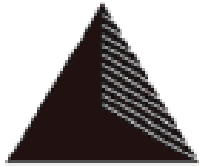


**DO NOT DISCARD**

Federal law requires that you successfully complete the enclosed training program and written test in order to keep your current appointment with Trinity Life Insurance Company in good standing.  
Thank you for your cooperation.

**ANTI-MONEY LAUNDERING  
AGENT TRAINING PROGRAM**



**TRINITY Life  
Insurance Company**

**HOME OFFICE:**

7633 East 63<sup>rd</sup> Place, Suite 230  
Tulsa, Oklahoma 74133

Phone (918) 249-2438  
Fax (918) 249-2478

Gregg Zahn, Senior Vice-President  
[gzahn@firsttrinityfinancial.com](mailto:gzahn@firsttrinityfinancial.com)

## **ANTI-MONEY LAUNDERING TRAINING**

The USA PATRIOT Act ("the Act") was enacted in response to the September 11<sup>th</sup> terrorist attack. Under the Act, the Department of the Treasury has expanded its attempts to deter the activities of terrorists and the financing of their operations.

*Part of this expansion requires insurance companies to establish an Anti-Money Laundering program and implement training programs to help prevent their products from being used in a money laundering operation.*

All employees and appointed agents must complete a training program that is tailored to fit the insurance company and the products they offer.

## **ANTI-MONEY LAUNDERING PROGRAM / POLICY**

Trinity Life will never knowingly participate in money laundering activities with any individual or entity and will incorporate procedures in compliance with all federal regulations and guidelines for insurance companies. The program will involve the following:

1. Trinity Life will develop internal policies, procedures, and controls;
2. Trinity Life will implement an effective program that is updated as necessary under the guidance of the Compliance Department and will provide easy access for reporting suspicious activities;
3. Trinity Life will provide adequate training to all key employees and appointed agents and will develop a "know your customer" rule;
4. Trinity Life will implement an independent audit function to test the overall program.

## **WHAT IS MONEY LAUNDERING?**

Money laundering occurs when someone uses legitimate financial mechanisms, including insurance products, to make the proceeds of his/her illegal activity appear legitimate.

Money laundering risks include:

- The ability to purchase products with cash;
- The purchase of products with a single premium or lump-sum payment;
- The ability to borrow funds under a product or surrender the policy for cash.

All of the above acts provide the money launderer with a means for integrating illegally obtained money into circulation so that it appears to be legal.

## **TRAINING OF AGENTS**

Insurance agents play an important role in the effective operation of the anti-money laundering program.

Insurance companies are required by law to provide adequate training and written testing of all appointed agents.

Insurance companies may satisfy the training obligation of its appointed agents by verifying that the agent has received the required training from another insurance company or from a competent third party.

If you have already received training from another company, it may not be necessary for you to complete our program. Please forward a copy of your certificate of completion to Trinity Life at the home office for verification.

### **PART 1. KNOW YOUR CUSTOMER**

It takes everyone associated with the insurance company to help make the anti-money laundering program a success, especially the agents who have one-on-one contact with the customer.

- If you know your customer, please note "personally known to me" under the agent's comments or on the front of the application.
- If you do not personally know your customer, please check a photo identification (driver's license or other government issued ID). Make a note concerning the type of identification checked under agent's comments or on the front of the application.

### **PART 2. BE AWARE OF "RED FLAGS"**

"Red Flags" may be an indication that a suspicious activity is occurring and can include:

- The purchase of a product inconsistent with a customer's needs;
- Any unusual method of payment, particularly by cash or cash equivalents;
- The early termination of a policy, especially at a cost to the customer;
- The transfer of the benefit of a policy to an unrelated third party;
- Little or no concern by a customer regarding investment performance, but concerned about early termination rules;
- The reluctance by a customer to provide identifying information;
- Purchase of multiple policies on the same individual in small increments;
- The request for a loan soon after purchasing the product;
- Owners or beneficiaries on a policy are foreign nationals;
- Frequent "free-look" surrenders.

**PART 3. REPORT ALL CASH TRANSACTIONS THAT INVOLVE OR AGGREGATE AT LEAST \$5000 IN FUNDS OR OTHER ASSETS AND INVOLVE A SUSPICIOUS TRANSACTION**

If an agent is aware of a cash transaction that meets or exceeds the threshold amount and involves a suspicious transaction, it should be reported to the Compliance Team.

**PART 4. SUSPICIOUS ACTIVITY MONITORING AND REPORTING**

A suspicious activity is an activity that is outside normal business procedures. If you should become aware of any suspicious activity or "red flag", you must report it to the home office.

**IMPORTANT FEDERAL PROHIBITION:**

**Federal law prohibits you from informing the individual or business that you suspect suspicious activity on their part and that you have reported it.**

**PART 5. PENALTIES**

If Trinity Life, any of its employees, or its appointed agents were to knowingly aid an individual or entity in money laundering, the company and/or the individual could be subject to penalties.

The penalties could involve:

- Criminal penalties in the form of fines or prison sentences imposed by the federal government;
- Civil penalties in the form of money judgments or the seizure of property. The civil penalties are related to an individual helping others to launder money by accepting the illegally obtained money and placing it in the financial system.

If Trinity Life or any of its agents or employees were found to be in violation of the federal law, the damage that would occur to the reputation of both the agent and company would be insurmountable. These are the types of stories that the news media promote, helping to cast doubt in customers' minds and in the eyes of the public.

**PART 6. WRITTEN TESTING**

Please complete the included written test. You may use the training manual to assist you. You must answer all questions correctly to receive a Certificate of Completion. Otherwise you will be asked to retake the test. Upon completion, return it to:

Gregg Zahn, Senior Vice President  
Fax (918) 249-2478  
Mail: 7633 East 63rd Place, Suite 230  
Tulsa, Oklahoma 74133