



Producer's Guide to Anti-Money Laundering

The Protective Life Corporation family of insurance companies adopted an Anti-Money Laundering Program (AML Program) May 1, 2006 in order to comply with new federal anti-money laundering regulations. The Companies' Anti-Money Laundering Program (AML Program) requires that you either receive training through LIMRA (see details below) or provide certification of recent training satisfactory to us.

As an insurance producer, your skills and services help your clients achieve financial success and security. Because you are on the front lines of a multi-billion dollar industry, you are in a unique position not only to serve your clients, but also to serve the country by helping prevent money laundering and the financing of terrorist activities. You have an important role to play in our AML program. As a person who deals directly with customers, you will often be in a critical position to obtain information regarding the customer, the customer's source of funds for the products you sell, and the customer's reasons for purchasing an insurance product.

In order to sell individual annuities and life insurance, the company's AML Program requires you to:

- Receive periodic anti-money laundering training. You will be notified when completion of the AML Program is required. Protective has contracted with LIMRA to provide your training at no cost to you or you can provide proof of AML certification to us. Once the company has notified you that AML certification is required and you choose to complete the training through LIMRA, please log on to <https://aml.limra.com> and follow the instructions. You will need a user name and password. If you have previously registered with LIMRA through us or another carrier, that user name and password will continue to be valid. If you have not previously registered, your user name will consist of the first four letters of your last name (lowercase) and the last six digits of your social security number. For example, the user name for Bill Smith whose social security number is 123-45-6789 would be: `smit456789`. Your password will be your last name (lowercase). Example: Bill Smith's password would be `smith`. Please note: Once you log in, you will be asked to change your password which must be at least 8 characters, one of which must be numeric. **If you have difficulty with logging on, please call the LIMRA Support Team at 1-866-364-2380.**

Contact Faye Page in the Licensing, Contracting and Commission Area at 1-800-444-2658 Ext 3841 if you have questions or concerns about the AML process.

You should complete this training as soon as possible after you are notified to ensure that we can continue to process your clients' applications for annuities and life insurance. LIMRA will automatically keep us updated about whether you have completed this required training or not.

- **Ensure that all information requested on the product application and associated documents is accurate and complete.** This may include requiring you to verify the identity of the policyholder by reviewing an unexpired government issued picture ID of the customer.

- **Notify us if you detect any money laundering red flags, so that the Company can determine whether a Suspicious Activity Report (SAR) must be filed with the U.S. Department of the Treasury.** Red flags can include:
 - The purchase of a product that appears to be inconsistent with a customer's needs.
 - The purchase or funding of a product that appears to exceed a customer's known income or liquid net worth.
 - Any attempted or unusual method of payment, particularly by cash or cash equivalents such as money orders or cashier's checks.
 - Payment of a large amount broken into small amounts.
 - Little or no concern by a customer for the investment performance of an insurance product, but much concern about the early termination features of the product.
 - The reluctance by a customer to provide identifying information, or the provision of information that seems fictitious.
 - Any other activity which you think is suspicious.

- **Contact the Life and Annuity Division's Second Vice President, Compliance, Keith Kirkley, at 1-800-866-9933, Ext 5912, immediately, in the event you observe any of the above red flags or any other suspicious activity. It is the Companies' responsibility to respond to any inquiry regarding the subject matter of a Suspicious Activity Report (SAR). You must not, under any circumstances, disclose the fact that a SAR has been filed or considered or disclose the contents to the subject of a SAR or to any third party.**

- **Advise customers that only the following types of payment may be accepted.**
 - Checks
 - Pre-authorized bank draft
 - Debit of bank account (available currently only on recurring premiums after the initial premium)
 - Credit Card (initial premium only in limited situations)

Additional details concerning our AML Program will be posted on our Companies' websites.

The Companies and their producers share an important responsibility to comply with the Companies' program and all applicable anti-money laundering laws. We take this matter very seriously and are relying on you to help us in this effort to help our country in its fight against money laundering and terrorist activities. Failure to do so could result in disciplinary action against you and/or the Companies with which you are appointed.