

ANTI-MONEY LAUNDERING TRAINING PART OF UL POLICY ISSUE REQUIREMENTS.

TO: LEGAL & GENERAL AMERICA GENERAL AGENTS
FROM: FRANK GENCARELLI, SVP SALES AND MARKETING
DATE: APRIL 12, 2012

The USA Patriot Act requires anti-money laundering (AML) training for certain insurance producers. Under the rules, insurance producers -- including independent agents -- who sell products that accumulate cash value or have an investment component must be trained to understand and detect possible money laundering activities. This AML training must be completed on an on-going basis.

In their continuing efforts to satisfy requirements under the USA Patriot Act, the Legal & General America Companies-- Banner and William Penn, will require agent certification of on-going AML training before issuing a universal life product. Legal & General America continues to partner with LIMRA to allow eligible producers to take the on-going AML training course at no cost.

Beginning April 12, 2012, all agents who completed LIMRA's "Anti-Money Laundering for Insurance Producers" course are required to complete the AML on-going training course every two years. To determine if you have taken AML training within the last two years please visit the LIMRA website at <https://aml.limra.com>. The 2012 refresher "Stages of Money Laundering —Anti-Money Laundering for Insurance Review" will automatically be assigned through LIMRA. The on-going training course will take approximately 30 minutes to complete and must be completed prior to issuance of any universal life policy.

The AML training site is located at <https://aml.limra.com>. Logging in takes only a few moments. Enter the Username which is the first four characters of the agent's last name together with the last 6 digits of the agent's SSN, then enter the Password established when taking the initial AML training course with LIMRA. (if the agent has forgotten his/her password click on "Forgot your password?") The Username and Password should be entered in lower case characters. The online instructions will then guide the agent through the course. If an agent is unable to log-on, please contact the LIMRA AML help desk at 888-577-5522.

If an agent successfully takes the AML on-going LIMRA training course for another carrier, he or she does not have to retake the course for Banner or William Penn. Just review the Banner and William Penn specific page with our AML contact information and LIMRA will notify us that the agent has successfully completed the course. A paper certification is not available. Certification is handled electronically between LIMRA and Banner and William Penn.

If you require additional information, please contact the Legal & General America compliance officer at 301.294.6968 or BannerAMLCompliance@LGAmerica.com or WilliamPennAMLCompliance@LGAmerica.com

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