

Your guide to AIG suitability standards & processes

AIG annuities are suitable for a variety of planning needs for people seeking to protect and grow their retirement savings, as well as those desiring protected lifetime income.

This guide is intended to assist you in making a suitable recommendation and understanding the AIG suitability process,¹ and will help you:

- ✓ Be well prepared throughout the sales process
- ✓ Understand the **Guidelines**: Know what might trigger questions. Concerns include situations when liquidity is low, an annuity contract or life insurance policy is replaced, or the annuity does not appear to meet the client's long-term goals
- ✓ Be prepared if the AIG Suitability Team requests more information
- ✓ Be aware of what AIG is unlikely to approve
- ✓ Know how to ask for help—we can review cases on a pre-sale basis!

¹ Producers must ensure that products are suitable for or in the best interest of the customer, as required by applicable laws, regulation and regulatory guidance. A sale must be reviewed under the AIG Annuity Suitability Program, unless AIG has made arrangements to have your firm conduct suitability supervision.

Be well prepared throughout the sales process

Know what tasks need to be completed, and what information you need to help ensure suitability, before submitting an application:

- Ensure that you have all appropriate licenses, appointments, and trainings completed prior to soliciting the sale. We cannot accept applications dated prior to the completion of the required training(s).
- Determine if the new sale or replacement annuity meets your client's goals.
- Set expectations with the client. Completing the Client Profile Form in its entirety will assist you with this process. Explain that AIG must review the application for suitability and additional information may be needed.
- Using the Owner's Acknowledgment and other approved materials, discuss the details of the annuity including any riders, allocations, fees, and potential penalties.
- If replacing an annuity or life insurance, do not surrender the existing contract or policy in advance. AIG will complete any necessary requests for funds or advise when the contract is ready to be funded.
- If there are multiple funding sources and/or premiums used to fund an annuity, ensure all amounts and sources of funds are indicated on the application and Client Profile form. If AIG receives funds that were *not* listed on the Client Profile form, AIG may not be able to accept the additional funds.

Annuity Suitability Guidelines

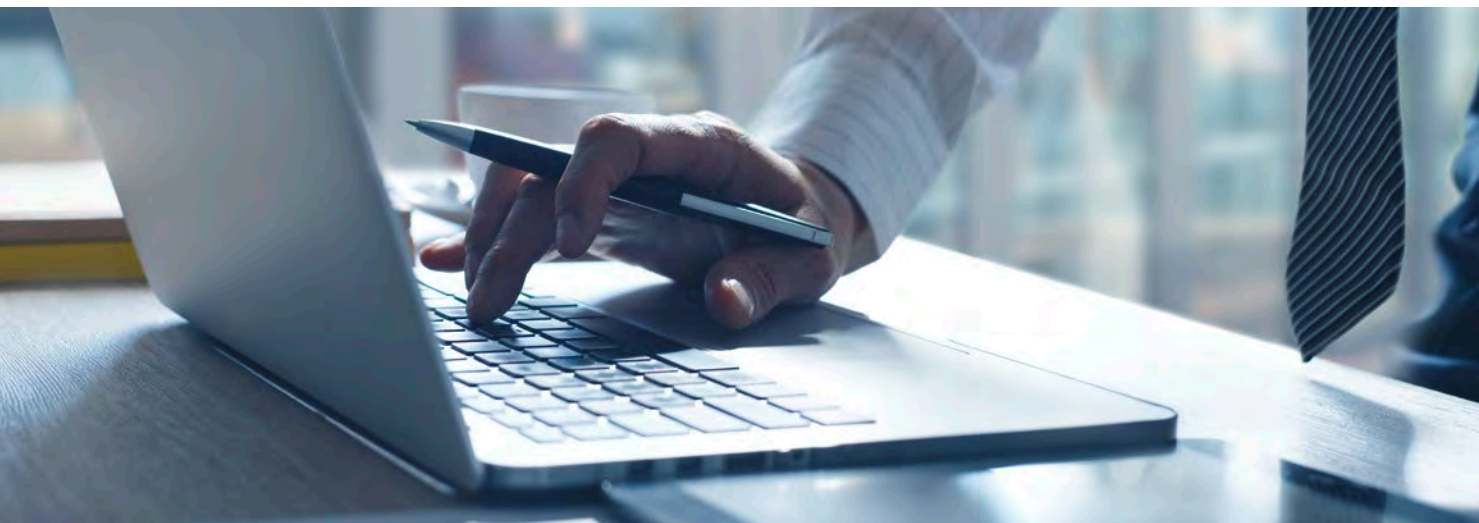
The AIG Annuity Suitability Program helps to ensure each client purchases a product that meets his or her specific needs. Key considerations include the client's age, employment status, concentration of assets, financial goals, available liquidity, investment risk profile and other factors that can influence the client's financial circumstances. While not an exhaustive list, below are some common areas that can trigger questions regarding annuity suitability.

1. Liquidity & Annuity Holdings

When evaluating liquidity and concentration of investments in annuities, AIG measures the client's liquid assets relative to the client's annual expenses. We are particularly concerned when the sale represents more than 50% of a client's net worth (excluding primary residence) in annuities.

Consider:

- Will the client have liquid asset reserves in the event of unforeseen liquidity needs?
- If the client is adding to existing annuity holdings, how does this proposed annuity serve the client's goals in a way that is not already being accomplished?



2. Annuity Replacement

When replacing an existing annuity or annuities,² please provide a clear explanation of how the client benefits from the replacement on the Client Profile Form.

Consider:

- What has changed for the client such that current annuity(ies) will no longer meet his/her goals?
- How will the new annuity substantially benefit the client in comparison to the existing product?
- Is the client willing and able to be subject to a new withdrawal charge (sometimes called Contingent Deferred Sales Charge or CDSC) and corresponding reduction in their overall liquidity?
- If you are replacing an index annuity with another index annuity, what is the benefit of the exchange? Generally, anticipated performance and availability of crediting strategy(ies) should not be the sole reason for the exchange when a withdrawal charge is involved, and any other impact to the client should also be acknowledged.
- If you are replacing a fixed annuity with an index annuity, have you carefully considered whether it's suitable for your client to give up the guaranteed rates offered on the existing product for the non-guaranteed performance related to growth of the index crediting strategy(ies) in the new annuity?
- If the client's current annuity(ies) have a living or death benefit that is not available on or different from the new product, how does this replacement better align with the client's current needs? Does the client understand what benefits they may lose as a result of the replacement? Keep in mind, all deferred contracts can be annuitized and many include an income rider, so if the goal is income, the annuitization and income values should be compared to the income payouts available on the new contract.
- What are the guarantees offered on the existing product, and why is the client willing to replace them with the new product? If the guarantees under the existing product are higher than under the new product, what other features or guarantees provided by the new annuity are more beneficial to the client that justify the loss of the existing guarantees?

² Replacements have a 13-month "look-back" period. Any funds that originated in an annuity in the past 13 months, regardless of their current source, are considered to be a replacement.

3. Other Considerations

It's important to think long-term. Annuities are long-term investments.

Consider:

- Does the client anticipate accessing the funds, other than for required minimum distributions, prior to the end of the withdrawal charge period?
- If the funds are qualified and the client is under age 59½, does he/she anticipate accessing the funds prior to reaching age 59½, which may result in a tax penalty?
- In most cases, annuitization is required at age 95. While some of our benefits may continue after annuitization, if your client is seeking continued deferral or access to contract value after age 95, is there a strategy for that goal?
- If the client is purchasing a living benefit rider, does the feature align with the client's income goal and long-term income plan?
- In most cases, potential performance should not be the sole reason for a replacement. For Index Annuities specifically, clients must understand that performance is not guaranteed and they should never rely on back tested or historical performance in illustrations as an expectation of future performance.

Three keys to avoiding delays

Most applications are reviewed within 1-2 business days, but incomplete paperwork or inconsistent responses may delay the process. Following these three best practices can help us process your application promptly. Be sure that your responses are:

- 1. Thorough.** Complete all sections of the required paperwork, ensure all data is accurate, and obtain client signatures. Any updates or changes made to the information after the initial submission will require returning the form to the client for their initials or signature.
- 2. Clear.** Provide a detailed explanation where requested; e.g., in the case of a replacement, provide the reason(s) for the replacement.
- 3. Legible.** Make sure your response is legible if it is handwritten.

Guidance for Completing the Basis for the Recommendation and/or Reasons for Replacement

The AIG Annuity Suitability Program requires that a summary for the basis of a recommendation be provided. If the AIG Client Profile form does not provide sufficient space, please continue your summary on a separate page with a client signature(s). Please follow the guidelines below to ensure that your summary is complete:

- ✓ Explain the particular features of the product that were considered when making the recommendation.
- ✓ Cite client-specific information
- ✓ Be sure to provide detailed information if the purchase will result in the replacement of another annuity. Consider the following in the case of a replacement.
 - Is the client is benefiting from better rates of return?
 - Provide and compare the rate information—percentage, duration, etc.
 - Current and guaranteed minimum rates should be provided/compared
 - **Note that current rates are not guaranteed for the life of the contract**
 - Will the new annuity provide greater future income?
 - Include income comparison details. If the existing product does not contain a living benefit or income rider, then the annuitization values should be compared.
 - Highlight specific feature details—base value, credits available, withdrawal amounts, etc.
 - Support with client-specific details, such as how and when the client plans to take income
 - Will the client be losing significant benefits or guarantees? If so, explain what those losses are, and describe the benefits of the replacement.
 - If the income on the new contract is not greater, explain the difference in income and provide an explanation about the benefits of the replacement
 - **Important Note: Ensure your explanation includes both the economic benefits and improvements of the new product as well as the benefits and value being given up in the transaction.**

Common errors or things to avoid when completing the Basis of Recommendation

- Avoid general statements like “higher rates” or “product features”
 - Support these statements with product-specific and client-specific information
 - “Guaranteed Income” explanations should include specific income/feature comparisons
- Avoid vague statements that could be applicable to the existing contract
 - Avoid citing only features that may be available on both the existing contract as well as the new contract
 - Instead, focus on the specific features and benefits of the new policy
- Avoid incomplete or inaccurate statements about the current or replacing product
- Avoid “template” responses or using the same statements for many clients
 - Responses should be individualized and specific to the customer

Be prepared if the AIG suitability team requests more information

We may request additional information to explain why the recommendation is being made and how this purchase will meet the client’s goals. You can help the suitability process by explaining the recommendation in an individualized cover letter. Situations that may require additional information can include, but are not limited to:

- Clients have a household income of \$25k or less
- Annual expenses are 80% or more of the client’s annual income
- Client's liquidity will not cover expenses in the case of an emergency
- Purchasing this annuity will prevent client from meeting liabilities and obligations (including mortgage loans, auto loans, credit card debt, insurance premiums, etc.)
- Client anticipates taking distributions that incur a withdrawal charge, exceed living benefit withdrawal requirements, or that may result in pre-59½ additional 10% federal tax
- Client is replacing an existing annuity within the withdrawal charge period.
- If replacing an annuity contract, and guaranteed income is a goal, we may ask for documentation demonstrating the amount of the current income stream available on, or an annuitization quote for, the existing annuity
- Basis for recommendation and/or reason for replacing an existing annuity is lacking sufficient detail, not client-specific, or inconsistent

Be aware of what AIG is unlikely to approve

While not all-inclusive, these are examples of cases the AIG Suitability Team generally will not approve:

- Annuity purchases funded by a home equity loan or reverse mortgage
- Client does not anticipate keeping the annuity for the duration of the withdrawal charge period
- Replacement purchases that will result in a net cost to the client of 3% or greater (net cost includes withdrawal charge with +/- market value adjustment)
- Replacement purchases where the guarantees (for example, Guaranteed Minimum Interest Rate) of the existing product are better aligned with the client's goals than the product being purchased
- Less than 6 months of liquid assets to cover household expenses after the purchase of the annuity
- Premium Enhancements/bonuses offered on new contracts to offset an existing withdrawal charge
- Purchasing an AIG annuity in order to qualify for means-tested government benefit programs
- An aggressive risk tolerance when the type of annuity being purchased is an AIG Index or Fixed Annuity

Know how to ask for help

We can review cases on a pre-sale basis!

To submit a case for preliminary review, complete and send us the Client Profile form. We do not require a signed document for a preliminary review. The approval is not considered final until we receive a signed Client Profile form with the approved preliminary information along with the application submission.

Thank you for considering an AIG Index or Fixed Annuity for Your Client! We're happy to assist with Suitability Questions or Pre-Sale Reviews

Email us: SuitabilityReview@aig.com

IMO/BGA (Indirect) Channel: 1-888-438-6933, Option 1

AIG Wholesaler (Direct) Channel: 1-800-445-7862

Annuities are issued by **American General Life Insurance Company** (AGL), Houston, TX or, in New York, by **The United States Life Insurance Company in the City of New York** (US Life), except the Power Index Elite annuities, which are issued by **The Variable Annuity Life Insurance Company** (VALIC), Houston, TX, in all states except New York. AGL, US Life, and VALIC and ACS are members of American International Group, Inc. (AIG).

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