

Company Rules on Anti-Money Laundering

Athene does not support, and will not knowingly assist, in any activity that facilitates money laundering or funding of terrorist or criminal activities.

Producers play an important role in our Anti-Money Laundering Program. Regulations require that Athene USA and our distribution force collaborate in preventing money laundering by detecting and reporting suspicious transactions.

Please be advised that pursuant to contractual obligations with the Company, marketing organizations, and producers are required to conform to all applicable federal, state, and local laws in conducting business as well as Company rules and regulations. All marketing organizations, and producers must also comply with the Company's anti-money laundering procedures which include:

The collection of customer information to detect and report suspicious transactions.

The verification of the identity of the customer (including the owner, annuitant, beneficiaries, and beneficial owners).

The communication of suspicious activity to Athene USA; The training requirements for producers.

Cooperation with any request as a result of independent testing of the company's Anti-Money Laundering Program by an auditor or other assessor.

The Anti-Money Laundering Officer has the sole responsibility for responding to any inquiry regarding the subject matter of any suspicious activity report (SAR). A producer must not, under any circumstances, disclose the fact that a SAR has been filed or considered, or disclose the contents of a SAR, to the subject of a SAR or to any third party.

Athene USA and its producers share an important responsibility to comply with the Anti-Money Laundering Program and all applicable anti-money laundering laws. The Anti-Money Laundering Officer is responsible for auditing compliance with the program. **A failure to comply by a producer will constitute grounds for discipline, which could include termination of appointment to sell Athene products. In addition, violation of anti-money laundering laws may expose those responsible to substantial penalties and legal action under federal law.**

Please refer to the Producer Guide to Anti-Money Laundering and the Doing Business with Athene Producer Guide located on our website for further information on producer obligations under our anti-money laundering rules.

Lisa Arechavaleta is the designated Anti-Money Laundering Officer for Athene USA. She is responsible for monitoring producer compliance with these procedures.

Athene USA's Agency Contracting Department is responsible for the administration of AML requirements for all new producers, and you may contact Agency Contracting at contracting@athene.com.

Agency Contracting Department
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(800) 800-9882