



Market Conduct Training Manual

This manual provides an overview of company market conduct standards, procedural guidelines, and regulatory information that impact you as an appointed producer. For additional market conduct information, please refer to the **secure agent portal** located on the agent section of the Company's website at www.baltlife.com. Should you have any questions regarding this information, please feel free to contact the Legal and Compliance Department at (800) 628-5433.

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Market Conduct and the Baltimore Life Companies

Baltimore Life is committed to high standards of ethical and professional behavior. We expect you, our representative, to act ethically as you provide services to our policyowners. Herein, our market conduct policies, standards, guidelines and procedures are outlined to help you understand the Company's expectations of you. This training manual is not the sole method of communicating these policies and procedures. We expect you to be familiar with other documents which set out our expectations. Additional training and resources are always available.

This guide will outline our company's policies and procedures that relate to the following topics:

Market Conduct <ul style="list-style-type: none"> ▪ Ethical and Professional Business Practices ▪ Professional Designations ▪ Appointment Review 	Policyowner Service <ul style="list-style-type: none"> ▪ Policy/Illustration Delivery Requirements ▪ Reinstatements ▪ Rewrite Rules ▪ Consumer Complaints
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MARKET CONDUCT

Baltimore Life uses a variety of processes to ensure compliance with the state regulations and the guidelines as provided within this manual. As part of our Compliance Risk Program, we use auditing procedures to monitor compliance with our policies and practices and state regulations. Our market conduct risk assessment audits monitor both home office and producer transactions and business practices. This program is intended to:

1. Assure excellent service for our policyowners
2. Verify compliance with all state and federal regulations
3. Identify the training needs of producers, and associates
4. Implement corrective action when needed

If you suspect any Baltimore Life policy or procedure is being compromised, please contact your manager or the Legal and Compliance Department by calling the Home Office. You may also provide feedback confidentially by using the **Customer Concern** Form 3668 at:

<http://spsport/Career/CASGForms/Forms/3668.pdf>

▪ Ethical and Professional Business Practices

The needs and desires of our client should always be your guide in making recommendations and providing service. To reflect these expectations, Baltimore Life echoes the professional pledge of The American College of CLU and ChFC Code of Ethics:

“In all my professional relationships, I pledge myself to the following rule of ethical conduct: I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself.”

All producers are also required to read the **Market Conduct, Ethics and Responsibilities at Baltimore Life pamphlet** (Form 5060) <http://spsport/Career/CASGForms/Forms/5060.PDF>

▪ Professional Designations

On any advertising material, Baltimore Life will only allow designations that are approved for use by the Company. We may consider approving the use of some designations, if an agent wishes to submit a designation for consideration, contact the Legal and Compliance Department.

You may not identify yourself using the titles of designation which are incorrect, misleading or imply expertise which is not commonly acknowledged through industry designation. The Company does not support the use of designations that are obtained through limited coursework or that do not demonstrate a level of relevant expertise that is far beyond that held by most producers. For additional information review, **Producer Use of Professional Designations** (Form 8234) at:

<http://spsport/Career/CASGForms/Forms/8234.pdf>

▪ Appointment Review

Every producer is required to have a background check, including financial and criminal history, prior to appointment. You may be asked by our Licensing/Contracting associates to provide additional information as part of the appointment process. We will review each situation and a final

recommendation will be made to the V.P. of the Sales Division. Failure to respond to our inquiry can result in a declination of your appointment request.

Information regarding Baltimore Life agent appointment review standards is provided under **Appointment Guidelines** (Form 6672) at: <http://spsport/Career/CASGForms/Forms/6672.pdf>

COMMUNICATIONS to the CONSUMER

▪ **Advertising Guidelines**

We strictly adhere to advertising rules and regulations of every state. Advertising material, referencing Baltimore Life or any of our products, (sales communications or otherwise) must approved **BEFORE** it is used. Advertising is defined in the link below. All marketing material must be reviewed and approved by Corporate Marketing, Branding and Communications in our home office. At no time is a producer granted authority to use The Baltimore Life name or logo in any advertising or marketing materials without our expressed written consent.

The process for advertising review is as follows:

1. A copy of the proposed material must be sent to the Corporate Marketing, Branding & Communications Department at the Home Office. Include sufficient detail about the intended use and audience, which will expedite the approval for using the material.
2. Approval from Corporate Marketing, Branding & Communications will be sent by E-mail or fax.
3. If you require assistance in preparing a draft of the material, please contact the Corporate Marketing, Branding & Communications Department.

Failure to comply with these guidelines will result in disciplinary action, which can include informal counseling, written warnings and termination of your appointment.

For complete details on our advertising standards information can be reviewed at: ***Advertising Policies and Procedures*** (Form 5064-1208) <http://spsport/Career/CASGForms/Forms/5064.pdf>.

▪ **Social Media**

We recognize that social media is an important tool of corporate and business engagement. The use of social media resources (including, but not limited to sites such as Facebook, Twitter or LinkedIn) for business purposes requires compliance with the advertising guidelines as stated in this manual. Complete details on our ***Social Media Policy*** can be reviewed at:

<http://spsport/HO/Legal/Public%20Documents/Social%20Media%20Policy.pdf>

▪ **Telephone Solicitation Guidelines and Do Not Call Compliance**

Baltimore Life's telephone solicitation guidelines have been established to uphold the standards of our company and to comply with laws and regulations.

Many states maintain statewide do-not-call listings. Additionally, the Federal Trade Commission (FTC), on behalf of itself and the Federal Communications Commission (FCC), maintains a federal do-not-call listing. You should also be aware that under federal regulations, producers are subject to fines for non-compliance

All producers and agencies must maintain a “No Call Listing.” This listing must contain the names of individuals that have requested not to be called. No call can be made to a person on this listing. You may not call any phone number on these listings unless:

- (1) The person is an existing customer of Baltimore Life, or
- (2) You have express permission to call.

Information regarding telephone solicitation and DO Not Call guidelines is provided under **Telephone Solicitation Guidelines** (Form 7749) at: <http://spsport/Career/CASGForms/Forms/7749.pdf>

AGENT COMMUNICATIONS

▪ Agent ID Number Verification

You have been provided with an identification number. You are required to provide your ID number, for access to your producer information and whenever you request customer information from Home Office staff. Please be prepared to provide your ID number. **Customer information will not be shared with a producer who does not provide their ID number or who provides an incorrect ID number.** For additional information, review the **Producer ID Number Verification** (Form 8068) at: <http://spsport/Career/CASGForms/Forms/8068.pdf>

If you suspect your agent ID number has been stolen or otherwise compromised, you must immediately report the matter to the Home Office.

▪ Comply on Demand (CODE)

The Company also distributes regulatory information through our online program, Comply on Demand (CODE). This is web-based software that is used to send compliance updates directly to producers via e-mail. It is expected that producers should review all communications provided through this data base to ensure you are current with any regulatory changes. As such, **balt_life_compliance@baltlife.com** should be added to your address book, safe list or contact list. This will help ensure that CODE e-mail messages are delivered to your inbox and not inadvertently discarded as spam or junk mail.

▪ News and Announcements

Administrative memorandums, bulletins, the producer news letters and other regulatory information are available on the producer section of the Company’s website under the **News and Announcements tab**. Please frequent this location for current updates and other information of value to you.

NEEDS BASED SELLING

It is vital that the producer’s business practices ensure that products presented to potential prospects meet their needs and are appropriate and suitable based upon the information provided at the time of the sale.

▪ Replacements

A replacement is defined as **any** transaction in which a new life insurance policy or annuity contract is to be purchased, and the sales representative knows or should know that an existing life insurance policy or annuity contract may be affected by this new purchase. Be sure to explore only those options with a client that are clearly in his or her best interest. Also, be sure that the client fully understands the drawbacks associated with all replacement sales. **Any Baltimore Life producer who is involved in a**

replacement sale is responsible for assuring that the replacement guidelines are followed. The **Replacement Policy and Procedures** (*Form 6824*) can be found at: http://spsport/Career/CASGForms/Forms/Producers_Responsibilities_NAIC.pdf

State regulations require each insurer to comply with the replacement rules. For state specific replacement requirement information, review **Replacement Requirements by State** (*Form 5994*) and can be found at: [\\office\portaldocs\5994\5994.pdf](http://office/portaldocs/5994/5994.pdf).

Replacements must always be documented (including why the replacement is occurring) on the application and the **Important Notice to Applicant: Replacement of Life Insurance or Annuities**, (*Form 7296-1201-NAIC*) (or state specific version) at the time of application. There are no exceptions to this requirement. Failure to comply with the replacement rules will result in disciplinary action, which can include informal counseling, warnings and termination of your appointment.

▪ **Suitability**

It is imperative that each sale is appropriate and suitable to the consumer. Producers are expected to have knowledge of Baltimore Life products to assure you can recommend the right one for each situation. Producers are expected to make recommendations that will facilitate this. In other words, producer recommendations should be suitable based on a reasonable assessment of your client's needs.

Baltimore Life offers fact-finding tools to assure that you can understand the needs of each client. These tools, such as Financial Needs Analysis or Asset Transfer Analysis Forms, allow you to ask questions about facts and feelings and determine goals and priorities.

In compliance with state regulations, the completion of product suitability and disclosure forms are a requirement for some products. We will provide you with the Company approved forms for all products requiring a suitability review. The suitability forms must be accurately completed in order to avoid delays in process the application. All products requiring suitability ***will be audited***, before the application is processed. **Failure to properly complete any required suitability, disclosure or replacement form will result in a delay in Home Office processing of applications.**

▪ **Annuity Suitability Training**

Under the NAIC Annuity Suitability Model Law, producers who write annuity products are required by law to complete a one-time four (4) credit annuity-specific training course approved by the Insurance Department. Producers must provide the Company with a copy of their training certification. The Company will not accept ***new*** annuity applications from producers who do not submit a copy of their certification by the training deadline.

In addition to the CE annuity training, producers must complete product-specific annuity training available on Baltimore Life's website at www.baltlife.com. Producers may access this material by selecting the Learning Center ([Annuity Training Material](#)) tab on the agent secure section of the website.

▪ **Illustrations**

An illustration can be an outstanding tool as a producer explains the proposed policy. However, these conditions are not contractual obligations. Great care must be taken to assure that the prospect fully understands the assumed elements and guaranteed elements of all illustrations are for demonstration purposes only. To reduce possible misunderstandings by the prospect you should:

- Emphasize that current assumptions are projections based on current interest rates, current mortality charges and other expenses.

- Always direct your prospect or policyowner to the guaranteed values to assure that they understand the difference between current and guaranteed projections.
- Always fully explain the effect of fluctuating interest rates and mortality charges.
- Always fully explain the effect policy loans or partial surrenders may have on the long term policy performance.
- Never use an assumed interest rate that is higher than the rate we are currently crediting.

▪ **State Illustrations**

Most states have adopted regulations that follow guidelines developed by the National Association of Insurance Commissioners (NAIC). Baltimore Life's policy illustrations are designed to fully comply with these guidelines.

You are required to follow state regulations pertaining to illustrations. For example, you must obtain a signature from your client on the illustration. Whenever a policy is issued differently from the signed illustration, a correct illustration must then be signed. For state specific requirements refer to the ***Replacement Requirements by State***, (Form 5994) at: <\\office\portaldocs\5994\5994.pdf>

▪ **Re-proposals with Policy Changes**

All policy change forms submitted to increase the benefits on an existing universal life policy must be accompanied by a reproposal. Benefit increases include face amount increases for the primary and additional insured as well as any rider additions. The reproposal must correctly reflect the changes being requested and must show that the policy will illustrate for a minimum of ten years (at current assumptions) after the changes are processed. A copy of the re-proposal, signed by the policyowner, should be submitted with the policy change application.

POLICYOWNER SERVICE

▪ **Policy/Illustration Delivery Requirements**

The prompt delivery of the policy is required to assure customer satisfaction and understanding of the policy. All policies will be mailed with a delivery receipt. When the policy is delivered, the delivery receipt must be signed by the customer and returned to the Company. If the Company does not receive a signed delivery receipt within **35** days of policy issue, a reminder will be sent to the producer.

In addition, any product which requires a signed illustration must also be completed within **35** days after the policy has been issued. If either requirement is has not been received within **65** days, a confirmation letter will be mailed to the customer. The producer will be assessed a charge back fee as outlined in **Policy Delivery Requirement** (Form 8227) available in the secure agent website at: <http://spsport/Career/CASGForms/Forms/8227.pdf>

▪ **Reinstatements**

A number of scenarios can occur that can affect the status of a policy. Examples of the most common events include:

- Unpaid premiums
- Premiums failing to cover policy expenses (UL products)
- Policy loans exceeding cash values

When a policy is scheduled to convert to extended term insurance (ETI), reduced paid-up insurance (RPU) or lapse, Baltimore Life sends the policyowner a written notification of the change in the policy

status. As the agent of record, you will be copied on such communications. A loss of coverage can have a negative impact on the insured. Therefore reinstating the coverage is an opportunity to emphasize the value of life insurance coverage. Your prompt attention to such matters will benefit all parties.

▪ **Rewrite Rules**

Policies that lapse soon after they are issued are not good for the customer, the producer or the company. This may be an indication that the customer does not have the means to afford the policy. With this in mind, Baltimore Life maintains the following re-write rule.

When an applicant has been insured under two or more policies in the most recent three year period that are all terminated on the date a new application is received, the company reserves the right to return the application to the producer without processing it. The only exception to this policy is if the new application is on the annual premium mode and is accompanied by a full annual premium.

For information on these topics is provided under **Reinstatement and Rewrite Procedures**, (Form 8008) located in the secure agent portal at: <http://spsport/Career/CASGForms/Forms/8008.pdf>

▪ **Consumer Complaints**

We take complaints seriously, and will make every effort to resolve our policyowner's concern. Any verbal or written complaint must be reported to the Home Office of the Company. All complaints should be sent to the Legal and Compliance Department for action.

Complaints include any verbal or written communication involving a grievance about the Company's services, representatives, employees, policies, or procedures. As part of our complaint investigation process, you may be required to provide a written statement or agent records. We will expect prompt attention to any such request. Failure to cooperate with a complaint inquiry can result in a suspension of your appointment.

RECORDS MANAGEMENT

▪ **File Documentation and Retention**

Documenting your client files means keeping track of the actions you take when dealing with prospects and policyowners. Your files should contain the following:

- ✓ Fact-finding materials that are used to determine insurance needs.
- ✓ Case notes listing dates and times of contacts and summaries of your interactions.
- ✓ Reasons for any product recommendations you make.
- ✓ Copies of correspondence.
- ✓ A log of all telephone calls listing the date, time and reason for the call. Be sure to include times and dates of unsuccessful calls and messages that you leave.
- ✓ Copies of all documents signed by your client, including but not limited to: applications, disclosure forms, amendments, illustrations, and delivery receipts.

Client files should be maintained for at least three years after all policies related to the client have terminated. All consumer information should be kept in a secure and locked location at all times. For our career agents, please refer to the **Record Management Policy** available through the secure agent website at:

<http://spsport/HO/Legal/Public%20Documents/Records%20Management%20Policy%202011.pdf>

▪ Privacy Requirements

All customer information must be kept confidential in compliance with The Financial Services Modernization Law (Gramm-Leach-Bliley), the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Consumer Credit Protection Act.

In order to assure that customer information is secure, all consumer information must be kept in a secure and locked location at all times. Customer information should only be accessible to those associates who need the information to perform their jobs and should be secure in file cabinets when not in use. All consumer files should be destroyed in such a manner, (such as shredding), which eliminates the possibility of the public disclosure of any personal information before disposal.

Any loss, theft or unauthorized disclosure of company records or encryption keys must be immediately reported to Baltimore Life Legal and Compliance Department. You will be required to prepare a written summary of any such incident, include the date of the occurrence, a full description of the information disclosed and the number of records accessed and the identity of the individuals affected.

When a customer requests policy information, such as cash values, loans, beneficiary designation or general policy information, verify the information below:

- Name of owner
- Address on file
- Owner's Social Security Number
- Owner's date of birth

If the caller, who should be the owner, cannot verify the above information, we can send the requested information directly to the owner at the owner's address. **Only with written authorization can we provide policy information to someone other than the owner of the policy.** No producer or field associate should provide medical information to a customer. When a customer would like access to medical information, a written request should be made. The written request should be forwarded to the underwriting department. The information will be sent to the doctor of their choice.

For additional information, review **Privacy Policy and Practices Statement (Form 6883)** at: <http://spsport/Career/CASGForms/Forms/6883.pdf>

ANTI-FRAUD POLICY

For the purposes of this manual, fraud, is considered an intentional and deliberate act of deception, concealment, false representation or omission of fact, whereby words, conduct or allegation, which may result in harm to the Company its employees or its customers, regardless of any benefit to the person who committed the fraud. Examples of fraud include but are not limited to the following actions:

- Misrepresentations and/or nondisclosure for the purpose of inducing a customer to make a purchase that is harmful to or not in the best interest of that customer.
- Having someone other than the proposed insured complete medical exams or tests so that health conditions of the insured are not identified through those exams or tests.
- Misrepresentations and/or nondisclosure on applications and forms submitted to the company.
- Theft of customer funds.

- Forging a signature or witnessing a signature the producer knows is not genuine.
- The submission of a fraudulent claim.

Failure to comply with this policy will result in disciplinary action, which can include informal counseling, written warnings and termination of your appointment.

▪ **Anti-Fraud Training**

We will make available anti-fraud training to all agents as required by state regulations. Training presentation will be available under the secure agent portal of our website. However, if you suspect fraud or have any questions on this topic, please contact the Legal and Compliance Department.

▪ **Federal Regulations**

USA PATRIOT ACT: Under federal law all business are required to comply with the USA PATRIOT ACT. This act requires businesses to report any suspected fraud activity to the appropriate enforcement authorities. Under the USA Patriot Act Baltimore Life must:

- Take steps to accurately identify our customers and assure no Baltimore Life customer is a known terrorist, and
- Maintain procedures designed to detect and report potential money laundering activity.

OFFICE OF FOREIGN ASSET CONTROL (OFAC): To comply with OFAC reporting regulations, Baltimore Life representatives must verify the identity of any prospect in order to comply with the requirements under this law. This can be done through careful and prudent completion of the application. However, if there is any question regarding the identity of your customer, you should request a copy of that individual driver's license for verification purposes. You should complete all information requested and make sure that you accurately record all information on the application.

▪ **Anti-Money Laundering (AML)**

Money Laundering is the criminal process of filtering illicit, or "dirty", funds through a transaction or series of transactions that obscure the fund's illicit origins and convert the funds to ostensibly "clean" money.

Money Laundering is accomplished by inserting the dirty funds into traditional financial institutions (such as banks, security companies and insurance companies), conducting seemingly legitimate financial transactions (such as placing the funds into a Single Premium Annuity) then removing the funds from the financial institution to give them the appearance of legitimacy.

Insurance products most susceptible to this practice include:

- **Single Premium Deferred Annuities**
- **Single Premium Immediate Annuities**
- **Single Premium Life Insurance**
- **Any Life Insurance plan with an ongoing annual premium of \$5,000 or greater.**

Our representatives must also be aware of the potential for money laundering activity. During the sales and service activities associates and producers should report the following situations to the Customer Relations and Compliance Department:

- Any request to exercise the policy "free look" period.
- Any policy surrender request within two years of the issue date.

- Any partial withdrawal or loan of more than 25% of the cash surrender value that occurs within two years of the issue date.
- Any occurrence of three or more partial withdrawals or loans that occur within two years of the issue date.
- Any unusual source of initial premium, such as cash or money order payments that are greater than \$5,000.
- Any unusually high concern for secrecy on the part of the customer.
- Any transaction in which the amount of funds paid by the customer seems well beyond the known income or resources of that customer.

Baltimore Life must complete Currency Transaction Reporting whenever cash or cash equivalents of over \$10,000 are used to pay premiums in cash or cash equivalents, paid on a single transaction or on two or more related transactions.

▪ **Anti-Money Laundering Training (AML)**

Anti-money laundering training is a federal requirement for insurance producers who write products covered by the law. As a marketer of covered products, Baltimore Life is obligated under federal law to ensure that our producers have completed training as required.

All Baltimore Life producers are required to complete the basic LIMRA anti-money laundering training. We also require you to complete the AML refresher LIMRA course every 2 years. We will not accept AML training or certification from any other vendor. Failure to comply with this market conduct standard will result in a suspension of all commissions until these course requirements have been completed. Instructions on the AML training process are available on the secure agent website portal at:

<http://spsport/HO/Legal/Public%20Documents/LIMRA%20AML%20Training%20Instructions.pdf>

INTEGRITY

Maintaining the highest degree of ethical representation is the right way to conduct your business. Insurance professionals who have sound ethical principles are highly regarded by their clients and their company. With integrity, your reputation will shine and people will want to do business with you.

▪ **Representations**

The company places great trust in you and relies on your representations to make sound and fair business decisions. Your statements and representations, whether, written or verbal must be accurate and complete so that your client can make choices that are in their own best interest and avoid making poor decisions.

Health or Medical Information: We require that the health questions on all applications be answered by the potential insured applying for coverage. The only exception to this would be for the applications on minors, in which a parent or legal guardian can answer the health questions. No person, regardless of the relationship, is authorized to answer the health questions for an insured who is not a minor.

Signatures: No producer should allow any person to sign on behalf of another adult individual unless there is specific legal authority, such as a power of attorney. The policyowner **must** authorize any change, revision or correction on the application by writing over or crossing out the writing **and**

initialing or signing the change. All forms that require the signature of a customer must be fully completed **before** the customer signs them.

Additionally, you must not omit information that you know is important to the choices your client must make. For example, it is wrong to:

- Highlight all of the benefits of replacing an existing policy without explaining the drawbacks to that replacement, or
- Use terms that are not accurate, such as, using the word “deposit” instead of “premium.”
- Agents are also prohibited from using the existence of the guaranty association for the purpose of sales, solicitation or to induce a person to purchase any insurance product.

▪ **Misrepresentations**

Any misleading statement, written or oral, can be considered misrepresentation. Examples of misrepresentations include:

- Making any false or misleading statements about a policy or a rider.
- Making false or misleading statements about another producer, agency or insurance company.
- Indicating that premiums on a policy may be stopped at some future date when, in fact, the premiums on that policy are payable for life.
- Telling a client that nonguaranteed policy features are guaranteed.
- Telling a client that the planned premium on a universal life policy is adequate to keep the policy in force to the maturity date when the policy may lapse before that date.
- Telling a client that a policy change will not have a negative impact on the policy when that change could be a factor in the policy lapsing at some future date.
- Telling a client that any question on the application need not be answered truthfully or is not important.

Evidence of participation in any such actions, will result in disciplinary action, which can include informal counseling, written warnings and termination of your appointment.

▪ **Disciplinary Action Process**

Any company representative who violates Baltimore Life’s market conduct policy, procedure or state regulation will be subject to disciplinary action by the Company.

A report of non-compliance of market conduct standards, violation of state regulations or unethical business practices, will be reviewed by the Legal & Compliance Department. As part of our review process, the producer/agency may be required to provide a written statement or a copy of your consumer records. Your agency manager (or managing IMO) will be copied on any correspondence related to the matter under review.

Failure to cooperate with our request for information can result in the suspension of your appointment.

The level of action taken against a producer/agency is dependent upon the severity of the situation, including but not limited to the following:

- Informal counseling to reinforce state regulations or our market conduct standards.
- Written reminder to formally document our expectation

- Written warning as notification of a failure to meet our market conduct standard, a violation of a state regulation or an unacceptable business practice which must be discontinued.
- Termination of appointment due to violation of state regulations, market conduct rules, unethical or dishonest behavior or unprofessional conduct.

Notices of disciplinary action will be documented and executed by the Legal and Compliance Department. All written notices will be sent to the producer/agency in writing via email (if available) and to the producer's address of record via U.S. Mail.

If our investigation indicates that an agent/agency has violated market conduct rules, state regulations or commits a fraudulent act, Baltimore Life, will make a report to the appropriate regulatory authority as required by state regulation.

MARKET CONDUCT SUPPORT

The Legal and Compliance Department is here to provide assistance. All forms referenced within this manual can be located in the secure agent portal section of the Company's website. Should you need any assistance, additional contacts for the Legal and Compliance Department are provided below:

Topic	Contact Person	Contact Number
State and Federal Regulations Comply on Demand File Documentation/Retention Privacy Requirements	Pam Bethea	Pam.bethea@baltlife.com
Market Conduct Consumer Complaints Appointments Reviews Advertising Issues	Zyvonne Adams	zyvonne.adams@baltlife.com
AML Training	Allison Thompson	Allison.thompson@baltlife.com
Suitability Issues Policy Illustration/Delivery	Pat Stevenson	Pat.stevenson@baltlife.com
Replacements Annuity Suitability Training	Mildred Allen	Mildred.allen@baltlife.com