

Compliance

Honesty, Ethics and Integrity



What's included...

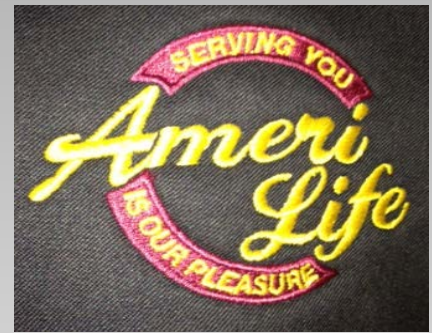
- Conduct and ethical behavior of an AmeriLife sales agent
- The consumer
- Rules specific to Medicare beneficiaries



Conduct and Ethical Behavior



Who you are



- You will clearly identify yourself and your relationship with AmeriLife.
- Disclose you are a licensed insurance agent.
- Never suggest you are an employee of the U.S. government or any carrier.



Inappropriate use of designation

You will not falsely imply that you:

- Possess special financial knowledge or have obtained specialized financial training; or
- Are certified or qualified to provide specialized financial service.
- You will not use terms such as “financial advisor” to falsely imply that you are licensed or qualified to discuss, sell or recommend financial products other than insurance products.
- At no time will you falsely imply that you are qualified to discuss, recommend or sell securities or other investment products in addition to insurance products.



Anti-Discrimination

- AmeriLife is committed to equal opportunity in all aspects of business practices and will not tolerate illegal discrimination or harassment of any kind.
- You will always be mindful to act with the highest standards of professionalism and ethics and avoid conduct that may be construed as discrimination or harassment.
- Examples include racial or ethnic comments and sexual advancements.



Misrepresentation

Misrepresentations are law violations and are unethical:

- You will not make any statement concerning any insurance product or plan that is untrue, deceptive, confusing or misleading.
- You will not make a false or misleading statement as to the financial condition of any carrier.
- You will not engage in activities that could confuse clients or potential clients.
- You will not misrepresent AmeriLife, our carrier partners or their products or plans.



Fraudulent signatures



You will not submit to a carrier, on behalf of a client, an application or policy-related document bearing a false or fraudulent signature or initials.

This conduct is illegal, unethical and grounds for immediate termination.

It is AmeriLife's policy to report all such violations to the appropriate law enforcement authority.



Unlawful inducement

Except as expressly provided by law, you will not give or provide anything of value to a client whether its directly or indirectly.

In addition to tangible items having value, inducements include:

- Special favors and offers to pay or rebate any portion of premiums or charges; or,
- Sharing of commissions or bonuses.



High pressure sales tactics



- You will not use scare tactics, coercion, deception, sympathy appeal, false sense of urgency or other high pressure tactic to cause a client or potential client to enter into any transaction.
- You will always give clear information and avoid the use of false, misleading or exaggerated statements.

Marketing material

- You will not use any unapproved marketing materials.
- All AmeriLife career agents must adhere to AmeriLife's Advertising Approval Policy.



Non-disparagement

You will not disparage:

- AmeriLife
- Our carrier partners
- Competitors or their products or plans
- Nor shall you make unsubstantiated comparisons or seek to influence the cancellation of any contract that may exist between competitors and their clients.

The Consumer



The rights and best interest of the client

- You will conduct yourself with courtesy, dignity and with respect for the rights and reasonable requests of clients and potential clients at all times.
- The business of insurance is declared to be a public trust in which all agents of all companies have an obligation to work together in serving the best interests of the public.
- You must understand and observe insurance laws to its fullest by presenting accurately and completely, every essential fact to a client's decision and always placing the client's best interest first.



Duty to verify

You will ensure that all information on any application is completely filled in by the client or their legal representative, or you at the direction of the client or their legal representative.

You will never sign any application on behalf of any client even if directed by the client to do so.

You will verify all of the information on the application is correct and confirm the client's understanding of the pending enrollment.



Ensure suitability



- Prior to recommending any product, you will first make reasonable efforts to obtain information concerning the client's objectives, needs, financial and/or health status, as applicable, to evaluate the suitability of the recommendation.
- You will objectively consider all information provided by the client to ensure the transaction is suitable.



Cognitive ability

If you believe that the consumer does not have the mental capacity to understand the information you are presenting, probe to determine if there is someone that assists with their healthcare and/or financial decisions. If yes, then re-schedule an appointment to meet with the “decision maker”.

If the consumer has a power of attorney for healthcare and/or financial decisions, make sure you see the document and include with the carrier application.

If there is no one that assists the consumer’s decision and they **do not** understand policy guidelines, health plan restrictions or the financial consequences of the application, “Walk away from the sale”!



The Medicare Beneficiary



Unsolicited contact



- Unsolicited contact of Medicare beneficiaries for the purpose of marketing a Medicare Advantage product is strictly prohibited.
- You will not engage in any door-to-door marketing or sales activity relating to all types of Medicare Advantage Plans.



Impermissible selective health marketing

- Enrollments in a Medicare Advantage plan will not be predicated on age or medical condition, except as provided by federal rules pertaining to access in Medicare.
- You will never engage in selective marketing based on health or a health screening.
- Except for certain diagnosis-specific products, you will not discriminate against any person based on health status or disability.
- You will ensure that all marketing materials and sales meetings are accessible to the disabled.



Scope of Appointment

- While marketing Medicare Advantage products, you will ensure that all CMS and carrier regulations regarding the scope of appointment are strictly followed, including the mandatory 48 hour wait period prior to discussion and recommendation of a specific plan.
- In every instance, you will ensure that the products discussed are those for which the client provided the appropriate advanced consent.



CMS guidelines on terminology and prohibited words and phrases



- You will be mindful and understand CMS' marketing guidelines relating to the use of prohibited words and phrases.
- You will never use the word “free” while marketing any insurance product or plan.
- You will avoid the use of absolute superlatives during any Medicare Advantage presentation.



Summary of Benefits

During every Medicare Advantage presentation, you will take steps to fully explain the plan's summary of benefits and provide the beneficiary with a copy of the summary of benefits, plan ratings and the multi-language insert.



Referrals

- In connection with Medicare Advantage products, you will not make direct initial contact with any person referred to you by a client.
- You may ask the client to provide your contact information (business card) to that person and have him/her initiate the contact.



Thank You

