



As an insurance producer, you are in a unique position to not only serve your clients to help them achieve financial success and security, but also serve our country by helping to prevent money laundering and the financing of terrorist activities.

The Treasury Department's Financial Crimes Enforcement Network (FinCEN) has issued regulations requiring insurance companies to establish anti-money laundering ("AML") programs that include, among other things, the integration of producers and the reporting of suspicious transactions. Producer integration consists of many components including but not limited to the requirements set forth in this Guide.

Nassau Financial Group ("Nassau") must take steps to ensure that all transactions comply with these AML regulations. As a Nassau producer, you have an important role to play in our AML program. To that end, you must comply with the following requirements when selling Nassau's individual life insurance and annuity products:

### **1. RECEIVE ANTI-MONEY LAUNDERING TRAINING EVERY TWO YEARS:**

Every two years you must review and understand your obligations with respect to Nassau's AML Program as outlined in this Guide, including becoming familiar with Nassau's "Covered Products" and the potential risk for money laundering with these products.

**-AND-**

Every two years you must receive core AML training through one of the following measures:

- Take the LIMRA AML online training course at <https://knowledge.limra.com>;

[Please refer to [Attachment A](#) for directions on how to login and use the LIMRA online training course]

**-OR-**

- Check with your Broker Dealer/IMO to determine if other Nassau approval has been obtained.

You must ensure that all customer information on the product application and associated documentation is complete and accurate. In other words, you must provide customer information to us about your clients and their financial activities. The following information shall be required in all instances before an application may be established for a customer:

Individual	Business
Name (First, Middle, Last)	Legal entity's name
Telephone number	Telephone number
Address (P.O. Box not acceptable)	Mailing address of business or principal place of business
Social Security Number	Tax identification number
Date of Birth	Type of Business Organization
Occupation	Ownership Information about the Business

The information above is the minimum information required by Nassau in order to process an application. Nassau reserves the right to request additional information as circumstances warrant. You should also provide any additional customer information that is required by your individual Broker Dealer/IMO.



**Enhanced Due Diligence** - Certain customers may pose a higher risk of engaging in money laundering activities, and thus additional due diligence is required. These types of customers include but are not limited to:

- Non-resident aliens or foreign customers,
- Customers who resist providing identifying information,
- Senior foreign political figures and their immediate family members, and
- Certain non-governmental organizations or charities.

### 3. ACCEPT ONLY THE FOLLOWING TYPES OF PAYMENT FROM CUSTOMERS:

- Checks written from an individual or corporate account payable to Nassau,
- Checks written from an individual or corporate account, payable to a trust and endorsed over to Nassau,
- Foreign checks payable to Nassau. The check must be paid through a U.S. Bank (Correspondent Bank) as noted on the front of the check and must be in U.S. currency,
- Bank Checks.

Please note that:

- Money Orders are only accepted on certain previously issued products, not accepted with new applications.
- Starter checks may or may not be accepted depending on Nassau's verification of the customer information.

[Please refer to [Attachment B](#) for a complete list of acceptable forms of payment]

### 4. NOTIFY NASSAU IF YOU DETECT ANY MONEY LAUNDERING RED FLAGS, SUCH AS:

- The purchase of a product that appears to be inconsistent with a customer's needs or exhibits lack of concern regarding investment risk,
- 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,
- Customer reluctance to provide identifying information, or the provision of information that seems fictitious,
- Customer is unusually curious about compliance procedures,
- Policy owner and/or insured focus on the administrative aspects of procedure (such as compliance, etc.) versus the purchase itself,
- Policy owner and/or insured purchases multiple policies where insured differs on each of the policies,
- Policy owner and/or insured has a recent substantial change in financial history, or
- Any other activity that you reasonably believe may be suspicious.

[Please refer to [Attachment C](#) for a complete list of red flags]

IF YOU DETECT RED FLAGS OR SUSPICIOUS ACTIVITY, YOU MUST CONTACT NASSAU'S CORPORATE COMPLIANCE DEPARTMENT AT [amlcompliance@nfg.com](mailto:amlcompliance@nfg.com). PLEASE NOTE THAT A REFERRAL TO THE COMPLIANCE DEPARTMENT IS TREATED CONFIDENTIALLY AND MAY NOT BE DISCUSSED WITH ANY THIRD PARTIES. YOU MUST NOT, UNDER ANY CIRCUMSTANCES, DISCLOSE THE FACT THAT A SUSPICIOUS ACTIVITY HAS BEEN REPORTED, OR EVEN CONSIDERED, TO THE SUBJECT OF THE SUSPICIOUS ACTIVITY REPORT OR TO ANY THIRD PARTIES.



**Attachment A**

**LIMRA ANTI-MONEY LAUNDERING (“AML”) PRODUCER TRAINING FREQUENTLY ASKED QUESTIONS**

**Logging In**

**Q: How do I access the CFM Network training site?**

A: Open Internet Explorer and go to <https://knowledge.limra.com>

**Q: How do I login to the CFM Network?**

A: To login to the CFM Network, you must be a registered user. In order to be a registered user, Nassau needs to provide your name to LIMRA.

Initial Log in Instructions: When you log into the LIMRA website you will see the following:



Enter your login information below.

\* Username:

\* Password:

- Forgot Your Username
- Forgot Your Password
- Need additional help?
- Show CE Availability by State
- Training Program Information

**NOTE:** You are the sole user of your Username and Password. If anyone else accesses your account, you will lose all credit for previous courses, since we cannot verify who completed the coursework.

If you are already registered, please follow the steps listed below. On the Login Page (<https://knowledge.limra.com>), enter your username and password in the spaces provided. Please note that



the login function is case-sensitive.

Click on the Login button.

**Username:** For most people, your Username is your National Producer Number (NPN). If you do not know your NPN and would like to look it up, please visit the National Insurance Producer Registry's website, <http://nopr.com/PacNpnSearch.htm>.

**Password:** **If this is your first time logging in**, the password is your last name (lowercase). After you log in for the first time, you will be immediately asked to change your password.

For example: Producer's name is John Smith and social security number is 123-45-6789. His log in information would be as follows: Username: smit456789 Password: smith

**If you have logged in previously**, you should use the password you created the first time you logged in. If you have forgotten your password, click the Forgot Your Password link and follow the prompts to reset it.

### Error Messages

**Q: I followed the steps to login to the CFM Network, but I received a message that says "You have entered an invalid Username. Please try again." What does this mean?**

A: This message indicates that the username information entered does not match our list of active accounts. If you are registered and receive this message, it could be for several reasons:

- Your username was typed incorrectly. Make sure your Caps Lock is off, that you are typing each character in lowercase, and that you are not transposing any of the characters.
- If you believe the information you entered is correct and you continue to receive this message, please contact our support staff at [support@cfmpartners.com](mailto:support@cfmpartners.com) or (866) 364-2380.

**Q: I followed the steps to login to the CFM Network, but I received a message that says "You have entered an invalid Password. Please try again." What does this mean?**

A: This message indicates that the password entered does not match the username. If you receive this message, it could be for several reasons:

- Your password was typed incorrectly. Make sure your Caps Lock is off, that you are typing each character in lowercase, and that you are not transposing any of the characters.
- You have logged into the site before but are entering your last name as your password. Instead, you should use the password you created the first time you logged in. If you have forgotten your password, click the Forgot Your Password link and follow the prompts to reset it.
- You have never logged into the site before but are entering a password other than your last name. Instead, try entering your last name.
- If you believe the information you entered is correct and you continue to receive this message, please contact our support staff at [support@cfmpartners.com](mailto:support@cfmpartners.com) or (866) 364-2380.



**Q: I have logged into the CFM Network previously but have forgotten my password. How do I resolve this situation?**

A: Click on the Forgot Your Password link for instructions.

- If you need further assistance, contact our support staff at [support@cfmpartners.com](mailto:support@cfmpartners.com) or (866) 364-2380.

### Taking the Course

**Q: How do I begin a course?**

A: Once you are logged in, you will be brought to the Home Page. The Home Page lists the course(s) you are enrolled in, provides a brief description of the course(s), and indicates your progress.

- To begin the course, click on the course title.
- The Table of Contents is the first screen that you will see upon entering the course. It lists the sections of the course and the percentage completed for each lesson.
- To start the course, click on the title of the first section.
- You may also return to a completed lesson or to one in progress by clicking its link.

**Q: Does my performance on Learning Checkpoints and Case Studies count toward my grade for the course?**

A: No, scores for Learning Checkpoints and Case Studies are not recorded. Learning Checkpoints and Case Studies allow you to test your understanding of the information presented. You are permitted two attempts to select the correct answer. If, on the second attempt, you have not identified the correct answer, it will be provided to you. You may also go back through the course and review the course information.



### Attachment B

#### ACCEPTABLE FORMS OF PREMIUM PAYMENT

The following forms of payment can be accepted:

- Checks written from an individual or corporate account payable to Nassau,
- Checks written from an individual or corporate account, payable to a trust and endorsed over to Nassau,
- Foreign checks payable to Nassau. The check must be paid through a U.S. Bank (Correspondent Bank) as noted on the front of the check and must be in U.S. currency,
- Bank Checks,
- Money Orders (only accepted on certain previously issued products, not accepted with new applications).

The following checks may or may not be accepted:

- **Checks received from a corporation or custodian bank payable to an individual, endorsed to Nassau**
  - For 1035 exchanges, qualified rollovers, etc., the check may be accepted. All others are generally not accepted, requests for acceptance must have Compliance approval,
  - Unendorsed checks will not be accepted under any circumstances.
- **Checks received from a corporation or custodian bank payable to a brokerage firm with a selling agreement with Nassau**
  - If it is determined that the brokerage firm has a selling agreement with Nassau, and the check is endorsed over to Nassau, the check will be accepted.
- **Starter Checks**
  - These are checks either with low numbers (i.e. 101) or no numbers at all, without names and addresses imprinted on them,
  - Call must be made to the bank to verify individual and address matches our data,
  - Verified checks will be accepted,
  - Unverified checks will not be accepted.

**Producers should be aware that due to privacy restrictions many banks will not verify customer account information, and if not verified Nassau will be unable to accept the starter check.**



The following checks will NOT be accepted

- Checks received from a corporate checking account payable to another corporation and forwarded to Nassau for deposit into another corporate account,
- Checks written from an individual account, payable to another individual or company and endorsed over to Nassau,
- Foreign checks without a U.S. banking (Bank) relationship,
- Travelers Checks,
- Money Orders drawn on foreign entities,
- Checks with the date missing or incomplete,
- Stale dated checks or checks dated more than 10 days in the future,
- Checks with no or the wrong payee.



### Attachment C

#### Producer's Guide to Red Flags

##### **Red Flag Definition**

A red flag is a sign of an unusual or suspicious activity that may indicate money laundering or other illegal behavior is taking place. A red flag, however, is not, in of itself a confirmation that illegal activity is actually taking place.

##### **Your Obligation**

As a producer of Nassau, you have an important role to play in our AML Program and are in the unique position of helping to prevent money laundering by monitoring, identifying and reporting red flags indicating potential suspicious activities.

If you identify a red flag, you must investigate its nature and immediately report to Nassau Compliance Department at [amlcompliance@nsre.com](mailto:amlcompliance@nsre.com).

##### **Point of Sale Red Flags**

While it is not possible to define every situation where activity is suspicious, you are responsible for monitoring and reporting the following red flags:

##### 1. Information Red Flags:

- Policy Owner and/or Insured is reluctant to provide identifying information including the type of business they are involved in and/or their overall assets,
- Policy Owner and/or Insured provides false information,
- Policy Owner and/or Insured provides information that is inconsistent or suspicious,
- Policy Owner and/or Insured provides unusual business documents,
- Policy Owner and/or Insured appears to be acting as an agent for an undisclosed principal, but is evasive about providing, or declines or is reluctant, without legitimate commercial reasons, to provide information regarding the undisclosed principal,
- Policy Owner and/or Insured has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry; in the case of a business account,
- For no apparent reason, the Policy Owner and/or Insured has multiple accounts under a single name or multiple names.

##### 2. Method of Payment:

- Policy Owner and/or Insured insists on dealing only in cash or cash equivalents, or asks for exemptions from Nassau's cash and/or cash equivalent policies,
- The address on the Policy Owner's and/or Insured's check is different from the application,



- Policy Owner and/or Insured inquiries about alternate payment methods,
  - Policy Owner and/or Insured pays with 3<sup>rd</sup> party check,
  - Wire transfers payment from jurisdiction not logical for the policy owner and/or insured (i.e. tax haven),
  - Policy Owner and/or Insured provides false, misleading or substantially incorrect information concerning source of funds,
  - Policy Owner and/or Insured refuses to identify or fails to indicate a legitimate source of funds.
3. Policy Owner and/or Insured is overly concerned with compliance procedures;
    - Policy Owner and/or Insured is concerned about Identification policies,
    - Policy Owner and/or Insured focuses on the administrative aspects of procedures versus the purchase itself,
    - Policy Owner and/or Insured inquiries about compliance procedures in general.
  4. Policy Owner and/or Insured is willing to only meet at a location that is unusual.
  5. Policy Owner and/or Insured exhibits a lack of concern regarding investment risks; commissions; surrender charges; sales charges; or other transaction costs.
  6. Policy Owner and/or Insured is concerned and asks questions as to how soon they can withdraw money out of their account (i.e. free look; borrow maximum; early surrender).
  7. Policy Owner and/or Insured engages in transactions that lack business sense or appear inconsistent with stated investment strategy.
  8. Policy Owner and/or Insured is attempting to purchase policy that appears to be above their needs.
  9. Policy Owner and/or Insured purchases multiple policies where insured differs on each of the policies.
  10. Policy Owner and/or Insured has a recent substantial change in financial history.
  11. Policy Owner and/or Insured is an alien residing in the U.S. and a citizen of an Office of Foreign Asset Control ("OFAC") sanctioned country. For up to date, accurate information regarding sanctions, including list of sanctioned countries, please visit OFAC's [Sanctions Programs and Country Information](#) page
  12. Policy Owner and/or Insured is a U.S. Citizen living abroad in an OFAC sanctioned or FATF non-cooperative jurisdiction.
  13. Policy Owner and/or Insured is a nonresident alien or foreign customer.
  14. Any other suspicious activity.