

Allstate Financial

Lincoln Benefit Life

Producer's Guide to Anti-Money Laundering

As an insurance producer, your skills and services help customers achieve financial success and security. Because you are on the front lines of a multi-billion dollar industry, you are in a unique position not only to serve customers, but also to serve the country by helping prevent money laundering and the financing of terrorist activities.

To comply with new federal anti-money laundering regulations for insurance companies, Allstate Financial has adopted a detailed anti-money laundering program. You have an important role to play in that program. As a person who deals directly with customers, you will often be in a critical position to obtain information on the customer, source of funds for the products you sell, and the customer's reasons for purchasing an insurance product.

In order to sell individual annuities and life insurance, Allstate's anti-money laundering program requires you to:

- Ensure that all information requested on the product application and associated documents is complete and accurate.

At a minimum, you must collect the following types of information about the policy/contract owner:

- Full name
- Residential address (a P.O. Box is not acceptable)
- Date of birth
- Social Security Number
- Citizenship, if requested on the application

If a customer resists providing information, notify Allstate Financial Compliance immediately by calling the Compliance Hotline at 1-866-635-7100.

Records of this information must be retained as long as the contract remains in force and for five years thereafter.

- Notify us if you detect any money laundering red flags, so that Allstate can determine whether a suspicious activity report must be filed. Examples of red flags you may encounter include:
 - the purchase of a product that appears to be inconsistent with a customer's needs
 - the purchase or funding of a product that appears to exceed a customer's known income or liquid net worth
 - any attempted unusual method of payment, particularly by cash or cash equivalents such as cash, money orders or travelers checks
 - payment of a large amount broken into small amounts
 - 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
 - the reluctance by a customer to provide identifying information, or the provision of information that seems fictitious
 - any other activity which you think is suspicious

Additional examples of red flags can be found in the Allstate AML Procedures documents which can be obtained from AF Compliance by calling the AF Compliance Hotline at 1-866-635-7100.

- Advise customers that we do not accept personal third party checks as payment for any policy or contract. If a customer provides a form of payment that is not permitted, it should be returned immediately.
- Receive periodic anti-money laundering training. Specific details on meeting the training requirements will be provided in subsequent communications.

Allstate's AML Contact: In the event that any existing or proposed internal policy, procedure, practice, customer or producer transaction, including contract level transactions, causes a concern regarding any possible non-compliance, money laundering or suspicious activity, the producer should immediately bring that issue to the attention of the AF Compliance Department. The AF Compliance Suspicious Activity Reporting Process may also be used to report concerns regarding possible legal non-compliance. Suspicious activity can be reported by calling the **AF Compliance Hotline at 1-866-635-7100**.

CONFIDENTIALITY OF SUSPICIOUS ACTIVITY REPORTING: THE AF AML COMPLIANCE OFFICER HAS THE RESPONSIBILITY FOR RESPONDING TO ANY INQUIRY REGARDING THE SUBJECT MATTER OF ANY SAR. AN AGENT OR BROKER MUST NOT, UNDER ANY CIRCUMSTANCES, DISCLOSE THE FACT THAT A SAR HAS BEEN FILED OR CONSIDERED, OR THE CONTENTS OF A SAR, TO THE SUBJECT OF A SAR OR TO ANY THIRD PARTY.

For more details on each of these requirements, please contact the AF Compliance Hotline at 1-866-635-7100.

The company and its producers share an important responsibility to comply with the company's program and all applicable anti-money laundering laws. A failure to do so will constitute grounds for discipline up to and including termination. In addition, violation of anti-money laundering laws may expose those responsible to substantial penalties under federal law.

You may download a copy of Allstate Financial's Anti-Money Laundering Policy communication from the "Compliance" section at www.accessallstate.com.