

## Anti-Money Laundering (AML) Policy

In compliance with and support of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT Act), it is Sagicor Life Insurance Company's (Sagicor) policy to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

Sagicor's employees and producers are integral to the success of the Company's efforts to prevent money laundering. Both groups receive training upon their initial association with the Company, and receive ongoing training every two years thereafter. They are expected to be diligent in identifying potential money laundering and any other criminal activity, and are required to immediately report such activity to the Company's Compliance Department for investigation.

**There are two primary ways for employees and producers to help prevent money laundering:**

### Know Your Customer

Producers and the Company must know the identity of each client with whom they are working. Sagicor requires producers, at a minimum, to obtain from each client a date-of-birth, Social Security Number (or applicable Tax Identification Number), and street address, and to view a government issued picture ID for the client and to record the type of ID and the ID number. In addition, a producer may want to obtain other information such as occupation and other sources of income. This information will not only help a producer to "know your customer," but it will assist the producer in determining a client's financial needs.

### Suspicious Activity / Red Flags

There are signs of suspicious activity that indicate money laundering may be occurring. These are commonly referred to as "red flags." If a red flag is detected, additional due diligence must be performed before a producer or the Company may proceed with the transaction. If a reasonable answer is not obtained for each question raised, the suspicious activity must be reported to the Sagicor Compliance Department. Examples of red flags to assist producers may be found in the Sagicor Producer Compliance Manual. A link to the Manual is located on the Training Center page of the Producer Portal.

Any employee, producer, customer or other person who becomes aware of suspicious activity should contact Sagicor's Compliance Department to report such activity. They may also contact the Department with any questions they may have regarding this Anti-Money Laundering Policy or any other legal or compliance matter. The Department may be contacted by calling the Sagicor Home Office and requesting Compliance, or by sending a fax to (480) 425-5130 or an email to: [compliance@SagicorLifeUSA.com](mailto:compliance@SagicorLifeUSA.com)