

Sales & Service Center

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Producer's Guide to Nationwide's Anti-money Laundering Program

As an insurance producer, your skills and services help your clients 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 your clients, but also to serve the country by helping prevent money laundering and the financing of terrorist activities.

To comply with federal anti-money laundering regulations for insurance companies, Nationwide 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 regarding the customer, the customer's 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 offered by one of the Nationwide companies, Nationwide's anti-money laundering program requires you to:

- Ensure that all information requested on the product application and associated documents are accurate and complete. Records of this information must be retained as long as the contract remains in force and for five years thereafter. If a customer resists providing you with this information, notify us immediately
- Also notify us immediately if you detect any money laundering red flags, so that Nationwide can determine whether a suspicious activity report (SAR) must be filed with the Financial Crimes Enforcement Network (FinCen), a division of the U.S. Department of the Treasury, such as:
 - 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 money orders or cashier checks
 - Payment of a large amount broken into small amounts (multiple checks drawn against different bank accounts, multiple money orders issued close in date when one money order would have worked, using a check and a money order so that neither of them exceed \$5,000 in value, etc.)
 - Little or no concern by a customer for the investment performance of an insurance product, however, they are very interested 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

Nationwide's AML Contact:

Drew Caravella
 Nationwide Field Sales Compliance
 1-800-321-6064, extension 98960

NATIONWIDE'S AML COMMITTEE HAS THE SOLE 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.

Receive periodic anti-money laundering training:

- **For producers selling through a broker dealer:**
You may already be receiving training through your company. As such, your company will be requested to provide a certification to Nationwide outlining the components of the training.
- **For independent producers who are not selling through a broker dealer:**
You must certify to us the receipt of such training, and identify the provider.

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

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