Chubb is in the process of reviewing our guidance on compensation practices during periods of office closings due to unexpected events/emergencies (e.g., power outage, fire, etc.). For the scenarios below, assume that the employee is not performing any work.

1. Does your organization have guidelines for handling employee compensation when employees cannot report to work to their normal location due to office closure?
   
   If yes, please describe.

2. If yes, do your organization's guidelines around paying employees during office closings vary based on the length of the event? (For instance, does pay only continue for 30 days if employees are not working?) What is the maximum number of days/weeks/months an employee would receive pay during a closing?

3. Do your organization's guidelines address how an employee's compensation would be affected if an alternate work site was offered and the employee was not willing to go?
   
   If yes, please describe and address if the length of commute/number of miles the employee would have to travel is factored into the decision.

4. Has your organization developed guidelines for at what point during an extended office closing would an employee's employment be terminated if they cannot work remotely or at an alternate work site?

*Julie La Saracina, Chubb, April 22, 2013*

<table>
<thead>
<tr>
<th>COMPANY, CONTACT NAME</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>AstraZeneca Liz Perotti</td>
<td>AstraZeneca doesn’t have a formal policy. We communicate as needed based on event and site. Our guidance is to work from home if you are able and it is safe for the employee and their family. If the site is officially closed, however, then this is not a requirement and is optional for the employee since everyone’s situation is different.</td>
</tr>
<tr>
<td>Bristol-Meyers Squibb Linda Gerber</td>
<td>Bristol-Myers Squibb does not have an approved directive as yet but we are working on getting one approved. See the below draft and provide results.</td>
</tr>
</tbody>
</table>

**DRAFT DIRECTIVE**

<table>
<thead>
<tr>
<th>4.1 Exempt Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1.1 For site closures less than one week, exempt employees will receive their standard pay in accordance with their scheduled work hours for the period in which the site is closed.</td>
</tr>
</tbody>
</table>
4.1.2 For site closures one week or more, pay for exempt employees will be determined by BMS management at the time of closure.

4.1.3 When the site re-opens or regains operations, the exempt employee is expected to report to his/her assigned work location:

· If an employee is ill or injured and cannot return to work for any reason, he/she must notify his/her manager and make the application for short-term disability consistent with the terms of the Disability Plan.
· If the employee has a safety and/or personal hardship concern, management, in consultation with human resources, will make a determination whether the employee will be eligible to request paid time off under the vacation directive or optional holiday(s).
· If the employee requests to work remotely due to safety or personal hardship, management in consultation with human resources will make a determination (see guidance on telecommuting under 4.4 below) and provide authorization, if appropriate.

4.2 **Non-Exempt Employees (overtime eligible)**

4.2.1 For site closures up to five (5) consecutive business days, non-exempt employees may receive their regular rate of pay for scheduled work hours up to a maximum of forty (40) hours per pay period.

4.2.2 For site closures greater than five (5) consecutive business days, pay for non-exempt employees will be determined by BMS management at the time of closure.

4.2.3 When the site re-opens or regains operations, the non-exempt employee is expected to report to his/her assigned work location:

· If an employee is ill or injured and cannot return to work for any reason, he/she must notify his/her manager and make application for short-term disability consistent with the terms of the Disability Plan.
· If the employee has a safety and/or personal hardship concern, management, in consultation with human resources, will make a determination whether the employee will be eligible to request paid time off under the vacation directive or optional holiday(s).
· If the employee requests to work remotely due to safety or personal hardship, management in consultation with human resources will make a determination (see guidance on telecommuting under 4.4 below) and provide authorization, if appropriate.
on telecommuting under 4.4 below) and provide authorization if appropriate.

1. If this authorization occurs, the non-exempt employee may work UP TO eight (8) hours per day
2. Advanced written notice must be obtained before the non-exempt employee works more than eight (8) hours per day or forty (40) hours per week.
3. All overtime worked (whether or not authorized) must be properly documented in the BMS time reporting system and reported to the non-exempt employee’s manager.

4.3 Scheduled Time Off

In the event of a site closure, eligible employees who were NOT scheduled to work for any reason during the closure including vacation, company holiday, optional holiday or paid leave will NOT be entitled to additional leave or restoration of vacation or holiday time. Likewise, employees who continue performing work during a site closure are not eligible for additional time off or additional compensation for time worked.

4.4 Telecommuting

If a facility is closed, some employees may be authorized to work remotely. For both exempt and non-exempt employees, work performed remotely will be paid the same as work performed if the site were open.

4. Guidelines

BMS will make every effort in good faith to provide employees with as much advanced notice as possible of a site closure to ensure employees are aware if they should not report to the site.

| Metro       | Suzanne Lauver       | LAUVERS@metro.net | Phone 213-922-7418 | All Metro employees are considered public safety officers, and are expected to report to work (at a designated location) in the event of a County or City-wide emergency (such as an earthquake, terrorist action).
|             |                      |                   |                   | One-off situations (such as a temporary power outage) are handled on case-by-case situations. |

| Pearson     | Christine Pfeiffer   | Christine.Pfeiffer@Pearson.com | Phone 201-236-3378 | 1. Yes
|             |                      |                                 |                   | 2. We pay our employees and assume they will do their best to work remotely. We don't have a policy around this...the longest we have gone is 5 days during hurricane Sandy and there were not pay implications.
<p>|             |                      |                                 |                   | 3. We don't have a 'policy' but if there was an alternative site that was a reasonable commute and the employee refused to go they would likely be able to work from home. If not then there would likely be pay implications. This would be handled on an 'as needed' basis. |</p>
<table>
<thead>
<tr>
<th>Raytheon Company</th>
<th>Barry J. Collamore</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="mailto:barry_j_collamore@raytheon.com">barry_j_collamore@raytheon.com</a></td>
<td></td>
</tr>
<tr>
<td>Phone 781-768-5260</td>
<td></td>
</tr>
</tbody>
</table>

4. No. This seems very unlikely so can't imagine we would develop a 'policy' for this. Again it would be handled on a 'as needed' or 'one off' basis.

We handle this issue case by case and don't have a policy - I think this is likely related to the fact that the government is our biggest customer and we need to partner with them regarding labor charging when these emergencies occur.