

Producer's Guide to Anti-Money Laundering

Applicable to: Athene ("The Company")

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Program Summary

As a producer for the Company, your skills and services assist customers in achieving financial success as well as security. You have first-hand knowledge of the customer's personal information such as source of funds, reasons for purchasing the Company's product, and the customer's personal identity.

In compliance with state and federal regulations for insurance companies, the Company has adopted a detailed Anti-Money Laundering Program. As a producer who maintains a direct relationship with the customer, you have an obligation to:

- Protect the Company and your customers against financial crime;
- Be well informed by fulfilling the required financial crime training;
- Be diligent in observing customer interaction for suspicious activity; and
- Report any suspicious activity that may be related to anti-money laundering or any financial crime.

For you to sell an Athene product, you are required to assist in combating financial crime by adhering to these guidelines and completing all applicable financial crime training.

Program Requirements

Identifying the Customer

For all products, producers must provide the customer with adequate notice that, in accordance with federal regulations, the Company is requesting information to verify his/her identity.

The Customer Identification Notice (form #10200) explaining why this information is being requested can be found on Athene Connect (under Rules & Guidelines/Legal & Compliance/Anti-Money Laundering) and must be presented to the customer prior to the sale.

When **customers resist providing identification information**, the following steps should be followed:

1. Pend the sale;
2. Review the Red Flag Desk Reference document for any additional red flags;
3. Complete a Request for Compliance Review (RFCR) form found at (see Section 6);
4. Submit the RFCR form to the Compliance Department form (instructions provided on the document) with all supporting documentation requested on the RFCR form; and
5. Submit the case file following normal procedures to the New Business area.

Know Your Customer Requirements

Individuals

Producers are required to validate the identity of individuals applying for annuity contracts. To do so, the following must be collected:

- Full name (first, middle initial, last);
- Residence address and mailing address if different. (P.O. Box alone will not be acceptable);
- Business address, when applicable (P.O. Box alone will not be acceptable);
- Place and date of birth;
- Social Security Number or Taxpayer Identification Number;
- Insurance experience (previously owned financial products) and financial objective in purchasing the product;
- Networth, liquid net worth, source of funds, annual income;and
- Citizenship status (e.g., U.S. citizen, resident alien with nationality, non-resident alien).

Documentation Sources for Individuals

The following must be collected when identifying individual identity:

- An official unexpired government-issued identification document with photo, such as a driver's license or passport;
- The serial number or identification number associated with the identification document;
- The place where the document was issued;
- The date the document expires; and/or
- If the individual is a non-U.S. citizen residing in the United States, valid VISA documentation is required.

Trusts, Power of Attorney, or other Legal Entities

Producers are required to validate the identity of entities applying for an annuity.

The following must be collected:

- The full name and address of the entity (Post Office boxes are not permitted);
- The jurisdiction of formation and legal form of the entity (if other than the U.S.);
- Annuity experience (previously owned financial products) and financial objective in purchasing the product;
- The names of all persons with responsibility for the management of the affairs of the entity (directors, general partners, trustees, authorized signatories), or copy of its annual report; and
- Current list of authorized signatories or copies of power of attorney or trust documents to establish and document that the entity's representative(s) are authorized to act on the entity's behalf.

Documentation Sources for Trusts, Power of Attorney, or other Legal Entities

The following must be collected when identifying Trusts, Power of Attorney, or other legal entities:

- Social Security Number or Taxpayer Identification Number;
- Copy of documents providing the existence of the entity (e.g. certificate of incorporation, memorandum and articles of association, trust deed, partnership agreement, power of attorney document, certificate of good standing, etc.); and
- Information regarding all beneficial owners (25% or more interest).
See requirements listed under "Individuals."

Non-Documentary Verification

When an individual cannot **legitimately** present an acceptable form of identification or if you are not familiar with the documents presented, the Company will perform "non-documentary verification procedures" by matching the information provided by the customer to a certified public information database.

The following step must be followed in these cases:

- Check the box on the Customer Identification and Suitability Confirmation Worksheet that indicates an unexpired government issued photo I.D. was not available.

Note: The application will be in a pended status until the non-documentary verification procedures are completed.

High Risk Jurisdictions and/or Businesses

More scrutiny and monitoring for suspicious activity will be placed on certain customers of high risk jurisdictions and/or engagement in a high-risk business. In particular, the Company will require enhanced additional due diligence for customers who reside in, have been formed in, or have connections to, a country identified by the Financial Actions Task Force (FATF) as a non-cooperating country and/or territory (NCCT).

For a list of jurisdictions identified by FATF with strategic AML/CFT deficiencies, please access the following link: <http://www.fatf-gafi.org/topics/high-riskandnon-cooperativejurisdictions/>

Before selling a product to such potential customers, whether an individual or entity, the producer must obtain, verify, and collect the following **additional** information:

Individuals Residing in a High Risk Jurisdiction (Non-FATF Compliant Country)

- Any prior names/aliases used;
- Financial and professional references - from a bank, accountant, or law firm known to Athene; and
- One of the following: the customer's tax return from the prior year, audited financial statements from the previous fiscal year, or bank statements from the previous quarter.

Trusts, Power of Attorney, or other Legal Entities

The following must be collected from these entities when they are from, formed in, or engaged in high risk businesses, jurisdictions, and/or a non-FATF compliant country:

- A certification of formation;
- A certificate of good standing;
- Any prior names/aliases used;
- Publicly available credit information, including reports by an established rating agency;
- Valid government issued photo identification of the principals of the entity; and
- The names, addresses, and number of the beneficial owners of the entity.

Procedures for High-Risk Customers/Entities

After the required information and documentation have been obtained, please follow these steps:

1. Notify the Compliance Department by completing and submitting the RFCR form (see Section 6).
2. Submit the case file following normal procedures to New Business with a copy of the RFCR form (see Section 6).

The Compliance Officer or designee will review the RFCR form (see Section 6) and documentation. As appropriate, the Compliance Officer or designee will either approve or disapprove the application for processing.

The compliance review and approval/disapproval will be noted in writing, dated, and maintained in the customer's file.

Material Modifications

Whenever a material modification is made to an existing account that is subject to increased scrutiny under these policies (e.g., new beneficiaries, new authorized representatives, material change in investment objectives, and/or additional assets are to be involved) or additional new business is accepted from the same customer, the producer must:

- Obtain copies of appropriate documentation;
- Update and provide the new customer information to the Company (the Company will update its records as to the customer's information); and Notify the Compliance department by completing and submitting the RFCR form providing applicable documentation.

Politically Exposed Persons (PEPs)

Politically Exposed Persons (PEPs) are individuals who have political roles or associations, such as politicians, diplomats, high-ranking members of the military, bureaucrat, or senior foreign government officials. PEPs present a heightened AML risk and therefore must be reported as a requirement of this program.

Any Athene producer or employee who becomes aware of a contract that is controlled or maintained by a PEP or a close family member or associate of such an official must report this information to the Anti-Money Laundering Compliance Officer or his/her designee immediately by using the Request for Compliance Review (RFCR) form (see Section 6).

Suspicious Activity Reporting

In addition to establishing an Anti-Money Laundering Program, the Company has an obligation to report suspicious activity. There are certain activities or **“red flags”** (see RFCR form, Section 6) that can alert you to potential financial crime activity. Producers and employees who have observed “red flags” while with the customer or through the administration of the case file must immediately report the matter to the Company’s Compliance Department for further investigation. After a case file has been referred to the Compliance Department, an in-depth review of the transaction will be completed to determine if a Suspicious Activity Report (SAR) should be filed with the U.S. Department of Treasury’s Financial Crime Enforcement Network (FinCEN).

The Company’s Compliance Officer or his/her designee has primary responsibility for filing of SARs to FinCEN. To determine whether a SAR must be reported, suspicious activity must be communicated to the Compliance Department by producers and/or administration staff. To report suspicious activity, employees must use the RFCR form (see Section 6) at the time the suspicious activity is observed.

Red Flags

The Compliance Department has documented a list of red flags that are to be used as a guide in identifying certain suspicious activities. In addition to using this guide, producers should trust their instincts and experience when dealing with customers and their financial transactions. Producers should report any activity that they feel involves financial crime.

How to Report Suspicious Activity

Suspicious activity can be reported to the Compliance Department by completing and submitting the RFCR form.

Confidentiality

Information related to suspicious activity is strictly confidential. The following requirements apply:

- Never disclose suspected money laundering information or discoveries to anyone other than those on a need-to-know basis such as your manager or the anti-money laundering officer or his/her designee of Athene.
- Never discuss the Company without the permission of the Anti-Money Laundering Officer.
- Never disclose to the customer/person who is the subject of the suspicious activity that a review is being conducted. **Note: This is considered “tipping” and is unlawful.**
- Notify the Company. Never use the suspicious activity reporting as a basis for not completing the transaction. It should be processed as normal, and the suspicious activity properly reported by the Company.

Forms of Payment

The Company has established standard acceptable and unacceptable forms of payments. Please refer to the Forms of Payment guidelines.

Note: Unacceptable forms of payments, when used, may be considered as indicators of red flags to suspicious activity.

Training

Under the regulations, each producer selling the Company's products must complete anti-money laundering training as well as the requirements outlined below in training components.

Producer Requirements

The Company has contracted with LIMRA to provide training to all producers who are contracted to sell the Company's products. With the implementation of this contract, information necessary to access the LIMRA training program has been provided. The following guidelines apply:

- **Existing or Newly Contracted Producers**, before the Company will process any business, will be required to participate in the LIMRA Anti-Money Laundering training or prove that they have received training from a course that meets ACLI specifications. Note: The LIMRA course is offered at no cost.
- **Independent Producers** who are selling through a broker/dealer or are employed by a federally regulated U.S. bank may already be receiving such training through their firm. If the completed training meets the generally accepted program standards, the Company will accept certification of completion in lieu of the Company's LIMRA training.

It is important that this guide is reviewed in detail and that all required training is completed either through LIMRA or an ACLI equivalent program to understand your obligations as a producer for the Company.

Should you have any questions, please contact the Anti-Money Laundering Compliance Officer or his/her designee.

Compliance Monitoring

The Company is committed to adhering to the laws and regulations supporting anti-money laundering and holds producers equally responsible. The Anti-Money Laundering Officer is primarily responsible for ensuring that the Company's anti-money laundering program is adequate, communicated, and in force. Failure to comply with this program will result in disciplinary action up to and including termination of employment and/or contract. In addition, violation of anti-money laundering laws may expose those responsible to substantial penalties and/or fines under federal law.

Record Retention

Any documentation, reporting, or case file information associated with any financial crime activity must be retained for a minimum of five (5) years after the date the relationship with the customer has ended.

Forms

AML Red Flag Definitions (#18541)

This document is provided as a reference. It may not include all activities that would be considered suspicious. If you suspect any activities are questionable, report those to the Compliance Department of Athene.

Anti-Money Laundering Red Flag Definitions Reference Guide (#17274)

This guide provides a list of AML Red Flag definitions, where they may be observed, and how to report concerns.

Company Rules on Anti-Money Laundering (#18545)

The notice explains your role in the Company meeting federal, state and local obligations relating to Athene's Anti-Money Laundering Program.

Customer Identification and Suitability Confirmation Worksheet (#17341)

This form provides valuable information to Athene relating to an applicant including Know Your Customer, needs and objectives, source of wealth and source of funds.

Customer Identification Notice (#10200)

This notice is provided to all customers purchasing an annuity product.

Foreign Nationals (#18542)

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

Forms of Payments (#18544)

This document describes Athene's standards for acceptable and unacceptable forms of payments.

OFAC Guidelines (#18537)

The guide provides an overview of the restrictions in which insurance companies, employees and producers must consider before entering into a transaction with a customer. The guide also explains your responsibilities as the producer relating to Specially Designated Nationals and Sanction Programs.

Request for Compliance Review (#16751)

This document is used to report potential suspicious activity relating to money laundering to Compliance.

Sanctioned Countries & Non-Cooperating Countries and Territories (OFAC & NCCT) (#18538)

This document provides guidance to you regarding sanction programs and countries who are identified as high-risk jurisdictions.

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