

Conflicts of Interest - Prohibitions

468NB

Date: January 18, 2024

We're sending this reminder to producers regarding conflicts of interest that are important to avoid within the context of an agent-client relationship. It is important to avoid even the appearance of a conflict of interest with your customers.

While not an exhaustive list, the following transactions between the Company's producers and customers are prohibited:

- Lending money to a customer
- Borrowing money from a customer (including investment in a producer's business)
- Commingling your funds with those of a customer

Producers should also not serve in any capacity that may be construed as creating a conflict of interest. Although the following list is not exhaustive, current Company practice does not allow a producer/registered representative to be named as, or to act as, the following:

- Beneficiary or contingent beneficiary
- Beneficiary of an owner's beneficiary trust
- Trustee, co-trustee or successor trustee for an owner's trust
- Attorney-in-fact or successor attorney-in-fact for an owner
- Estate executor/executrix
- An owner of the customer's contract

An exception exists when the producer is "immediate family" of a customer, defined as spouse, child, step-child, mother, father, grandparent, brother or sister, or as otherwise determined by Company procedure or state law.

It is equally unacceptable to use an agency or producer's home and/or business address or telephone number as the owner's address or phone number of record if the owner does not also reside at the address. The customer must list his or her primary residence (where property taxes are paid) as the address of record. A producer must scrupulously avoid real or apparent conflicts of interest involving customers to whom our products are sold.

Additionally, producers may not use their family members, business associates or any other party to accomplish what they themselves are otherwise prohibited from doing in this regard. In addition, producers should not engage in or be involved in the writing of a trust for customers.

Engaging in any of these activities may result in termination of your contractual relationship with the Company and could also be a violation of state law, subjecting you to applicable statutory fines or penalties and possible revocation or suspension of your insurance license.

For more information, or if you have questions regarding this or other conflict of interest matters, we encourage you to contact the Special Investigation Unit at 877-872-0757.

We appreciate your business and commitment to conducting business in compliance with the Company's policies and guidelines.

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