

Policy

Before an individual engages in activities involving the solicitation, negotiation or sale of a life insurance product, he or she must be properly licensed, appointed and registered for that product as required by this policy and by State and Federal law.

An insurance producer must be properly **licensed** prior to solicitation in all jurisdictions where licensing is required. In addition, the Insurance producer must be properly **appointed** for the transaction with the appropriate issuing company in each of the states where licensing is required. State requirements vary for the timing of the appointment and, for the purposes of this policy, are separated into two categories described below. The Insurance producer must also be **FINRA** and, where necessary, **state securities registered** when selling a registered insurance product. A summary of the specific state requirements can be found in Exhibit 1.

These rules apply to both firms and to individuals.

This policy will be updated to reflect changes to jurisdictional licensing laws and our interpretation of these laws. *For further information related to this policy* or for general information about selling Prudential insurance products, please contact us at 877-782-7654.

Prudential has the sole discretion to appoint an insurance producer as an agent of the Company.

Definitions

Included below are general definitions, based upon the NAIC model, for certain concepts discussed in this policy. Specific state definitions of these terms may vary and, where they differ, the state definitions will control.

As a general rule, **solicitation** occurs when an individual approaches a client or potential client attempting to sell insurance or asking or urging a person to apply for a particular kind of insurance from a particular company.

Negotiation occurs when an insurance producer confers directly with or offers advice directly to a purchaser or prospective purchaser of a particular contract of insurance concerning any of the substantive benefits, terms or conditions of the contract. A **sale** occurs when a contract of insurance is exchanged by any means, for money or its equivalent, on behalf of an insurance company.

State Insurance Licensing Requirements

An insurance producer must always be insurance licensed, usually by specific product line, in all states in which solicitation, negotiation or sale of insurance occurs. These activities may take the form of face-to-face or telephone contact or correspondence by any means, including e-mail, fax, or computer.

Additionally, if the proposed insured is a resident of any of the following states, the insurance producer must also be insurance licensed in that state, even if the solicitation, negotiation or sale does not take place there:

Alaska

Idaho

Mississippi

State Insurance Appointment Requirements

Insurance producers must also have an effective appointment with the appropriate issuing company in the jurisdictions where licensing is required. The timing of appointment requirements varies by jurisdiction.

- 1) **Pre-Solicitation:** In **Pennsylvania**, insurance producers who hold the appropriate license(s) must also be state appointed to represent the issuing company **PRIOR TO the solicitation, negotiation or sale of insurance.**

To comply with this requirement, Prudential will accept only those insurance applications that are signed by the applicant on or after the insurance producer's effective company appointment date in Pennsylvania.

- 2) **Concurrent Submission:** Other jurisdictions do not require an insurance producer to be appointed prior to submitting the first insurance application to the appropriate issuing company. **Prudential will begin its review of the insurance application and file a notice of appointment where applicable, if:**
- at the same time the paper insurance application or the electronic worksheet is submitted, the insurance producer submits a completed Confidential Data Sheet (or have a previously approved CDS on file - completed within the last two years) together with a current license copy, **and**
 - Prudential determines the information submitted meets its appointment criteria.

The new business application will be returned if the appointment paperwork is delayed or incomplete. These jurisdictions are:

Alabama	Alaska	Arizona	Arkansas	California
Colorado	Connecticut	Delaware	District of Columbia	Florida*
Georgia	Hawaii	Idaho	Illinois	Indiana
Iowa	Kansas**	Kentucky	Louisiana	Maine
Maryland	Massachusetts	Michigan	Minnesota	Mississippi
Missouri	Montana	Nebraska	Nevada	New Hampshire
New Jersey	New Mexico	New York	North Carolina	North Dakota
Ohio	Oklahoma	Oregon	Rhode Island	South Carolina
South Dakota	Tennessee	Texas**	Utah	Vermont
Virginia	Washington	West Virginia	Wisconsin	Wyoming

* In Florida, the insurance producer must submit evidence of an existing Florida appointment with another carrier.

** In Kansas and Texas, prompt submission of the insurance application is critical to Prudential's ability to meet the states' guidelines and process the business.

Commissions will not be paid until the appointment is effective with the applicable state(s).

FINRA Registration

In addition to state licensing and appointment requirements, insurance producers must be FINRA registered in order to sell a registered insurance product. The insurance producer's registration must be with a Broker-Dealer that has a Broker-Dealer Selling Agreement with Pruco Securities LLC; the insurance producer must be specifically covered by that Agreement; and the product involved must be available for sale under that Agreement. **Applications for registered products will be accepted from insurance producers only if all of these requirements are met as of the date the application is signed by the applicant.**

Blue Sky Licensing

Some jurisdictions require state securities (Blue Sky) registration, in addition to insurance licensing and FINRA registration, for sales of variable life products.

Therefore, if the solicitation, negotiation or sale occurs in, or if the contract owner resides in, any of the following jurisdictions, Blue Sky licensing is required:

Arizona	District of Columbia	Florida	Hawaii	Minnesota
Montana	Nevada	North Carolina	North Dakota	Oregon
Rhode Island	South Dakota	Utah	Vermont	Washington
Wyoming				

This grid is a supplement to Prudential's Licensing, Appointment & Registration Policy. Please refer to that document for complete requirement descriptions.

STATE	Licensing	Appointment		Registration
	Producer must have an effective license, before an application is signed, in any state where solicitation, negotiation or sale of insurance takes place – AND – in this state if the insured resides here	Producer must have an effective appointment in this state before soliciting, negotiating or selling insurance in this state	Producer must submit appointment paperwork with information that meets our standard at the same time as the first insurance application in this state ¹	Producer must have an effective state securities (blue sky) registration before soliciting, negotiating or selling a variable insurance product in this state or with a resident of this state ²
ALABAMA			<input checked="" type="checkbox"/>	
ALASKA	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
ARIZONA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ARKANSAS			<input checked="" type="checkbox"/>	
CALIFORNIA			<input checked="" type="checkbox"/>	
COLORADO			<input checked="" type="checkbox"/>	
CONNECTICUT			<input checked="" type="checkbox"/>	
DELAWARE			<input checked="" type="checkbox"/>	
DIST. COLUMBIA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
FLORIDA			<input checked="" type="checkbox"/> - w/ proof of appointment	<input checked="" type="checkbox"/>
GEORGIA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
HAWAII			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
IDAHO	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
ILLINOIS			<input checked="" type="checkbox"/>	
INDIANA			<input checked="" type="checkbox"/>	
IOWA			<input checked="" type="checkbox"/>	
KANSAS			<input checked="" type="checkbox"/>	
KENTUCKY			<input checked="" type="checkbox"/> - w/ proof of E&O	
LOUISIANA			<input checked="" type="checkbox"/>	
MAINE			<input checked="" type="checkbox"/>	
MARYLAND			<input checked="" type="checkbox"/>	
MASSACHUSETTS			<input checked="" type="checkbox"/>	
MICHIGAN			<input checked="" type="checkbox"/>	
MINNESOTA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MISSISSIPPI	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
MISSOURI			<input checked="" type="checkbox"/>	
MONTANA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
NEBRASKA			<input checked="" type="checkbox"/>	
NEVADA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
N. HAMPSHIRE			<input checked="" type="checkbox"/>	
NEW JERSEY			<input checked="" type="checkbox"/>	
NEW MEXICO			<input checked="" type="checkbox"/>	
NEW YORK			<input checked="" type="checkbox"/>	
N. CAROLINA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
N. DAKOTA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
OHIO			<input checked="" type="checkbox"/>	
OKLAHOMA			<input checked="" type="checkbox"/>	
OREGON			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
PENNSYLVANIA		<input checked="" type="checkbox"/>		
RHODE ISLAND			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
S. CAROLINA			<input checked="" type="checkbox"/>	
S. DAKOTA			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
TENNESSEE			<input checked="" type="checkbox"/>	
TEXAS			<input checked="" type="checkbox"/>	
UTAH			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
VERMONT			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
VIRGINIA			<input checked="" type="checkbox"/>	
WASHINGTON			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
WEST VIRGINIA			<input checked="" type="checkbox"/>	
WISCONSIN			<input checked="" type="checkbox"/>	
WYOMING			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

1. Producer must have an effective appointment before commissions will be paid. Business submitted simultaneously may have to be rejected if any negative information is found in the due diligence review of the producer.
2. Producer must have an effective Series 6 or Series 7 registration and their Broker-Dealer must have an effective selling agreement with Pruco Securities before soliciting, negotiating or selling a variable contract.