

Nationwide Business Practices and Compliance Guide (BPCG) and Anti-Money Laundering (AML) Policy Update Notification Talking Points

Background

Traditionally Nationwide relies on distribution partners that are Broker Dealers or Banks to provide oversight and training to Financial Professionals offering Nationwide's life and annuity products. As Nationwide has expanded into new relationships with distribution partners that work with independents (i.e., IMO, BGA, WFG, NFN), the *Nationwide Business Practices and Compliance Guide (BPCG)* and *Nationwide's Anti-Money Laundering (AML) Policy* were created to educate Firms and Financial Professionals on the policies that Nationwide has in place to ensure compliance with state and federal laws, rules, regulations, and any other applicable Nationwide policies and procedures so that they know what practices are acceptable to Nationwide.

Nationwide distributes the BPCG and *AML Policy* to new Financial Professionals offering Nationwide's life and annuity products during the onboarding process. These documents educate Financial Professionals on:

- State and federal laws applicable to the sale and solicitation of insurance
- Acceptable sales practices
- Nationwide operations requirements and procedures
- Suitability standards
- Money Laundering red flags and acceptable forms of payment
- Who to contact if they suspect money laundering

The BPCG and AML Policy must be periodically updated to reflect regulatory changes and changes to Nationwide policies and procedures in response to state and federal requirements. To ensure Financial Professionals that received the guide are aware of any updates and have the most recent version, Nationwide has established a regular cadence to notify them that a change has occurred.

Both the BPCG and the AML Policy are available on the SSC and can be accessed without logging into their account.

The URLS are:

- Nationwide Business Practices and Compliance Guide
- Nationwide Anti-Money Laundering Policy

Impacted Distribution Partners

Financial Professionals selling with these distribution partners are in scope for these notices:

- o BGA o IMO o NFN Independent Affiliated
- o WFG o M Financial o LPL
- o Firms with agreement to sell fixed annuities only

BPCG and AML Policy Notification Program Overview

Timing: All scheduled BPCG communications will begin the first week June.

Bundle Delivery: Each scheduled BPCG and/or AML Policy update will be completed in one bundle (approx. 72,000).

Included with this communication is a copy of the email that Nationwide will send to the Financial Professionals.

Frequently Asked Questions

1. Why have I received this communication?

Nationwide is proactively notifying Financial Professionals when there are updates to the BPCG or AML Policy to ensure compliance with state laws, rules, regulations, and any other applicable Nationwide policies and procedures.

2. What do I need to do with this guide?

Financial Professionals should:

- Read, understand, and abide by the contents of the guide
- Bookmark the guide; the location will remain the same even as content is updated
- No additional action is needed by you at this time

3. How will I know what has changed?

Nationwide knows that your time is important, so we've identified sections of the BPCG that have been updated since the last version on page 2 of the guide.

4. When will I receive the emails notifications?

Financial Professionals will receive a notice each June after Nationwide completes their annual review of the BPCG or AML Policy. If there are significant changes in the industry, Financial Professionals could receive additional notices throughout the year.

5. How does this affect my existing appointment(s), or recent onboarding request with Nationwide?

This communication <u>does not</u> impact your appointments as long as you conduct your business in compliance with the BPCG and AML Policy.

6. Can I continue to service my existing clients' contracts/policies?

This communication <u>does not</u> impact your ability to service existing contracts or policies as long as you conduct your business in compliance with the BPCG and AML Policy.

- Servicing of existing contracts/policies should remain intact unless your status changes in regard to your license and appointment with Nationwide.
- 7. I have business in underwriting? Will those applications be impacted?

This communication <u>does not</u> impact any existing applications submitted as long as you conduct your business in compliance with the BPCG and AML Policy.

- Any applications received by Nationwide will be reviewed under current underwriting and new business guidelines to determine status.
- 8. Will I still receive compensation on my existing contracts/policies? This communication should not impact any existing compensation as long as you conduct your business in compliance with the BPCG and AML Policy.

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