ATHENE STANDARDS AND PRACTICES

We are building insurance around you.®



Guidelines for Writing Annuity Business on Foreign Individuals

Athene and its life insurance subsidiaries are not licensed to do business in any foreign country. Accordingly, we have developed these guidelines for use when doing business with foreign nationals.

The existence of these guidelines does not mean that any or all applications submitted on foreign nationals will be accepted. Individuals living in certain countries may pose an unacceptable risk just by residing in that particular country. Countries that pose this type of risk may change from time to time, due to a variety of uncontrolled factors including, but not limited to, the social, economic, health, political and/or military climate of the country in guestion.

Athene reserves the right to evaluate any application where the applicant is not a citizen of the U.S.A. Please see the following guidelines for annuities listed below:

- 1. Producers may not advertise or solicit business within a foreign jurisdiction.
- 2. The application MUST be completed in the United States and in a state where the company is admitted, the producer is duly licensed and appointed, and the product applied for is approved.
- 3. The applicant must have a valid social security number or tax identification number issued by the Social Security Administration.
- 4. The proposed annuitant and owner must be a legal resident of the United States.
- 5. Delivery of the contract must be made in the state where the application was taken. In all cases a delivery receipt will be required.
- 6. The applicant must be in the U.S.A. for a reason other than to purchase a product with the company. The company will not consider an application on a person who is simply visiting the country.
- 7. The proposed applicant must be a legal resident of the United States or demonstrate one of the following:
 - a. an existing substantial business or vocational connection with the United States. For example, total or partial business ownership or employment in the United States; or
 - b. ownership of property (which includes residential property the applicant resides) in the United States.
 - *Applicants may not use owned rental property addresses or family addresses located in the U.S.A. as their own if not residing at the address. Applicants may not use the address (residential or business) of the producer.
- 8. The applicant must have provided you with their non-expired government issued identification card. Acceptable forms of identification include driver's license, passport, or U.S. military ID card.
- 9. Athene will not accept applications on politically exposed persons, including figures from a foreign country; officials, members or employees of a foreign government (national or local) and/or their family members; officers, enlisted personnel or employees of a foreign country military force.
- 10. Athene products are available only in the English language forms. Athene will only accept an application and issue a contract if the proposed owner understands English. Athene will not accept an interpreter's certificate.
- 11. It is strongly preferred the applicant's address of record (including the mailing address) be within the U.S.A.
- 12. All payments must be made in U.S.A. dollars and must meet Athene's acceptable forms of payment guidelines.
- 13. Athene will compare all applicant names (including customers, beneficial owners, beneficiaries, business associates and payees) against the United States Department of Treasury's Office of Foreign Asset Control Specially Designated Nationals (SDN) and the United Kingdom Her Majesty's (HM) Treasury list (and any additional man 10.11. It is strongly preferred the applicant's address of record (including the mailing address) be within the U.S.A. dated lists) and comply with any legal requirements.

For additional guidance, please refer to the Doing Business with Athene Guide and the Company Rules on Anti-Money Laundering.