

Compliance Bulletin

Marketing Practices

We always require producers selling F&G's products to deal fairly and honestly with the public. The requirements are outlined in our F&G **Market Conduct Guide, Code of Ethical Conduct, Insurance Producer Agreement** and applicable **Compliance Alerts and Bulletins**.

In an effort to protect customers against improper sales activity, we want to remind you that when you promote any F&G life insurance or annuity products, you make it clear upfront that you are an insurance producer in the business of selling insurance or annuities. Failure to do this could be viewed as "pretext interviewing", which is prohibited by state insurance laws.

We also want to remind you of the following important points in connection with common marketing methods:

1 Websites

If you use a website for marketing, your website must be accurate and compliant with state laws and insurance regulations. We're not responsible for your website, but you need to have accurate disclosures when you provide any information to the public. Good website compliance practices are:

- You should have prominent disclosures on your website homepage that you're an insurance agent selling annuities and life insurance products.
- You should avoid creating any impression you provide advice unrelated to compensation for the sale of products.

This means you should not use certain terms to disguise the fact you sell annuities and life insurance, i.e., calling annuities "guaranteed income for life" or calling life insurance "lifetime protection products." It also means if your website shows that your business is primarily providing financial or retirement advice, don't describe yourself as an investment advisor or insurance consultant. You must prominently disclose that you are compensated for the sale of annuity and life insurance products. These disclosures are necessary even if you are registered as an investment advisor, financial planner, or other licensed professional.

2 Seminars

If seminars are part of your marketing program, you must disclose in any material, and at the beginning of every workshop, that you are an insurance producer who will discuss life insurance or annuity products.

3 Veterans Aid and Attendance

We no longer accept annuity sales intended to assist policyholders who want to qualify for Veterans Administration benefits.

4 Estate Planning and Trust Services

You have to be careful when providing any estate planning related services to make sure you aren't practicing law without a license. This means you should not advise or counsel clients, or act like you are offering advice or counsel, on the drafting, preparing, or analyzing legal documents. These include wills, trusts, or powers of attorney unless you are an attorney.

If you are an attorney, you must:

- Disclose all conflicts of interest in writing and receive the client's informed consent in writing
- Disclose your fees for services in a way that's compliant with state insurance laws
- Abide by requirements of the applicable code of professional responsibility for lawyers, including without limitation, rules on conflicts of interest and engaging in business transactions with clients. Note that this does not prohibit you from referring a consumer to an independent attorney with whom you have no financial relationship.

5 Financial Planning Services

If your business provides financial services, you can't use terms like "financial planner," "investment advisor," "financial consultant," or "financial counselor." These terms imply you have an advisory business where compensation isn't related to sales. If you only offer insurance products, you should avoid these terms altogether and say you are an insurance agent or producer. If you provide services that pay you fees, make sure you disclose your compensation and obtain your client's written consent in a way that's compliant with state insurance laws relating to fee disclosure.

Please note that these guidelines are shortened to give you basic compliance expectations. You should review our **Market Conduct Guide**, **Code of Ethical Conduct**, and **Insurance Producer Agreement** for more details. If you don't follow these guidelines, you can be subject to disciplinary action that can include termination for cause.

While our **advertising guidelines** only require financial professionals to submit advertising that mentions our name, logo or products, you are required by our **Market Conduct Guide** and **Insurance Producer Agreement** to satisfy all advertising laws and regulations in your state. We will not allow any improper or deceptive advertising methods used with your business.

We know the majority of our financial professionals strive to comply with all applicable laws, regulations, and contractual obligations. We also know the majority of our financial professionals care about providing quality, ethical service to their clients. We ask that you take whatever steps are necessary to review your advertising practices to make sure they comply with our standards and expectations.

Thank you for doing business with us and for your commitment to good compliance. Please contact us at **Compliance@fglife.com** for more information.