

Agent Suitability Guide

Issued by North American Company for Life and Health Insurance[®]





Our review starts with you!

At North American, we understand that as an independent producer you have many choices of products and companies to offer your clients. We thank you for considering our products for your client's needs and objectives.

The purpose of this guide is to help you consider and discuss our products with your clients and to further assist you and your client in the completion of the Consumer Profile Form required with the application paperwork for all proposed annuity sales.

We know that the financial needs analysis begins with you, the producer. You have likely met with your client(s) multiple times, obtained confidential financial information, analyzed their particular financial circumstances, insurance needs and financial objectives with them, and if appropriate, made certain recommendations for products. We expect that determination involves many factors, including:

1. A thorough review of your client's financial situation, insurance needs and financial objectives to determine if an annuity will effectively address those needs over the whole life of the contract.
2. In the event that a replacement is involved, that the client will not incur significant penalties and that the new, proposed product will provide substantial benefits over the whole life of the contract in a way that the replaced annuity will not.
3. A thorough examination of your client's sources of income and expenses to determine if your client's household finances support the purchase of an annuity.
4. Whether your client has sufficient income and liquid assets to pay current and reasonably anticipated living expenses after purchasing the proposed annuity. It is important to note that this determination cannot include any withdrawals or other distributions from the proposed annuity during the surrender period. (We understand that you and your client cannot predict the future, but there should be enough income or liquid assets to provide for expected or unexpected life changes/emergency needs).
5. Whether your client's financial portrait is too heavily concentrated in annuities under surrender as a result of the proposed purchase and after taking into consideration all other annuities under surrender.
6. Your client's complete understanding of the features, costs, benefits, and your basis for recommending the applied for product.

While annuities can be a valuable component of a diversified portfolio, an annuity may not offer an appropriate solution to everyone.



Examples of Fact Finder questions

It is important for you to know your client's complete financial situation in order to help them determine their insurance needs and financial objectives. We strongly recommend that you use a Fact Finder with every client and maintain a copy of it with your records. You can create your own or our Company offers a Fact Finder that you may use. **A copy of your written basis for the recommendation must be kept in your files; a copy may also be requested by compliance post-issue.** The following list might help you in understanding and evaluating your client's financial situation:

- **What is the amount and source of monthly income?**
Remember, while documenting the net worth values on page 1 of the required Consumer Profile Form, be sure to include all "household assets" and income corresponding to the household, not just limited to your individual client.
- What are their **monthly** expenses? Monthly expenses commonly include items such as mortgage payment, utilities, life/health insurance, food, transportation, debt repayment, savings, clothing, entertainment, etc.
- What is their gross monthly spendable income after monthly expenses?
- Are their goals and objectives being met with their current financial portfolio?
- Where do they want to be financially in 5 years? 10 years? 15 years?
- When will they need/want to access their money or benefits from financial products?
- What are your client's tentative plans/timeline for retirement?
- What liquid assets do they have to address anticipated needs or unexpected emergencies should any arise after issuance of the proposed annuity?
- Do they anticipate any changes in spendable income?
- What are their lifestyle goals?
- Is there a need to address lifestyle changes such as an "ADL" or activities of daily living need?
- Will their living situation change in the near future, moving into a retirement care facility?

Why can't the determination end there?

While the review determination starts with you, state insurance laws, rules, and regulations require us to further review before we can issue the business. Ultimately, under the applicable regulation, the review of the business you submit is our responsibility. No one likes turning down business and we understand that it's difficult for you to explain to your clients. These decisions are not made arbitrarily. You may be able to help - by helping us understand the story behind the recommendation. Additionally, we would recommend using suitability pre-check to get the decision before submitting the application.

The story behind the recommendation

You know your client in person. We know your client on paper. Help us understand the unique facts and circumstances of your client(s) that resulted in the recommendation and the application for an annuity. The more information you can provide, the better (and faster) we can determine whether we can issue the business. If you have information beyond the required documentation that you believe would be beneficial to our review or if you are concerned that the clear financial benefit to the customer that we are looking for may not be evident, you may want to consider submitting a customized cover letter and in cases of annuity or life replacements a copy of the current statement.

The benefit of a customized agent cover letter (ideally co-signed and dated by your client) detailing *the story behind the recommendation* cannot be over-emphasized. Given how different each client's situation may be, there isn't such a thing as a standard cover letter. Summarizing the positioning of a given sale or providing the basis for the recommendation is generally found to be effective and efficient, particularly if it alleviates some of the follow-up between the producer and the Home Office that may occur if the clear financial benefit isn't otherwise apparent with the standard required paperwork. A detailed cover letter also serves as a record of the circumstances surrounding the sale in the event documentation is requested later. **Its inclusion in a fully documented file for preservation is expected as it is your responsibility to document the clear financial benefit of the sale.**

If your client already has an existing annuity into which the additional funds could be added (as an alternative to the establishment of a new annuity contract and new surrender charge schedule), a cover letter explaining the rationale corresponding to the client's overall financial objectives may assist in the review of your clients' proposed application.

From time to time we may need to reach out to you on a particular case. Often these calls are made in an attempt to assist you with outstanding business requirements. Other calls are seeking information or documentation to further understand the circumstances around your recommendations. You should take advantage of the opportunity to discuss and highlight your file by assisting us in understanding your client, your client's needs, and the story behind the recommendation. Yes, at times these calls are made to inform you of the Company's inability to partner with the proposed business. If you receive one of these calls, it was made following a difficult decision that was arrived at after thoughtful consideration—and not a reflection of your recommendation or your client. We understand your frustration should this occur and thank you for your professionalism and understanding. To help mitigate frustration that can occur with a decline, we suggest using the suitability pre-check option.

Consumer Profile Form

Our goal is to make the completion of the Consumer Profile Form as easy as possible for agents and their client(s). In addition, we hope that the following section-by-section guide and business pointers will assist you.

Owner/Joint Owner

Applicant/Owner's name (First, Middle Initial, Last)	Contract number
Joint Applicant/Owner's name (First, Middle Initial, Last)	

How to complete this section:

Make sure to include each owner's name. If this proposed Annuity is to be owned by a Trust, complete the form based upon the Trust information as compared to the annuitant or grantor of the Trust. (Note: Any death benefit is payable upon the death of the annuitant for annuity contracts with non-natural owners.)

Household Financial Information

A. Household income & expenses (Include your information as well as that of your spouse or domestic partner)

1. Total monthly household income

Examples: Employment salary, pension, Social Security, investment income, disability income, annuity lifetime income payments

\$ _____

2. Total monthly household debts or other expenses

Examples: Groceries, utilities, mortgage/rent, car, health/long term care, auto/home insurance, loan repayments

\$ _____

How to complete this section:

“Household” information should include the financial information of the client and of the client's spouse/partner. The **gross** total income and total expenses are required for all clients.

Non-natural owners:

- Trusts: If the grantor of the trust and annuitant of the contract are the **same**, complete page 1, sections A and B (financial information) based upon the trust and annuitants assets, pages 2 and 3 completed based on the annuitant, and page 3 signed by the owner. If the grantor of the trust and the annuitant are **different**, leave page 1 of the Consumer Profile Form blank.
- Corporate owners: If the annuitant and owner of the contract are **different** page 1 should be left blank, page 2 completed based on the annuitant, and page 3 signed by the authorized signer.
- Uniform Transfers to Minors Act/Uniform Gifts to Minors Act (UTMA/UGMA): Complete the Consumer Profile Form based upon the person funding the annuity, however if the person funding is not a parent or legal guardian, then page 1 should be based on the household assets for the minor, meaning their parent or guardian who is authorized to sign the Consumer Profile Form.
- Non-profit: If the Owner and the Annuitant are different, page 1 should be left blank, page 2 completed based on the annuitant, and page 3 signed by the authorized signer.
- Legal/court required: If required by the court to put assets into an annuity, page 1 is not required, however page 2 would be completed based on the annuitant, and page 3 signed by the authorized signer.
- Qualified Domestic Relations Order (QDRO): Page 1 of the Consumer Profile Form should be based on the household assets for the owner/annuitants.
- Non-qualified stretch or Inherited IRA: Complete the Consumer Profile Form based upon the person who is now the owner of the contract.
Example: Owner-John Doe Jr. as beneficiary to John Doe Sr. (deceased IRA). John Doe Jr. should complete the Consumer Profile Form.

Business pointers:

1. The “monthly household income section” should not include income currently earned on money that will be used to purchase this proposed annuity.
2. “Household expenses” should include property taxes, income taxes, and Federal Insurance Contributions Act (FICA) taxes (if self-employed).
3. If the client is currently receiving income from an annuitized contract, those assets should only be documented once in Section A1 Monthly household income.

B. Household financial information

Do not include primary residence, cars, or other personal possessions in either asset category below.

Household liquid assets

1. Stocks/bonds/mutual funds/money market/brokerage accounts \$ _____
2. Checking/savings/CDs \$ _____
3. Pension/401(k) over 59 1/2 \$ _____
4. Cash value of life insurance \$ _____
5. Death claim proceeds \$ _____
6. Annuities out of surrender period \$ _____
7. **Total liquid assets** \$ _____

Household non-liquid assets

8. Annuities in surrender \$ _____
 9. Pension/401(k) under 59 1/2 \$ _____
 10. Limited partnership \$ _____
 11. **Total non-liquid assets** \$ _____
-

How to complete this section:

Liquid assets: A liquid asset is an asset which can be converted to cash readily without penalty or loss of value. We have listed some common liquid and non- liquid assets above.

For annuities to be considered “liquid” they must be **both** free of surrender charges/out of their surrender schedule.

Business pointers:

1. A home, while a very valuable asset, is not liquid and is not considered for purposes of annuity suitability. We do not accept home equity loan proceeds or reverse mortgage proceeds as annuity premium since that would be considered a financed purchase.
2. Exclude from assets the primary residence, household contents, clothing, vehicles, and other personal possessions.
3. If the client owns a business, you may determine the area of the form to include the net worth of the business that best suits your client’s scenario but we would suggest that it be listed in line 10.
4. In situations where there are little or no liquid assets, annuity applications will be denied. It is important that the client have sufficient liquid assets for emergencies. Addressing liquidity concerns and plans for emergencies in a detailed cover letter may assist in the suitability analysis.
5. A common question asked is “*where in the net worth should the premium for the proposed annuity be set forth?*” Generally, premiums for all pending applications for the entire household should be reflected in the funding source or asset category in which they exist before issue of this annuity, under the liquid or non-liquid asset column as applicable. We would expect to see the amount of premium for the proposed annuity (combined with any other money) noted in the corresponding asset category, disclosed on page 1.

If the source of funds for the proposed annuity is coming from proceeds of a death claim or inherited funds, that amount should be reflected in line 5 Death claim proceeds. If, however, the client has already received the proceeds from the life insurance proceeds and placed those proceeds into their personal checking account, the premium for the proposed annuity should be shown in line 2 of the Consumer Profile Form in “Checking/savings/CDs” amount.

If the premium is coming from a life insurance policy which has been surrendered or proposed to be exchanged, the amount should be reflected in line 4 of the Consumer Profile Form in “Cash value of life insurance.”

Business pointers (continued):

6. The surrender or proposed tax exchange of a life insurance policy should only be done after the client consults their tax advisor. You should not give tax advice. We suggest that you consider obtaining (and retaining) a tax opinion and advice letter from your client's tax advisor before submitting the annuity application.
7. While your client may not need life insurance at the present time, you should make clear to them that should that need change in the future, insurability is not guaranteed and, if available, generally increases in cost with age. We recommend that you document this conversation and their understanding in your files.
- 8. Replacement forms should be completed if a policy is being replaced as required by the applicable state's laws, rules/regulations and Company procedure. The substantial benefit provided over the life of the new, proposed contract in comparison to the replaced contract must be documented in your records and available to us should we ask for additional information pre or post issue.**
9. If the funding source is a security, remember that only properly registered professionals can give investment advice or recommend the replacement of a security.

Household liabilities (debt)
Exclude primary mortgage

- | | |
|-------------------------------------|-----------------|
| 12. Second mortgage | \$ _____ |
| 13. Credit card outstanding balance | \$ _____ |
| 14. Student loans | \$ _____ |
| 15. Other | \$ _____ |
| 16. Total liabilities | \$ _____ |

How to complete this section:

Please consider all liabilities including those categories provided and any additional liabilities should be documented in line 15 Other.

Business pointers:

1. The amount set forth above should be a total of all debts with the exception of your client's primary home mortgage and **not** the monthly debt payment amount.

17. Total household net worth (Liquid assets + Non-liquid assets – Liabilities) \$ _____

How to complete this section:

This field should equal the amount of total assets in line 7 plus line 11 minus line 16. Please check for mathematical accuracy.
Net worth = Assets - Liabilities

Business pointers:

1. Providing a current statement reflecting allocation rates, renewals, fees, riders, and current values will expedite the suitability review.
2. All figures noted above should reflect the income, assets, liabilities, and expenses combined for all adults contributing to, and residing within, the household.
3. While there are a variety of situations that may trigger a call from a Suitability Review Consultant several of those concern net worth, including but not limited to:
 - a. The proposed premium and existing contracts are equal to or greater than 50% of a client's total net worth;
 - b. The client is a senior with low or limited net worth;
 - c. A significant percentage of the client's net worth is in annuities still within the surrender period;
4. A cover letter as discussed above can be very helpful in any of the above (and other) circumstances.

18. Do you anticipate a material change in any of the following during the surrender charge period that would impact your purpose for purchasing this annuity?

- Income
- Expenses
- Household liquid net worth

Yes No a. If yes, please explain: _____

How to complete this section:

Indicate Yes if your client expects any changes during the surrender charge period. For example, indicate Yes if your client plans to retire, may need to withdraw more than the penalty-free amount, or expects to change how they would cover emergencies without using this annuity. If none of these apply, indicate No.

C. Source of funds & liabilities

1. (Reverse mortgage and home equity funds are not an allowable source of funds for the purchase of this annuity – applicants must check all items below that apply):

- | | | | |
|--|--|--|---|
| <input type="checkbox"/> Death claim proceeds | <input type="checkbox"/> Checking/savings/CDs | <input type="checkbox"/> Stocks/bonds/mutual funds | <input type="checkbox"/> Money market/brokerage account |
| <input type="checkbox"/> Sale of primary residence | <input type="checkbox"/> Inheritance | <input type="checkbox"/> Traditional fixed annuity | <input type="checkbox"/> Salary Reduction |
| <input type="checkbox"/> Fixed life insurance | <input type="checkbox"/> Variable life insurance | <input type="checkbox"/> Annuitized payment(s) | |
| <input type="checkbox"/> Pension/401k | <input type="checkbox"/> Fixed index annuity | <input type="checkbox"/> Variable annuity | |

How to complete this section:

Indicate in this section all sources of funds used in funding the annuity contract. Remember - If funds are coming from an annuity that went into, for example, a checking or brokerage account, that would still be considered a replacement within the last thirteen months. A brief stop would still constitute a replacement.

Business pointers:

1. We do not accept “financed” purchase annuity applications that use reverse mortgage proceeds or proceeds from a home equity loan or line of credit for the purchase, in whole or in part, of the proposed annuity.
2. A brief stop in the client’s checking/savings or money market account does not alter the source of funds, so please assist the customer to execute this section accurately.

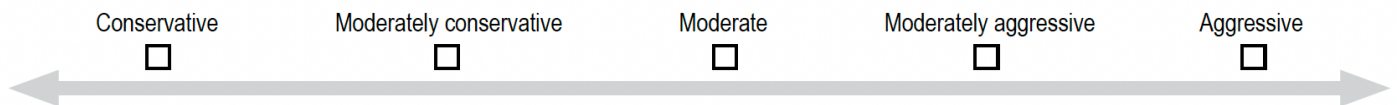
D. Financial experience & tax status

1. Tax filing status: Single Head of household Married filing jointly Married filing separately Widowed

How to complete this section:

Complete based on the previous year’s tax return unless a change of circumstances since the last filing will result in a new filing status (e.g. widowed)

2. What is your general risk tolerance? Check one.



How to complete this section:

Your client should check only one box as it pertains to their overall portfolio risk tolerance.

3. What is your experience with financial products, including investment, annuity, and insurance holdings? Check one option for each category.

	1-4 years of experience	5-9 years of experience	10+ years of experience	None
Stocks/bonds/mutual funds/ brokerage accounts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CDs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Life insurance/annuities (fixed/variable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pension/401k/403(b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

How to complete this section:

Indicate for each the number of years of experience that your client(s) have with these products. If your client does not have experience within a category, indicate "None."

E. Financial objectives, insurance & distribution needs – basis for the recommendation of the sale(s)

1. Describe the basis of the recommendation for each financial objective applicable to purchasing this annuity and any elected optional benefit riders. (check all that apply):

- Preservation of principal
- Principal growth/accumulation
- Pass assets to beneficiaries
- Income tax deferral

How to complete this section:

Select the clients financial objective for purchasing this annuity, select all applicable options.

Business pointers:

1. Make sure that your client understands all the benefits of the proposed annuity and be certain that a) those expected benefits provide a clear financial benefit to the client, b) are available with the particular annuity applied for and c) the annuity effectively addresses your client’s financial situation, insurance needs and financial objectives over the life of the contract.
2. Double check to make sure that the answers to the objectives questions in Section E1 align with how your client would like to access their money or take distributions. If the proposed annuity is a deferred annuity, make sure your clients understand the difference between the “Deferral” period and the “Surrender” period.

A **deferral** period refers to the minimum number of years that the client must hold the proposed annuity before beginning a stream of income.

A **surrender** period refers to the number of years that a surrender charge will apply if the proposed annuity is cancelled/ surrendered, or if the client accesses more than the penalty-free amounts available in the contract for the proposed annuity.

2. Withdrawals - If planning to take distributions or exercise withdrawal options, indicate the options you anticipate utilizing during the life of the contract:

	Immediate	1-5 years	6-10 years	11+ years	Unknown
a. Penalty-free withdrawal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Annuitization	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Required minimum distribution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Guaranteed living withdrawal benefit (GLWB Payments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Lump sum distribution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

How to complete this section:

Your client should indicate how they intend to take distributions. If those responses are not consistent with the proposed annuity’s benefits and applicable riders, it will trigger heightened suitability analysis and will need additional documentation to be considered.

Business Pointers:

1. Any answer that sets forth a period of years less than the surrender period for the proposed annuity will trigger heightened suitability analysis and will need additional documentation to be considered.

F. Replacements

1. Excluding this transaction, have you exchanged or replaced any other life policy or annuity contract within the last five years?

Yes No

How to complete this section:

Indicate whether or not the client has switched any other life or annuity accounts in the last 60 months.

Business pointers:

1. Help your client understand the meaning of the word “replacement” as used by insurance regulators concerning annuity purchase recommendations. Questions to help your client understand what is being asked for in this question:
Within the last 60 months, has any life insurance or annuity that you have owned:
 - (a) Been surrendered, lapsed, forfeited, or otherwise terminated?
 - (b) Been converted to reduced paid up insurance, continued as extended term insurance, or otherwise reduced in value by the use of other benefits or other policy values? (note: generally the definition of replacement would include the use of nonforfeiture benefits to reduce value)
 - (c) Been changed or amended to result in a reduction of benefits or in the term for which coverage would otherwise remain in force or for which benefits would be paid?
 - (d) Been reissued with any reduction in cash value?
 - (e) Been used in a financed purchase? (Generally a “financed purchase” is the purchase of a policy with funds obtained by the withdrawal or surrender of an existing policy, or by borrowing from the values of an existing policy to pay premiums on a policy. (note: a financed purchase also includes premiums paid for a new policy through the withdrawal, surrender, or borrowing the policy values when the new policy is owned by the same owner and issued by a carrier within 13 months after the existing policy’s effective date)
2. If you are recommending a replacement of an existing annuity contract complete in detail the Comparison of Annuity Contracts Form (32907Z) and clearly demonstrate the features of the existing annuity that are not meeting the client’s needs and how the proposed annuity will fulfill those needs. Provide an impartial assessment of the benefits and disadvantages of each policy. This should include a full explanation (and documentation) with your client of the benefits and costs of replacing their existing annuity including surrender charges, loss of premium bonus, guarantees, product design, tax consequences (with the help of their tax advisor), unpaid loans, etc. If you were the producer who wrote the annuity proposed to be replaced, provide details explaining what has changed since the existing annuity was issued that makes the proposed annuity purchase suitable. You are required to document the substantial benefit over the whole life of the proposed annuity in comparison to what the replaced annuity provides.

Agents should submit annual statements for the annuity to be replaced to assist the Company in its review.

We are here to help you succeed.

We look forward to working with you to help fulfill your client’s financial objectives. If you have any questions or concerns please reach out to our Suitability Team by phone **877-858-1364** or by email at suitability@sfgmembers.com.

We would appreciate the opportunity to help you and earn your business!



North American is a Sammons Financial Group company.

We are employee owned and committed to our customers, distribution partners, employees and communities –and the deeply rooted belief that we grow stronger together.

With so much change happening in the world, people are looking for companies that can stand the test of time. They need a partner that can weather life's storms. That's us. For over a century, we have been here for our customers and honoring our commitments. We are proud of our impact on the financial futures we help secure, and the legacies we help establish.

We believe that we aren't here to serve just today's customers, but customers for generations to come. As we look ahead to our next hundred years, that fundamental principle remains rich in its vision. No matter how much change happens in the world around us, we strive to find new ways to create value for our customers.

Just like always.



Not FDIC/NCUA Insured	Not A Deposit Of A Bank	Not Bank Guaranteed
May Lose Value	Not Insured By Any Federal Government Agency	