days;
- personal business;
- periods of Family and Medical Emergency Leave which are unpaid;
- the elimination period of Parental Leave; and
- the elimination period for Short Term Disability.

In addition, employees who work in a state with a statewide or local Paid Sick Leave law can use up to ten (10) days of accrued PTO per calendar year as PTO – Paid Sick Leave. PTO – Paid Sick Leave days are governed under the guidelines covered in the Paid Sick Leave (PSL) section below.

Eligibility

You are eligible to accrue PTO if you are actively employed, are a salaried employee and are regularly scheduled to work at least twenty (20) hours per week. Interns, temporary employees, hourly employees and employees on salary continuation are not eligible for PTO.

Additionally, certain commissioned employees including AIG Financial Network Career Distribution Agents, VALIC Financial Advisors, AIG Financial Network Agents and certain wholesalers are not eligible for PTO. However, they may be eligible for paid sick days as required by law. Please see the Paid Sick Leave section for more information. Eligibility inquiries can be addressed by HR Shared Services at 1-800-265-5054.

How PTO is Accrued

You begin accruing PTO on your date of hire, on a monthly basis. As of the next January, you begin your annual accrual. If you work any time during a month, you will accrue that month's PTO entitlement.

PTO accruals are based upon your years of service and in certain instances, as noted in the schedules below, your grade level. A year of service for PTO purposes is defined as any calendar year in which you worked. When you are eligible to advance to a greater PTO bank based on years of service, the increase will occur January 1 of each calendar year in which you worked. If you are promoted to a grade level with a greater PTO bank, your entitlement will be increased to that amount as the following month.

Welcome to AIG

[Table of Contents](#)

[Working Together](#)

Work-Life Balance

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Work-Life Balance (continued)

For Example: LaKeshia is a grade 16 and was hired October 15, 2014. So, in 2014, she accrued six (6) PTO days – two (2) days for October, November, and December, respectively. January, 2018, she will begin her fifth year of service (2014, 2015, 2016, 2017) and will therefore begin her five (5) year PTO accrual rate of twenty (27) days per year. She will not have to wait until October 15, 2018 to begin to accrue at the five (5) year accrual rate.

New Hire Schedule *

Month of Hire	PTO Days Grade 23 and lower	PTO Days Grade 24-26	PTO Days Grade 27-31
January	24	27.00	30.00
February	22	24.75	27.50
March	20	22.50	25.00
April	18	20.25	22.50
May	16	18.00	20.00
June	14	15.75	17.50
July	12	13.50	15.00
August	10	11.25	12.50
September	8	9.00	10.00
October	6	6.75	7.50
November	4	4.50	5.00
December	2	2.25	2.50

New hires will receive a prorated amount of annual PTO in their first calendar year of employment based upon their date of hire and grade level. The monthly accrual rate is calculated based on the number of annual PTO days divided by twelve (12). If you are hired during the month of January, you will receive the entitlement for the full year.

PTO Banks Based on Calendar Year

Years of Service	Annual # of PTO Days	Exceptions
1-4	24	
5-9	27	Minimum for Grade level 24-26
10-14	30	Minimum for Grade level 27- 31
15	33	

If your regular work schedule is less than the standard weekly hours for your business unit your PTO bank will be prorated accordingly. If you are full-time and your regular work schedule is less than five days per week, your PTO accrual calculation is prorated and assumes a regular work schedule of 40 hours per week over a five day work week. You do not accrue PTO while on an unpaid leave of absence. With management approval, you may be able to take PTO days prior to accrual.

For Example: Maria is eligible for 24 PTO days and her regular schedule is 35 hours per week over a 5 day work week. Maria’s annual PTO pay and accrual is 168 hours (24 days x 7 hours each day = 168 hours of PTO). Kyle is eligible for 24 PTO days and his regular work schedule is 40 hours per week over a 5 day work week. Kyle’s annual PTO pay and accrual is 192 hours (24 days x 8 hours each day = 192 hours of PTO). Brenda is also eligible for 24 PTO days and her regular schedule is 40 hours per week over a 4 day compressed work week. Brenda would also receive an annual PTO pay and accrual of 192 hours (24 days x 8 pro-rated hours each day = 192 hours of PTO).

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

If you have a break in service (you are terminated, subject to a reduction in force, or resign) and are rehired within six (6) months of your termination date (last day worked), your years of service will include the time prior to the break in service, and your annual PTO entitlement will reflect all years of service both before and after the break. If your break in service is greater than six (6) months, your rehire date is used to calculate your annual PTO entitlement.

Using your PTO Appropriately

When requesting to use your PTO days, it is important to be sensitive to the operating needs of your business or department. Advanced approval of PTO is required unless the time off is due to an unanticipated illness or emergency. As you plan to use your PTO for the year, it's important to keep the following points in mind:

- You should request your PTO and have it approved by the person to whom you report in advance of taking it, unless a lack of notice is unavoidable.
- If you are non-exempt you may use your PTO time in increments, the minimum increment permitted is fifteen (15) minutes.
- You must exhaust your PTO balance before you may take an unpaid personal leave.

Excessive Use of Unscheduled PTO

As stated above, you should make every effort to schedule your time off in advance. Excessive use of unscheduled PTO may be considered frequent absenteeism and may result in Corrective Action up to and including termination of employment.

Unused PTO

If you do not use your full accrued allotment of PTO by the end of the calendar year, you may carry over a maximum of ten (10) unused PTO days accrued in that year. If you work less than the standard weekly hours for your business unit, your carry over bank will be prorated accordingly.

NOTE: This provision of the PTO program is administered in accordance with applicable state law. You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

If You Leave the Company

If you leave the Company as a result of termination, resignation, retirement, or death, you will be paid for any remaining carry over days and any accrued, unused PTO based on your base rate of pay when you leave.

For More Information

Some AIG groups have a modified Paid Time Off (PTO) program. If you have questions about PTO, please contact your manager or HR Shared Services at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Paid Sick Leave

If you work in a state with a statewide or local Paid Sick Leave law, AIG provides Paid Sick Leave (PSL). Paid Sick Leave is an annual allotment of paid leave hours that you may use when you need time off for yourself or a covered family member for the diagnosis, care or treatment of an existing health condition or preventive care, or if you are a victim of domestic violence, sexual assault, or stalking.

Eligibility

You may be eligible to receive Paid Sick Leave if you meet the following criteria:

- you have been employed by the Company for at least ninety (90) days; and
- you work in a state with a statewide or local Paid Sick Leave law.

Using Your Paid Sick Leave

Requests for Paid Sick Leave should be made in advance, unless the time off is unanticipated. Please note:

- if you are a non-exempt employee, you may use your Paid Sick Leave allotment in increments; the minimum increment permitted is fifteen (15) minutes; or
- if you are an exempt employee, you may use your Paid Sick Leave allotment in increments; the minimum increment permitted is thirty (30) minutes.

For the purposes of Paid Sick Leave, covered family members are defined as: Child (biological, adopted, or foster child; legal ward; child of an employee standing in loco parentis); Grandchild; Spouse; Domestic partner; Parent; Grandparent; Child or parent of an employee's spouse or domestic partner; Sibling (including a half, adopted, or step sibling).

Generally, employees may not be penalized for requesting and using available Paid Sick Leave.

- This means that an employee's use of Paid Sick Leave, in most instances, will not be treated as an occurrence or used as part of a Corrective Action under applicable AIG attendance policies.

Paid Sick Leave—PTO Eligible Employees

If you work in a state or local jurisdiction with a Paid Sick Leave law, AIG allows you to designate up to ten (10) days of your accrued PTO as PTO-Paid Sick Leave days. These are not additional PTO days; rather the ten (10) PTO-Paid Sick Leave days are included in your total PTO bank. Designating a PTO day as PTO-Paid Sick Leave means that this time will not be treated as an occurrence or used as a part of a Corrective Action under applicable AIG attendance policies. When you use PTO-Paid Sick Leave days, you will be paid at the same rate as PTO days.

Any PTO days, including those that may be designated as PTO-Paid Sick Leave days, that have been accrued and unused are able to be carried-over up to a maximum of ten (10) days or the carry-over amount per individual state guidelines. Any carry-over PTO days may be used immediately in the new year as PTO-Paid Sick Leave. You cannot designate more than ten (10) days of PTO-Paid Sick Leave from your total PTO bank in any calendar year.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

For Example: During the year, you used most of your PTO, including 5 days designated as PTO-Paid Sick Leave days. As of December 31, you have 10 remaining PTO days. You will be allowed to carry over all of these days as PTO. In addition, you may designate any or all of these days as PTO-Paid Sick Leave days. During this and any subsequent calendar year, you can only designate 10 of your PTO days as Paid Sick Leave days (regardless of how many PTO days you accrue during the year.)

Similarly, if you leave the Company as a result of termination, resignation, retirement, or death, payment will be made for PTO days that are accrued and unused including those that may be designated as PTO-Paid Sick Leave days.

NOTE: Please refer to the Paid Sick Leave matrix (for PTO eligible employees) in the Appendix section of this handbook for the covered states.

Paid Sick Leave — Employees not eligible for PTO

If you work in a state or local jurisdiction with a Paid Sick Leave law, AIG provides Paid Sick Leave time based on the city or county requirements of your work location. The Paid Sick Leave time is front-loaded at the beginning of each calendar year. Using Paid Sick Leave means that this time will not be treated as an occurrence or used as a part of a Corrective Action under applicable AIG attendance policies. When you use Paid Sick Leave time, you will be paid based on your Annual Base Benefits Rate (ABBR).

If you do not use your full allotment of Paid Sick Leave by the end of the calendar year, you will lose it. Paid Sick Leave does not carry over from one calendar year into the next.

Similarly, if you leave the Company as a result of termination, resignation, retirement, or death, any unused Paid Sick Leave time will be forfeited and will not be paid out to you.

NOTE: Please refer to the Paid Sick Leave matrix (for employees not eligible for PTO) in the Appendix section of this handbook for the jurisdictions and the applicable amount of Paid Sick Leave time.

For More Information

In addition to Paid Sick Leave, you may be eligible for other leave options such as short-term disability or leave under the Family and Medical Leave Act. If you have questions about PTO, Paid Sick Leave or other benefits that may be available to you, please contact Human Resources Shared Services at 1-800-265-5054.

NOTE: You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

AIG Holidays

In addition to PTO, AIG designates certain days during the year as paid holidays.

AIG chooses on which holidays it will officially be closed based on annual research of industry standards. AIG's Yearly Holiday Schedule is published on Contact in the preceding December. Designated holidays will be observed on the calendar days on which they fall. However, holidays occurring on either Saturday or Sunday may be observed on the preceding Friday or following Monday. In addition, some locations operate on a half-day schedule on several of the days preceding an official AIG holiday.

Eligibility and Exceptions

Eligible employees are regular active salaried employees whose regularly scheduled work week is at least twenty (20) hours per week. Interns, temporary employees, hourly employees and employees on salary continuation are not eligible for paid Holidays.

Most employees follow the Yearly Holiday Schedule. But, because of the nature of our work, not all locations, business units, and employees are eligible. Please review the Yearly Schedule for exceptions and alternate schedules for locations and employees including, but not limited to:

- certain commissioned employees, including VALIC Financial Advisors, AIG Financial Network Career Distribution Agents and External Wholesalers;
- Mount Mansfield employees;
- AIG Business Units that follow the Stock Market Calendar;
- AIG Direct Employees; and
- AIG Travel Guard Employees.

Holiday Pay

For information regarding pay during AIG Holidays please refer to the Your Pay section in this handbook.

Time Off and AIG Holidays

An employee will not receive Holiday pay during any unpaid leave or inactive status.

If a Company holiday occurs on an eligible employee's PTO day, it will be counted as a Holiday instead of a PTO day.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Civic Duty

AIG encourages you to fulfill your mandatory civic responsibilities and works to accommodate your need for time away from work for this purpose.

Eligibility

Regular active salaried employees whose regularly scheduled work week is at least twenty-eight (28) hours per week and employees whose regularly scheduled work week was at least twenty (20) hours per week, but less than eight (8) hours per day on or before December 31, 2002 are eligible for Civic Duty.

Ineligible employees include: hourly employees, employees on unpaid leave, interns, and contingent or temporary staff. Additionally, certain commissioned employees, including AIG Financial Network Career Distribution Agents, VALIC Financial Advisors and certain wholesalers are not eligible.

Eligible Duties

Types of civic duty include but are not limited to:

- court duty/jury duty;
- witness testimonials;
- voting; or
- attending a statutory board/committee meeting.

Not covered under this civic duty standard include but are not limited to:

- appearing in court to pay a fine;
- appearing in court under prosecution;
- attending an event that does not align with AIG corporate policy or culture; and
- attending a fund raising, activist, campaign, or protest event.

Pay During Civic Duty

You will receive full pay for time off when called upon to complete a mandatory civic duty. You are permitted to keep any payment provided to you for fulfilling your mandatory civic duties, in addition to your regular pay.

In recognition of work and family concerns, employees on non-standard shifts are not generally required to report to work after having served mandatory civic duty during the day. Like employees working other shifts, they will be paid for this time.

While you are fulfilling a civic duty, you are required to keep your manager apprised of your status.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Notification

When you are made aware that your service will be required, you should contact your manager as soon as possible to inform of the dates and times needed off from work. If your service ends prior to the end of the workday, contact your manager to discuss whether you should report to work for the remainder of the workday.

Returning to Work

Upon returning to work, you may be asked to provide your manager with written documentation clearly stating the number of days that you attended your civic duty event.

Bereavement Leave

It is important when faced with the death of a loved one that employees are provided with the appropriate time to grieve. Bereavement Leave provides you with up to five (5) days paid leave from work to be used within thirty (30) days of the death to mourn the loss of an immediate family member and spend time with your family. The five (5) days are in addition to, and will not count against, your PTO bank. The five (5) days do not need to be taken consecutively (See the Example below). One (1) day off with pay is given for attending the funeral or memorial service of extended family if the funeral is held on a regular workday. Exceptions may be granted by HR Shared Services, 1-800-265-5054, if the employee is the one responsible for the funeral arrangements.

Immediate family, for the purposes of Bereavement Leave, is defined as:

- spouse/domestic partner; AND
- you or your spouse/domestic partner's:
 - sibling/step-sibling;
 - grandparent/step-grandparent;
 - parent/step-parent;
 - legal guardian relations;
 - child/step child; and
 - grandchild/step-grandchild.

Extended family, for the purposes of Bereavement Leave, is defined as:

- aunts/uncles;
- cousins; and
- great-grandparents.

All employees are eligible for Bereavement Leave. If the time you would take for Bereavement Leave for the death of an immediate family member falls while you are not scheduled to work or while you are on an approved leave of absence, whether paid or unpaid, then you are not eligible for Bereavement Leave.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

If you are on Paid Time Off (PTO) when the death occurs and when you would take the Bereavement Leave as a result, you may take Bereavement Leave for the eligible days instead of using your PTO time.

Example: Your immediate family member dies and you take three (3) days Bereavement Leave to grieve with your family. Two (2) weeks later you plan to attend a memorial service held for the same immediate family member who recently passed. You have two (2) remaining Bereavement Leave days in connection with that immediate family member's death that you may use to attend the memorial service.

When a Death Occurs

When you experience a death in your family, we expect you to contact your manager to let him/her know you will be taking Bereavement Leave. If it is not immediately possible to contact your manager, please let him/her know as soon as it is possible. If you are unable to call your manager, it is acceptable to send an e-mail.

If you or a family member are having difficulties dealing with the loss of your loved one, you or the family member are encouraged to seek assistance through the Company's Employee Assistance Program (EAP).

The Employee Assistance Program is a strictly confidential program and can be contacted by calling 1-800-774-6742 or guidanceresources.com and use AIG Web ID: AIG918 at any time.

Family and Medical Leave Act (FMLA)

This policy grants eligible employees up to a total of twelve (12) work weeks of time off without pay, and with job reinstatement to the same or similar position in a twelve (12) month period due to incapacity due to pregnancy, prenatal medical care or child birth, the placement of a child for adoption or foster care; the serious health condition of the employee that makes him or her unable to perform his or her job's duties; or for the care of an employee's immediate family member who has a serious health condition.

Although Family and Medical Leave (FML) is unpaid, the Company allows employees to concurrently use available Paid Time Off (PTO) or Paid Sick Leave (PSL), as well as Short-Term Disability (STD) benefits, if available, during the FML period.

NOTE: The AIG Benefits Service Center administers all leaves of absence, including those qualifying as Family and Medical Leave Act eligible. The AIG Benefits Center can be reached at 1-800-265-5054.)Some states have enacted leave legislation that may supersede this policy. The AIG Benefits Service Center can help determine if a state has specific requirements.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Qualified Leave Reasons

The Company will grant FML to eligible employees for the following reasons:

- for the birth of, and to care for, a newborn child;
- for the placement of a child for adoption or foster care with the employee, and to care for the newly placed child;
- when the employee is unable to work because of a serious health condition; and
- to care for an immediate family member who has a serious health condition.

NOTE: The FMLA also allows eligible employees to take leave as a result of a family member’s service in the Armed Forces under certain conditions. Please refer to the Service Member Family and Medical Leave Policy for additional information on service-related FML.

Eligibility

To be eligible for FML, an employee must:

- have worked for the Company for at least twelve (12) months, and
- have worked at least one thousand two hundred fifty (1,250) hours over the previous twelve (12) months immediately preceding the start of the leave.

The determination of whether an employee qualifies for FML will be made at the time a leave of absence is requested. If an employee is deemed ineligible for leave under FML, or has exhausted his or her twelve (12) weeks of FML, the employee may be entitled to a leave of absence under the Company’s established policies addressing other leaves of absence.

Definitions

Twelve (12) Month Requirement:

In order to meet the twelve (12) month requirement, the twelve (12) months need not be consecutive, provided that any break-in-service is for a period of less than seven (7) years. Periods of approved military leave will be counted as time worked when calculating the months of service requirement for FML.

Immediate Family Member:

For purposes of FML, “Immediate Family Member” is defined as an employee’s parent (not a parent-in-law), spouse, domestic partner or child. Please refer to the Domestic Partner Leave section for additional information.

Spouse:

For purposes of FML, “Spouse” is defined as an individual who is in a marriage, including common-law marriage, which is legal according to the law of the state where the marriage was entered into, regardless of where the couple resides. “Spouse” also includes individuals who entered into opposite-sex, same-sex, or common-law marriage outside of the United States, as long as the marriage is valid in that other country, and could have been lawfully entered into in at least one state in the United States.

Child:

For purposes of FML, a “Child” must be under the age of eighteen (18), or eighteen (18) years of age or older and incapable of self-care because of mental or physical disability. A child can be a biological, adopted, step or foster child of the employee, a legal ward of the employee, or a child for whom the employee is serving in loco-parentis (i.e., the employee has day-to-day responsibilities to care for or financially support the child, but the employee has no biological or legal relationship with the child, such as in the case of the child of the employee’s domestic partner).

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

FML Limitations

Spouses employed by the same employer may be limited to a combined total of twelve (12) work weeks of family leave for the following reasons:

- birth and care of a child; or
- the placement of a child for adoption or foster care, and to care for the newly placed child.

Notice and Scheduling Requirements

FML may be taken all at once (referred to as “continuous” FML), or, under certain circumstances, intermittently in blocks of time or by reducing the normal work schedule. Use of both “continuous” and “intermittent” FML leave is subject to approval by the AIG Benefits Service Center based on review of medical certification from a health care provider, or other supporting documentation such as proof of birth or adoption.

Employees seeking FML should provide written notice at least thirty (30) days prior to the proposed leave to their manager and the AIG Benefits Service Center. Where advance notice is not possible, such as in the event of a medical emergency, notice should be given as soon as possible.

Employees should notify their manager and the AIG Benefits Service Center on each day of absence pending leave approval, unless other arrangements have been made.

Pending review of the medical certification (if required), the AIG Benefits Service Center will notify the employee and the employee’s manager that the Company is provisionally designating the leave as FML. Both the employee and the manager will receive periodic written updates as approval or denial determinations are made, and/or FML eligibility is exhausted.

Employees on intermittent FML should make a reasonable effort to avoid disrupting Company operations, including scheduling doctor’s appointments outside of work hours. Each incident of intermittent leave must be reported to the employee’s manager, and to the AIG Benefits Service Center.

Failure to provide notification of a need for a FML leave or report intermittent leave incidents, and/or failure to provide required medical certification may delay or postpone the commencement of the leave and/or result in Corrective Action.

Certification by Health Care Provider

If FML is based on a serious health condition, whether it involves the employee or a family member (parent, spouse, domestic partner or child), medical certification from a health care provider will be required. Failure to provide such certification within the specified timeframe may result in a delay or denial of the employee’s leave.

Where the Company requires an employee to provide a medical certification, the AIG Benefits Center will provide a form for completion by the medical provider. The employee must return the required certification within thirty (30) business days of the commencement of the leave.

Employees should be aware that the Company may, under certain circumstances, require recertification of a medical condition.

In addition, employees will be required to report on their intent to return to work. Whenever an employee learns of a change in the anticipated length of a FML, the employee must notify the AIG Benefits Service Center within two (2) business days of learning of such a change.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Length of Leave

Eligible employees may be entitled to up to twelve (12) weeks of unpaid leave during any twelve (12) month period (this period is measured backward from the date an employee uses any FMLA leave). Each time an employee takes FML, the remaining leave entitlement equals the balance of the twelve (12) weeks that has not been used during the immediately preceding twelve (12) months.

Substituting Paid Leave (PTO) and Short-Term Disability (STD)

Employees have the option of using available PTO or PSL days as income replacement during an unpaid portion of a FML leave. PTO days do not have to be accrued prior to use.

If an employee is unable to work due to his or her own illness, after five (5) days the employee must apply for STD. The claim must be initiated by the eighth (8th) consecutive calendar day of the absence. To qualify for STD, employees must meet all the requirements as outlined in the STD policy independent of their request for FML. Time on STD will count towards the twelve (12) weeks of FML in a fifty-two (52) week period. An employee approved for STD may not use any PTO days during STD. However, available PTO will be applied for the first five (5) days of absence to satisfy the STD elimination period.

Benefits During Leave

The Company will maintain the employee's same health coverage provided that (a) in the case of a paid FML, the employee continues to pay his or her portion of the benefit costs, and (b) in the case of an unpaid FML, the employee prepays the benefit costs.

Upon return from FML, most employees will be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

The use of FML will not result in the loss of any employment benefit that accrued prior to the start of the employee's leave. PTO will continue to accrue only during that portion of the leave which is paid by using PTO or STD; PTO does not accrue during unpaid FML. For those persons returning from any unpaid FML, accrual of PTO days will resume starting the month the individual returns to active work.

Measuring the Twelve (12) -Month Period

When an employee is out on FML and the twelve (12) weeks of leave have expired, there will be no further FML benefit. To be eligible for a new FML, the employee must:

- be actively at work for at least thirty (30) days; and
- have reached the eligibility date for a new fifty-two (52) week rolling period.

The eligibility date is determined by looking back to the first day of FML leave, and then counting fifty-two (52) weeks forward from that period.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Actively at Work

“Actively at work” means performing all the regular functions of the employee’s regular occupation in the usual way, and on a normal basis at:

- the Company’s usual place of business;
- a location to which the Company’s business requires the employee to travel; or
- the employee’s home, if that is the business location the Company has agreed to, and the employee is physically able to work at another location, if the Company required it.

The employee is considered to be actively at work if he or she meets the conditions stated above, or if the employee is absent from work on a day which is an AIG Holiday, Paid Time Off (PTO) day or regularly scheduled day off, as long as the employee is actively at work on the preceding regularly scheduled work day.

Returning from Leave

Failure to return to work once FML has been exhausted may be considered unapproved time, and may result in a review for termination of employment. Please refer to the Unapproved Leave of Absence section for details. Upon the exhaustion of FML due to an employee’s personal medical condition, the employee may be eligible for additional leave as accommodation. For more information, please see the Disability and Reasonable Accommodation section of the handbook, or contact the AIG Benefits Service Center.

Managers must reach out to an HR Shared Services ER Advisor at 1-800-265-5054 prior to taking any action (including position replacement) if an employee is unable to return to work or has exhausted the twelve (12) weeks of FML.

For More Information

Information can be obtained by contacting the AIG Benefits Service Center. at 1-800-265-5054. Questions of interpretation under this policy will be resolved by reference to the FMLA and regulations issued by the United States Department of Labor. Employees’ rights under this policy shall in no case be less than those afforded by the FMLA.

NOTE: Some states have enacted leave legislation that may supersede this policy. You should check the Appendix in this handbook, and contact the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

NOTE: Dealing with issues that give rise to the need for FML can be challenging. Returning to work following FML can be stressful. For these and other matters, the Company offers the Employee Assistance Program (EAP) for free, confidential, one-to-one support at any time. You can contact the EAP by using its toll-free number at 1-800-774-6742, or online at guidanceresources.com and use AIG Web ID: AIG918. Professional EAP counselors are available 24 hours a day, seven days a week.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Service Member Family and Medical Leave

The federal Family and Medical Leave Act (FMLA) allows eligible employees to take leave as a result of a family member's service in the Armed Forces under certain conditions. This policy supplements the Company's FMLA policy and provides general notice of employee rights to such leave. Except as discussed below, an employee's rights and obligations to FMLA as a result of a family member's military service are still governed by the Company's existing FMLA policy.

Qualification

Employees may qualify for unpaid leave for any one (1), or for a combination, of the following reasons:

- eligible employees are entitled to leave for "any qualifying exigency" arising because the spouse, son, daughter, or parent* of the employee is on "covered active duty" or call to "covered active duty" status (or has been notified of an impending call or order to "covered active duty");
- for members of the regular Armed Forces, "covered active duty" means duty during deployment of the member with the Armed Forces to a foreign country; and/or
- for members of the reserve components of the Armed Forces (National Guard or Reserves), "covered active duty" means duty during deployment of the member with the Armed Forces to a foreign country under a call or order to active duty in support of a contingency operation.

"Qualifying exigencies" include the following:

- to address **any** issues arising from the military member's short notice deployment (within seven [7] days or less of notice), employee make take leave up to seven (7) calendar days;
- to make or update financial and legal arrangements arising from the military member's covered active duty;
- to attend counseling for the employee, the military member, or the child of the military member;
- to attend military events and related activities;
- to spend up to fifteen (15) calendar days with a military member who is on Rest & Recuperation leave during covered active duty; or
- to address certain childcare and related activities concerning the military member's child that arise from the military member's covered active duty. (This does not permit leave to provide routine childcare, but allows for leave to make arrangements for alternative childcare or to provide childcare on a non-routine, urgent basis.);
- to attend post-deployment activities for up to ninety (90) days following the termination of covered active duty;
- to address certain activities related to the care of the military member's parent who is incapable of self-care, when the care is necessitated by the member's covered active duty;

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

- an employee who is the spouse, child, parent, or next of kin of a covered service member or qualifying veteran may go on leave to care for a covered family member who has incurred an injury or illness in the line of duty or that existed prior to service and was aggravated in the line of active duty (provided that such injury or illness may render the family member medically unfit to perform duties of the member's office, grade, rank or rating);
- any other event that the employee and employer agree is a qualifying exigency; or
- the Company may require that an employee's request for military family leave be supported by appropriate certification.

Duration

- When leave is due to a "qualifying exigency," an eligible employee may take up to twelve (12) work weeks of leave during any twelve (12) month period.
- When leave is to care for an injured or ill service member, an eligible employee may take up to twenty-six (26) work weeks of leave during a single twelve (12) month period to care for the service member.
- Both types of leave run concurrently with other leave entitlements provided under federal, state, and local law.

Leave Under State Military Leave Laws

Some states also provide leave for family members of service members. The entitlements for such leave differ from state to state. The Company's policy is to comply with such laws in any circumstances where they apply to our employees.

Domestic Partner Leave

The Company has adopted a Domestic Partner Leave policy to allow employees with domestic partners to enjoy the same benefits that employees in married relationships are entitled to under the FMLA. The Domestic Partner Leave policy is based upon the guidelines applicable to the Company's Family and Medical Leave Act (FMLA) policy. Specifically, the eligibility requirements, notice and scheduling requirements, certification requirements, and all other terms and conditions that govern a leave under the Company's FMLA policy to care for a spouse will govern a leave under this domestic partner leave policy. Please refer to the FMLA policy for all terms and conditions.

FMLA leave banks will not be reduced when an employee takes a domestic partner leave. Instead, a separate domestic partner leave bank will be provided that follows the guidelines applicable to the Company's FMLA policy.

Domestic Partner Leave will run concurrently with any applicable state Family and Medical Leave that allows employees to take Family and Medical Leave to care for a domestic partner under applicable state law.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

In order to qualify as a Domestic Partnership, the following criteria must be met and certified:

- the parties are the same sex;
- the parties are at least eighteen (18) years of age and not related by blood;
- neither party is legally married to another person or in a domestic partnership with another person;
- the parties are in an exclusive, committed relationship that is intended to be permanent;
- the parties share a mutual obligation of support and responsibility for each other's welfare;
- the parties share a principal residence; and, if available in their resident state; and
- the parties have registered as domestic partners, entered into a civil union as allowed under state law.

American International Group, Inc. reserves the right to amend, or terminate this Domestic Partner Leave Policy at any time, or from time to time, in its sole discretion.

Parental Leave

The Company provides eight (8) weeks of Parental Leave at 100% of regular base pay to eligible employees.

Eligibility

In order to be eligible for Parental Leave, an employee must meet the Employment Eligibility Requirements and the Status Eligibility Requirements described below.

An employee meets the Employment Eligibility Requirements if the employee is a regular active salaried employee (a) whose regularly scheduled work week is at least twenty eight (28) hours per week; or (b) whose regularly scheduled work week was at least twenty (20) hours per week, but less than twenty-eight (28) hours per week on or before December 31, 2002, and who satisfy one of the Eligibility Requirements below. Hourly employees, employees on unpaid leave, interns and contingent or temporary staff are not eligible for Parental Leave.

In addition, certain commissioned employees including AIG Financial Network Career Distribution Agents and AIG Financial Network Agents and certain wholesalers are not eligible.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

An employee meets the Status Eligibility Requirements if the employee:

- gives live-birth to a child; or
- has adopted a child who is newly placed in the employee’s home and (a) who has not attained the age of eighteen (18) as of the time of the adoption, unless the child is physically or mentally incapable of caring for him or herself, and (b) who is not the child of someone living in the employee’s home (for example, the child of the employee’s spouse or domestic partner); or
- is the parent (but not the birth parent) of a newborn child who resides with the employee.

In the event that both parents work for the Company, each is entitled to Parental Leave.

Eligibility inquiries can be addressed by contacting the AIG Benefits Service Center at 1-800-265-5054.

Commencement of Parental Leave

Parental Leave may be taken in one (1) or more increments, each of which must be a minimum of (1) week (i.e., seven (7) consecutive calendar days), within the first fifty-two (52) weeks, as calculated from the date of birth or adoption and with manager approval.

Commencement for Birth Mothers

Parental Leave for a birth mother may commence at any time after the employee has completed a period of Short-Term Disability (“STD”), if eligible, related to the birth. If the employee is not eligible for STD, Parental Leave may commence any time within the first fifty-two (52) weeks, as calculated from the date of birth.

Commencement for Parents Who Are Not Birth Mothers

Parental Leave may commence any time within the first fifty-two (52) weeks, as calculated from the date of birth.

Commencement for Adoptive Parents

Parental Leave may commence at any time within the first fifty-two (52) weeks from the date: (a) the child (or children) is placed in the employee’s home pending adoption and the employee has filed the initial forms or application or petition for a legal adoption of such child (or children) pursuant to the adoption rules in the applicable jurisdiction; OR (b) an adopted child is placed in the employee’s home and the employee has legal documentation confirming that the child has been adopted.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Notice Required for Parental Leave

An employee must apply for Parental Leave with the AIG Benefits Service Center at 1-800-265-5054 and must also inform his or her manager at least two (2) weeks, or as soon as reasonably possible, in advance of the planned leave.

Required Documentation

Employees must submit proof of adoption or birth within thirty (30) days of the birth or adoption in accordance with the procedures governed by the STD policy. (Please refer to the Company's STD Policy for information regarding STD.)

To avoid any disruption in pay, employees must notify the AIG Benefits Service Center at 1-800-265-5054 as soon as possible of the child's date of birth or adoption.

Complications Before Birth of the Child

A pregnancy-related disability occurring before the birth of the child will be governed by the STD policy. Please refer to the Company's STD policy for information regarding STD. Once the employee has exhausted the twenty-six (26) weeks of STD leave, which includes any STD leave previously taken during the rolling fifty-two (52) week period, the employee may be eligible for Long-Term Disability (LTD), or Unpaid Medical Leave in the event the employee was not enrolled in the Company- paid or voluntary employee LTD coverage.

The Effect of Parental Leave on a Salary Increase

An employee is not eligible for a salary increase while on a Parental Leave.

The Effect of a Parental Leave on Benefits

During Parental Leave, employees will continue to receive salary continuation at 100% of regular base pay and the same health and welfare benefits that they received prior to commencing the leave. The employee-paid portion of the employee's benefits will be deducted from his/her pay in the usual manner.

Interaction with State Paid Family Leave Laws

In some states, the employee pays into a state fund to provide certain paid family leave benefits. Eligible employees who work in such states will be provided with the necessary information and documents to apply for these state benefits. Generally, if a state benefit leave would run concurrently with the AIG Parental Leave, the maximum benefit the employee can receive will equal 100% of the employee's regular base salary.

NOTE: Some states have enacted leave legislation that may supersede this policy. You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

Other Leave Available for Birth Parent Employees

In addition to Parental Leave, birth parent employees may be eligible for STD leave for a period of recovery post-birth. A typical STD leave is 6 weeks for a natural birth and 8 weeks for a c-section birth. Birth parent employees should refer to the Short-term Disability section of this handbook for more information. All employees may also be eligible for FMLA leave, and should refer to the Family Medical Leave Act section of this handbook.

American International Group, Inc. reserves the right to change or terminate this Parental Leave of Absence policy at any time or from time to time, in its sole discretion.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Bonding Leave

AIG provides two (2) weeks of Bonding Leave at 100% of regular base pay as salary continuation to employees who meet the Employment Eligibility Requirements.

Eligibility

An employee meets the Employment Eligibility Requirements if the employee is a regular active salaried employee and, is not the biological or adoptive parent of a child, but who qualify as being “in loco-parentis” with respect to a child. Some examples of in loco-parentis situations are grandparents who are responsible for raising a child, step-parents, foster parents, legal guardians, etc. However, the term does not include “parents-in-law.”

Hourly employees, employees on unpaid leave, interns and contingent or temporary workers are not eligible for Bonding Leave. In addition, certain commissioned employees including AIG Financial Network Career Distribution Agents, AIG Financial Network Agents and certain Wholesalers, are not eligible.

In the event that two eligible employees who both work for the Company are considered to be in loco-parentis with respect to the same child, each employee is entitled to two (2) weeks of Bonding Leave.

Eligibility inquiries can be addressed by HR Shared Services at 1-800-265-5054.

Commencement of Bonding Leave

Bonding Leave may commence beginning with the day the employee’s request for Bonding Leave is approved. The leave may be taken at any time within the first twelve (12) months following the date the child is placed in the home of the employee. Bonding Leave may be taken as a single leave period of two (2) consecutive weeks, or as two (2) nonconsecutive leave periods where each leave is one week.

Notice Required for Bonding Leave

An employee must apply for Bonding Leave with the AIG Benefits Service Center at 1-800-265-5054, and must also inform his or her manager at least two (2) weeks, or as soon as reasonably possible, in advance of the planned leave.

Required Documentation

Employees must submit proof of newly placed children for foster care or other in-loco-parentis situation within thirty (30) days of the start of the leave.

Employee’s Benefits Continue While on Bonding Leave

During Bonding Leave, employees will continue to receive the same benefits that they receive while working. The employee-paid portion of the employee’s benefits will be deducted from their pay in the usual manner.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Uniformed Service (Military) Leave of Absence

The Company complies with all applicable federal and state laws in granting leaves of absence, in providing re-employment rights, and in continuing benefits to employees whose uniformed service commitments require them to be away from work. Leaves are available for military training and active duty in military units, but there are differences that apply to each. Additionally, if you are the family member of a service member on leave, you may also be eligible for either “exigency” or “care-giver” leaves under the Family and Medical Leave Act or certain state laws.

Training Leaves

Employees are eligible to receive two (2) weeks of paid leave for reserve or active duty training, unless more paid leave is required by state law. Leave for training time that exceeds two (2) weeks will be without pay, unless the employee elects to use his or her allotted Paid Time Off (PTO) days, or unless state law otherwise requires. During such a training leave:

- the employee is considered an active employee;
- all benefits will continue without interruption; and
- while the training leave is paid leave, benefit deductions will continue. Should the training leave become unpaid leave, benefits will continue only if the employee pays the required premiums.

Active Duty Leaves

When an employee receives orders to participate in active uniformed service:

- the cumulative length of time an employee may take military leave and retain his or her reemployment rights is five (5) years, with certain exceptions that can extend the duration of leave beyond five years;
- employees must notify their immediate supervisor as soon as they know the required dates of service (unless such notice is precluded by military necessity or is otherwise impossible or unreasonable) and, if requested, furnish the supervisor with a copy of the official orders or instructions; and
- if the leave is needed because the federal or a state government has activated the employee’s unit, the employee will be granted a paid leave of absence for up to one (1) year; after the first year, the leave will be without pay. The employee may choose to drop benefit coverage. If the employee wishes, however, the following benefits will continue provided that the employee continues to make the required contributions or premium payments or to have the costs deducted from his/her paycheck.

Other Absences Related to Military Service

Employees are eligible to receive ten (10) days per calendar year of paid leave for the purpose of enlistment into the uniformed services, to perform funeral honors duty and for absences related to an examination to determine fitness for military duty, unless more paid leave is required by state law. Leave that exceeds ten (10) days will be without pay, unless the employee elects to use his or her allotted Paid Time Off (PTO) days, or unless state law otherwise requires.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Notice Required

Employees must notify their immediate supervisor as soon as they know the required dates of service (unless such notice is precluded by military necessity or is otherwise impossible or unreasonable) and, if requested, furnish the supervisor with a copy of the official orders or instructions within thirty (30) days of the start of the leave.

Group Life Insurance: Basic and Supplemental Life Insurance coverage is extended for a maximum of six (6) months following the month in which the uniformed service leave begins.

Personal Accident Insurance (Accidental Death and Dismemberment): This coverage is extended for a maximum of six (6) months following the month in which the uniformed service leave begins.

Medical, Vision, Dental Insurance: This is available for up to twenty-four (24) months following the month the leave began. If an employee elects any or all of these coverages (rather than the equivalent coverages available from the military), he or she will be required to pay the applicable contributions or premiums under these plans.

Incentive Savings Plan—401K: While an employee is on paid uniformed service leave, contributions will be deducted from the employee's paycheck and, as applicable under the plan, matched by the Company. Contributions and matching contributions will stop once the employee goes on unpaid leave status. A returning service member who is eligible for reinstatement has up to three times the period of service – up to five (5) years – to make up missed employee contributions. Please contact the AIG Benefits Service Center at 1-800-265-5054 for more details.

Pension Plan: On reemployment, the employee is treated as not having a break in service with the Company for purposes of participation, vesting and accrual of benefits, by reason of the period of absence from employment due to or necessitated by service in the uniformed services.

Long Term Disability (LTD): While on unpaid leave status, LTD coverage is extended for a period of one month following the month in which, the unpaid leave began. The employee has the option to re-enroll in benefits immediately upon return from service, without any additional requirements.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Returning from Leave

Employees must observe the following timelines regarding returning to work upon returning from military leave:

- if the leave was one (1) – thirty (30) days, the employee must report to work on the next business day (allowing eight [8] hours for travel) after military discharge;
- if the leave was thirty-one (31) – one hundred eighty (180) days, the employee must report to or submit an application for reemployment (oral or written) within fourteen (14) days of completion of military service. The period from completion of military service to reemployment is unpaid;
- if the leave was one hundred eighty-one (181) days or longer, the employee must report to or submit an application for reemployment (oral or written) within ninety (90) days of completion of military service. The period from completion of military service to reemployment is unpaid; or
- if an employee is hospitalized or convalescing from an injury or illness suffered while on leave, or from an existing injury or illness that was aggravated by the leave, the reporting or application deadlines specified above may be extended for up to two (2) years.

As a general rule, an employee is entitled to reemployment in the job position that he or she would have attained with reasonable certainty if not for the absence due to uniformed service, including appropriate pay, benefits, seniority and other job perquisites. To be eligible for reemployment, the employee must report to work or submit an application for reemployment in a timely manner. In addition, the employee must have received the type of discharge or separation from military service that makes the employee eligible for reemployment under federal or state law.

Leave Coordination

An employee going out on leave should contact the AIG Benefits Service Center at 1-800-265-5054 and his or her manager as soon as possible. The manager will handle the necessary paperwork and get guidance from the AIG Benefits Service Center at 1-800-265-5054. An employee returning from leave should contact his/her manager to confirm both job reinstatement and benefit reinstatement plans. While on leave, employees should contact the AIG Benefits Service Center with any questions regarding benefits.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Unpaid Personal Leave

Employees may be eligible for an unpaid leave of absence from work, if time off is needed for personal reasons not covered by other leaves. Unpaid Personal Leave may be granted when it does not unduly compromise the needs of the business.

Eligibility

Regular active salaried employees (a) whose regularly scheduled work week is at least twenty-eight (28) hours per week; or (b) whose regularly scheduled work week was at least twenty (20) hours per week, but less than twenty-eight (28) hours per week on or before December 31, 2002, may be eligible for an Unpaid Personal Leave.

Certain commissioned employees including AIG Financial Network Career Distribution Agents are not eligible. Eligibility inquiries can be addressed by HR Shared Services at 1-800-265-5054.

Employees must use all accrued, unused PTO prior to being eligible for an Unpaid Personal Leave.

Approvals

The employee must request approval of an unpaid personal leave through his or her manager. To initiate a claim for an unpaid personal leave, contact the AIG Benefits Service Center. Managers will only approve an unpaid personal leave if the employee has exhausted his/her PTO time. When considering approval of an unpaid personal leave, a reasonable and flexible attitude is expected in weighing the needs of the employee with the needs of the department and business, with consideration given to provisions that can be made to cover the employee's work during the leave.

Duration

The duration of an unpaid personal leave may be approved for a finite period of time from one (1) week up to two (2) consecutive months. An unpaid personal leave may be extended for up to a total of six (6) months, but such extension must be approved by the manager and reviewed by an HR Shared Services ER Advisor at 1-800-265-5054. Careful consideration and strong justification is expected in response to leaves for longer periods of time or for frequently recurring leaves.

Notice Required for Unpaid Personal Leave

Employees must apply for Unpaid Personal Leave with the AIG Benefits Service Center and inform his or her manager at least two (2) weeks, or as soon as reasonably possible, in advance of the leave.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Work-Life Balance (continued)

Effect on Other Time Off

While out on an unpaid personal leave, employees will not accrue additional PTO days. Employees will not receive holiday pay for a Company Holiday that falls during an Unpaid Personal Leave.

Effect of an Unpaid Personal Leave on Salary Increase

Employees will not be eligible for a salary increase while on an unpaid personal leave .

Effect of an Unpaid Personal Leave on Benefits

During an Unpaid Personal Leave, all benefits the employee received while working with the exception of Dependent Care Flexible Spending Accounts and Basic Short-Term Disability remain intact provided that the premium payments are submitted for continuation of benefits. Basic Long-Term Disability and Voluntary Long Term Disability continue for one (1) month following the date the employee begins the leave. It is the employee's responsibility to submit his or her premium payments to continue benefit coverage. In certain circumstances, employees will be required to reimburse the Company for benefits paid by the Company if the employee fails to return to work after the leave.

Effect of an Unpaid Personal Leave on Position

The Company will attempt to keep an employee's position available during an approved Unpaid Personal Leave. However, this may not be practical or possible in every case. In cases in which business needs mandate the immediate filling of the position, the Company will provide the employee with at least one (1) week's notice so that he or she has the opportunity to terminate his or her Unpaid Personal Leave and return to work. If the employee cannot return by the time the one (1) week notice period expires, the Company may fill the employee's position after the end of the one (1) week notice period.

If the employee is unable to return to work by the time the one (1) week notice period expires, and the employee's position is filled, upon the end of the unpaid personal leave, the employee will be given forty-five (45) unpaid days to look for another position within the Company. If another position is not offered to the employee, the employee will be eligible for severance pursuant to the Company's severance policy. The forty-five (45) day transition period and severance is not available to an employee who does not return to work after an initial approved Unpaid Personal Leave ends, and the employee has been denied an extension of the originally approved leave period.

American International Group, Inc. reserves the right to amend or terminate this Unpaid Personal Leave Policy at any time or from time to time, in its sole discretion.

[Welcome to AIG](#)

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)



Your Career

Your career and performance are important to AIG's success. Your Career gives you the information you need to take charge of your career. This section also explains ways you are rewarded for your service.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Career (continued)

Performance Management

Performance Management is a continuous process between employees and their managers. It works best when managers and employees engage in regular conversations about goals, performance and development. The Company has a performance management philosophy that supports and rewards your contributions through a transparent pay-for-performance approach. On an annual basis you will participate in the performance review process. We also offer training opportunities and other career development related programs.

For more information please see the Performance Management site on the AIG Intranet at <http://contact.aig.net/performancemanagement>. For any questions related to the performance review process and other performance management initiatives please contact the Performance Management team at aig_global_performance_management@aig.com.

Access to Personnel Files

As a current employee of the Company you may review your personnel file upon request. If you wish to review your file, please submit an e-mail request to HR Shared Services at HRSharedServices@aig.com with your name, employee ID number (if available), and, if you are only seeking to review specific documents, the documents being requested (e.g. offer letter). Upon receiving your request, you will receive a response within fifteen (15) business days of your request (or less, if required by law). If you have any questions, please contact HR Shared Services at 1-800-265-5054.

Global Mobility Program

The Global Mobility Program provides a global framework to support AIG business needs and objectives that require deployment of employees to a new work location. AIG's Global Mobility team develops and implements the program and policies to ensure effective permanent relocations and temporary assignments.

The intent is to provide financial assistance and professional services to employees and their household members who are approved for relocation or assignment benefits. These benefits help ensure a smooth transition and minimize the cost of transfer for both the Company and the employee.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Career (continued)

Eligibility

Employees and their families who have been asked to relocate or go on assignment by the Company may be eligible for assistance. Eligibility and application of Assistance may vary by grade level and by duration of relocation, assignment, and locations. Your Talent Acquisition or local HR representative will initiate the approval and authorization of mobility benefits on your behalf. Once the approval has been received, the Global Mobility team will authorize AIG's mobility vendor to contact you, review your benefits and serve as your advocate throughout the process. Please contact your local HR representative or GlobalMobilityCOE@aig.com for further information about your eligibility.

Types of Global Mobility Assistance Available

A comprehensive set of supportive benefits are provided to ensure that the employee and their household members are able to successfully complete their relocation in a timely manner. Ongoing support is provided for employees on an assignment. The assistance includes internal support, external services provided by carefully selected vendors, and monetary benefits. If you are requested by the Company to relocate or go on assignment, you will be provided with further information on the specific benefits you may be eligible for.

Additionally, AIG offers the opportunity for Temporary International Assignments across the organization. Job openings labeled Global Mobility Eligible indicate that the hiring manager will consider qualified internal candidates from countries other than the job's home country.

For information and FAQs go to: <https://live.contact.aig.net/glb/hr/crer/js/Pages/International-Assignments.aspx>

Reimbursement Agreement

Before relocation benefits are initiated, a relocating employee must sign a Reimbursement Agreement which sets forth the circumstances under which an employee is required to repay the Company for one-time relocation benefits. These circumstances include voluntary termination, voluntary cancellation, failure to complete relocation, or termination of employment for cause either within twelve (12) months from your new job start date, or the date household goods are delivered to your new location, whichever of the two dates is later. If an employee terminates within the repayment period, the local HR representative will contact Global Mobility to determine the repayment amount and pursue collection from the employee.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Career (continued)

Internal Career Opportunities

Getting Started

AIG encourages you to manage your career, take advantage of learning and development opportunities, and to grow professionally.

Our broad range of initiatives targeted at professional development and internal mobility are widely supported across the Company.

To assist you with mobility opportunities during your career, open roles are posted on AIG's global job board site on Contact.

Our procedures for hiring internally or transferring positions within AIG are designed to provide a fair and equitable process resulting in the appropriate match of an employee's skills, knowledge, and experience with any given position's job requirements.

Eligibility

You are encouraged to apply to open positions, if you:

- have been in your current role for a minimum of ten (10) to twelve (12) months; and
- are not currently on a written warning.

Please note that applying for a position does not guarantee that you will be automatically selected for an interview.

AIG looks within for qualified employees, including those who have been affected by a reduction-in-force, layoff, or return-to-work from an approved period of leave, as appropriate.

Application Instructions

If you are interested in being considered for an open role, please follow the instructions on the internal job board which can be accessed via the intranet at the link Job Search.

Positions are posted internally for a minimum of seven (7) business days. In addition to posting open positions internally, AIG reserves the right to recruit from outside the Company as needed.

Manager Notification

You are encouraged to discuss your career goals and interests in an open dialogue with your manager early in the recruitment process. However, manager approval is not required to apply to an open position.

You should inform your manager prior to accepting an offer for a new role.

Transferring to Your New Role

If you meet the selection criteria and are offered the new position, the Recruiter will determine a start date with your current manager. The guideline is a 4-week maximum transition.

When there is a dispute, Human Resources will discuss with both Managers to reach a mutual agreement.

- [Welcome to AIG](#)
- [Table of Contents](#)
- [Working Together](#)
- [Work-Life Balance](#)
- [Your Career](#)
- [Leaving the Company](#)
- [Our Facilities](#)
- [Information Technology, Intellectual Property and Media](#)
- [Your Benefits](#)
- [Appendix](#)



We recognize that employees leave the Company for a variety of reasons. This section provides important and helpful information if you leave the Company.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Leaving the Company (continued)

Separation of Employment

We want your time at the Company to be productive and satisfying. However, we recognize that some employees leave the Company for a variety of reasons. Employees may leave the Company either voluntarily or involuntarily.

After you leave the Company, you may not use any property or disclose any proprietary information/trade secrets/confidential information that you had access to, or obtained as a result of, being employed by AIG or any of its subsidiaries. This information would include, but is not limited to, business plans, customer information, vendor information, pricing information, competitive data, and employee information.

In all cases of employment separation, Company property must be returned to your manager on or before your last day, unless another arrangement is approved by management. Company property includes, but is not limited to: manuals and other information, computers and related equipment, smartphones, tablet computers, tools, keys, badges, credit cards, motor vehicles and all other items that are considered Company property.

Voluntary Separations

Resignation

If you choose to voluntarily resign from the Company, we ask that you submit a written statement and provide at least two (2) weeks' notice to your manager. This notice provides sufficient time to transition work within your department and to prepare your exit paperwork. In some cases your manager may request that you leave earlier than the end of your notice period, in which case you will be paid through the end of the notice period.

Notice periods may be longer for certain positions including those in Grade 27 and above. If you are not sure about the notice period for your position, consult HR Shared Services at 1-800-265-5054.

Job Abandonment

Failure to return from a leave of absence on the date specified will also be considered a voluntary resignation. Failure to report to work and call in for three (3) consecutive days may be considered to be a voluntary resignation due to job abandonment.

Retirement

If you are an employee considering retirement, you should contact HR Shared Services at 1-800-265-5054 to discuss your eligibility for pension benefits at least sixty (60) days prior to your planned retirement date.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company**
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Leaving the Company (continued)

Involuntary Separations Discharge

In the event your employment is terminated, you will be notified accordingly.

Position Elimination

Employees may be terminated due to a reduction in force, elimination of a position, office closing, new position requirements, or returning from a leave of absence and no position is available. In the event your position is eliminated, please refer to the Severance section of this handbook for further guidance.

Proprietary Information/Trade Secrets/ Confidential Information

After you leave the Company, you may not use or disclose any proprietary information, trade secrets, or confidential information that you had access to or obtained as a result of being employed by the Company. This information would include, but is not limited to, business plans, customer information, vendor information, pricing information, competitive data and employee information.

You may not, for example, forward confidential information to your home or other computer in anticipation of leaving AIG. You must return any confidential information before your termination of employment date. This provision supplements and does not supersede any confidentiality obligation you may have pursuant to any individual non-disclosure agreement you have executed. For additional information concerning the protection of trade secrets, other confidential information and competitive information, please refer to AIG's Code of Conduct.

Exit Survey

The success of our business is dependent upon our employees being engaged and committed to the organization. Upon resignation, you are offered an opportunity to tell us about your experience via an Exit Survey. The survey includes an opportunity to request a live follow-up discussion. We also want to know the reasons why you are leaving and want to know of any potential violations of law, the AIG Code of Conduct or other AIG policies. Refer any "Leaving the Company" questions to HR Shared Services at 1-800-265-5054.

Reporting a Potential Violation of Law, the AIG Code of Conduct or Other AIG Policy:

Most concerns likely to be faced at work can be resolved by talking to and working with management, Human Resources and/or the local compliance officer.

In addition, employees may ask questions, raise concerns or, where permitted by law, report instances of potential non-compliance with AIG policies or applicable laws and regulations by contacting any of the following:

- AIG's Global Compliance Group at 1-646-857-1877 or email corporatelegalcompliance@aig.com.
- AIG Compliance Help Line at 1-877-244-2210 or via Internet at www.aigcompliancehelpline.com. Communications to the Help Line may be made anonymously, subject to local laws.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company**
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Leaving the Company (continued)

AIG prohibits retaliation against any employee for making a good faith report of actual or suspected violations of laws, regulations, or AIG policies. In addition, employees may also contact Employee Relations at 1-800-265-5054 for further assistance.

Severance Plan

Reductions in force, office closings, job eliminations and terminations for performance reasons are never easy decisions for managers to make or for employees to accept. Under the AIG Severance Plan, if you experience a job loss under certain conditions, execute a release and satisfy other conditions included in the plan, AIG will provide you severance pay and other benefits to help ease the transition to a new position.

You may access the AIG Severance Plan Summary Plan Description via https://contact.aig.net/aigcontact/intranet/en/files/Severance_Plan_tcm1246-535325.pdf. This link can be accessed in the Policies section of Contact, under Related Links.

Other Termination Payments or Benefits

If you are eligible for payments or benefits upon termination of employment under any offer letter, separate contract or severance plan, you will not be eligible for severance under the AIG Severance Plan.

NOTE: Severance time is not part of service for calculation of severance. Time off for approved leaves of absence with pay and approved leaves covered by salary continuance programs and FMLA leaves will be counted towards service for calculation of severance. If an employee is rehired after a service break of twenty-six (26) weeks or more, service for severance purposes will not include any employment that occurred prior to the rehire date. Employees that previously received severance for prior years of service and were rehired will not receive additional severance for the period of time prior to the rehire date.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company**
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Leaving the Company (continued)

Employment Verification and Reference Checks

In order to respect and protect the privacy of our employees, AIG provides limited information in response to requests for employment and income verifications from outside organizations; such as prospective employers, government agencies, financial/lending institutions or mortgage companies (Verifiers). The Company will provide the dates of your employment and current/last job title in response to a request for a Verification of Employment (VOE).

If you are a current employee, your salary information may also be provided in response to a request for a Verification of Income (VOI). If information has been requested that the Company does not provide, such as whether the employee's employment will continue over a period of time or whether the employee is eligible for rehire, the Company will indicate "Data Not Provided."

Additional information beyond the type addressed above may be provided in response to subpoenas and requests from certain government agencies. These requests should be directed to HR Shared Services at HRSharedServices@AIG.com. Managers shall not respond to VOE and VOI requests or any other type of request for reference information on behalf of the Company.

All requests for VOEs, VOIs and reference checks must be directed to: www.theworknumber.com or 1-800-367-5690. The AIG employer code is 12573.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities**
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix



Our Company facilities may close or your work hours may be modified due to an unforeseen situation or a planned event. This section provides information on what will happen if an emergency condition occurs or if there is an early office closing.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities**
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Our Facilities (continued)

Emergency Conditions

In the event of emergency conditions, your office location may delay the start of business operations, suspend business operations for the day, or invoke an early suspension of business operations. Emergency conditions include, but are not limited to, weather-related incidents. The Incident Management Team (IMT) which includes representatives from Global Business Continuity Management, Global Security, Global Real Estate/ Property Management and Senior Business Management will determine whether to delay business operations or suspend business operations. Employee notifications regarding delays or suspensions of business operations will be communicated via AIG’s Emergency Notification System, AIG Alert, and/or by activating your department calling tree. You will be responsible for checking on the status of your office location.

Offices Remaining Open During Emergency Conditions

During an emergency or an incident, employee safety is our highest priority. We request that you use sound judgment to determine if traveling into the office will expose you to unnecessary danger. You should contact your manager if you have concerns.

Critical Employees

Depending on the severity of the situation, a decision may be made to maintain business operations for critical function. “Critical Employees” may be asked to remain at work, commute to work or relocate. Your department business continuity plans should identify critical employees. Please check with your manager if you have any questions regarding your plan.

Working from Home

If you have the capability to work from home, you may request approval from your manager to do so in an emergency situation. It is important that employees and managers be proactive in determining if working from home is a viable option during emergency conditions and have the necessary equipment and systems access in place.

Pay When Office Remains Open

If you are an exempt or salaried non-exempt employee and if government-sanctioned travel restrictions have been issued or a state of emergency has been declared by your city, state, or local agencies, and you are unable to report to work or remain at work for the duration of your scheduled workday due to unavailable public transportation and/or unsafe travel conditions, you will be paid. You will not be required to use PTO nor subject to Corrective Action.

For additional information regarding pay for non-exempt employees, please refer to the Your Pay section in this handbook.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities**
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Our Facilities (continued)

Office Closings

Some AIG facilities may occasionally delay or suspend business operations. A facility's delay or closing may be scheduled and prearranged (such as the day of a Company event or the day before a Company observed holiday) or it may occur due to an unforeseen emergency (such as inclement weather, natural disaster or facility incident).

Notification

You will be notified in writing when there is a scheduled and/or prearranged closing, early closing or delayed start. In situations where there is no opportunity for advance notice, you will be notified by AIG's Emergency Notification System, AIG Alert and/or your management as soon as possible.

Decision Process

The Incident Management Team (IMT) is responsible for making the decision to close a facility. In the event of an emergency situation, the IMT will determine if a closing is warranted.

Pay During Office Closures

If you are an exempt or salaried non-exempt employee and you were scheduled to work and your office closes you will be paid for your regularly scheduled time. If you are able to work from an alternate AIG work facility, or from home, you are expected to do so. You will not be required to use a PTO day.

For additional information regarding pay for non-exempt employees, please refer to the Your Pay section in this handbook.

Out-of-Office

Please remember to update your office voicemail and your email out-of-office assistant, if possible, so that others are aware of your availability and contact information.

For more information, please contact HR Shared Services at 1-800-265-5054 or email: hrsharedservices@aig.com.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities

Information Technology, Intellectual Property and Media

- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media



The Company wants to protect you, the work you produce and its infrastructure. This section contains information and expectations regarding your use of the Company’s technology systems, intellectual property created while working for AIG and other media issues. Please refer to the AIG Code of Conduct and other Company materials for additional information.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Electronics and Their Use in the Workplace

AIG fosters a productive workplace in which you have the tools you need to work effectively. In support of this initiative, AIG provides various electronic resources and services.

You are provided Company owned electronic equipment and services, such as computers, telephones, Internet, and e-mail, and connectivity for those with sanctioned personal devices to increase your effectiveness while conducting AIG business. You should not engage in excessive personal use of Company equipment and services. Additionally, Company devices and services should be used in ways that promote ethical business practices.

Telephone Use

AIG's telephone system is to be used for Company business. Personal or non-business related calls and conversations should be kept to a minimum whether made on a Company phone or personal cellular telephone. Office telephone numbers are not to be used in personal advertisements.

Locations and departments may need to modify this policy as business needs dictate.

E-mail Use

AIG's electronic mail (e-mail) system is Company property and is intended to be used for business purposes. The Company retains the right to monitor, access, review, copy, delete and disclose e-mail messages, even those marked private, without notice or your permission. We provide you access to e-mail to assist you in the performance of your job. It should be used to provide service to customers and for other business purposes.

While occasional, incidental, and appropriate personal use of the Company e-mail may be permitted. Prohibited activities include, but are not limited to:

- transmitting information that is hostile, malicious, unlawful, sexually explicit, discriminatory, harassing, profane or abusive;
- sharing private personal information and business data;
- disclosing confidential, and/or proprietary information and trade secrets belonging to the Company and our business partners; or
- participating in activities that could negatively impact work activity or systems availability, e.g., chain letters or initiating links in e-mails from unknown senders.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

User Responsibility

You are responsible for any content that is e-mailed from your e-mail address, which references either AIG or an AIG affiliate. You may also include an automated signature in your e-mails reflecting your employment with the Company. Any statements made in your e-mails may be attributed to AIG in an official capacity. To avoid potential issues, you should review all of your e-mail correspondence carefully prior to sending or forwarding. This review gives you the opportunity to ensure that your communications do not contain information subject to the prohibitions above, or that may cause legal or reputational risk to the Company.

You are responsible for the proper management of your messages, either through deletion or long-term storage. You must not use e-mail for any communication of any sensitive information or information such as credit card and telephone numbers, passwords etc., unless it is encrypted by approved methods. E-mail should not be used for the transfer of large files. Failure to comply with these policies may subject you to Corrective Action, up to and including termination.

Electronic Recording in the Workplace

You may not tape, film, or electronically record the conversations or actions of any other AIG employee under any circumstances. This type of recording has a detrimental effect on candor and the free expression and exchange of ideas in the workplace and causes mistrust among colleagues and may also be a violation of law. In addition, you may not secretly or otherwise tape, film, or photograph any AIG facilities, areas or operations. Electronic recording devices should be kept out of the office and other AIG locations. Devices capable of recording audio and video, such as smartphones, should not be used in such a way.

AIG reserves the right to install monitoring devices for security or other purposes necessitated by our business in accordance with and subject to applicable law.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Video Conferencing

AIG encourages you to use the information resources available to you. As AIG operates in a Global community, video conferencing can be a helpful tool in collaborative discussions with colleagues.

Following are employee guidelines on Video Conferencing (VC) with other employees and business partners. When you video conference, you must abide by AIG’s Code of Conduct, as well as by local laws and regulations. Inappropriate uses, which include personal purposes not related to AIG work, and commercial uses such as solicitation of goods and services, are not permitted.

Observers to any session should be announced to all participants in the session. If a session is to be recorded (video or audio) this fact should be announced to all participants in the session at all sites.

Internet Security and Usage

This policy applies to all parties, including, but not limited to employees, contractors, consultants, temporaries, etc., who access the Internet via the Company’s computers, smartphones and other PDA’s or networking resources. The network, computers, servers and other equipment utilized to connect you to the Internet are the property of AIG, and they are to be used to serve the business needs and purposes of the Company.

Prohibited Activity

Accessing the Internet for any illegal conduct, game playing, personal financial gain, private business activities, unethical purposes, creation of personal web pages, or any other improper reason is prohibited. Viewing, transmitting or storing of pornographic, indecent or otherwise offensive material is also prohibited. AIG retains the right to monitor, access, review, restrict or terminate your use of the Internet. In addition, improper Internet usage would include but is not limited to:

- disclosure/sharing of accounts or passwords;
- disclosure of any Company data, reports, or confidential, proprietary, or other privileged information in any publicly accessible forum or in any web based forums applications or news group postings;
- participation in bulletin board discussions, chat sessions, and other related offerings on the internet, where you do not indicate that the opinions expressed are your own and are not necessarily those of the Company;
- deliberate circumvention of security on any internet site;
- the use of abusive, threatening, hostile or harassing language in public or private messages;

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

- actions that are likely to result in the loss of work or systems (e.g. chain letters, viruses);
- use of the internet in connection with any illegal, fraudulent, or unethical activities;
- any use of the internet which would be inconsistent with the general policies or standards of conduct of the Company; and
- actions which prove to damage the reputation of the Company.

Authorized Means of Accessing the Internet

If you are set up for remote access, which allows you to establish a connection with the Company's computers via the Internet, you must authenticate yourself at a firewall before gaining access to the internal network. The only authorized means of accessing the Internet for Company purposes is through the Company's sponsored firewall and approved service provider. Accessing the Internet through any commercial service provider (such as AOL, CompuServe, Netcom, etc.) or by any other method (dial-up or direct TCP/IP connection) while on the Company's network is prohibited.

The Employee's Responsibilities

You are personally responsible for all activities originating from the use of your account and/or system. This includes responsibility for all messages, commands, programs, software, or files that originate from you or which you willfully accept via the Internet.

Any copying of software in a manner that is not consistent with the vendor's license is strictly forbidden. All software downloaded from non-Company sources via the Internet must be screened with virus protection and authorized by Security and Enterprise Architecture prior to being invoked. If any sensitive Company information, any passwords or other system access control mechanisms are lost, stolen, or disclosed, the Business Unit Information Security Officer (BISO) must be notified immediately.

Please refer to the E-mail Use section of this handbook for additional guidance regarding employee's responsibilities in connection with the electronic mail (e-mail) system.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Approvals Needed

The Company Data Center must approve, in advance, the use of new and existing Internet connections to establish new distribution channels. All external representations on behalf of the Company and placed on any publicly accessible Internet computers must first be cleared through the Internet Committee.

Monitoring/Privacy

You should expect that all information, images and messages created, transmitted, downloaded, received or stored in Company computers may be accessed by the Company at any time with or without prior notice. You should not have any expectation of privacy or confidentiality in such images, messages, or information (whether or not password protected). You should not assume that deleted documents or messages (including e-mail messages) are necessarily removed from the system.

Failure to comply with this policy may subject you to Corrective Action, up to and including termination.

Confidential Information

In the course of employment, you will have access to confidential information with respect to the business or affairs of the Company and its clients. You will be expected to respect and maintain the confidentiality of this information and to utilize it solely in connection with the discharge of your responsibilities. Failure to comply may be grounds for termination. In the event you leave the Company, you may not remove, destroy, or use such information for your benefit, or on behalf of a different employer, entity, or other organization. This provision supplements and does not supersede any confidentiality obligation you may have pursuant to any individual non-disclosure agreement you have executed. For additional information concerning the protection of trade secrets, other confidential information and competitive information, please refer to other Company policies, including but not limited to AIG's Code of Conduct, the AIG Global Information Handling Policy, and IT Security Risk and Compliance (ITSRC) policies.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Trade Secrets

AIG is committed to safeguarding trade secrets belonging to the Company and its business partners. Trade secrets developed by AIG for use in its business are to be kept confidential. You are to exercise discretion in using, discussing or otherwise transferring information regarding AIG’s business. In addition, AIG does not condone the practice of improperly obtaining, disclosing or using the trade secrets of others. Any employee who has entered into a non-disclosure agreement or any other contract restricting the use of confidential information or trade secrets with a former employer must provide a copy of the agreement or contract to the Human Resources Department and his/her immediate manager.

Trade secrets generally include any information that can be used in the operation of a business or other enterprise and that is sufficiently valuable and secret to afford an actual or potential economic advantage over others. Examples of trade secrets generally include technological information, business information such as customer lists, financial projections, and marketing and sales promotions. Examples of information that could constitute trade secrets at AIG include, but are not limited to, AIG’s relationships with policyholders or producers, product developments, business prospects, current account information, the status of accounts, pricing, underwriting criteria, and any other non-public information.

The Consequences of Trade Secrets Violations

The theft or misuse of trade secrets also constitutes a crime under the laws of most of our operating locations. Many jurisdictions, including most states within the United States, the United Kingdom, France, Germany, Italy, Japan, China and Brazil have enacted laws protecting the trade secrets of companies and individuals conducting business within their borders.

Additionally, the misuse of trade secrets may subject individuals and corporations to civil lawsuits seeking monetary and injunctive relief. Trade secret violations could also irreparably damage the reputation of AIG in the business community and hamper its ability to successfully compete. Questions regarding the trade secret law of a given country should be referred to the attorney covering that country for that profit center.

NOTE: AIG is firmly committed to complying with all laws governing trade secrets. Questions about AIG’s trade secret policy should be directed to the General Counsel’s Office at 1-212-770-5427.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Outside Activities

On occasion, outside activities can create the appearance of a potential conflict of interest. AIG respects the privacy of all its employees, but you must disclose outside activities that could result in real or perceived overlaps and/or conflicts between your personal interests and the interests of AIG. The following activities may be considered conflicts and should be reported to your designated compliance officer and your manager, as set forth below, to ensure that any potential conflicts are addressed and resolved as soon as possible:

- Service with an outside business or trade association, whether as an employee, board member, officer, trustee, partner or consultant, and especially any business that currently does or seeks to do business with AIG, or competes or seeks to compete with AIG; prior written approval from your manager is required before engaging in this type of outside activity and each request must be submitted to your designated compliance officer as part of the approval process. Managerial and Compliance approval must be renewed on an annual basis, and at any point there is a change in relevant facts upon which the original approval was granted.
- Service with a foundation, charity or non-profit organization where you will be paid for your service, or where you hold a position of financial responsibility (e.g., serve as Treasurer, a member of the Audit Committee or a member of the Investment Committee); prior written approval from your manager is required before engaging in this type of outside activity and each request must be submitted to your designated compliance officer as part of the approval process. Managerial and Compliance approval must be renewed on an annual basis, and at any point there is a change in relevant facts upon which the original approval was granted. This provision does not apply to service on the board of a co-op, condominium association or similar entity in which you reside, or a holding Company, trust or similar entity that is established solely for you or your family's estate or tax planning.
- Service with a foundation, charity or non-profit organization that has a business relationship with AIG. No approval for this type of outside activity is required so long as you will not be paid and there is no appearance of a potential or actual conflict of interest. If you have a question whether there is such a conflict, discuss it with your designated compliance officer.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media**
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

- A presentation, talk, or service on a panel in which you are offered an honorarium. If you are to be compensated for this type of activity, you must notify your designated compliance officer in writing in advance of any fees that may be received and you may be required to turn the fees received over to AIG. In addition, any materials to be used during the presentation, talk or panel may need to be reviewed before the presentation in accordance with business unit or AIG policy.
- Serving as a public official, as an appointee of a governmental entity or running for elected office; prior written approval must be obtained from AIG’s Chief Compliance Officer or his/her designee as well as your manager. Approval must be renewed whenever the term expires and before reelection or reappointment is sought.

NOTE: To avoid even the appearance of any conflict with AIG’s interests, whenever you participate in community support efforts outside of AIG-sponsored programs you should never imply AIG endorsement of the effort. Questions about AIG’s participating in outside activities should be directed to your designated Compliance Officer.

Media Relations

AIG External Communications and Media Relations is ultimately responsible for all communications and interaction with the media around the globe, and, most importantly, for protecting AIG’s reputation and brand. Since there are potentially serious reputational, legal, and monetary consequences and penalties for incorrectly reported information, without proper permission, employees, agents, and representatives of AIG and its businesses are not permitted to make statements to, or answer inquiries from, the media. All inquiries from the media must be immediately referred without comment to AIG External Communications and Media Relations or to the relevant business unit’s communications team, unless the person receiving the inquiry is an Authorized Person as defined in the Corporate Information Disclosure Policy and has the express prior approval of the Senior Vice President, Communications or any person designated by the Senior Vice President, Communications.

Moreover, AIG External Communications and Media Relations must be consulted before any public outreach is undertaken at the business level that could potentially affect the broader AIG platform and/or the AIG brand or the brands of its subsidiaries. Given the powerful role of media coverage on the global reputation of our organization, it is important that all employees adhere to this policy.

For more information, please see the Media Relations and Corporate Information Disclosure and Policies.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Social Media

Social Media is the term given to websites, online tools and applications that allow users to interact with each other, including the creating and sharing of information, opinions, knowledge and interests. The AIG Social Media Policy governs the general use of Social Media and the use of Social Media by Authorized Communicators and applies to all employees and consultants, agents, representatives, contractors, and contract workers when they act on behalf of American International Group, Inc. and its affiliates (collectively, the “Company”).

Social Media usage can have an effect on the Company’s reputation, as well as trigger violations of certain laws, rules and regulations. Although access to most Social Media sites is restricted using the Company’s systems, the Company still has an interest in your usage of Social Media both in and outside of work.

The Company requires that when you use Social Media, you comply fully with the AIG Code of Conduct. In particular, you must not:

- disclose the Company’s confidential, propriety, or material non-public information, trade secrets, customer data or employee confidential information;
- use the Company’s logo(s), trademark(s) or other property for personal gain;
- transmit unlawfully harassing, threatening, defamatory or discriminatory comments; or
- violate any other local, state or federal laws, self-regulatory organization rules or regulations of any country.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Information Technology, Intellectual Property and Media (continued)

Authorized Communicators

If you believe that you need access to Social Media for business purposes, you must become an Authorized Communicator. To become an Authorized Communicator, you must complete the Social Media Authorization Form for Authorized Communicators, and be approved as an Authorized Communicator.

Social Media communications on behalf of the Company may be construed to be advertising and/or sales literature, so they must be reviewed and receive appropriate Company approvals before posting. AIG requires that each proposed posting or communication by an Authorized Communicator be reviewed by some combination of legal, compliance, and communications before being posted or communicated. Each Authorized Communicator must, therefore, coordinate with his/her local business unit to determine the specific approvals required. Please contact AIG Corporate Legal at ebusiness.legal@aig.com or AIG Corporate Communications at SocialMediaApproval@aig.com for more information.

Violations of this Social Media Policy

Employees may receive Corrective Action for violations of this Social Media policy, up to and including termination of employment. If you have knowledge of, or in good faith suspect, a violation of this Social Media policy, you should report such information to your assigned legal or regional counsel or manager. The Company prohibits retaliation against any employee for a good-faith reporting of a possible violation of this Social Media Policy or for cooperating in an investigation.

Contact Information for Additional Questions

This Social Media Policy may be revised from time to time as new technologies evolve, new tools become available, and/or laws or regulations change. If you have any questions about this Social Media policy, please contact AIG Corporate Legal (ebusiness.legal@aig.com) or AIG Global Employee Relations (Global_ER@aig.com) or AIG Corporate Communications (socialmediaapproval@aig.com) for assistance.

NOTE: Notwithstanding the foregoing, nothing in this Social Media policy should be construed to restrict the rights of employees under any Federal, state, or local laws. You continue, among other things, to be free to discuss your wages, hours and other working conditions with your fellow employees and others.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits**
- Appendix



Your Benefits

Benefits are an important component of your total rewards at AIG. A comprehensive, competitive package of benefits enables the Company to attract and retain the best employees in the markets in which we operate. Our offerings support a holistic view of total benefits provided without regard to your age, sex, ethnicity or background and in compliance with local regulatory requirements.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits**
- Appendix

Your Benefits (continued)

Global Benefits Philosophy

American International Group, Inc. (AIG) is committed to providing an overall benefits package that helps attract and retain the best qualified employees for AIG’s business needs.

A benefit is a mandatory or voluntary Company-sponsored program that provides protection and/or compensation to the employee and/or the employee’s family in the event of illness, disability, death or retirement. A benefit may also provide assistance towards the payment of specific expenses. Benefit programs may be paid entirely by the Company or the employee, or the costs may be shared.

Guiding Principles

AIG has identified the following guiding principles in developing its employee Benefits programs:

- **Local Market Considerations:** AIG’s voluntarily-provided benefits should be considered in combination with applicable union agreements, social security and other statutory benefits and should be appropriate for the local market.
- **Cost Effectiveness:** The design of benefits plan should be cost-effective for both the Company and the employee with cost sharing between the Company and employees should be aligned to that of the companies in our peer group.

- **Consistency:** For any country in which AIG has employees, we will favor providing a comprehensive single benefit program for all employees as opposed to multiple programs for different groups of employees. However, in recognition that AIG may have multiple business objectives in individual countries, benefit programs may be tailored to employees of specific business entities when indicated by prevailing market practice or appropriate to meet such business objectives.

Approach

Our approach encompasses three broad categories:

1. **Protection:** AIG intends to provide a core level of benefits to you and your family with benefits coverage for everyday issues as well as unforeseen events. Where possible, these Protection benefits are integrated with social programs. Protection programs may include the following: medical, life, disability, and business travel accident benefits.
2. **Market:** These benefits may include commonly offered plans in local markets such as: retirement, car policies and parking benefits, commuter / transportation reimbursement, allowances, paid time off, paid holidays, leaves, meal vouchers, AD&D, dental and vision.
3. **AIG Culture:** AIG strives to promote diversity and inclusion, be a socially responsible employer and ensure the well-being of its employees around the world. To achieve these goals, AIG will support initiatives such as maternity and parental leaves, wellness initiatives, child care, EAP, Domestic partner benefits, employee volunteer programs and gift matching, tuition reimbursement and unpaid personal leave.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Competitive Positioning

AIG's competitive philosophy is generally to have Protection and Market benefits positioned within market competitive ranges (median) on a size-adjusted basis, as compared to other companies with similar lines of business, organizational complexity and geographic reach.

For AIG Culture benefits, AIG will support programs designed to promote AIG's culture as long as they are appropriate in the local market, regardless of whether the benefit is prevalent in the local market.

Disability and Reasonable Accommodations

AIG values the contributions of persons with differing abilities. We are committed to the inclusion of persons with disabilities in our workforce. We do not discriminate on the basis of any known mental or physical disability that is protected by law, a history of disability, a perceived disability or an association with someone with a known disability. Reasonable Accommodations are applicable to job application procedures, hiring, termination, advancement, compensation, job training and other aspects of employment.

We recognize that at some time during your employment you may require a reasonable accommodation to perform the essential functions of your job.

What is an Accommodation?

- An accommodation is a modification or an adjustment to a job, the work environment or the way things usually are done, which enables a qualified individual with a disability to perform the essential job functions of his/her job or to enjoy equal benefits and privileges of employment.
- A reasonable accommodation is one that does not cause an undue hardship to the Company or pose a significant risk to the health or safety of the qualified individual or others.
- A qualified individual is a disabled employee who meets the required skill, experience, education or other requirements of a position that he or she holds or seeks, and who can perform the essential functions of the position with or without reasonable accommodation.

Examples of accommodations include, but are not limited to: workplace modifications, leave time, specialized equipment, or reassignment to a vacant position for which you are qualified. You may request an accommodation at any time. We may request medical information to certify that you have a covered disability. In the event that it is necessary to do so, the information will be evaluated by AIG Benefits Service Center at 1-800-265-5054 or the HR Shared Services ER Advisor Team at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Any information you provide to the AIG Benefits Service Center or HR Shared Services ER Advisors will remain confidential and will be retained in a file separate from your personnel records (please provide the disability accommodation request information to the AIG Benefits Service Center or HR Shared Services ER Advisor and not to your manager). We will work with you to determine whether an accommodation will enable you to perform the essential functions of your job. Additionally, there may be times when we recognize that you may need an accommodation and will offer one accordingly. All requests for accommodations are voluntary and confidential. If you are given an accommodation, it will be documented in your Human Resources file.

NOTE: If you are a qualified individual with a disability and believe you have not been provided the appropriate accommodation, been discriminated against, or have been retaliated against, please contact the HR Shared Services ER Advisor Team at 1-800-265-5054.

What You Need to Do

- If you think you may require a reasonable accommodation during your employment, please inform HR Shared Services.
- Requests for accommodations are voluntary and confidential.
- You can obtain a description of your position for your health care provider's review upon request to your manager.
- You may be requested to provide information from your health care provider in order to determine what reasonable accommodations may be available to you.

Short Term Disability (STD)

Short Term Disability (STD) replaces a portion of the base salary an employee loses during all or part of the first twenty-six (26) weeks of disability leave. This STD policy provides salary continuation based on guidelines contained in the Medical Disability Advisor, as published by MDGuidelines. The Medical Disability Advisor guidelines are used to determine whether an employee satisfies the definition of disability for purposes of approving a leave related to illness or injury. The Medical Disability Advisory recommendations are governed by a panel of board certified physicians.

Eligibility

Regular active salaried employees (a) whose regularly scheduled work week is at least twenty-eight (28) hours per week; or (b) whose regularly scheduled work week was at least twenty (20) hours per week but less than twenty-eight (28) hours per week on or before December 31, 2002 and who were eligible for STD on or before December 31, 2002, are eligible for STD benefits.

Disability

Except in states that mandate otherwise, for the purposes of this policy only, a "disability" is the inability of an employee, as a result of pregnancy, injury, sickness, or medically necessary procedures, to (a) perform the regular duties of his or her employment, or (b) perform the duties of any other employment that the Company may offer the employee at the employee's regular wages. "Any other employment" means employment that the employee's training, education or experience will reasonably allow.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Short Term Disability

STD pays a percentage of an employee's base salary if the employee should become disabled for a short period of time.

Disabled employees may be eligible to receive STD for a period of up to twenty-six (26) weeks (or 182 days), which includes a one (1) week elimination period, within a rolling fifty-two (52) week period. Parental Leave is not counted toward the twenty-six (26) weeks. State mandated disability benefit requirements will apply as required by state law.

When an employee is absent on STD leave and the twenty-six (26) weeks of leave expire, there will be no further STD benefit. To be eligible for a new STD benefit, the employee must have reached the eligibility date for a new fifty-two (52) rolling-week period. The eligibility date is determined by looking at the first day of the new leave and looking back in time for a fifty-two (52) rolling-week period. Any STD leave used in the preceding fifty-two (52) week period is not available for the new disability and counts toward the new rolling fifty-two (52) week period.

Example: An employee who is absent on an STD leave of absence from March 1, 2010 to May 30, 2010 (or 92 days), returns to work, and then incurs a new disability starting on October 1, 2010. Because employees are limited to 182 days of STD leave during a fifty-two (52) rolling-week period, the employee will be eligible for STD leave from October 1, 2010 through December 29, 2010 (or 90 days) for a total of 182 days.

Notice Required to Take Short Term Disability Leave

If an employee is unable to work due to his or her own illness for more than five (5) working days, the employee must apply for Short-Term Disability (STD). The employee must initiate a claim for STD leave with the AIG Benefits Service Center at 1-800-265-5054. The claim must be initiated by the 8th consecutive calendar day of the absence. If the employee is unable to personally call, a friend or family member of the employee may notify the AIG Benefits Service Center on the employee's behalf.

In non-emergency situations, a claim may be initiated up to thirty (30) days prior to the anticipated first day out of work. The employee must also inform his/her manager on or prior to the first day of his/her absence. In all instances physician documentation of the disability must be submitted within 30 days of the start date of the leave in order to be eligible for the leave. If the employee is unable to personally call his or her manager, a friend or family member of the employee may notify the employee's manager on the employee's behalf.

Proof of Disability

Medical provider documentation of the disability supporting the leave must be submitted within thirty (30) days of the start of the leave, or the leave may be denied and income replacement benefits may be stopped pending approval of the leave. The employee may be required to repay income replacement benefits received for any portion of the time off that has been paid but not ultimately approved under plan guidelines, HRSS will notify the employee of any overpayment due.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Short Term Disability Elimination Period

The first five (5) days of leave or the equivalent of one work week that an employee is unable to work due to disability are considered Paid Time Off (PTO) days and are deemed an “elimination period.” Unused PTO days will be applied to the first five (5) days of leave or to the one work week equivalent, paid at 100% of their base salary. If PTO days are not available, the “elimination period” will be unpaid.

NOTE: Base salary is the employee’s annual salary as of the last day worked excluding commissions, supplemental bonuses, year-end bonuses, overtime pay, or expense reimbursements. Some states have enacted leave legislation that may supersede this policy. You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

Short Term Disability Benefit Amount

STD benefits begin on the 8th consecutive calendar day of disability. Benefits may continue for up to twenty-six (26) weeks as described in the Benefit Schedules below. In no event will an employee receive more than twenty-six (26) weeks of STD benefits in a rolling fifty-two (52) week period.

Short Term Disability Benefit Schedule

Employees are entitled to the following benefit:

- **Week 1:** one (1) week elimination period
- **Weeks 2-9:** paid at 100% Base Pay
- **Weeks 10-26:** paid at 80% Base Pay

Higher benefit percentages will apply where required by state law.

Disability Beyond 26 Weeks - Long Term Disability (LTD) Insurance

You may be eligible for LTD benefits after being totally disabled for twenty-six (26) consecutive weeks. Payment of STD benefits does not guarantee that LTD benefits will be payable. For additional information on LTD insurance, please refer to the Summary Plan Description for the LTD Plan.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Recurrent Disability

If you return to work from a STD Leave, and subsequently go out on a second STD Leave for the same medical condition, as long as the prior STD Leave is within thirty (30) calendar days, the period of disability prior to your return to work and the recurrent disability will be considered one Period of Disability under this policy (a new elimination period is not required). A “Period of Disability” means a continuous length of time during which the employee is disabled under this policy.

If you return to active employment for thirty (30) days or more, any subsequent recurrence of a disability is treated as a new disability. A new disability is subject to a new elimination period and a new maximum duration of STD benefits. The new maximum duration of benefits will be determined using the first day of the new leave and looking back in time over a fifty-two (52) week period. Any STD leave used in the preceding fifty-two (52) week period is not available for the new disability and counts toward the new rolling fifty-two (52) week period.

Taxable Short Term Disability Payments

STD payments are subject to federal income tax and to applicable payroll taxes and deductions. STD payments may also be subject to state and local income taxation. The employee should check with his/her tax advisor for the state and local tax treatment of STD payments.

Effect of Leave of Absence on a Salary Increase

An employee is not eligible for a salary increase while on a STD leave of absence.

Effect of Leave of Absence on Benefits

If an employee is granted a paid STD leave of absence, any contributions for Company-sponsored employee benefits will automatically be deducted from the employee’s paycheck.

Leave of Absence Effect on Employee’s Position

Employees who have been on STD Leave and whose positions have been filled during their leave and who are ready, willing and able to work are eligible to receive forty-five (45) days (four [4] weeks of which are paid) to look for another position within the Company. Should no comparable position be available or found, the employee is eligible to receive severance pay under the AIG Severance Plan.

Payment of Short Term Disability Benefits

STD benefits are paid by the Company. There is no cost to the employee for this coverage.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Offsets to Short Term Disability Benefits

Depending on where the employee works, the employee may be eligible for other types of leave.

NOTE: Some states have enacted leave legislation that may supersede this policy. You should check the Appendix in this handbook and the AIG Benefits Service Center at 1-800-265-5054 to determine if your state has specific requirements.

STD benefits are reduced by the amount paid or payable for benefits under any state non-occupational benefit law or other compulsory governmental program. For example, the STD benefit will be reduced by any temporary or permanent disability benefit for the loss of income under a state workers' compensation, occupational disease, or similar law.

The maximum benefit amount payable to an employee in a state that has legislation that supersedes this policy will be reduced by the amounts of other payments received for the employee's disability from the appropriate state. These benefit reductions are commonly known as "offsets."

The AIG Benefits Service Center is not responsible for processing state claims and therefore cannot advise an employee as to when a decision will be made on a state claim, and cannot advise an employee as to the dollar amount of any state benefit/offset.

Benefit Exclusions

The STD policy does not cover, and no STD benefit shall be paid for, any disability:

- unless the employee is under the regular care of a licensed medical provider for medically necessary procedures and/or surgery; or
- that is a result of a surgery that is considered to be an elective cosmetic procedure (excluding Transgender Surgery); or
- that is a result of a surgery performed outside of the U.S. by a physician who is not U.S. board certified in a specialty appropriate to the nature of the disability; or
- unless the appropriate care and treatment:
 - is received from a doctor, who is not related to the employee, whose medical training and clinical experience are suitable for treating the disability;
 - is necessary to meet the employee's basic health needs and is of demonstrable medical value;
 - frequency and duration of treatment with relevant guidelines of national, medical, research and health care coverage organization and governmental agencies; and
 - is consistent with the diagnosis of the employee's condition, and its purpose in maximizing the employee's medical improvement; or
- caused by the employee's commission of or attempt to commit a felony, or where a contributing cause was the employee's engagement in an illegal occupation.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

The employee may not be eligible for state mandated short term disability benefits or salary continuation under this policy (except where otherwise provided by the laws of the state in which employed) if:

- AIG Benefits Service Center does not receive the initial or supplemental information as required from your licensed medical provider;
- the employee's disability begins after his/her last day of active work, for example during a severance period; or
- the employee is no longer employed by the Company.

Termination of Benefits

The employee's STD benefits will terminate if:

- the employee exhausts his/her twenty-six (26) weeks of STD benefits;
- the employee refuses an examination by a Company designated licensed medical provider;
- the AIG Benefits Service Center determines the employee is not disabled from his/her usual occupation or from other employment the Company may offer at the employee's regular wages, and which his/her disability does not prevent the employee from performing on a full or part-time basis;
- the employee performs other work for remuneration or profit;
- the employee refuses to attempt to work with the assistance of adaptive equipment or devices, or modifications to the work environment, functional job elements or work schedule;
- the employee returns to work on a full or part time basis;
- the employee is no longer disabled; or
- the employee voluntarily terminates from employment.

Employee Responsibilities

It is the employee's responsibility to obtain required medical information requested by the Leave Administrator. The employee is responsible for all fees associated with the completion and submission of any and all medical documents required during the review of his or her STD claim.

American International Group, Inc. reserves the right to change or terminate this short term disability policy at any time or from time to time, in its sole discretion. The Company's short term disability policy does not constitute a plan, program or arrangement that is subject to the Employee Retirement Income Security Act of 1974, as amended.

Workers' Compensation

Workers' Compensation (WC) coverage is state mandated and requires employers to provide benefits to employees who sustain work-related injuries or illnesses directly attributable to the course and scope of work. Any employee who is injured on the job may be eligible for workers' compensation benefits as outlined by the laws of the state in which the employee is employed. The employee may also be eligible for unpaid leave under the Family and Medical Leave Act (FMLA), which would run concurrently with workers' compensation benefits. Please refer to the FMLA section for additional information.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Workers' Compensation Vendor

Broadspire, AIG's workers' compensation Third Party Administrator (TPA), will be responsible for determining the compensability of the claim, and if approved, will coordinate medical management of workers' compensation leaves.

Eligibility

All domestic Company employees are eligible for workers' compensation coverage upon their hire date.

Eligible Reasons

An employee may be eligible for workers' compensation coverage when he or she sustains a potential work-related illness or injury within the course and scope of their employment.

Reporting the Illness or Injury

Employees should immediately report their work related illness/injury claim to HR Shared Services at 1-800-265-5054, and as soon as possible to their direct supervisor. HR Shared Services will initiate the workers' compensation claim on behalf of the employee and will also initiate a Short Term Disability (STD) pending Workers' Compensation claim with AIG's Leave Administrator, The Reed Group, as soon as the employee is unable to work.

Employees may be eligible for STD benefits as outlined under the Company's Short Term Disability Policy, providing that all requirements are met, the leave of absence has been approved by our Third Party Administrator, Broadspire, Inc., and the employee is disabled as defined in the STD Policy.

Elimination Period

Paid Time Off (PTO) will be used for the first five (5) days of leave, or the equivalent of one (1) work week, elimination period associated with the STD claim opened initially. If the workers' compensation leave of absence is approved, an employee's PTO leave bank will be credited for any PTO time applied during the STD elimination period. For additional information regarding the one (1) work week elimination period, please refer to the STD Policy.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Coordination with Other Leaves

The following leaves may run concurrently with workers' compensation:

- State Disability (including CA, NJ, HI, RI and NY)
- Short-Term Disability
- State Family and Medical Leave (FML)
- Federal FMLA
- Long-Term Disability
- Unpaid Medical Leave (UML)

If an employee qualifies for workers' compensation, as well as federal FMLA and/or State FML, the time off work is counted towards his/her twelve (12) weeks of annual FMLA leave or applicable state leave.

Approval of concurrent FMLA/FML leaves is based on the approval of the workers' compensation claim by the workers' compensation administrator. In this case, employees will not be required to submit additional paperwork, except in states that require additional paperwork for disability.

If the workers' compensation claim is denied, the concurrent leave will also be denied, unless The Reed Group has sufficient documentation to approve a FMLA, state disability, state FML, or STD leave.

Compensation During a Workers' Compensation Leave

When the workers' compensation administrator determines an employee is eligible for workers' compensation benefits, the administrator will pay the employee a non-taxed state mandated income disability benefit. In addition, depending on Company policy, AIG will pay the employee a salary continuation supplement to bring the total amount the employee receives to 100% of his or her regular salary. Employees are entitled to a maximum of twenty-six (26) weeks of combined STD/WC leave in a rolling-back twelve (12) month period. The amount of combined time (STD/WC) the employee has available directly affects the amount of time an employee will be paid a salary continuation supplement in addition to workers' compensation income disability benefit payments. When the combined bank of STD/WC leave time (up to twenty-six [26] weeks) has been exhausted employees will no longer be eligible for a salary continuation supplement payment from AIG. However, if the employee is still eligible for workers' compensation benefits, the workers' compensation administrator will continue to pay income disability benefits directly to employee.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Example: If an employee goes out on an eight (8) week STD Leave for a non-work related injury in May and then goes back out on leave for a work related injury in November of that same year, the employee will only be eligible for eighteen (18) weeks of a salary continuation supplement.

AIG Financial Network and Mount Mansfield employees are not eligible and will not receive a salary continuation supplement from AIG based upon Company specific policies. Instead workers' compensation income disability payments will become the primary benefit, and paid directly from the workers' compensation administrator.

Benefit Changes for Disabled and New Hire Employees

Workers' compensation leaves may continue for up thirty-six (36) months following the start date of the workers' compensation leave. After the thirty-six (36) month period, an employee who is eligible to retire may apply for retirement. Employees ineligible to retire will be terminated from employment; however, workers' compensation coverage may continue based on continued eligibility.

Accepted Claims

Employees will be notified directly by the workers' compensation administrator if the claim is accepted and deemed compensable per state statutes. Coordination of benefits will be dependent upon the employee's leave status, i.e. full-time, intermittent or part-time.

Denied Claim

When the workers' compensation administrator determines the claim is not compensable per state statutes, the employee can appeal that decision to the workers' compensation administrator or State WC Division directly. The employee may be eligible to receive benefits under the Company's STD policy, providing all the requirements of the STD policy are met. If the claim decision is overturned due to an employee's appeal per workers' compensation statutes, the employee will be retroactively placed on workers' compensation leave and any time associated with STD leave will be credited, if eligible.

Returning to Work from a Workers' Compensation Leave

Employees will be required to present a release from their health care provider to the workers' compensation administrator prior to returning to work and will not be allowed to return to work or resume duties without a release from the approved workers' compensation health care provider and/or a release from the workers' compensation administrator. Employees attempting to return to work without the specified doctor's release will be told to leave until they provide an acceptable release note. If an employee is released to return to work with restrictions, the workers' compensation administrator will coordinate with the employee's manager, and HR Shared Services to determine a reasonable accommodation of work restrictions.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Occupational Safety

AIG is committed to developing and maintaining the highest practical standards of occupational safety, health, and risk management. Leading this effort is Corporate Occupational Safety (COS) whose goal is to create an environment and culture of safety that minimizes the risk of injury and illness to our employees, business partners, and visitors.

Occupational Safety and Health Awareness

Occupational safety is a shared responsibility between all employees and corporate stakeholders. COS provides tools and resources to enable you to support and apply AIG occupational safety and health practices in the workplace. **All employees should complete both items below as indicated:**

1. **AIG Contact Occupational Safety and Health Training:** This training course is available from Talent Connection. It should be completed at time of hire and annually as a refresher. The course contains information on: AIG Fire and Life Safety, Workplace Safety and Injury Prevention, and Ergonomic Principles and Best Practices.
2. **How to Adjust Your Workstation:** This should be completed at time of hire, if you move to a new work space, or if you experience comfort issues you feel may be related to your workstation set-up or equipment. Available from the **COS home page on AIG Contact**, it is a three (3) step video based process which will empower you to independently adjust your workstation according to ergonomic principles and best practices.

Fire and Life Safety

Your safety and the safety of your co-workers depends on your awareness of what to do during an emergency. All AIG employees should obtain and understand the emergency procedures, evacuation routes, and contact numbers for their local office. The Global Fire Life Safety Policy and other helpful information can be found here on AIG Contact.

Reporting Facility Safety Concerns

It is important as an AIG employee that you know how to identify and report facility safety concerns using the AIG Property Management Service Request System (<http://contact.aig.net/PropertyManagement>). If your location is not serviced by this system, report facility safety concerns to your manager or property management representative. COS works closely with the Global Property Management to monitor and promptly respond to these requests.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the
Company

Our Facilities

Information
Technology,
Intellectual Property
and Media

Your Benefits

Appendix

Your Benefits (continued)

Submitting a COS Service Request

COS provides consultation, training, and specialized services to all domestic employees through their Request for Service (RFS) program. Types of requests managed through this program include ergonomic requests for workstation assessment or modification, environmental requests related to indoor air quality, and requests for departmental or group safety training. You can submit a service request via the **Request Service** link on the **COS home page on AIG Contact**.

NOTE: For questions or additional information regarding Corporate Occupational Safety or AIG safety standards and procedures, contact **CorporateOccupationalSafety@aig.com**.

Unpaid Medical Leave of Absence

Eligibility

Regular active salaried employees whose regularly scheduled work week is at least twenty-eight (28) hours per week or whose regularly scheduled work week was at least twenty (20) hours per week, but less than twenty-eight (28) hours per week on or before December 31, 2002 may be eligible for an Unpaid Medical Leave of Absence under the conditions set forth herein.

Certain commissioned employees including AIG Financial Network Career Distribution Agents are not eligible.

Eligibility inquiries can be addressed by HR Shared Services at 1-800-265-5054.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

The following employees may be eligible for unpaid medical leave provided they are not receiving benefits under the Company's Workers' Compensation Plan, and provided they meet the definition of "disability" (as defined below). Employees who:

- become eligible for STD Leave under the Company's STD policy;
- have exhausted their eligible STD benefit (up to twenty-six (26) weeks of STD during a rolling fifty-two (52) week period); and thereafter remain "disabled" (as defined below) and are under the continuing regular care of a licensed medical provider; and either:
 - did not purchase long-term disability (LTD) insurance (if the first date of disability began prior to January 1, 2012); or
 - do not qualify for LTD benefits (because they do not meet the LTD requirements that are not related to the definition of disability, or due to a pre-existing condition or other reasons, such as failure to complete the one hundred eighty-two (182) calendar day elimination period required for LTD benefits).

Definition of "Disability"

Except in states that mandate otherwise, for the purposes of Unpaid Medical Leave of Absence only, a "disability" is the inability of an employee, as a result of pregnancy, injury or sickness to (a) perform the regular duties of his or her employment, or (b) perform the duties of any other employment that the Company may offer the employee at the employee's regular wages. "Any other employment" means employment that the employee's training, education or experience will reasonably allow.

Maximum Duration of Unpaid Medical Leave

Unpaid medical leaves following STD leaves with start dates **on or after January 1, 2012**, may continue for up to thirty-six (36) months following the start date of the STD leave and the employee will be eligible to receive the benefits as described in the Benefits Continuation Rules document that is located on the AIG Benefits Service Center site. For more information, please refer to the AIG Benefits Service Center at 1-800-264-5054. After the thirty-six (36) month period, an employee who is eligible to retire may apply for retirement. If the employee is not eligible to retire, the employee will be terminated from employment and offered eighteen (18) months of COBRA continuation coverage for medical (including prescription drug) coverage.

Effect on PTO

While on an unpaid medical leave of absence, the employee will not accrue additional PTO days.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Termination of Unpaid Medical Leave

An unpaid medical leave of absence will continue until the first to occur of the following:

- the date the employee reaches the maximum duration of an unpaid medical leave or is approved for Disability Retirement under the Retirement Plan;
- the date the employee fails to timely furnish proof of Disability (as described below);
- the date the employee refuses an examination by a designated, licensed, medical provider after missing two appointments;
- the date a licensed medical provider selected by the Company determines that the employee is no longer Disabled as defined under this policy;
- the date the employee engages in any work for remuneration or profit;
- the date the employee returns to work on a full or part time basis;
- the date the employee refuses to attempt to work with the assistance of:
 - modification made to the work environment, function job elements or work schedule; or
 - adaptive equipment or devices;
- the date the employee terminates from employment with the Company;
- the date of the employee's death;
- the date the employee is determined to have engaged in Fraud; or
- the date the employee refuses to meet and cooperate with an appointed Case Manager.

Managing Unpaid Medical Leaves of Absence

Unpaid Medical Leaves are managed by a third-party vendor. All open unpaid medical leave of absence cases will be re-evaluated periodically by the vendor. Case management involves working closely with the employee, health care providers, the vendor and other significant parties to coordinate successful and cost-effective outcomes. A Case Manager will be assigned to each employee while they are on unpaid medical leave of absence. Case Managers have knowledge of community resources, excellent counseling techniques and other specialized skills and training that assist with attaining a successful recovery, rehabilitation and return to work outcomes. The failure to meet and cooperate with a Case Manager will result in the termination of unpaid medical leave of absence.

Fraud Management

Fraud occurs when an employee, with the intent to injure, defraud or deceive the Company, provides the Company with false information or files proof of Disability that contains any false, incomplete or misleading information. The Company will use all means available to detect, investigate (including, but not limited to surveillance), deter and prosecute those who commit Fraud and will pursue all available legal remedies if an employee commits Fraud.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Proof of Disability

The benefits under the Unpaid Medical Leave of Absence policy are only available when the employee submits satisfactory proof that the employee is Disabled as previously defined. Failure to provide the necessary documentation for proof of Disability will result in termination of Unpaid Medical Leave of Absence and any of its available benefits. In addition, there may be penalties applicable to employees who engage in Fraud, as described above in "Fraud Management."

Proof of Disability may include, but is not limited to, the following:

Documentation of:

- The date the employee became Disabled
- The cause of the Disability
- The prognosis of the Disability
- The employee's earnings or income, including, but not limited to, copies of his filed and signed federal and state income tax returns
- Evidence that the employee is under the regular care of a licensed medical provider
- Any and all medical information, including x-ray films and photocopies of medical records, including histories, physical, mental, or diagnostic examinations and treatment note

- Names and addresses of all:
 - licensed medical providers (i.e., physicians, practitioners of healing arts) the employee has seen or consulted;
 - hospitals or other medical facilities in which the employee has been seen or treated; and
 - pharmacies which have filled the employee's prescriptions within the past three years
- The employee's signed authorization for the Company to obtain:
 - medical, employment and financial information; and
 - other information the Company may reasonably require

An employee will have twelve (12) business days from the date of the letter requesting the Proof of Disability in which to submit the requested proof.

All proof submitted must be satisfactory to the third party vendor who will periodically (at reasonable intervals) request proof of continuing disability.

American International Group, Inc. reserves the right to change or terminate this unpaid medical leave of absence policy at any time or from time to time, in its sole discretion.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Unapproved Leave of Absence

This policy describes types of absences that constitute Unapproved Leaves of Absence. An Unapproved Leave of Absence may result in Corrective Action for job abandonment, including the employee's termination of employment as described in this policy.

An Unapproved Leave of Absence

An employee is considered to be on an unapproved leave of absence if the employee:

- is absent from work for more than eight (8) consecutive calendar days and has not initiated a Short Term Disability (STD) claim with the AIG Benefits Service Center;
- does not return to work after the employee's approved leave has ended; or
- fails to submit the documentation required to support or extend any medical leave has not been submitted to AIG's Benefits Service Center.

NOTE: If an employee has unused PTO days available, the employee may use available PTO days following his or her approved leave, but only if the employee notifies his/her manager and HR Shared Services, at 1-800-265-5054, prior to the first day of the employee's paid time off leave. Please refer to the Company's Short Term Disability Policy for additional information regarding STD leaves. Please refer to the Summary Plan Description for the Long Term Disability (LTD) Plan for additional information regarding LTD leaves. Please refer to the Company's Unpaid Medical Leave of Absence Policy for additional information regarding unpaid medical leaves.

Absence Due to Illness

An employee must notify his/her manager when absent from work. If the employee is unable to personally do so, a friend or family member of the employee may provide notice on the employee's behalf.

An employee who anticipates being absent from work for more than eight (8) consecutive calendar days due to the employee's illness or injury can avoid being on an unapproved leave by initiating a claim for STD leave with the AIG Benefits Service Center at 1-800-265-5054.

Returning to Work from an Unapproved Leave

AIG's Disability Management vendor will send an "Intent to Return to Work" letter within one (1) business day of the employee being placed on unapproved leave. On the sixth business day after the "Intent to Return to Work" letter is sent, the AIG Benefits Service Center will notify AIG HR Shared Services of the employee's leave status, to commence the termination process.

American International Group, Inc. reserves the right to change or terminate this Unapproved Leave of Absence Policy at any time or from time to time, in its sole discretion.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits**
- Appendix

Your Benefits (continued)

Adoption Assistance Program

The Company provides reimbursement of eligible expenses up to a certain amount in connection with the adoption of an eligible child as defined below.

Eligibility

You are eligible if you are an active salaried or commissioned employee who works at least twenty-eight (28) hours a week, have been employed by AIG for at least one (1) year, and are a U.S. tax payer.

In addition, certain commissioned employees including AIG Financial Network Career Distribution Agents and certain wholesalers are not eligible.

For example, if you were hired on March 3, 2015, you would become eligible to participate in the Adoption Assistance Program on March 3, 2016. Any expenses incurred prior to the first anniversary of your hire date will not be eligible for reimbursement.

Eligibility inquiries can be addressed by HR Shared Services at 1-800-265-5054.

Eligible Child

An eligible child is an individual who has not attained the age of eighteen (18) as of the time of the adoption or who is physically or mentally incapable of caring for him or herself and cannot be a child of the spouse of an employee.

Eligible Expenses

Eligible expenses include agency fees, attorney and court cost, and any other expenses directly related to and the principal purpose of which is, the legal adoption of an eligible child by an employee. No reimbursements will be made for legal guardianship expenses or adoption of a natural child or stepchild or child of a spouse. Expenses must meet the guidelines on Qualified Adoption Expenses as stipulated by the Internal Revenue Code Section 23(d) and must be incurred when the employee is eligible to participate in the program.

Expenses cannot be incurred in violation of State or Federal law or in carrying out any surrogate parenting arrangement. Any travel expense incurred during the adoption process will not be eligible. Expenses submitted for reimbursement may not be used for Federal tax credits.

Program Benefit

The program offers reimbursement of up to \$7,500 per eligible child for qualified expenses. Reimbursements are limited to a lifetime maximum of \$15,000 and two (2) adoptions per employee.

Your reimbursement will be added to your wages, and income taxes and Social Security will be deducted. This amount will also be included on your year-end W-2 Statement. Please note that employees with adjusted gross income of less than a given amount generally can exclude this reimbursement from their income. Employees with adjusted gross income in excess of the given amount may or may not be able to exclude this item. You should contact a tax accountant or attorney for advice.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

Application Process

To apply for reimbursement for expenses under the Adoption Assistance Program, employees must complete an Adoption Assistance Reimbursement Form and provide several required documents. These documents are detailed with the Adoption Assistant Program Application.

Please also see the Parental Leave section for more information regarding benefits you may be eligible for post-adoption.

All requests for applications and completed applications should be directed to HR Shared Services at 1-800-265-5054.

Employee Assistance Program

The Employee Assistance Program (EAP) has been developed to help you and your family members manage the sometimes stressful challenges of work, personal and family life.

You and your family members may use this program, at no cost, for issues including:

- improving marital and other interpersonal relationships;
- communicating more effectively with your children;
- dealing with substance abuse; or
- understanding and coping with depression, anxiety and stress.

For immediate access, simply call the EAP toll free number at 1-800-774-6742 or guidanceresources.com and use AIG Web ID: AIG918 at any time. Professional counselors are available to speak with you 24 hours a day, seven days a week.

NOTE: All services provided through the EAP are confidential.

Employee Service Awards

AIG appreciates your commitment, hard work, and loyalty to the Company. In recognition of your service and tenure, you are invited to participate in the AIG Service Award Program. The Service Award Program is intended to recognize the major service milestones (5, 10, 15, 20, 25), beginning with your fifth.

The Service Award Program provides you with the opportunity to make a selection from a wide range of gifts (in accordance with your service milestone), managerial recognition and acknowledgment of your accomplishment, a Celebration Kit to memorialize your milestone, and, when appropriate as outlined below, a group luncheon or dinner.

All regular full-time and part-time employees are eligible for the program. These awards are not taxable income and their value will not be shown as earnings on your annual W-2 form.

Welcome to AIG

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Your Benefits (continued)

Choice of Gift and Milestone Acknowledgment

Shortly before you reach a milestone, you will receive a celebration package at your home address. In the package, you will receive an invitation to order a gift of your choice online. You will also receive this invitation via email. Once you choose your gift, it will be shipped to your home address.

Guidelines for Luncheons or Dinners

You will also be eligible for a luncheon or dinner beginning with your ten (10)-year milestone and every subsequent five (5)-year milestone. Your manager will coordinate your luncheon or dinner to be held within three (3) months of your service milestone. If you are on an approved leave at the time of its occurrence, your manager will schedule the luncheon or dinner to take place within three (3) months of the date you return from leave.

Managers should coordinate with their employees to determine attendees and location. You are welcome to invite family members or a significant other to your celebration. As is practical, managers will be present at the luncheon or dinner in order to acknowledge the milestone being celebrated. In instances where an employee works primarily on a virtual basis and significant travel may unreasonably delay or hinder the celebration, managers may allow an employee to proceed with a celebratory lunch or dinner with family members or significant other and co-workers and submit the expense up to the amount specified below.

Please refer to the Service Milestone Celebration Schedule below for guidance on the appropriate cost for the luncheon or dinner. The cost of the meal will be limited to the schedule of expense listed below. Meals planned without the manager's approval will not be reimbursed by the Company.

Service Milestone Celebration Schedule

Milestone	Retirement	Maximum Reimbursable Expense
10 year milestone	Retirement after 10 – 12 years of service	\$300
15 year milestone	Retirement after 13 – 17 years of service	\$400
20 year milestone	Retirement after 18 – 22 years of service	\$500
25 year milestone and every 5 years thereafter	Retirement after 23 years of service or more	\$750

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Your Benefits (continued)

If employees desire, they can elect to have a larger event to include members of their department or combine their lunch or dinner with a colleague who may also have a service milestone, as long as the total cost of the event is no greater than the sum of the employees' entitled budgets. For example, if two employees are celebrating their ten (10) and fifteen (15)- year milestones together, the total expense for their shared celebration must not exceed \$700.

NOTE: All Service Milestone Celebrations must occur within three (3) months of the actual date of the milestone or retirement and must be limited to one celebration, regardless of whether the full allotment has been exhausted.

Gifts are not to be included as part of the Service Milestone Celebration expense. If a gift is purchased, it should follow the guidelines associated with the Expense Management Policy on **Gifts**. Service Milestone Celebrations that involve a supplier contract must also follow the requirements set forth in **Policy 401: Meeting & Events**. Service milestone meal and gift amounts may be used only as instructed. Equivalent cash values will not be issued nor directed as donations to charitable organizations in lieu of the meal or gift.

Retirement Gifts

Upon retirement, the employee will be eligible to select a retirement gift from the AIG Service Award selection that corresponds to the next appropriate year level. A retirement luncheon or dinner, using the guidelines set forth above, is also appropriate.

Please refer all questions regarding service/retirement awards to HR Shared Services at 1-800-265-5054 or HRSharedServices@aig.com.

Learning and Development

AIG's Talent Management Policy reflects our commitment to supporting you as you enhance your professional skills and prepare for new opportunities. To sustain career growth for employees, AIG provides a learning and development foundation that includes a competency framework, a learning management system, development training from managers and educational assistance. A skilled and highly trained workforce will help maintain AIG's status as an industry leader.

AIG encourages you to make use of the learning and development opportunities provided to you. These Standards define the types of opportunities available to you and the manner in which you can participate in the programs.

You should review and understand the core and technical competencies of your job function to determine your strengths and identify areas for improvement. You are responsible for creating development goals for each year and for discussing learning and development goals with your manager.

It is a good practice to review the learning opportunities made available to you and proactively identify and participate in appropriate learning and development opportunities.

Managers should create an environment conducive to learning and development for all employees, and provide their employees with opportunities to develop and enhance their professional skills and careers.

[Welcome to AIG](#)[Table of Contents](#)[Working Together](#)[Work-Life Balance](#)[Your Career](#)[Leaving the Company](#)[Our Facilities](#)[Information Technology, Intellectual Property and Media](#)[Your Benefits](#)[Appendix](#)

Your Benefits (continued)

Tuition Reimbursement

AIG believes that formal education has a positive impact on an employee's contribution to the company. The Company's goal is to provide employees appropriate opportunities to access education that enhances their abilities to perform in their current or future job responsibilities. AIG has implemented the Tuition Reimbursement Program to encourage employees to enhance their education, skills and knowledge in areas that relate to their current position or future positions to which they may transfer or progress.

Eligibility

Eligible employees working in the United States, or those assigned as Mobile Overseas Personnel, are regular active employees who:

- have a regularly-scheduled work week of at least twenty-eight (28) hours per week; or
- have a regularly-scheduled work week of at least twenty (20) hours per week, but less than twenty-eight (28) hours per week on or before December 31, 2002; and
- have completed one (1) year of continuous service; and
- meet the performance expectations of their current role.

Hourly employees, interns, and contingent or temporary staff are not eligible for Tuition Reimbursement. In addition, AIG Financial Advisor Network agents are not eligible.

For More Information

For more information regarding costs that may be covered and how to apply for Tuition Reimbursement, please see the Tuition Reimbursement site on the AIG Intranet at https://contact.aig.net/US-Tuition-Reimbursement_1246_479081.html.

- [Welcome to AIG](#)
- [Table of Contents](#)
- [Working Together](#)
- [Work-Life Balance](#)
- [Your Career](#)
- [Leaving the Company](#)
- [Our Facilities](#)
- [Information Technology, Intellectual Property and Media](#)
- [Your Benefits](#)
- [Appendix](#)



- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Appendix (continued)

State Discriminatory Harassment Information

California

California Discrimination, Harassment and Retaliation Prevention Policy

Equal Opportunity

In accordance with applicable law, AIG provides equal opportunity in all aspects of the employment relationship. The company prohibits discrimination and harassment (including sexual harassment) against employees; applicants for employment; individuals compensated by a temporary service agency for work performed for the company; and unpaid interns and volunteers based on their: race, religious creed, color, national origin, ancestry, actual or perceived physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including actual or perceived pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age (40 and over), sexual orientation, military and veteran status, immigration status, and any other consideration protected by federal, state or local law (collectively referred to as "Protected Characteristics").

For purposes of this policy, discrimination on the basis of "national origin" also includes discrimination against an individual because that person holds or presents the California driver's license issued to those who cannot document their lawful presence in the United States. An employee's or applicant for employment's immigration status will not be considered for any employment purpose except as necessary to comply with federal, state or local law. Our commitment to equal opportunity applies to all persons involved in our operations and prohibits unlawful discrimination and harassment by any employee (including supervisors and co-workers), agent, client, customer, or vendor.

Harassment Prohibited

The company prohibits harassment based on any Protected Characteristic against employees; applicants for employment; individuals providing services pursuant to a contract; individuals compensated by a temporary service agency for work performed for the company; and unpaid interns and volunteers.

If such harassment occurs on the company's premises or is directed toward any of these individuals, the procedures in the Complaint Procedure of this policy should be followed.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct, such as leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct, including making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature; graphic verbal commentary about an individual's body; sexually degrading words to describe an individual; suggestive or obscene letters, notes or invitations.
- Physical conduct including touching, assault, impeding or blocking movements.
- Retaliation for reporting harassment or threatening to report sexual harassment.

An employee may be liable for harassment based on sex even if the alleged harassing conduct was not motivated by sexual desire. An employee who engages in unlawful harassment may be personally liable for harassment even if the company had no knowledge of such conduct.

Other Types of Harassment

In addition to prohibiting sexual harassment, the company also will not allow harassment against the individuals described above on the basis of any legally protected classification, including, but not limited to: race, color, religious creed, national origin, ancestry, actual or perceived physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including actual or perceived pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age (40 or over), sexual orientation, military and veteran status, immigration status or any other consideration protected by federal, state or local law. Behavior that is similar to the examples of sex harassment applies to other types of harassment, in addition to the following conduct:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct, including derogatory posters, photographs, cartoons, drawings or gestures based on protected classification; and
- Physical conduct, including assault, unwanted touching or blocking normal movement because of an individual's protected status.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Protection Against Retaliation

Retaliation is prohibited against any employee or applicant for using the company's complaint procedure, reporting proscribed discrimination or harassment or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Discrimination, Harassment, Retaliation Complaint Procedure

Any employee or other person covered by this policy who believes that he or she has been harassed, discriminated against, or subjected to retaliation by a co-worker, supervisor, agent, client, vendor, customer, or any other third party workplace contact in violation of the foregoing policies, or who is aware of such behavior against others, should immediately provide a written or verbal report to

- AIG Employee Relations at 1-800-265-5054 or email to HRSharedServices@aig.com;
- AIG Compliance Help Line at 1-877-244-2210 or via Internet at www.aigcompliancehelpline.com;
- AIG's Global Compliance Group at 1-646-857-1877 or email to corporatelegalcompliance@aig.com; or
- His or her supervisor.

Employees are not required to make a complaint directly to their immediate supervisor. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to AIG Employee Relations 1-800-265-5054; they will attempt to resolve issues internally. When a report is received, the company will conduct a fair, timely, thorough and objective investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The company expects all persons to fully cooperate with any investigation conducted by the company into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other company policies. The company will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law.

Upon completion of the investigation, the company will communicate its conclusion as soon as practical. If the company determines that this policy has been violated, remedial/corrective action will be taken, commensurate with the severity of the offense, up to and including termination of employment.

The federal Equal Employment Opportunity Commission (EEOC) and the California Department of Fair Employment and Housing (DFEH) will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. Information may be located by visiting the agency website at www.eeoc.gov or www.dfeh.ca.gov.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Illinois

Sexual harassment is illegal. Under Illinois law sexual harassment is defined as any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (c) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Examples of prohibited sexual harassment are contained in the Sexual Harassment portion of the Working Together Section found earlier in this Handbook.

Employees who believe that they have been sexually harassed may also file a complaint with the Illinois Department of Human Rights (IDHR) or the Illinois Human Rights Commission. The IDHR protects persons from discrimination in all terms and conditions of employment, including hiring, selection, promotion, transfer, pay, tenure, discharge, and discipline. Complaints may be mediated; however, if mediation is either not available or successful, the complaint will move to the investigation stage and the fact-finding conference. Remedies may include back pay, lost benefits, clearing of personnel file, emotional damages, hiring, promotion, reinstatement, front pay where reinstatement is not possible, and attorney's fees and costs. The Company's internal complaint procedure is found in the section titled "Reporting a Potential Violation of Law, the AIG Code of Conduct or Other AIG Policy" found earlier in this handbook.

Every manager, supervisor and employee must remember that seemingly "harmless" and subtle actions may lead to sexual harassment complaints. The use of terms such as "honey", "darling" and "sweetheart" is objectionable to many women who believe that these terms undermine their authority and their

ability to deal with men on an equal and professional level. And while use of these terms by an individual with authority over a female employee will rarely constitute an adverse employment action, it may lead to the creation of a hostile work environment.

Another example is the use of a compliment that could potentially be interpreted as sexual in nature. Below are three statements that might be made about the appearance of a woman in the workplace:

- "That's an attractive dress you have on."
- "That's an attractive dress. It really looks good on you."
- "That's an attractive dress. You really fill it out well."

The first statement appears to be simply a compliment. The last is the most likely to be perceived as sexual harassment, depending on individual perceptions and values. To avoid the possibility of offending an employee, it is best to follow a course of conduct above reproach or to err on the side of caution. Sexual harassment is unacceptable misconduct, which affects both genders. Sexual harassment will often involve a man's conduct directed at a woman. However, it can also involve a woman harassing a man or harassment between members of the same gender.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the
Company

Our Facilities

Information
Technology,
Intellectual Property
and Media

Your Benefits

Appendix

Appendix (continued)

Under Illinois law it is unlawful for an employer to retaliate against an employee because that employee has opposed practices prohibited by the Illinois Human Rights Act or has made a charge, filed a complaint, testified, assisted, or participated in an investigation, proceeding, or hearing under this Act. In addition to the Open Door Complaint Procedure policy found in this handbook, an employee in Illinois may file a formal complaint with either or both of the government agencies set forth below.

Illinois Department of Human Rights

Chicago Office

100 West Randolph Street, Suite 10-100
Chicago, Illinois 60601
1-312-814-6200 or 1-800-662-3942
TDD: 1-312-263-1579

Springfield Office

222 South College, 1st Floor
Springfield, Illinois 62704
1-217-785-5100
TDD: 1-217-785-5125

Marion Office

2309 West Main Street, Suite 112
Marion, Illinois 62959
1-618-993-7463

Illinois Human Rights Commission

Chicago Office

100 West Randolph Street, Suite 5-100
Chicago, Illinois 60601
1-312-814-6269
TDD: 1-312-814-4760

Springfield Office

401 South Spring, Suite 404
Springfield, Illinois 62706
1-217-785-4350
TDD: 1-217-557-1500

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits

Appendix (continued)

Maine

Harassment on the basis of sex is a violation of Section 4572 of the Maine Human Rights Act. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- I. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- II. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- III. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

In addition to the above process for filing an internal complaint, an employee in Maine may file a formal complaint with either or both of the government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
 Government Center, Cambridge Street
 4th Floor, Room 475
 Boston, MA 02203
 Phone: 1-617-565-3200, 1-800-669-4000
 Fax: 1-617-565-3196
 TTY: 1-617-565-3204, 1-800-669-6820

Maine Human Rights Commission

State House Station 51
 Augusta, Maine 04330
 Phone: 1-207- 624-6050

Massachusetts

In addition to the Open Door Work Environment Standard found in this handbook, an employee in Massachusetts may file a formal complaint with either or both of the government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
 Government Center, Cambridge Street
 4th Floor, Room 475
 Boston, MA 02203
 Phone: 1-617-565-3200, 1-800-669-4000
 Fax: 1-617-565-3196
 TTY: 1-617-565-3204, 1-800-669-6820



Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

The Massachusetts Commission Against Discrimination (MCAD)

Boston Office:

One Ashburton Place, Room 601

Boston, MA 02108-1518

1-617-994-6000

TTY (Deaf and Hearing Impaired) 1-617-994-6196

Springfield Office:

436 Dwight Street, Room 220

Springfield, MA 01103

1-413-739-2145

Rhode Island

In addition to the Open Door Complaint Procedure policy found in this handbook, an employee in Rhode Island may file a formal complaint with either or both of the government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building

Government Center, Cambridge Street

4th Floor, Room 475

Boston, MA 02203

Phone: 1-617-565-3200, 1-800-669-4000

Fax: 1-617-565-3196

TTY: 1-617-565-3204, 1-800-669-6820

Rhode Island Commission for Human Rights

180 Westminster Street, 3rd Floor

Providence, Rhode Island 02903

1-401-222-2662

TDD 1-401-222-2664

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Vermont

In addition to the above process for filing an internal complaint, an employee in Vermont may file a formal complaint with either or both of the government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
 Government Center, Cambridge Street
 4th Floor, Room 475
 Boston, MA 02203
 Phone: 1-617-565-3200, 1-800-669-4000
 Fax: 1-617-565-3196
 TTY: 1-617-565-3204, 1-800-669-6820

Vermont Attorney General's Office

109 State Street
 Montpelier, Vermont 05609
 1-802-828-3171

State Leave Information

California

"Notice B"

Family Care and Medical Leave and Pregnancy Disability Leave

- Under the California Family Rights Act of 1993 (CFRA), if you have more than 12 months of service with your employer and have worked at least 1,250 hours in the 12-month period before the date you want to begin your leave, you may have a right to an unpaid family care or medical leave (CFRA leave). This leave may be up to 12 workweeks in a 12-month period for the birth, adoption, or foster care placement of your child or for your own serious health condition or that of your child, parent or spouse.
- Even if you are not eligible for CFRA leave, if disabled by pregnancy, childbirth or related medical conditions, you are entitled to take pregnancy disability leave (PDL) of up to four months, or the working days in one-third of a year or 171/3 weeks, depending on your period(s) of actual disability. Time off needed for prenatal or postnatal care; doctor-ordered bed rest; gestational diabetes; pregnancy-induced hypertension; preeclampsia; childbirth; postpartum depression; loss or end of pregnancy; or recovery from childbirth or loss or end of pregnancy would all be covered by your PDL.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

- Your employer also has an obligation to reasonably accommodate your medical needs (such as allowing more frequent breaks) and to transfer you to a less strenuous or hazardous position if it is medically advisable because of your pregnancy.
- If you are CFRA-eligible, you have certain rights to take BOTH PDL and a separate CFRA leave for reason of the birth of your child. Both leaves guarantee reinstatement to the same or a comparable position at the end of the leave, subject to any defense allowed under the law. If possible, you must provide at least 30 days advance notice for foreseeable events (such as the expected birth of a child or a planned medical treatment for yourself or a family member). For events that are unforeseeable, you must notify your employer, at least verbally, as soon as you learn of the need for the leave.
- Failure to comply with these notice rules is grounds for, and may result in, deferral of the requested leave until you comply with this notice policy.
- Your employer may require medical certification from your health care provider before allowing you a leave for:
 - your pregnancy;
 - your own serious health condition; or
 - to care for your child, parent, or spouse who has a serious health condition.
- See your employer for a copy of a medical certification form to give to your health care provider to complete.

- When medically necessary, leave may be taken on an intermittent or a reduced work schedule. If you are taking a leave for the birth, adoption or foster care placement of a child, the basic minimum duration of the leave is two weeks and you must conclude the leave within one year of the birth or placement for adoption or foster care.
- Taking a family care or pregnancy disability leave may impact certain of your benefits and your seniority date.

Contact your employer for more information regarding your eligibility for a leave and/or the impact of the leave on your seniority and benefits.

This notice is a summary of your rights and obligations under the Fair Employment and Housing Act (FEHA). The FEHA prohibits employers from denying, interfering with, or restraining your exercise of these rights. For more information about your rights and obligations, contact your employer, visit the Department of Fair Employment and Housing's Web site at www.dfeh.ca.gov, or contact the Department at (800) 884-1684. The text of the FEHA and the regulations interpreting it are available on the Department's Web site.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits

Appendix (continued)

Maryland

Reasonable Accommodation for Disabilities Due to Pregnancy

- Chapter 548-HB 804, State Government Article, §20-609

Posting and Notice

Under the recent amendments to State Government Article, Title 20, §20-609, pregnant employees now have a statutory right to a reasonable accommodation if the pregnancy causes or contributes to a disability and the accommodation does not impose an undue hardship on the employer. The law requires an employer to provide notice as follows:

An employer shall post in a conspicuous location, and include in any employee handbook, information concerning an employee's right to reasonable accommodations and leave for a disability caused or contributed to by pregnancy.

Key Provisions

If an employee seeks to exercise her right under the statute, an employer may not:

- Changing job duties
- Changing work hours
- Relocation
- Providing mechanical or electrical aids
- Transfers to less strenuous or less hazardous positions
- Providing leave: An employer may require certification from an employee's health care provider regarding the medical advisability of a reasonable accommodation to the same extent certification is required for other temporary disabilities. The certification shall include:
 - Date a reasonable accommodation is medically advisable
 - Probable duration
 - Explanation as to the medical advisability of the reasonable accommodation

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Retaliation

If an employee seeks to exercise her right under the statute, an employer may not:

- interfere with;
- restrain;
- deny the exercise; or
- deny the attempt to exercise the right.

New Jersey

Security and Financial Empowerment Act (SAFE Act)

The New Jersey Security and Financial Empowerment Act (NJ SAFE Act), P.L. 2013, c.82, provides that certain employees are eligible to receive an unpaid leave of absence, for a period not to exceed 20 days in a 12-month period, to address circumstances resulting from domestic violence or a sexually violent offense. To be eligible, the employee must have worked at least 1,000 hours during the immediately preceding 12-month period. Further, the employee must have worked for an employer in the State that employs 25 or more employees for each working day during each of 20 or more calendar workweeks in the then-current or immediately preceding calendar year.

Leave under the NJ SAFE Act may be taken by an employee who is a victim of domestic violence, as that term is defined in N.J.S.A. 2C:25-19, or a victim of a sexually violent offense, as that term is defined in N.J.S.A. 30:4-27.6. Leave may also be taken by an employee whose child, parent, spouse, domestic partner, or civil union partner is a victim of domestic violence or a sexually violent offense.

Leave under the NJ SAFE Act may be taken for the purpose of engaging in any of the following activities as they relate to an incident of domestic violence or a sexually violent offense:

- seeking medical attention for, or recovering from, physical or psychological injuries caused by domestic or sexual violence to the employee or the employee's child, parent, spouse, domestic partner or civil union partner;
- obtaining services from a victim services organization for the employee or the employee's child, parent, spouse, domestic partner, or civil union partner;

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

- obtaining psychological or other counseling for the employee or the employee's child, parent, spouse, domestic partner or civil union partner;
- participating in safety planning, temporarily or permanently relocating, or taking other actions to increase the safety from future domestic violence or sexual violence or to ensure the economic security of the employee or the employee's child, parent, spouse, domestic partner or civil union partner;
- seeking legal assistance or remedies to ensure the health and safety of the employee or the employee's child, parent, spouse, domestic partner, or civil union partner, including preparing for or participating in any civil or criminal legal proceeding related to or derived from domestic violence or sexual violence; or
- attending, participating in or preparing for a criminal or civil court proceeding relating to an incident of domestic or sexual violence of which the employee or the employee's child, parent, spouse, domestic partner, or civil union partner, was a victim.

Leave under the NJ SAFE Act must be used in the 12-month period immediately following an instance of domestic violence or a sexually violent offense. The unpaid leave may be taken intermittently in intervals of no less than one day. The unpaid leave shall run concurrently with any paid vacation leave, personal leave, or medical or sick leave that the employee elects to use or which the employer requires the employee to use during any part of the 20-day period of unpaid leave. If the employee requests leave for a reason covered by both the NJ SAFE Act and the Family Leave Act, N.J.S.A.

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Appendix (continued)

New York Paid Family Leave Policy

AIG provides paid leave (up to a certain percentage of your weekly wages) to eligible employees pursuant to New York’s Paid Family Leave Benefits Law.

Eligibility

To be eligible for Paid Family Leave, employees must: (i) regularly work 20 or more hours per week and be employed for at least 26 consecutive workweeks preceding the first full day family leave is taken; or (ii) regularly work less than 20 hours per week and be employed for at least 175 days preceding the first full day leave is taken.

Permissible Purposes for Paid Family Leave

Eligible employees will be entitled to paid time away from work (i) to care for a family member with a serious health condition, (ii) to bond with a child after birth or placement for adoption or foster care within the first 12 months after the birth or placement, or (iii) because of any qualifying exigency arising from the fact that an employee’s spouse, domestic partner, child or parent is on active duty (or has been notified of an impending call or order to active duty) in the armed forces of the United States.

Notice of Need for Paid Family Leave

An employee must provide at least 30 days advance notice before leave is to begin if the qualifying reason for leave is foreseeable. When not foreseeable, the employee must provide notice as soon as practicable under the facts and circumstances and within the time prescribed by our usual and customary notice requirements. Failure to provide timely notice may result in leave being delayed or denied.

Certification

Eligible employees who wish to take Paid Family Leave must comply with applicable certification requirements any may be required to provide additional documentation (such as copies of military orders), as permitted by law.

Use of and Interplay with Other Leave Programs

To the extent permitted by law, employees may elect to charge all or part of their Paid Family Leave time to unused Paid Time Off (PTO) and receive full pay. In such case, AIG will offset the employee’s PTO compensation by the amount that the employee is paid under Paid Family Leave.

Paid Family Leave will run concurrently with leave taken pursuant to the Family and Medical Leave Act (with the exception of leave taken due to the employee’s own health condition). Paid Family Leave may be taken consecutively to any AIG paid leave such as Parental Leave.

[Welcome to AIG](#)[Table of Contents](#)[Working Together](#)[Work-Life Balance](#)[Your Career](#)[Leaving the Company](#)[Our Facilities](#)[Information Technology, Intellectual Property and Media](#)[Your Benefits](#)[Appendix](#)

Appendix (continued)

Job and Benefits Protection

Paid Family Leave is job protected. Thus, AIG must generally restore an employee who returns from such leave to the same or a comparable position. While on leave, employees will continue to receive existing health insurance coverage, provided that they continue to pay their share of health insurance premiums. You may lose coverage retroactively to the date an unpaid premium was due (upon proper notice from our carrier) if you fail to pay your portion of the premium in a timely fashion.

Limitations and Rules Related to Use of Paid Family Leave

Paid Family Leave may only be taken in full day increments, unless otherwise provided by law.

Disability leave and Paid Family Leave may not be used at the same time. You will not be entitled to Paid Family Leave if your family leave combined with disability benefits previously received exceeds 26 weeks during the same 52 consecutive calendar weeks.

Funding of Paid Family Leave Benefits

In accordance with state law, Paid Family Leave benefits are funded through payroll deductions at a prescribed amount from each eligible employee. Employees who are ineligible for Paid Family Leave will be given the option of filing a waiver of benefits, exempting them from payroll deductions, as permitted by law.

Please see contact HR Shared Services at 800-265-5054 if you have any questions about this benefit or how to apply. After choosing your language press Option 1 and then Option 2.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

State Paid Time Off (PTO) Regulations

California PTO

LIMITATIONS ON ACCRUAL AND CARRYOVER

The PTO that an employee may accrue at any time is limited to the amount of his/her annual calendar year allowance plus ten (10) days. An employee in California can carryover accrued, unused time, but will cease accruing PTO days until the balance falls below the cap, which is the annual accrual plus ten (10) days.

If the amount carried over is equal to the employee's annual allowance plus ten (10) days, there will be no additional accrual of PTO time in the new calendar year until some of the accrued time has been used. Thus, the employee does not earn or accrue PTO for any month in the calendar year where the amount of carryover from the prior year and the amount accrued to-date in the current year equals his or her annual allowance plus ten (10) days.

If the PTO is less than the employee's annual allowance plus ten (10) days, accrual will occur for any month in which the employee's current PTO balance is less than the employee's annual allowance plus ten (10) days up to the cap. In no case will an employee's balance be allowed to exceed the amount of his/her annual allowance plus ten (10) days.

EXAMPLE: Marlene earns 2 PTO days per month (24 per calendar year). On December 31, 2012 she had 12 unused PTO days which she carried over into 2013. Marlene did not take PTO between January and November and she accrued an additional 22 days during that time (2 days per month). As of November, she had reached her maximum allowed amount of 34 days (22 days for the current year plus 12 days carryover). Therefore, she will not accrue any additional PTO until she uses some of her PTO. Assuming she doesn't take any PTO during the rest of the year, she will carryover 34 days. However, she will not accrue any PTO in 2014 until her balance falls below her maximum allowance (or cap) of 34 days (24 days annual allotment plus 10 carryover days).

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Appendix (continued)

State Paid Sick Leave

State Paid Sick Leave for PTO Eligible Employees

If you are eligible for PTO and work in a state on the below Paid Sick Leave Chart, you can designate up to ten (10) days of your accrued PTO per calendar year as PTO – Paid Sick Leave. These are not additional days.

Paid Sick Leave
Arizona
California
Connecticut
District of Columbia
Illinois
Maryland
Massachusetts
Minnesota
New Jersey
New York
Pennsylvania
Oregon
Rhode Island
Vermont
Washington

Welcome to AIG

[Table of Contents](#)

[Working Together](#)

[Work-Life Balance](#)

[Your Career](#)

[Leaving the Company](#)

[Our Facilities](#)

[Information Technology, Intellectual Property and Media](#)

[Your Benefits](#)

[Appendix](#)

Appendix (continued)

State Paid Sick Leave for Employees Not Eligible for PTO

For certain commissioned employees such as VALIC Financial Advisors, AIG Financial Network Financial Representatives, and certain external wholesalers, and hourly employees who are normally scheduled to work less than 20 hours per week who are not eligible for PTO and who work in the states below, AIG provides Paid Sick Leave in the amounts indicated.

Please see the Paid Sick Leave section of this Handbook for additional information.

Paid Sick Leave States – Employees not eligible for PTO	
State	Amount of Paid Sick Leave Hours
Arizona	40
California	80
Connecticut	40
District of Columbia	24
Illinois	40
Maryland	56
Massachusetts	40
Minnesota	48
New Jersey	40
New York	40
Oregon	40
Pennsylvania	40
Rhode Island	24
Vermont	24
Washington	72

- Welcome to AIG
- Table of Contents
- Working Together
- Work-Life Balance
- Your Career
- Leaving the Company
- Our Facilities
- Information Technology, Intellectual Property and Media
- Your Benefits
- Appendix

Appendix (continued)

Paid Sick Leave: Specific State Requirements

New York City Paid Safe and Sick Leave

Employees who work in New York City are eligible for paid sick leave in accordance with the guidance in the Paid Sick Leave section of this handbook. In addition, the following special provisions are applicable to employees who work in New York City:

Covered Family Members

For the purposes of New York City Paid Safe and Sick Leave, covered family members also include: (1) any individual whose close association with the employee is the equivalent of family, and (2) any other individual related by blood to the employee.

Using Your Paid Safe and Sick Leave

Paid Safe and Sick Leave may also be used to take time off from work when you or a covered family member may be the victim of any act or threat of domestic violence or unwanted sexual contact, stalking, or human trafficking and you need to take actions necessary to restore the physical, psychological, or economic health or safety of you or your family members or to protect those who associate or work with you, including to:

- Obtain services from a domestic violence shelter, rape crisis center, or other services program.
- Participate in safety planning, relocate, or take other actions to protect your safety or that of your family members, including enrolling children in a new school.
- Meet with an attorney or social service provider to obtain information and advice related to custody; visitation; matrimonial issues; orders of protection; immigration; housing; discrimination in employment, housing, or consumer credit.
- File a domestic incident report with law enforcement or meet with a district attorney's office.

Welcome to AIG

Table of Contents

Working Together

Work-Life Balance

Your Career

Leaving the Company

Our Facilities

Information Technology, Intellectual Property and Media

Your Benefits

Appendix

Appendix (continued)

Rhode Island Paid Sick and Safe Leave

Employees who work in Rhode Island are eligible for paid sick and safe leave in accordance with the guidance in the Paid Sick Leave section of this handbook. In addition, the following special provisions are applicable to employees who work in Rhode Island:

Covered Family Members

For the purposes of Rhode Island Paid Sick and Safe Leave, covered family members also include: (1) care recipients (individuals for whom an employee is responsible for providing or arranging health or safety related care) and (2) members of the employee's household.

Using Your Paid Sick and Safe Leave

- Paid Sick and Safe Leave may also be used to take time off from work related to domestic violence, sexual assault, or stalking impacting an employee or covered relation;
- Closure of the employee's place of business, or a child's school or place of care, by order of a public official due to a public health emergency; or
- If health authorities or a health care provider determines the employee or covered relation's presence in the community may jeopardize others' health because of the individual's exposure to a communicable disease, whether or not the employee or covered relation has actually contracted the communicable disease.

Leaving the Company

If you leave the Company as a result of termination, resignation, retirement, or death, payment will be made for PTO days that are accrued and unused including those that may be designated as PTO-Paid Sick Leave days.

Paid Sick Leave time will be forfeited and will not be paid out to you.

The company reserves the right to deduct any "borrowed" time from your final wages.

Note: Employees are eligible to use up to 24 hours of Paid Sick Leave as of September 1, 2018. Beginning in 2019, employees who are eligible for PTO may designate up to ten (10) days of Paid Time Off as Paid Sick Leave and employees who are not eligible for PTO may use up to 40 hours of Paid Sick Leave.