



PROSPECTIVE DISTRIBUTION PARTNER DISCUSSION TOPICS

Following our review of your completed Compliance Questionnaire and related records and documentation, North American Company for Life and Health Insurance® (“North American”) will schedule to meet and/or conduct a teleconference with the executive management of your organization to review information disclosed on the questionnaire, as well as to learn more about your organization’s business and distribution model. Please be prepared to discuss the topics referenced below during a review meeting with the team from North American.

1. Describe your agency including its history, strategy, and methods for marketing and sales of insurance products.
2. Explain your method(s) of lead generation (including sources), advertising and sales solicitation.
3. Describe the call center structure and your sales methods and practices.
4. Describe your methods for scripting sales processes and training agents on compliant sales practices and products.
5. Describe your Compliance program and processes.
6. Describe any formal Ethics Code or Code of Conduct within your entity.
7. How is compliance training related to products and sales to seniors administered and monitored?
8. How often do the entity’s employees/agents receive training on the Code and/or other compliance topics (e.g. product training and sales to seniors)?
9. Describe the controls in place to monitor and maintain compliance with state insurance licensing regulations.
10. Describe your policies and procedures for AML/OFAC compliance, agent AML training and verification of customer identify.
11. Describe the policies and procedures relating to sales call recording.
12. How are your agents compensated? (i.e. salary, commission, bonus)? Describe your compensation program and/or structure.
13. What has been your market conduct experience?
14. What has been the frequency and type(s) of customer complaints you have experienced?

15. Describe your written policies and procedures relating to compliance with Do Not Call regulations, Telephone Consumer Protection Act, Federal Trade Commission and any related regulations.
16. Describe your written policies, procedures and controls in place related to Privacy and Data Security Issues.
17. Are these Privacy and Data Security policies and procedures subject to audit?
18. Please share copies of the following information for review by North American:
 - a. Examples of your lead generation materials
 - b. Sales scripting that will be used to sell North American products
 - c. Scripting for lead generation phone calls that will be used to solicit sales of North American products