Guide To Market Conduct

For financial professionals associated with:

Ameritas Life Insurance Corp.
Ameritas Life Insurance Corp. of New York
Ameritas Investment Company, LLC
Ameritas Advisory Services

Ameritas®
fulfilling life®

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NOTE: This guide will periodically be revised. Agents and their staff should retain this and future editions and updates as a tool for continued reference. Agents are responsible for obtaining and utilizing the most current version of this guide which may be found on Producer Workbench and supersedes any earlier version of this guide.

Introduction

Message from Bill Lester

At Ameritas, fulfilling life is what we do every day. With your assistance, our customers can better enjoy life, because we help them reduce uncertainty, grow assets and protect what they most cherish.

As a mutual organization, we put our customers first. Backed by our financial strength, we offer competitive insurance, retirement and investment products. And we support them in a welcoming, ethical and professional manner that builds trust and lasting relationships.

This Guide to Market Conduct is for financial professionals and associates representing Ameritas and its affiliated companies. It explores and explains the issues surrounding ethical practices in the insurance and financial services industry. It can help you understand and promote the market conduct standards Ameritas upholds, and explains how your role with policyholders and other customers requires you to go above and beyond the minimum requirements established by law.

We know you already adhere to these guidelines at all times, and we appreciate your diligence. We wouldn't do business with you, or you with us, if we didn't already share these high standards. Working together to keep these very important promises, we will continue fulfilling life, and building the trusted relationships that lead to our mutual success.

Sincerely,

Bill Lester
President and Chief Executive Officer

Compliance with market conduct guidelines

Ameritas takes very seriously the principles and guidelines explained in this publication. If you become aware of a violation of one or more of the principles, guidelines or policies presented here, whether committed by you or by another financial professional, it is your responsibility to report that violation to the home office. Reports, preferably in writing, are to be made to the corporate compliance officer for Ameritas. All reports will be investigated in the strictest confidence.

Failure to comply with the requirements and responsibilities explained in this guide, or violation of any pertinent law, will be subject to appropriate, case-specific disciplinary or development action. This includes but is not limited to fines, at will termination and for cause termination. Additionally, be advised that the acts or omissions described in this booklet do not constitute an exclusive list of the reasons applicable to termination for cause.

Questions and approvals

Questions regarding the contents of this guide should be directed to the corporate compliance officer for Ameritas. Whenever a situation requires interpretation and/or approval under these guidelines, you should keep a record of the interpretation or approval in your files.

Instructions

It is understood and agreed that no employment rights are created by executing the undersigned document. When viewing the electronic version of the guide, please print a copy from Producer Workbench and complete the section below.

I, _____ , have read and fully understand this Guide to Market Conduct. I agree to follow, uphold, support and promote these rules of professional ethical behavior.

_____ _____
Signed Date

_____
Printed Name and Title

_____
Agency and Location

_____ _____
Agency Number Agent Number

Industry response to market conduct standards

Guidelines concerning market conduct and ethical sales practices are not new to our industry. As early as the 1970s, The National Association of Insurance Commissioners (NAIC) adopted model regulations regarding unfair trade practices, and marketing and sales activities. At that time, the NAIC encouraged states to make these regulations into law.

Like many other industry organizations, the NAIC sought to institute uniform laws and regulations governing the sales of insurance products and services. Additionally, it was interested in better educating consumers about what to expect from a professional insurance advisor.

Since that time, the National Association of Insurance and Financial Advisors (NAIFA) and the American Council of Life Insurance (ACLI) have implemented a number of initiatives. Life Happens was formed by ACLI and NAIFA, along with several other life insurance organizations. Life Happens has developed national magazine advertising that includes stories about real people and how our products have positively impacted their lives.

Additionally, Ameritas promotes ethical conduct in the sale of life insurance and annuity products by subscribing to six principles of ethical market conduct and establishing a compliance program to achieve them.

The principles of ethical market conduct

1. To conduct business according to high standards of honesty and fairness and to render that service to its customers which, in the same circumstances, it would apply to or demand for itself.
2. To provide competent and customer-focused sales and service.
3. To engage in active and fair competition.
4. To provide advertising and sales materials which are clear as to purpose and honest and fair as to content.
5. To provide for fair and expeditious handling of customer complaints and disputes.
6. To maintain a system of supervision and review that is reasonably designed to achieve compliance with these Principles of Ethical Market Conduct.

The Ameritas commitment to ethics

At Ameritas, along with our subsidiaries and affiliates, we believe our Company principles represent the most important definition of who we are. It is in these statements that our uniqueness and our values are evident. But if they are to have meaning, they must be lived, not merely repeated. It is in applying our principles that our work adds meaning and value to our clients, and that we are able to contribute to our industry and society at large.

The Ameritas principles

Working from clear and identifiable values. Ameritas has long operated from solid values involving personal integrity, professional standards, and a strong work ethic. These values have served us well in delivering on our commitments and promises. The partnership between our financial professionals and headquarter associates mirrors the relationship that exists between our representatives and clients. Trust is a living concept; it needs to be nurtured daily. We have the courage to live by our values and the commitment to do what is right all the time, not just when someone is watching.

Meeting the requirements of the law. All states and state insurance departments have laws and regulations affecting our business activities. These generally relate to sales practices, including prohibitions against unfair sales practices and certain requirements in connection with advertising, sales solicitations, and replacement sales. Financial professionals are responsible for knowing and following all applicable insurance and investment laws, as well as all Company procedures.

Meeting clients' needs. We subscribe to the ethical standards of our industry, in spirit as well as in practice. Our objective is to put our clients first. We want to understand their problems, aspirations, hopes and fears. It is in knowing and actively listening to our clients that we can better understand what they want and need, can better evaluate their alternatives, and can ultimately deliver real value.

Managing with a long-term view. The thinking and decision-making for Ameritas seeks to assure quality services for individuals, independent of trends, the latest products or a roller-coaster economy. We work hard to earn our clients' trust every day.

Developing long-term relationships. Ameritas seeks long-term relationships with our agency managers, agents, retirement plans, brokers, other field partners and home office associates just as they seek lifelong relationships with clients. This means that all parties must know, understand, appreciate and serve one another. Constancy and trust in our relationships, guided by the long-term view rather than the short-term gain, will ensure a rich legacy for our future.

Delivering responsive and accessible support. Our reputation for quality service to customers, managers and producers, both before and after the sale, will continue to be a top priority. This is essential to the development of long-term relationships among home office associates, field partners and customers.

Mutual obligations

At Ameritas, we seek to practice these principles day in and day out, year in and year out, among home office and field associates. That means having a shared sense of obligation when it comes to maintaining our clients' trust and operating with personal and professional integrity. This is what we mean when we describe the Ameritas-representative relationship: both parties working toward the common good of the client, our mutual success and together living up to our principles.

As a representative of Ameritas, you hold a high position of responsibility and trust. The clients trust you to act in their best interests. Ameritas trusts you to act with honesty and integrity in all your business dealings.

As you conduct business on behalf of Ameritas, a good rule is to ask "Am I doing the right thing? If the situation were reversed, would I do what I am recommending for my client?" These questions are the heart of ethical market conduct.

Required business practices

Following are practices you must observe to help maintain high ethical standards. Using these guidelines will help ensure that you are offering clients professional and ethical service.

- Adhere to Ameritas values.
- Provide products, service and advice that are in the client's best interest.
- Use clear, easily understood terms that are not misleading or ambiguous.
- Avoid false, deceptive, misleading or disparaging statements about competitors, products or companies.
- Use only illustrations/proposals furnished or approved by the home office.
- Prior to use, all advertising materials, including internet advertising, that use the Ameritas name or other Ameritas copyrighted content must be sent through the home office for review.
- Maintain clients' confidential information according to the privacy policy of Ameritas.
- Notify us of any privacy incident involving client information.
- Ensure that policyholder requests are processed as soon as reasonably possible.
- Maintain a log of all communication with clients to document your level of service.
- Conduct business activities in a professional manner.
- Promptly report all complaints to the home office.
- Promptly report all regulatory actions to the home office.
- Promptly, honestly and accurately respond to all inquiries, correspondence and investigations from the home office.
- Render ongoing counsel and service.
- Continue education throughout your professional life.
- Obey all laws and regulations governing business and professional activities.
- Avoid activities which detract from the integrity and professionalism of your position.
- Avoid even the appearance of conflicts of interest.
- Never sign or initial the name of another person, such as an applicant, insured, policyowner, beneficiary, assignee or otherwise, whether or not such person consents.
- Never alter a signed form, even with the signer's consent. This includes use of white-out and any cut-and-paste activity.
- Never sign as a witness to any person's signature on any application or other document relating to business with Ameritas, unless the signature is actually performed in your presence.
- Never impersonate a client or any other person, even with their consent.

NOTE: Field partners and home office associates who are Financial Institution Regulatory Authority (FINRA) registered representatives of Ameritas Investment Company, LLC have additional responsibilities and guidelines. These are detailed in the respective Policy & Procedures manual.

Compliance procedures in action

Contract, licensing and registration

Ameritas is dedicated to providing clients with superior products and service for a wide range of financial needs. Therefore, to represent us we seek and develop individuals who are knowledgeable, skilled, ethical and highly motivated to fulfill client needs. As a field partner, your first responsibility before soliciting business is to be properly appointed and/or contracted with Ameritas, its subsidiaries and affiliates. In addition, you must have a license issued by the state where you intend to solicit. And you must:

- Solicit sales of insurance and other financial products only in states where you are appropriately licensed, appointed and/or registered.
- Conduct yourself in compliance with all licensing laws.
- Obtain a confirmed, effective date of appointment before soliciting business for Ameritas.

In addition to the above, if you are involved in the sale of variable life insurance, variable annuity products and/or other securities products, you must:

- Hold an appropriate FINRA registration and state securities registration.
- Pass any and all appropriate examinations for every state in which your sales efforts are directed, originated or accepted.
- Be licensed and appointed in the state of solicitation and in the owner's resident state (even if that owner moves to another state for subsequent solicitations and/or subsequent payments for annuity products).
- Be a registered representative of an approved broker/dealer. The approved broker/dealer must also be licensed and appointed in the state of solicitation and in the owner's resident state.
- If you have private administrative staff, you must ensure that they either limit their activities to clerical and administrative functions or have the appropriate licensing and registration as well. However, for secretarial and clerical functions, you must be registered as a "Non-registered Finger Print" person. Please contact the Registration and Licensing Department to initiate the Fingerprinting process.

The terms and conditions of your authority to act on behalf of Ameritas are stated in your contract, which you should read carefully. These, along with the rules and regulations published from time to time by Ameritas, set out the parameters of your relationship with Ameritas.

Agents are responsible for renewing their licenses and registrations, including completing all continuing education requirements, and ensuring that the licensing department receives a copy of the renewed license prior to any expiration date.

Agents must immediately inform the licensing and registration department of any license or registration suspension, revocation, termination for cause or any other state or regulatory disciplinary action against them. When requested by the licensing or registration department, agents are required to provide copies of any licensing forms or associated documents sent to or received from the state insurance department or regulatory authority.

Contracting, appointment and maintenance standards

Determining whether candidates are contracted and appointed is within the sole discretion of Ameritas. The licensing department, in consultation with other departments as necessary, will investigate and consider, using the factors set forth below, the overall merit of candidates and determine whether they are of sufficiently good character and reputation to be appointed as agents for Ameritas. Ameritas reserves the right to refuse to accept candidates for any reason. The licensing department may refer the results of an investigation to the compliance department and/or distribution for further deliberations.

Hiring and Maintenance Standards

Factors that may be considered when determining whether or not to approve or terminate an appointment include, but are not limited to, the following:

1. Licensing: Candidates must be properly licensed in the state(s) where he/she will conduct business.
2. Work history: Past work history including the number of times the candidate has changed companies or employers, past violations of company or employer policies or procedures and disciplinary actions.
3. Financial history: Personal and professional financial standing and experience, including a proven ability to manage finances. The candidate's history regarding bankruptcy, bondability, debt owed to an insurance company or government regulatory body, outstanding liens or judgments and credit history.
4. Criminal history: Involvement with the criminal justice system.
5. Civil litigation: The extent and nature of a candidate's involvement in past, pending or current litigation.
6. Regulatory action or sanction: Any action or sanctions by a state insurance department or other regulatory entities.
7. Customer complaint history: In the event a candidate has experience in selling insurance, the number and type(s) of customer complaints against the candidate.
8. SEC or FINRA complaint and disciplinary history: In the event a candidate has experience in selling variable products or other securities, the number and type of complaints to or disciplinary actions by the Securities and Exchange Commission (SEC) or a securities self-regulatory organization, including, but not limited to, the Financial Industry Regulatory Authority (FINRA).
9. Lack of candor: Whether a candidate has omitted relevant information or provided any false or misleading information on the application for appointment or any supporting documentation.
10. Prior company termination: Previous refusal for contract processing, declined for appointment or termination for any reason.
11. General reputation: The quality of your general reputation withn the business and financial services communities.
12. Errors and omissions liability insurance: Candidates are required to have errors and omissions coverage.

Federal law 18 USC §§ 1033(e)(1)(A) and (B) prohibits a Company from appointing any individual who has been convicted of any felony involving dishonesty or breach of trust, without the specific written consent of the appropriate insurance regulatory officials. Ameritas reserves the discretion to refuse to appoint candidates who have been involved with the criminal justice system in any way. Individuals convicted of felonies described in this paragraph may be appointed only with the prior approval of both distribution and the compliance department and with the specific written consent of the applicable insurance regulatory officials. In addition, to ensure continued compliance with the law, all appointed agents are required to immediately report to the compliance department their conviction of or "no contest" plea to any felony charge.

Training and education

As a field associate, you have the responsibility to meet all requirements regarding licensing, registration and continuing education mandated by the states in which you do business and other regulatory bodies. This standard provides you with additional education that will help enhance your career in an ethical manner. However, it will only minimally meet the educational requirements you will need to remain current in the laws and practices you need to know to properly service customers.

As a financial services professional, you must remain knowledgeable and properly skilled to guide clients correctly when addressing their financial concerns. Ameritas recommends various tools and techniques that provide you with information you need, whether you are new to the business or a veteran in our industry. You are responsible for knowing and understanding the various features and operation of the products and services offered by Ameritas. Ameritas regularly updates its product information and makes such updated information available to its distributors on Producer Workbench. Ameritas requires that agents obtain, review and follow the product information available from Ameritas.

As a Company, we endorse various industry designation programs. These curricula will also allow you to meet many of your continuing education requirements. A CLU, ChFC, LUTCF, CFP or one of the other industry designations approved by Ameritas may be listed after your name to add credibility to your commitment to professionalism.

Ameritas offers home office training programs, schools and seminars that are designed to educate you on product, sales techniques, market conduct issues and the many changes in the laws that affect the financial services industry.

Ameritas supports the use of various market conduct study materials. They are available upon request to both home office and field associates.

It is important that you take advantage of the opportunities Ameritas presents each year that will serve to enhance your knowledge, skills and professionalism. The state required minimums will only take you so far. Let us help you get to where you want and need to be in the financial services industry.

Errors and omissions liability insurance

To protect yourself against claims involving your professional services, it is a good business practice to maintain professional liability insurance. If you are an agent or manager contracted with, or appointed to solicit the sale of life insurance for Ameritas, you must obtain professional liability insurance in order to maintain your contract with us.

You may obtain this coverage on your own or, if eligible, elect to participate in the errors and omissions insurance program sponsored by Ameritas. If you obtain coverage on your own you must, on an ongoing basis, provide evidence of current coverage with a carrier in good standing and the coverage must specifically apply to the sale and service of life insurance and annuity products. Moreover, you must maintain coverage in sufficient limits to comply with existing requirements of your approved insurance companies and broker/dealer.

You should promptly report any claim made against you to your carrier. This includes, but is not limited to, any lawsuit, any threat of lawsuit or regulatory action that is brought against you. In addition, you should notify your carrier if you become aware of any wrongful act or allegations of a wrongful act; even if you feel that the claim is unjustified.

For RR/IARs registered with a broker/dealer or RIA, including those registered with AIC or AAS, please consult the policies and procedures manual for guidance on maintaining appropriate E&O coverage.

Tax and legal implications

Your sales proposals may have tax or legal implications for the buyer. Or the sale may be motivated by the client's desire to minimize current or future income taxes, gift taxes or estate taxes. In these cases, you should advise clients to seek the advice of a tax professional, such as a tax attorney or accountant, to review the tax and legal implications of any contemplated transaction. Neither Ameritas field partners nor employees are authorized to provide legal or tax advice to prospective or current policy or contract holders.

Conflicts of interest

As an Ameritas field associate, you have a responsibility to act in the best interest of clients. Therefore, you must appropriately account for any property or money you receive. You must also avoid any real or perceived conflict of interest between acting in the best interest of the client and your personal interests. As a result, you may not:

- Lend money or securities to clients.
- Borrow money or securities from clients.
- Make unauthorized transactions.
- Use client funds inappropriately.

If you are the producer of record or have earned a commission on the sale of a life insurance policy or annuity contract issued by Ameritas, you may not, at the time of issue or at any later date, be any of the following:

- An owner or payer of the policy or contract.
- A beneficiary or assignee of the policy or contract.
- A trustee of a trust that is an owner, assignee or beneficiary of the policy or contract.
- A partner, principal, shareholder, officer or director of an entity that is an owner or beneficiary of the policy or contract.
- Address of record of the policy or contract.

The only exceptions to this are insurance policies or annuities purchased by you or members of your family for individual needs.

Real or perceived conflicts of interest, as noted above, may add liability you would not otherwise have. Moreover, such activities may extend beyond the level of professional services that are generally covered under errors and omissions insurance. In addition, you should not purchase, assign, transfer, escrow or otherwise deal in a commercial transaction with insurance policies. Again, the only exceptions involve insurance policies or annuities purchased by you or members of your family for your individual needs where an insurable interest exists.

You should also avoid any activity or relationship that may interfere, or give the appearance of interfering, with your ability to effectively perform your role as an Ameritas producer. If an activity, interest or relationship is incompatible with the best interests of Ameritas it presents a conflict of interest.

Handling funds

Funds collected on behalf of Ameritas are received in trust and must be submitted to Ameritas immediately. Co-mingling of funds is prohibited. All checks must be made payable to the appropriate company. We do not accept checks drawn on agents' or agencies' bank accounts (unless used for their own policies or those of their immediate family). You must not accept checks from clients that are made payable to "cash" or to your order, and you must not accept cash. You must not purchase cashier's checks or money orders for clients.

(See your broker/dealers' supervising manual for instructions on handling security-related funds).

As a producer for Ameritas, you are prohibited from advancing or financing premiums. You are also prohibited from rebating.

Anti money laundering (AML)

It is the policy of Ameritas to prohibit and actively prevent money laundering as well as any activity that facilitates money laundering or the funding of terrorist or criminal activities. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins or constitute legitimate assets. Our AML policies, procedures and internal controls are designed to ensure compliance with all applicable regulations and rules and will be reviewed and updated on a regular basis to ensure appropriate policies, procedures and internal controls are in place to account for both changes in regulations and changes in our business. For additional information please log on to Producer Workbench and search "Anti-Money Laundering."

Customer Identification and Verification

Prior to opening an account, the agent must collect the following information for all accounts for any person, entity or organization that is opening a new account and whose name is on the account: (1) legal name, (2) date of birth for individual or date of inception for trust, (3) valid and current street address, (4) an identification number (social security number, tax identification number or equivalent for non-U.S. person) and (5) an unexpired driver's license, passport or other form of government issued identification and including documentation for non-natural entities.

In addition to the above mentioned requirements, non U.S. citizens must also present a copy of their green card.

An agent opening an account for a non-natural entity must submit documents showing the existence of the entity, such as certified Articles of Incorporation, a government-issued business license, a partnership agreement or the full copy of the trust instrument. For additional information log on to Producer Workbench and search "Anti-Money Laundering."

Anti Money Laundering procedures require all field associates to undergo periodic AML training. By signing the Guide to Market Conduct you are attesting to knowing and understating that periodic AML training is required and certifying that you are within the guidelines of these requirements or you will contact the compliance department to make arrangements to complete the training.

Charging fees

If you perform separate fee-based financial planning or consulting it is important that you comply with appropriate registration requirements, including registration as a Registered Investment Advisor or Investment Advisory Representative. You must keep such business separate from your insurance business with Ameritas and make certain clients understand your role in each instance. For example, you should identify separate company names for each purpose and use separate stationery. Before soliciting any insurance sales, you must inform clients that you will receive a commission for the sale of the product. Any financial planning fees must be based on a written agreement or schedule between you and the client before the services are performed.

Unless you are appropriately registered to perform financial planning, you may not charge a separate fee to a client for services performed in the sale of an insurance policy, annuity contract, or AIC/AAS investment product. For instance, you cannot charge a client a fee for assessing his or her financial needs. And in no case should you charge a separate fee for such services as preparing an illustration, assisting in completing an application, delivering a policy, completing paperwork for a death claim or obtaining a license to complete a sale.

Privacy

Privacy – Security Protection

All agents and agencies are required to establish physical, technical and administrative safeguards designed to protect customers' Nonpublic Personal Information (NPI) and meet the requirements of all states in which they are licensed. These safeguards should include implementing strong passwords for accessing electronic information, locking paper documents, securely shredding documents containing customer information and encrypting all mobile devices that store or maintain NPI as well as any NPI that is transmitted wirelessly or accessed via public networks. Nonpublic personal information includes all information about a customer that is not public, such as first and last name combined with Social Security Number, Driver's License Number (state-issued identification card), Financial Account Numbers, medical information and Credit or Debit Card Numbers.

Each agent and agency must establish a security plan with regard to all electronic devices and storage systems that maintain nonpublic personal information, including, but not limited to: Laptops, PCs, servers, tablets, smart phones, USB flash drives and external hard drives, CDs/Disks, tape backups and storage cabinets/paper files. It is also important to remember that agency staff should only have access to the personal information needed to execute their roles and that terminated employee's access to such information and company IDs are immediately revoked and disabled. Agents are obligated to become familiar with and adhere to the privacy policy of Ameritas which can be found on Producer Workbench by searching "Privacy Policy."

Security breaches

Anytime Non Public Information (NPI) is lost, stolen, hacked or unaccounted for, the compliance department must be contacted immediately. The Ameritas privacy officer will evaluate the situation and help determine whether or not a security breach has actually occurred and the appropriate steps to take. The privacy officer will assist in helping to contain and resolve any security breach as well as providing guidance regarding the necessary steps required to help prevent a breach from occurring again.

Do Not Call/Telephone Consumer Protection Act

In compliance with federal and state Do Not Call (DNC) and Telephone Consumer Protection Act (TCPA) requirements, Ameritas has established DNC and TCPA policies. The DNC policy prohibits agents from making sales calls to any telephone number (residential or cell) that has been placed on the National DNC register, state DNC list or Ameritas DNC list, and requires agents to abide by any related federal laws, regulations and rules, and all applicable state laws ("Telemarketing Laws"). In addition to prohibiting calls to numbers on the DNC list, the TCPA policy prohibits telemarketing calls to cellular telephone lines using an automatic dialing system and prohibits artificial or prerecorded voice recordings, except for emergency purposes or with prior express written consent of the called party. Agents are obligated to be familiar with and adhere to the Ameritas DNC and TCPA policies, found on Producer Workbench.

Anti-SPAM

Compliance with state and federal Anti-SPAM regulations is required of all agents and agencies as well as, but not limited to, all internal and external marketing and sales associates. Agents choosing to communicate by email must become familiar with the email and Anti-SPAM policies of Ameritas as well as the different types of email communication as described below:

Business Relationship-Transaction emails are non-soliciting in nature and are sent for the purposes of communicating with any client or applicant regarding a product or service they have purchased or are in the process of purchasing.

Marketing emails are any email that is not a Business Relationship-Transactional email, that a receiver has not requested, nor consented to receive of which the primary purpose is the commercial advertisement or promotion of the Ameritas Company or any of their products or services, including a link or direction to website(s) with information about the Ameritas Company and/or any of their products or services.

The anti-SPAM policy for Ameritas may be found at Producer Workbench by searching "Email Compliance."

Fair competition

The insurance industry is comprised of many fine companies working toward a common goal – to best serve the client's needs. In order to uphold the integrity of our profession, it is critical that Ameritas and our agents engage in fair competition at all times. Therefore, the professional manner in which you conduct business, as well as the positive attitude you display during the sales process, will reflect well on the industry as a whole.

Fair competition refers to competition based on the elements of price, quality and service subject to federal and state antitrust laws and state insurance laws and regulations. Focusing on fair competition helps assure that you will:

- Make fair and balanced comparisons between Ameritas products and those of our competitors.
- Identify certain negative practices which should be eliminated, such as inappropriate replacement.
- Avoid making false or misleading statements about competitors and refrain from criticizing them or their products.
- Display a positive attitude toward the products you are marketing and the industry in which you work.

Bear in mind, it is both unethical and illegal to mislead a client by making dishonest, false or fraudulent statements about a product you are marketing or that of a competitor. Some unfair competition practices have been specifically identified and addressed in federal antitrust and trade practices law and regulation and in some states the NAIC model Unfair Trade Practices Act (as adopted in those several states), such as:

- Unreasonable restraint of trade.
- Making false/fraudulent or misleading statements.
- Criticizing or misrepresenting other companies' ratings.
- Redistributing articles prepared by sources outside Ameritas.
- Repeating rumors or stating as fact unofficial reports.

As a service to ourselves, our customers and our industry, Ameritas stands firm in its commitment to prohibit our agents and our employees involved in the sales process from making false, misleading, inappropriate or derogatory statements about a competitor, its representatives or its products.

Compliance requirements for marketing materials

Ameritas is committed to providing accurate and consistent sales information to our prospective clients that will assist them with making appropriate buying decisions. Advertising and/or sales material refers to materials designed to create public interest in Ameritas, its annuity, life, disability, group or other insurance products or its distributors, or to encourage the public to purchase, increase, modify, reinstate, borrow from, surrender, replace or retain a policy. The definition of advertising and/or sales material is expansive and includes items agents may not think of as advertising and/or sales material. It is important to remember that advertising and/or sales material includes items created by third parties such as industry organizations. Agents questioning whether something is advertising and/or sales material based on this definition, should submit it to the home office for approval prior to use. Once an item has been approved no changes may be made to it without resubmitting the item for approval.

Consumer materials will be written using a needs-based approach that presents the product fairly and equitably with a sound basis in fact. To assure that this commitment is met, an agent must use the following guidelines when developing any sales or presentation material that may be seen by a client or prospective client. All such material that is developed by an agent must be submitted to the home office for market conduct and legal review prior to use.

Identity of Insurer, Product and/or Agent

The full name of the licensed issuing company must appear in the sales piece to prominently identify the insurer when referring to Ameritas or a specific product.

The product being presented must be clearly identified as life insurance, disability insurance or an annuity at the beginning of the material. The policy type (universal life, term, etc.) and formal name and form number of the product must be clearly identified the first time a specific product is mentioned.

Terms or figures used to describe policy benefits must not differ from those used in the contract.

Prospecting letters and business cards must clearly identify the agent as a life insurance agent and identifying Ameritas Life Insurance Corp. If no reference to insurance is found in the agency name, the wording "Licensed Insurance Professional" must be included under the agent's name at the signature line. If "insurance" appears in the name of the agency, "Sales Associate" is acceptable.

The terms "financial planner," "investment advisor," "financial counseling" and "financial consultant" must not be used by an insurance agent without the proper licenses and registrations. Individuals licensed as a Registered Investment Advisor (RIA) or Investment Advisory Representative (IAR) under a corporate registered advisor such as Advisory Services (AAS) may use the term "financial planner" if compensation is actually unrelated to sales and is not a commission.

Accuracy and Truthfulness

The sales piece must not contain untrue, deceptive or misleading statements based on information included or omitted. It must clearly identify the product as an insurance product if that is what it is. The sales piece, as a whole, must not lead a person of reasonable intelligence to any false conclusions. The sales piece must not exaggerate or offer more than will be received. Absolute words such as; **all, never, best,** must not be used. The sales piece must be written using adjectives and superlatives that do not exaggerate the product's features.

Avoid	Preferred
Outstanding	Respected
Unique	Favorable
Highest Quality	High quality
Lucrative	Exciting opportunities
Liberal	Do not use—open to individual interpretation
Low premiums	Competitive premiums
Solutions	Strategies (solutions can be used if context is not too promissory)
Financial planning/planner	Financial strategies/Financial Representative
Financial recommendations	Financial options
Financial consultant	Registered representative/insurance agent/licensed insurance professional/sales associate

Limitations associated with the product must be disclosed as clearly as the benefits. The terms **just, only, free, no cost, no extra cost** must not be used to refer to benefits included in the contract or to minimize limitations in the contract.

The following words or similar terms must not be used in a capacity that could lead a prospective client or client to believe something other than an insurance or annuity product is being sold:

- Investment
- Interest Savings Plan
- Profit
- Supplemental Pension Plan
- Deferred Compensation Plan
- Private Pension Plan
- Deposit Profit Sharing
- Interest
- Supplemental Retirement Plan
- Private Financing or Banking

Nonguaranteed Policy Elements

Nonguaranteed policy elements include current interest rates, assumed interest rates, dividends, cash values, death benefits or other policy benefits not contractually guaranteed. There must be no implication that non-guaranteed elements are guaranteed. If nonguaranteed elements are illustrated, guaranteed elements must be shown with equal prominence and must contain the following disclosure: Guarantees are based on the claims paying ability of the issuing insurance company. References to nonguaranteed elements must disclose that they are not guaranteed.

Dividends must not be referred to as **tax free**.

Interest rates illustrated must not be higher than the current rate unless the higher rate has been publicly declared with an effective date for new issues not more than three months subsequent. Guaranteed rates must be shown with equal prominence. If the rates illustrated in the advertising piece are higher than the current rate, they must be reviewed for reasonableness of the rate illustrated and the rationale discussed with the home office at the time of market conduct review.

In a sales piece or sales presentation, if illustrations are discussed, or the sales piece is an illustration, there must be disclosure stating that a proposal is not valid without an attached illustration.

Any sales piece or presentation regarding an Equity Indexed product must clearly reflect that ownership of the investments remains with Ameritas and that potential for higher credited interest rates is linked to a portion of index growth. Clients are not invested directly in the market. Reference to the participation rate must also be included.

A sales presentation or piece must not create a special group where none exists. Notice of an endorsement by an association is acceptable, provided an association discount applies to the product or service advertised.

Premiums

A premium should not be referred to as anything other than a premium. Terms such as **deposit, contribution and investment** must not be used. If a policy has nonlevel premiums, premium changes must be prominently described. If any sample premiums are included in a sales presentation or sales piece, all pertinent information such as rate class, age, sex, etc. must be included.

Any reference to an abbreviated — quick pay or short pay — premium plan in which dividends or policy values are used to pay future premiums must be accompanied by a statement that i) dividends are not guaranteed; ii) premiums must be paid for a policy to remain in force; iii) at some undetermined point in the future, the dividends may be insufficient to pay all or a portion of the policy premium; and iv) if policy loans are taken or cash values are withdrawn, the date at which dividends are sufficient to pay premiums will change. Never use the term **vanishing premium** in any advertisement or illustration.

A sales presentation or piece must not represent that premiums paid for life insurance can be withdrawn under the terms of the policy contract.

If the materials present an endowment policy, it must not be represented as profit or return on premiums paid.

Comparisons, Ratings and Competition References

Any reference to the company's rating must describe the scope and extent of the rating and must include language reflecting specifics regarding the consistently high ratings of Ameritas. Refer to the rating agency material concerning Ameritas for information regarding rating, number of rating levels possible and scope of rating (financial, claims paying ability, etc.).

All statistical information must be recent and relevant. The source and date must be identified.

References to the competition must be factual and must not directly or indirectly disparage another company or insurance agent in any way, particularly its financial condition or practices, services or methods of marketing. Comparisons to competitors' products must be fair and complete.

There must be no reference to guaranty associations or RBC (risk based capital).

Other Considerations

Endorsements or testimonials must not be used without written approval within one year of use from the person or organization providing such endorsement or testimonial. If that person or organization is an employee of, or has a financial interest in, Ameritas or receives any benefit for providing an endorsement or testimonial this relationship or benefit must be prominently disclosed. Individuals who are Registered Investment Advisors or Investment Advisory Representatives are prohibited from using testimonials.

Any use of copyright material requires written permission of the owner of the copyright.

Tax and investment features must not be emphasized nor insurance features minimized in any advertising materials.

Nothing of value may be offered as an inducement to listen to a sales presentation or complete an application.

Advertising material must not offer a free consultation without the wording "with no obligation."

Agency prospecting letters must include identification of the insurer they are soliciting for. If a product is mentioned, the specific product name and form number must be included.

In addition to market conduct review, all materials relating to a registered product must have been reviewed by the FINRA compliance officer for Ameritas and, if required, submitted to FINRA prior to use.

Social media

The use of social media sites including, but not limited to, Facebook, LinkedIn and Twitter are considered advertising and must be approved prior to use though the Advertisement Review process. If deciding to use social media, the following Best Practices guidelines should be adhered to:

- Cite your credentials and provide background experience.
- If choosing to reference Ameritas Life Insurance Corp. on the site, your site must be pre-approved – this includes the page layout. All disclosures must be submitted to the compliance department for review and approval before you begin using these social media sites for your business.
- Contain a statement that third-party posts do not necessarily reflect your views.
- Respect client confidentiality – not everyone may want to be visible on your 'friend' or 'contact' list.
- Avoid giving advice or mentioning specific products – advice, recommendations and strategies should be avoided because suitability must first be determined. The content on social media sites is viewable by all and no one strategy or product is suitable for all contacts.
- Avoid being specific – all posts should be general in nature and not provide details of products or an individual's financial situation. Do not provide "blanket" or individualized recommendations.
- Avoid utilizing chat rooms – utilizing chat rooms can be construed as a public appearance.
- Avoid having conversation threads – conversational threads of more than 2-3 should be avoided. Instead, take it offline and reach out to the person on an individual level.
- Avoid linking to another site unless you are sure of the source – linking to another site or source can be deemed as being attributable to you by implying that you have endorsed or approved its content.
- Unless you have written authority, you should not use clients' testimonials.
- Be professional.

NOTE: AIC registered representatives must comply with AIC's rules on using social networking sites.

Registered Representative/Investment Advisor Representative (RR/IAR) marketing materials

Securities and investment advisory marketing material must adhere to the guidelines and interpretations of the SEC as well as the Financial Industry Regulatory Authority (FINRA) as set forth in FINRA Conduct Rule 2210. These guidelines cover all aspects of communication with the public. Foremost among these rules is the requirement that all communications with the public be approved by a principal of the broker/dealer prior to use. RR/IARs must take care to ensure that they obtain proper approval from their compliance department before using any marketing material.

By reviewing all marketing material prior to use, the compliance department may be able to catch and correct potential problems before marketing material is seen by the public. The guidelines presented below are intended to assist RR/IARs in preparing marketing material which is in compliance with applicable rules and industry standards.

General Standards Applicable to all Marketing Materials

- All marketing material must be fair and balanced and must disclose all pertinent facts regarding an investment.
- The inherent risk of an investment must be explained.
- Exaggerated, unwarranted or misleading statements or claims must not be used.
- Promissory language must not be used.
- SEC standardized returns must be used any time past performance is shown.
- The name of the broker/dealer through which a registered representative offers securities must be prominently disclosed.
- The affiliation, or lack thereof, to AIC or AAS of any entity mentioned within marketing material must be disclosed. For example: AIC and AAS are not affiliated with (Agency Name).

Specific standards/guidelines for commonly-used marketing materials are described below.

Retail Communications

The following are some examples of marketing materials subject to FINRA standards regarding communication with the public: advertisements in newspapers, magazines or other mass-distributed media, ads in bulletins or programs (e.g., high school football programs, church bulletins), ads in the yellow pages, agency brochures, websites and social media pages.

In addition to complying with the general standards listed above, all communications with the public must:

- Contain contact information of the RR/IAR.
- Specifically identify which products and/or services are offered through the broker/dealer or RIA.

Depending on the content of the material, AIC may be required to file it with FINRA's Advertising Department for approval. Such filings can delay the approval process and is done at the expense of the requesting RR/IAR.

Correspondence

RR/IAR one-on-one correspondence with clients or potential clients that contains a solicitation or recommendation is subject to prior approval by AIC. RR/IARs must send copies of all client correspondence to their appropriate broker/dealer or RIA prior to use. The general standards for marketing material presented above apply to all client correspondence.

Business Cards and Letterhead

All business cards and letterhead must be approved by AIC before use and must identify the broker/dealer and/or RIA using the appropriate disclosure language. It is acceptable for the broker/dealer and RIA disclosure to appear on the back of business cards.

Electronic Communication

Electronic communication is subject to the same requirements as traditional, written forms of communication. For example, securities and investment advisory related email to a client is considered correspondence and is subject to the same approval requirements as written correspondence. Websites, including social media, which advertise insurance and/or deal with securities are considered advertising and are subject to the requirements detailed above. For current regulations on email and other electronic communications, search Producer Workbench for "Email Compliance."

Individuals registered with AIC and AAS may only use their AIC/AAS approved email address when communicating with securities and investment advisory clients or prospects.

Handling client complaints

As a Company, we want our clients to be satisfied with the products and services they receive. Therefore, we have an obligation, both legally and ethically, to provide a fair and expeditious handling of client complaints and inquiries. As a field associate, if you become aware of a policy or contract holder's complaint or inquiry, you are expected to advise the client that Ameritas has procedures for reviewing and responding to the complaint.

A complaint is any written communication primarily expressing a grievance involving the company, its products, services, practices, associates or field partners. A distinction is made between passing expressions of indignation or resentment that can be resolved immediately as simple misunderstandings, versus entrenched grievances, including threats to seek third party assistance from attorneys, regulators, the BBB, etc. Written communications include electronic (e-mail) and facsimile communications.

You should encourage the client to contact the compliance department in writing and lay out the facts surrounding the complaint. Any complaint you receive should be forwarded to the compliance department immediately. The complaint or inquiry will be reviewed in accordance with the Ameritas procedures for complaint and inquiry resolution.Never attempt to settle or resolve a complaint on your own.

Sales process for the individual market

Needs-based sales

As a field associate, when you market life and disability income insurance and accumulation products, your recommendations must be based on the needs and/or financial objectives of the customer for such products. A fact-finding process will help you determine what these needs are and which objectives are foremost. You must provide needs-based recommendations, truthful and accurate descriptions of products and services, keep abreast of changes and admit what you do not know. In keeping with insurance laws and regulations in most states, you must begin the initial interview by stating that you are acting in the capacity of a field associate representing the licensed insurance company you are soliciting for.

We are in the business of providing products and services to fulfill our customers' needs and objectives. Doing so not only increases the likelihood they will purchase the appropriate products, but also the likelihood that the products will remain in force. The persistency of business is so important to you, the policyowner and Ameritas that particular efforts should be made to keep clients satisfied through regular contact, prompt service and personalized attention.

Stranger owned life insurance ("STOLI")/ Investor owned life insurance ("IOLI")

STOLI/IOLI transactions involve the purchase of a life insurance policy with the intent to sell that policy, or an interest in it, to a group of investors. Ameritas prohibits participating in, brokering or facilitating these types of transactions.

STOLI/IOLI schemes vary in shape and form. A typical example of STOLI/IOLI involves "non-recourse premium financing," sometimes advertised as "free" insurance, in which outside investors induce consumers to buy insurance with cash incentives and promises to fund the premiums during the two-year contestability period. After the contestability period, the policy is often sold on the secondary market or transferred to the investor(s) so that the consumer can pay off or walk away from the debt. In some deals, consumers are required to commit to selling their policy once the contestability period has passed.

STOLI/IOLI schemes pose a threat to the tax favored status of life insurance and may violate state insurable interest requirements if the transaction is for the purpose of speculation and is a mere cover for a wagering transaction. While there are generally no restrictions on a person's right to insure him or herself against all losses from any peril, contracts under the guise of insurance which are actually nothing more than wagers are illegal.

For further details, see the Ameritas policy on STOLI on Producer Workbench by searching for "Stranger Owned Life Insurance."

Life settlements

In contrast to STOLI/IOLI, a life settlement involves the sale of an existing life insurance policy by a relatively healthy senior. "Existing policy" means that it was not purchased with an intent or pre-disposition to settle. Several situations, including these, can create a legitimate need for a life settlement: the policyowner owns multiple life insurance policies and wishes to eliminate one; the beneficiary for whom the policy was originally purchased is now deceased; or the policyowner is not satisfied with the performance of the existing policy. Involvement in a life settlement transaction is not without risk, as seen by many recent lawsuits.

RR/IARs should consult the policy and procedure manuals of their respective broker/dealer and RIA for guidance on participating in life settlement transactions.

For further details, see the Ameritas policy on Life Settlements on Producer Workbench by searching for "Life Settlements."

Replacements

We are required to maintain a system of supervision and control to ensure compliance with laws and regulations governing the replacement of life insurance and annuities. We also are committed to following the highest ethical and moral standards when conducting business.

The objective of this policy is to set forth the position of Ameritas with regards to accepting replacement business. Replacements are appropriate only if:

1. They are suitable and are driven by the client's best interests; and
2. They are completed in accordance with applicable laws and regulations. As a Producer for Ameritas you should be familiar with the Replacement Laws and Regulations in the states where you do business. You can access this information on Producer Workbench.

You should be familiar with the definition of replacement. "Replacement" means a transaction in which a new life insurance policy or annuity contract is to be purchased, and it is known or should be known to the proposing field partner, that as a result of the transaction, an existing life insurance policy or annuity contract has been in the previous 6 months or is to be in the next 13 months:

- Lapsed, forfeited, surrendered or partially surrendered, assigned to the replacing insurer or otherwise terminated;
- Converted to reduced paid-up insurance, continued as extended term insurance or otherwise reduced in value by the use of nonforfeiture benefits or other policy values;
- Amended so as to effect either a reduction in benefits or in the term for which coverage would otherwise remain in force or for which benefits would be paid;
- Reissued with any reduction in cash value; or
- Used in a financed purchase.

When you and your client consider replacing an existing product, the following guidelines must be followed:

- The recommendation should be supported by a thorough needs based review.
- All required replacement forms must be completed.
- The new product should clearly meet the client's personal and financial goals, and this should be evident to the client.
- The benefits of the new product should clearly outweigh the costs and consequences of replacing the existing product.
- The benefits and drawbacks of the proposed transaction should be thoroughly discussed with the client.
- Disclosure of the replacement must be made to the client and all Company and state legal requirements must be complied with.
- All Company procedures, including "Internal Exchange Guidelines for Life Products," must be observed.

In some states, replacement definitions and requirements are more stringent than the above. You should be familiar with these requirements if you do business in one of these states.

Field underwriting and insurability

Life insurance and disability insurance policies are issued only after a determination of insurability based on personal, financial and medical information about the proposed insured. Some of this information is also needed to issue accumulation products. You will develop much of the required information through field underwriting, a necessary part of the sales process. It is your duty to report all such information accurately and in a timely fashion. Ordinarily, reporting is done by means of the application submitted to the home office. However, you should report any additional information bearing on the situation in a cover letter.

Similarly, if you learn of any adverse information after the application has been submitted and before the policy or contract is placed or delivered, or during the contestability period, you are required to report it. Further, you should not deliver a life or disability income insurance policy if the proposed client's insurability has changed since the application was taken. In that situation, you should contact the home office for instructions.

With respect to life insurance, there must be an insurable interest and the recommendation must be affordable given your client's financial situation. An insurable interest exists when the beneficiary has an economic interest in the continuation of the proposed insured's life. Where family members are dependents of the insured the presence of an insurable interest is usually evident. In business insurance situations there sometimes is a need for a more elaborate explanation. Whenever there is an unusual beneficiary arrangement or one in which there may appear to be a question as to insurable interest, an explanation should accompany the application.

Sales illustrations and literature

Sales Illustrations

Beginning with the initial approach to the potential client and continuing throughout the sales process, you will most likely use sales literature and sales illustrations. Ameritas follows the National Association of Insurance Commissioners (NAIC) Model Regulation for Life Insurance Illustrations. It describes an illustration as any presentation with nonguaranteed elements shown over a period of years. The purpose is "to provide rules for life insurance policy illustrations that will protect consumers and foster consumer education."

The Regulation states: When using an illustration in the sale of a life insurance policy, an insurer or its producers or other authorized representatives will not:

- Represent the policy as anything other than a life insurance policy.
- Use or describe nonguaranteed elements in a manner that is misleading or has the capacity or tendency to mislead.
- State or imply that the payment or amount of nonguaranteed elements is guaranteed.
- Use an illustration that does not comply with the requirement of this regulation.
- Use an illustration that at any policy duration depicts policy performance more favorable to the policyowner than that produced by the illustrated scale of the insurer whose policy is being illustrated.
- Provide an applicant with an incomplete illustration or one that is not in the correct numerical order; reordering is not acceptable.
- Represent in any way that premium payments will not be required for each year of the policy in order to maintain the illustrated death benefits unless that is a fact.
- Use the term "vanish" or "vanishing premium" or a similar term that implies the policy becomes paid up to describe a plan for using dividends to pay a portion of future premiums.
- Except for policies that can never develop nonforfeiture values, use an illustration that is "lapse-supported."
- Use an illustration that is not "self-supported."

You should use the sales illustrations provided, using only company-distributed product software, to appropriately explain the numerical features of Ameritas products. Use only the current version of such software as determined on Producer Workbench.

When presenting illustrations before or after policy issue you must present them in full with no omissions. When required by the policy plan, you are required to submit a signed sales illustration that matches the policy at contract issue to Ameritas. If the illustration presented during underwriting changes, you are required to obtain an amended version consistent with the policy issued and return the accurate and signed revised illustration to Ameritas. You may only use sales illustrations, in addition to those produced using company-provided software, after prior approval by the home office.

Sales Literature

When presenting illustrations before or after policy issue, you must present them in full with no omissions. When required by the policy plan, you are required to submit a signed sales illustration that matches the policy at contract issue to Ameritas. Use only the current edition of such materials as found on Producer Workbench. Do not use "for agent/producer use only" or "for broker/dealer or RIA use only" sales materials with customers.

There may be times, however, when you will want to develop your own sales literature for a specific marketing purpose. This is acceptable, provided you understand that sales literature prepared in the field, as well as any communication with clients or potential clients for the purpose of inducing or tending to induce such persons to purchase, amend, lapse, forfeit, change or surrender insurance or accumulation products, may be used only after prior approval by Ameritas. Stationery and other papers bearing Ameritas identification may not be used to communicate with clients for the purpose of marketing or servicing products of companies other than Ameritas. The purpose of these procedures is to ensure that all communications materials not created in the home office conform to state insurance regulations and Ameritas guidelines, to the benefit of the field force, clients and company. For more specific details regarding submission and approval of marketing materials, please refer to Producer Workbench.

NOTE: With regard to securities or investment advisory products or services, RR/IAR's of AIC and AAS must also send any advertisement, mailer, letter, article, brochure, seminar material, invitation or any other type of marketing material dealing with securities or investment advisory products and services or the potential marketing of these products and services to their respective broker/dealer or RIA compliance department for approval. All such materials require approval of a supervising principal prior to their use. For further information regarding securities sales materials, refer to Producer Workbench.

Completing applications and other company forms

When taking an application for insurance and accumulation products, you provide essential information to Ameritas as a part of the underwriting process and in setting up records for proper administration and service. It is important that you personally ask all questions of the proposed insured (and applicant or annuitant, if other than the insured) and record all answers accurately and completely on the application prior to its being signed. Applications and other company forms may never be signed by the applicant or the insured in blank. All information must be completed in full prior to obtaining an applicant's or insured's signature. Only the proposed insured (and applicant or annuitant, if other than the insured) may sign applications, including any supplementary forms. No "stamp" type or non-natural signatures will be accepted for representative or client signatures. The person signing must initial any changes. The person signing must initial any changes. Changes may not be made by anyone else, even with the signer's permission. "White-out" or erasures should never be made after the application or other forms are signed. It is important that you follow all instructions on the application or other form.

When accepting an electronic signature from a client, the signature must be captured using an Ameritas-approved method. Electronic signatures include any signature made with an electronic device, including but not limited to tablets, smart phones, laptop computers and electronic signature software or apps. Contact the new business team with questions about approved electronic signatures.

Policy delivery

Prompt and proper delivery of the policy or contract is important from both a good business and a legal standpoint. Policies should be delivered personally. You should not keep a policy (other than your policy or a policy of a member of your immediate family) for a period longer than is necessary for review, analysis and delivery. As we seek to serve our clients, we know that their understanding of the features, benefits and terms of the products they purchase goes a long way toward satisfaction. Much of this understanding can be achieved during a well constructed and attentive delivery interview.

Depending on the contract, insurance and annuity products contain a provision which allows purchasers to return them for a complete refund within a certain time frame referred to as the **free look period** following policy delivery. Since the free look period does not begin to run until delivery, it is important that you deliver the contract promptly. It is also important that there is evidence that the policy has been delivered. For that reason, you must secure the client's signature on the delivery receipt and promptly return it to the home office.

As noted above, you should not deliver an insurance policy if the proposed insured's insurability has changed after the date of the application. Even if the initial premium has been collected and a Conditional Receipt provided, you must hold the policy and contact the home office underwriting department immediately in the event of a change in insurability.

Service at time of claim

One of the most important benefits of a long-term relationship between you and a client is prompt, trustworthy claim service. A field partner who knows the client's financial circumstances and personal interests can be of invaluable assistance at the time of death or disability. While in some instances it is appropriate for the home office Claims Department to deal directly with the client or beneficiary, you should make every effort to render service personally when appropriate.

Claims must be handled as quickly as possible. This is not only good business practice, but is also legally required. It is your duty, as a field associate, to report to the home office immediately that an event that will lead to a claim has occurred. The law considers that when an agent has been notified of such an event, Ameritas has also been notified. Any delay in reporting will inhibit the ability of all parties to be served properly.

Sales process for the guaranteed standard issue (gsi) and retirement plan markets

Underwriting authority

Field associates, who market Ameritas guaranteed standard issue, whether employer-paid and/or voluntary, must obtain proposals from the GSI 'wholesaler' supporting their territory. The GSI wholesaler will work with the Home Office GSI administrative and support staff to provide accurate and timely proposals and provide additional sales and marketing support on an 'as needed' sales scenario.

The GSI wholesalers will work and consult with the GSI administrative, underwriting and support staff and act as the liaison with the agents on their specific cases. Agents cannot obligate Ameritas, and the proposal will be released to the GSI wholesaler and the agent/agency once it is reviewed and approved for release and any external approvals from reinsurance are in place.

Applications for Retirement Plans Group Annuity products provide critical information in setting up records for proper administration and service. You should ask all questions of the applicant and record them accurately. Disclosure must be complete.

Disclosure requirements

In addition to Retirement Plans' Application and Issue guidelines, the Employee Retirement Income Security Act of 1974 (ERISA) requires full disclosure of a product's charges, fees and commissions. Group Annuity products fall under the full disclosure requirement. You must disclose this information prior to the issuance of any Group Annuity or Pension Life product. You may obtain disclosure materials through the home office or any regional group pension office. The submission of incomplete or incorrect disclosure will result in the home office obtaining signed disclosures directly from the client prior to the issuance of a Group Annuity or Pension Life contract or declining the application.

Sales literature

As with the sale of individual products, representatives may use only company-approved sales and promotional literature. You should take care to use up-to-date editions of all brochures, advertisements and sales materials produced by the home office by checking Producer Workbench or the Retirement Plans website. Additionally, you may use only company-approved software, again taking care to use the most current versions by checking Producer Workbench or the Retirement Plans website.

You must receive home office approval prior to using brochures, related sales literature, advertisements and communications with clients or potential clients. Stationery or related materials are not approved for any use other than representing the solicitation, sales, service or issuance of Ameritas products.

Sales practices

Sales representatives who market Guaranteed Standard Issue (GSI) or Retirement Plans products:

- Acknowledge and agree to abide by Ameritas rules and state laws and regulations governing the sale of products and conduct involved in the selling process.
- Agree to promptly remit to Ameritas all monies collected or received on behalf of the client for initial administrative and takeover services. Premium checks or client deposits are to be remitted directly to Ameritas by the client in accordance with Ameritas policy for such transactions.
- Understand that keeping accurate records of all transactions on behalf of Ameritas is required. Books of accounts, documents, vouchers, letters and any other material connected with the business are the property of Ameritas and subject to audit.
- Agree to act in an ethical, dignified, positive and professional manner, and to not misrepresent or omit important facts in any application of insurance or supplemental material.

NOTE: Field partners who are also registered representatives may not sell a second company's group variable product; unless a selling agreement is in place between that field partner's broker/dealer and the second company's broker/dealer.

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