

Sun Life Financial Anti-Money Laundering and Anti-Terrorist Financing Training for Producers

Policy

As a life insurance or annuity Producer appointed with Sun Life Financial (“the Company”), you are responsible for complying with the Company’s Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) policies and procedures that apply to Producers under USA Patriot Act, Bank Secrecy Act (BSA) and related regulations. The Sun Life Financial (SLF) AML/ATF Program seeks to prevent the Company’s products from being used as conduits for money laundering or terrorist financing.

Definitions of Money Laundering and Terrorist Financing

Money laundering is any attempt to use Company products and/or services to make money obtained through criminal activity appear to have come from a legitimate source. Some examples are money obtained from drug trafficking, terrorism, fraud, blackmail, prostitution, robbery, counterfeiting, and tax evasion.

SLF cannot accept business from or pay funds to individuals or entities in countries sanctioned by the U.S. Office of Foreign Assets Control (OFAC), the Canadian Office of the Superintendent of Financial Institutions (OSFI), the United Nations, or to known and suspected terrorist individuals or entities who appear on OFAC or OSFI lists.

You will be notified if any individual or entity associated with one of your life insurance or annuity contracts matches a name on the OFAC or OSFI list, or has an address in a sanctioned country and advised regarding any action you should take. You can find the list of sanctioned countries on the Company’s producer website. To access the website, go to <https://salesnet.sunlife-usa.com>. Then logon with your user name and password and select either:

Annuity Financial Advisors, and click on Tools; then on Compliance, **or**
Individual Insurance Professionals, and click on Admin Services; then on Field Compliance

Click on the link to Market Conduct Guide for Life Insurance and Annuity Producers, for the full Guide, or Sun Life Financial’s Anti-Money Laundering Program, for the AML section of the Market Conduct Guide.

Anti-Money Laundering Program

The Sun Life Financial Anti-Money Laundering Program applies to the “covered products” specified in The Patriot Act Regulations for Insurance Companies, currently life insurance (except term life insurance) and annuities. The four components of the Program (below) are important to you as a Sun Life Financial appointed Producer.

1. Suspicious Activity Monitoring and Reporting

The Suspicious Activity Reporting (SAR) Regulation requires insurance companies to report activities or transactions that raise “red flags”, including red flags identified by Producers, about whether a life insurance or annuity product is being used to launder money or fund terrorism.

“Red flags” are communications and transactions that don’t seem logical or don’t appear to be in the interest of the person. As a Producer dealing directly with customers, you are in the best position to identify “red flags” at point of sale.

Some example red flags you might encounter are:

- Customer expresses more interest in product liquidity than product features.
- Customer asks an unusual number of questions about whether SLF will make any reports to the government related to the purchase or future transactions.
- Customer is reluctant to share or is evasive about, customary personal information or his/her occupation.
- Customer is reluctant to reveal how he/she acquired the funds being used for the purchase, i.e., source of wealth.
- Customer wants to wire money for the premium from a foreign bank.

If the Sun Life Financial AML Officer asks you for customer information in connection with investigating a red flag identified through routine review of transactions, you are required to respond.

It is critical for you to remember that the Regulations require you to maintain absolute confidentiality about any red flag you report or any SAR you know was filed by the Company. This confidentiality extends to the customer, business associates, and even your friends and family. You may discuss it only with the head of your organization, a compliance officer in your organization, and the SLF AML Compliance Officer. It is a criminal offense to violate this requirement.

What should you do if you encounter a red flag? Report it immediately. Do not try to investigate it or prove that it is money laundering. Summarize it in writing:

- Date of the occurrence
- Name, address, phone number and date of birth of the person involved
- What was said or done that raised your suspicion

Then call the SLF AML Compliance Department at 1-800-432-1102, ext. 1188, 3205, 1025 or 2399 to receive further instructions. Do not use any form of electronic communication for suspicious activity reporting since that could breach the confidentiality requirement.

2. Customer Information

You must obtain customer information that may help in investigating possible suspicious activity related to a customer. This should include details about the client's occupation and business; the source of his/her wealth, current income, assets and net worth; involvement in governmental entities or activities, and notes about your source of and relationship to the customer. You must retain this information in your files for five years and make it available to SLF on request.

3. Unacceptable Forms of Payment

The Company does not accept cash and payments made by certain cash equivalents because the issuer of those financial instruments cannot be relied on to have verified the identity of the person or entity that purchased them. Cash and cash equivalents are listed on the producer website, <https://salesnet.sunlife-usa.com>. If a client asks you to submit, or if he/she can submit, an unacceptable form of payment, call the SLF AML Department to report this as a 'red flag' and write a summary (see instructions above regarding SARs).

4. Training

In addition to the training in this document, you are required under the AML Regulations to obtain ongoing AML training, including periodic updates and refreshers. The Company recommends that you obtain AML refresher training within an ongoing 12-month period. You have an obligation to affirm on each SLF application you submit that you have received AML training.

As a Sun Life producer, you may receive ongoing training by completing the AML training module on the LIMRA website <http://www.limra.com/compliance/aml.aspx>. The SLF-specific training in this document also can be accessed at the end of the LIMRA module. To sign-on to the LIMRA site, enter the first four letters of your last name (an apostrophe is a 'letter') and the last six digits of your Social Security number. If you have questions about AML Training, contact the AML Department (see phone number and extensions above regarding SARs).

Keeping Current with the SLF AML Program

For periodic updates and amendments to the SLF AML Program including Example Red Flags, Acceptable Forms of Payment, Sanctioned Countries, and a Sample Customer Information Form, access the Sun Life Financial Market Conduct Guide for Life and Annuity Producers at <https://salesnet.sunlife-usa.com>.

SUN LIFE AML TRAINING NOTICE

Dear Sun Life Financial Producer:

Many Producers ask us about Anti-Money Laundering (AML) training required by Sun Life Financial (SLF). Our response is straightforward:

Please read the Compliance Update enclosed with this letter -- Sun Life Financial Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) Training for Producers.

In Section 4 you will see a reminder that the Patriot Act Regulations for Insurers requires that Producers obtain

AML training on an *ongoing* basis. We want to take this opportunity to advise you that LIMRA has online AML training programs available to assist you in maintaining your compliance with the AML Regulations. Although it is not an SLF requirement at this time, as noted, SLF recommends that you obtain AML training every 12 months.

To access LIMRA training, go to <http://www.limra.com/compliance/aml.aspx> and enter your UserName (first

four letters of your last name and last six digits of your social security number) and password (your last name if

you are accessing training for the first time; if you accessed training before, you will need to use the password you

created at that time.) LIMRA will offer you its 2008 AML refresher training module, or, if you haven't already

taken the LIMRA AML base course, you will be offered it. There is no cost to you for LIMRA training. LIMRA

reports your completion to SLF and there is no further action required on your part.

We hope the enclosed Training and access to the LIMRA site are helpful to you.