



# AIG GLOBAL CUSTOMER COMPLAINTS HANDLING GUIDELINES

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## [1.] PURPOSE

To supplement the **AIG Global Customer Complaints Handling Policy** (“Policy” - click [here](#)) with general Guidelines or recommended Procedures for handling Customer Complaints.

Defined terms in this Guideline are capitalized and defined at the end of the document, see [Glossary](#).

## [2.] SCOPE

These Guidelines apply to all Employees handling Customer Complaints on behalf of AIG worldwide.

*Note: The AIG Global Customer Complaints Handling Policy excludes AIG Investments which primarily provides investment advisory services to AIG and maintains separate Policies and Procedures to address client complaints.*

## [3.] GUIDELINE STATEMENT AND GUIDELINES

Local management should develop and maintain separate Guidelines and Procedures to address local business, legal and regulatory requirements.

The following bullets provide key components of AIG’s Complaints handling process:

- Identification of Complaints so as to distinguish them from ordinary business transactions;
- Referral of Complaints to the appropriate handlers for further review and resolution;
- Prompt acknowledgement of Complaints;
- Effective review of Complaints to determine the appropriate resolution in consultation, as needed, with relevant stakeholders including but not limited to business and processing units, and legal and compliance units;
- Determination and communication of measures to resolve Complaints;
- Logging sufficient information about Complaints to facilitate accurate collection, reporting and analysis of data;
- Recommended periodic monitoring and reporting on Complaint handling processes to measure effectiveness; and compliance with applicable laws and regulations; and
- Retention of complete and accurate Complaints-related documentation.

### 3.1 Key Roles and Responsibilities

Key roles and responsibilities in the Complaint handling process include but may not be limited to:

### **3.1.1 Employees or Third Parties**

Handle complaints on behalf of AIG and are responsible for promptly reporting Complaints to their area's designated contact and/or manager for further handling.

### **3.1.2 Complaints Reviewers**

Review Complaints and assist in determining the appropriate resolution, or validate any actions already taken to resolve the matter; report or work with Legal or Compliance on external reporting requirements.

### **3.1.3 Local Complaint Handling Units**

Assist managers with regard to the identification, review and resolution of Complaints and maintain a central repository of Complaints data.

### **3.1.4 Business Units and Corporate Functions**

Responsible for establishing and maintaining appropriate procedures and controls ("local controls") that incorporate the minimum requirements set out in the Policy and any business requirements, as well as any applicable local regulatory and legal requirements.

## **3.2 Guidelines**

### **3.2.1 Receipt and Identification of a Complaint**

Before initiating the Complaint handling process, it must first be determined whether the matter is a Complaint. To help make this determination, Employees may consider the criteria and examples below. If questions persist, they may refer the matter to their Complaints Reviewer to help make this determination and proceed with the process as appropriate.

#### **3.2.1.1 Interactions in Scope**

The following allegations are examples of a Complaint that may be subject to these Guidelines:

- Delays or failure to respond to or process a request;
- Misrepresentation;
- Deficient or misapplied payments that cannot be addressed via ordinary interactions or processing, or are due to system error;
- Defective, faulty or poor product or service;
- Infringement of legal or regulatory requirements by AIG or an Employee; or
- Alleged criminal conduct by AIG, an Employee, or an agent of AIG.

#### **3.2.1.2 Interaction Not in Scope**

The following allegations are examples of topics that may not be in scope subject to these Guidelines:

- Ordinary interactions in the course of transacting business, which may take the form of expressions of disagreement or dissatisfaction regarding:
  - Insurance terms, premium and pricing or the negotiation thereof;
  - Negotiation of coverage and claim resolution; or
  - Processing of routine business transactions.

*Notes:*

*1] Processing of routine business transactions is open for interpretation and dictated by local laws and regulations.*

*2] Complaints received directly from regulatory agencies may involve ordinary interactions and be considered Complaints covered under this Policy.*

### **3.2.1.3 Guidelines for Identifying a Complaint**

Differentiating actual Complaints from ordinary interactions which are part of business transactions requires judgment and a thoughtful analysis which will guide employees to recognizing a Complaint. Certain communications which may otherwise appear on their face to be ordinary interactions could, however, when taken alone or with other similar communications, indicate possible systemic issues in the provision of, or a failure to provide, AIG products or services.

Complaints may arise during any stage in the conduct of our business including, but not limited to, sales and marketing, advertising, underwriting and rating, policy issuance and service administration, and/or claims handling.

Complaints may be received from many sources, i.e., an authorized third-party, including insurance brokers and legal counsel, and regulatory bodies. Communications that may or may not be considered a Complaint should be discussed with the local Customer Complaint Handling Units and/or Compliance.

### **3.2.1.4 Additional Guidance for Processing Certain Complaints**

Special local Procedures may apply to litigated Complaints, Consumer Complaints received from regulators, and Complaints subject to mandated internal appeals.

Such Complaints may include litigation papers such as court filed complaints, summonses and other adversarial legal process, but are only Complaints, within the meaning of the Policy, to the extent that they otherwise satisfy the Policy's definition of a Complaint. However, Litigated Complaints, in most circumstances, must be referred to the Legal department in accordance with local processes.

A communication to, or forwarded by, a regulatory entity expressing a grievance in dealing with AIG will always be treated as a Complaint.

Consumer Complaints requiring responses to regulatory entities may be referred to the Legal department in accordance with local processes.

Where a Complaint is to be referred to an internal dispute resolution committee (if required to be established under local law), it will not be considered subject to these policy Guidelines but rather forwarded to the appropriate body for handling.

### **3.2.1.5 Referral of a Complaint**

Interactions identified as Complaints must be promptly referred to the assigned Complaints Reviewer for further handling (or as needed, to help determine if the matter is a Complaint or an ordinary interaction).

### **3.2.1.6 Acknowledgement**

If the reported allegation is confirmed to be a Complaint, the Complaints Reviewer must ensure a timely delivery of the acknowledgement to the Complainant and/or regulatory body as per local guidelines and rules.

## **3.2.2 Review of Complaints**

The facts and circumstances surrounding each Complaint must be reviewed objectively and in an unbiased manner. The following are typical review questions and considerations:

Complaints Reviewers should start the review by considering the following key questions:

- What specifically is the Complaint about, and which area(s) of AIG and/or individual(s) are involved?
- What does the Complainant want as their desired outcome of the review?
- Have any actions been taken by the receiving area and/or individual?
- Can the Complaint be resolved without further investigation, i.e., by providing an explanation/alternative solution or desired action?
- What (if any) additional areas need to be engaged to assist with the investigation?
- Does the Complaint require escalation to relevant stakeholders?
- Is there a recommendation for resolution, or validation of any actions taken to resolve the matter?

Complaints Reviewers must make sure that:

- The review is not conducted by the individual responsible for the conduct alleged in the Complaint; and
- The matter is handled with an appropriate level of confidentiality and information is released only to those who need it for the purposes of investigating or responding to the Complaint.

## **3.2.3 Resolution**

Upon completion of the review, the Complaints Reviewer will:

- Determine or recommend the appropriate action to resolve the matter;
- Obtain any necessary authorizations to confirm the recommended resolution; and
- Communicate the resolution, usually to the Complainant or regulatory body, by the appropriate means, i.e. letter, fax, email.

Types of Resolution may include one of the following:

- AIG Position Upheld - Complaint was not justified;
- Complainant Position Upheld - Complaint was justified;
- Compromised Resolution - both sides agree to settle the Complaint in a specific manner;
- No Action Required - results in an oral apology or explanation required with no additional action needed, or when a Complaint is withdrawn (in either case, it is recommended and, in some markets mandatory, that closure of the matter be confirmed back to the Complainant in writing);
- External Resolution - matter needs to be resolved through some legal proceedings, ombudsman or similar other independent processes; and
- Other - matter needs to be handled in a particular manner not described above (for example, matter needs to be referred to law enforcement).

### **3.2.4 Complaint Repository**

The Global Complaint Management System (GCMS) is the AIG preferred Complaint repository. Complaints must be logged to ensure that sufficient information is captured to facilitate accurate collection, reporting and analysis of Complaint data.

#### **3.2.4.1 Complaint Information**

Complaints should be logged onto GCMS or another Complaints repository in a timely manner, as dictated by local laws and regulations. The repository must capture minimum information about a Complaint, subject to any local legal or regulatory restrictions or requirements. Minimum information includes:

- Unique Complaint Identifier
- Full Name of Complainant
- Contact Information of Complainant
- Agent name and back office name (if applicable)
- Policy/Claim number (if applicable and available)
- Date of Receipt
- Method of Receipt (e.g., in person, email, written correspondence, fax)
- Date of Acknowledgement
- How the Acknowledgment was Delivered
- Notice/Referral to Regulator
- Type of Complaint
- Business Line
- Product Type or Service (if applicable)
- Resolution (see the Resolution section above for types)
- Date of Resolution

### **3.2.5 Reporting**

All required internal or external reports must be prepared on a timely basis, completely and accurately, must comply with any legal or regulatory reporting requirements, and should help identify potential opportunities to assist management in improving operational practices.

#### **3.2.5.1 Internal Reports**

Complaint Management will prepare periodic reports that will: 1) help identify any systemic issues, trends, root causes and patterns; and 2) provide an analysis of potential operational opportunities that will assist management to improve business practices. The Complaint log (if not AIG-supported GCMS) should be monitored for accuracy and maintained regularly to ensure integrity of the reports.

#### **3.2.5.2 External Reports**

Complaint Management will work with various regulatory and other bodies to prepare approved reports on a timely basis.

## **[4.] CONTACT INFORMATION**

Questions relating to this Guideline should be addressed to Policy Document Key Contact noted below. Employees may also ask questions, raise concerns or report instances of potential non-compliance with this Guideline by contacting any of the following:

**AIG's Global Compliance Group** at 646-857-1877 or email at: [corporatelegalcompliance@aig.com](mailto:corporatelegalcompliance@aig.com).

**AIG Compliance Help Line** at 877-244-2210 or via Internet at: [www.aigcompliancehelpline.com](http://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 this Guideline.

## **[5.] RELATED INFORMATION**

- **Corresponding Policies, Standards, Procedures, or Guidelines**
  - [AIG Global Anti-Money Laundering Policy](#)
  - [AIG Life & Retirement Anti-Money Laundering and Economic Sanctions Policy](#)
  - [AIG Global Antitrust and Competition Law Policy](#)
  - [AIG Global Customer Complaints Handling Policy](#)
  - [AIG Global Information Handling Policy](#)
  - [AIG Global Records and Information Management Policy](#)
  - [AIG Global Standards for Response to Privacy Risk Incidents](#)
  - [AIG Audit Committee Procedures for Handling Accounting & Auditing Complaints](#)
- **Other**
  - [Complaints Handling Toolkit](#)
  - [AIG Code of Conduct](#)

## [6.] GLOSSARY

For purpose of this Guideline, the following definitions apply:

**American International Group, Inc. / AIG / Company** - These terms refer to American International Group, Inc., a Delaware corporation, and its consolidated subsidiaries.

**Business Unit** - Any individual business division, unit, segment, subsidiary or collection thereof of AIG that is intended to generate revenue as a profit center.

**Complaint** - Generally a written communication expressing a grievance or dissatisfaction by or on behalf of a customer, which alleges that either AIG itself or an authorized Third Party, in connection with the provision of, or a failure to provide, AIG products or services, has engaged in: 1) unfair business practices; 2) conduct in violation of applicable law or regulation; or 3) unethical conduct. Complaints may also include oral communications if subsequently confirmed in writing; required by applicable law, regulation, or rule; or raised to the level of a Complaint after escalation to department management and specifically made on a Company's designated administrative systems that record telephone conversations with customers in the ordinary course of business. Complaints do not typically include ordinary interactions in the course of transacting business, which may take the form of expressions of disagreement or dissatisfaction regarding insurance terms, premium and pricing or the negotiation thereof, negotiation of coverage and claim resolution, or processing of routine business transactions.

**Complainant** - A party (or someone on their behalf) that makes or files a Complaint.

**Corporate Function** - Any department or division of AIG the purpose of which is to provide functional or other support to AIG and/or a Business Unit.

**Customer** - A person or organization that is a policyholder, has applied to become a policyholder, or otherwise seeks to open or maintain an account with an AIG company.

**Employee** - A full-time or part-time employee, eligible for some or all benefits and paid on AIG payroll. This includes internal agents and intern/trainee or apprentices who are paid on AIG payroll.

**Guidelines** - Guidance or recommended best practices that: 1) support implementation or interpretation of policy requirements; or 2) address areas not covered by existing policy.

**Policy** - Formal statements of principles or rules that explain legal, regulatory and/or organizational requirements and that regulate organizational actions and employee conduct (what can and cannot be done, as well as what decisions or activities are appropriate).

**Procedures** - Steps (sequence of actions and instructions) necessary or that help implement and/or support policy requirements.

**Regulator** - Any governmental regulatory agency, whether domestic, foreign, or international, that is in charge of the surveillance of compliance with or enforcement of laws, regulations, and established rules, except with respect to their capacity as it relates to the regulation of antitrust, including but not limited to any state insurance regulator, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, the Board of Directors of the Federal Deposit Insurance Corporation and the Securities and Exchange Commission.

**Third Parties** - Non-AIG employees or non-AIG entities including but not limited to, independent contractors, vendors, consultants, agents, program administrators, claims administrators, third-party administrators, and/or third-party service providers.

**Key Policy Document Information:**

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