

North American Companies



We're Here for Lifesm

North American Company
for Life and Health Insurance
Since 1886

525 West Van Buren
Chicago, Illinois 60607
1-312-648-7600
www.nacolah.com

North American Company
for Life and Health Insurance
of New York

990 Stewart Ave., Suite 200
Garden City, New York 11530
1-516-228-8899
www.nacolah.com



Partnering With You On Compliance Matters

For Agent Use only Not Intended For Consumer
Solicitation Purposes.



Introduction

The North American Companies endorse and support the concepts in the Principles and Code of Ethical Market Conduct established by the Insurance Marketplace Standards Association (IMSA). As a representative of the North American Companies, you must agree:

- To conduct business according to standards of honesty and fairness;
- To provide service to the customers which, in the same circumstance, you would apply or demand for yourself;
- To provide competent and customer focused sales, based on an analysis of the insurable needs and financial objectives of the customer;
- To engage in active and fair competition;
- To provide advertising and sales materials that are clear as to purpose and honest and fair as to content;
- To provide fair and expeditious handling of consumer complaints and disputes;
- To comply with all applicable laws, regulations, and company requirements;
- To report any activities of which you are aware that may be in violation of this code.

The North American Commitment

North American Company is committed to fair and ethical sales practices for all its customers. We are also committed to complying with applicable laws and regulations, the IMSA Principles of Ethical Market Conduct and the Company's Policy Statement Concerning Fair Competition. We will maintain and enforce policies and procedures to reasonably assure compliance, including a system for communicating all company requirements and monitoring sales practices. Representatives and employees of North American Company are expected to uphold these principles and guidelines. A violation of these guidelines by a representative or employee will result in disciplinary action, including, if appropriate, termination of the relationship with the Company.

Policy Statement Concerning Fair Competition

North American Company will engage in active and fair competition and believes that such competition is the most effective and efficient means of providing products and services to customers. Such competition, however, must be carried out in compliance with applicable laws. Federal and state laws exist to preserve a competitive economy in which free-enterprise can flourish. North American Company supports the purposes of these statutes and laws and insists that its employees and agents are in full compliance with applicable federal and state statutes governing trade practices, antitrust, and restraint of trade. In furtherance of this policy, North American Company employees and associates will:

- Comply with applicable state and federal laws fostering fair competition.

Policy Statement Concerning Fair Competition (cont.)

- ❑ Refrain from using or making any misrepresentation or false advertising regarding insurance products including any misrepresentation of the benefits, advantages, conditions, or terms of any insurance policy; interest, dividends or surplus to be received on any insurance policy; using any name or title misrepresenting the true nature of an insurance product.
- ❑ Refrain from making, publishing, disseminating or circulating, directly or indirectly, or aiding, abetting or encouraging the making, publishing, disseminating or circulating of, any oral or written statement which is false or maliciously critical of, or derogatory to, the financial condition of an insurer, for the purposes of injuring any person or insurer engaged in the business of insurance.
- ❑ Refrain from entering into any agreement to commit or by any concerted action committing, any boycott, coercion or intimidation resulting in an unreasonable restraint or monopoly, in the business of insurance.
- ❑ Make no agreement or understanding with competitors to fix or control prices, to allocate products, markets or territories, to boycott certain customers or suppliers, or refrain from or limit the sale of any product.
- ❑ Avoid replacing existing life insurance policies and annuity contracts without meeting the requirements of applicable federal and state law, and providing information to the customer that he or she needs in order to ascertain whether replacement of existing policies or contracts may be in his or her best interest.

Except as set forth above in order to meet the requirements of applicable state and federal law, North American will compete freely and actively in markets or market segmentation determined by its

Policy Statement Concerning Fair Competition (cont.)

management to be appropriate and consistent with its marketing plans and goals, both financially and in the marketplace. A violation of the above guidelines by any employee or agent will result in disciplinary action including, if appropriate, termination.

Privacy Notice

North American Company is committed to maintaining the confidentiality, integrity and security of personal information entrusted to us by current and prospective customers. The following is our Privacy Policy.

Right to know

Customers have a right to know what we do with the personal and confidential information we collect in the normal course of business offering, processing administering and maintaining the insurance and financial product purchased from North American Company. Because we value the integrity of our customer relationships, we want to assure you and your customers that we are properly safeguarding this important information.

Personal Information We Collect

We need accurate, current health and financial information about your customers so that we can determine their needs at a fair price. We collect personal information that is provided to us on applications, other forms and in interviews. In addition, we maintain information about their transactions with us, such as policy coverage, premiums and payment history. We may obtain additional information from third parties which may include agents, employers, other insurers, consumer reporting agencies or health care providers in the course of processing, underwriting or administering their annuity contract.

Privacy Notice (cont.)

Information We May Disclose

We may share their personal financial and health information on a confidential basis only with authorized employees, representatives and third parties whose services are required to assure the highest level of service. We may cooperate with other financial institutions in order to bring additional products and services to their attention. We will disclose only financial information that is necessary to such individuals or companies who perform marketing services on our behalf, or to other financial institutions with whom we have agreements.

We will not disclose any non-public personal information about your customers or about any other customers or former customers except as authorized by law, as described in the Privacy Notice or as otherwise communicated to your customers. Because we respect and share their concern for privacy, we will not provide their health information to anyone outside of our Companies except as described above. We will notify them if we make any material change in this Privacy Notice. We may share selected financial information about them with our affiliated companies in order to better serve them and to offer them worthwhile products and services.

Protection of Your Information

Reasonable care will be taken to keep pertinent records current, complete and accurate. If there are any inaccuracies in their statements, or in any other communication from us, we would appreciate their assistance in making corrections by contacting us.

We will protect all information collected about your customers, and we will restrict access to non-public personal information by maintaining physical, electronic and procedural safeguards. We will restrict access to protected data only to individuals who

Privacy Notice (cont.)

must use it in the performance of their job-related duties. Employees who violate our Privacy Policy will be subject to disciplinary action, which may include termination.

Above all, we value your customer's trust and confidence in our ability to manage and protect their important personal information. If you have any questions or concerns about our Privacy Notice, please call our Compliance Officer.

USA PATRIOT Act

The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA PATRIOT Act) was signed into law by President George W. Bush on October 26, 2001. This law, enacted in response to the terrorist attacks of September 11, 2001 strengthens the nation's ability to combat terrorism and detect and prevent money-laundering activities. The Treasury has broad authority to interpret and enforce these anti-money laundering laws. Under the USA PATRIOT Act financial institutions, including life insurers and broker/dealers are required to establish or enhance anti-money laundering policies and procedures. Know Your Customer—As a normal part of the application process for insurance products, agents and registered representatives collect personal and financial information about proposed insureds. Information collected includes:

- The name, address, telephone number, age and social security number of the contract owner and annuitant.
- The names of any beneficiaries to the contracts and their relationship to the contract owner.
- Information regarding occupation, employer, financial status, tax status and investment objective for variable products.

USA PATRIOT Act (cont.)

Prior to accepting an application, the agent/registered representative typically meets personally with the proposed owner and witnesses his or her signature. In addition, the agent/registered representative is required to document how long he or she has known the applicant and the source of the referral. This information is gathered in order to determine the suitability of the recommended product and enables the agent/registered representative and North American Company to make a determination that the product purchased represents a transaction that is reasonable for the customer and reflects a legitimate business purpose.

Some suspicious activities which indicate that a transaction may not reflect a legitimate business purpose include:


- The purchase of a single lump sum contract by a customer whose previous product experience is with smaller, regular payment products;
- Payments for contracts by a third-party check;
- A customer who shows no concern for the product performance, but much concern for the surrender or early cancellation of the contract;
- Payment by cash, when this type of business transaction would normally be handled by checks or other payment instructions;
- Lump sum payments with foreign currency or foreign wire transfers;
- Purchases beyond the customer's apparent means;
- Purchases where the source of funds is unclear;
- Borrowing from a single premium policy shortly after paying for the policy;

USA PATRIOT Act (cont.)

- Early cancellation of a single premium sum contract;
- Payment by multiple bank checks or money orders.

If an agent/registered representative or employee suspects that a transaction does not represent a legitimate business purpose, contact Meg Taylor, Vice President and Chief Compliance Officer at 800-800-3656 Ext. 87712 or Tracy Michels, Assistant Vice President ext. 87648.

Provide Competent and Customer Focused Sales

 ompetent and customer focused sales are based on an analysis of the customer's insurable needs and financial objectives. You should carefully consider each customer's circumstance and future expectation when making product recommendations. You should review all the proposed policy features with the customer, including values and benefits, premium structure, expenses, surrender charges, and existing coverage.

Products change quickly in today's marketplace. Make sure you understand the features and mechanics of the products that you are recommending. Make clear and competent presentations to be sure your customer understands how the product you are recommending works and how it will address his or her insurable needs and financial objectives.

North American Company encourages the use of needs analysis tools to assist you in determining your customer's insurable needs and objectives.

Insurance products recommendations will be made only upon having reasonable information to determine such recommendations are appropriate and

Special Needs of the Senior Market

The senior market can be a good market for the life and annuity producer. With a record number of baby boomers beginning to retire, there is a need for conservative retirement products such as fixed annuities. This market will continue to grow with the ageing of our population. With more sales opportunities, there are also some things to consider when dealing with the senior market. Although this is not a comprehensive list of senior market guidelines, it does illustrate some points to consider when dealing with this market.

Full Fact Finding and Documentation is Very Important: Documentation is key to proper compliance in any market, but is especially important in senior market sales. Suitability is extremely important and is often scrutinized in this market.

Need to Error on Side of Being Conservative: Seniors are conservative by nature. Whenever you have a doubt, it is always best to rely to less aggressive strategies and recommendations.

“Buyers Remorse”: Many people, including seniors, go through this phenomenon after making a major financial decision. Again, proper documentation, a conservative strategy, and making sure that client fully understands what they have purchased will help overcome this issue.

Some Clients May Be Less Sophisticated Than They Appear: Seniors may give the impression of being “market-savvy” because they might have owned several stock/bonds or mutual funds in the past, but realistically have little or no market knowledge. Agents must not assume that seniors understand annuity concepts without proper instruction.

Seniors Often Work Closely With Other Advisors: Most seniors have other advisors, such as a CPA, a tax advisor, an attorney or even family members. These advisors may have different options and/or motives for the senior client.

Special Needs of the Senior Market

Broad Protection of Elder Abuse Laws: Elder abuse legislation has gained momentum in recent years. With the emerging senior population, often courts will favor on the conservative side with the senior client.

Beneficiaries Sometimes Have Different Objectives than the Contract Holder: A senior client’s beneficiary may have a different financial objective and opinion than the senior did at the time of sale. Again, documentation is the key to keeping a record of the client’s objectives and intentions at the time of the annuity purchase.

These are just a few points to consider when dealing with the senior market. Please consult your elder law attorney for questions or clarifications.

Financial Planning

Terms such as “financial planner”, “investment advisor”, and “financial consultant” may not be used in a way to imply that an agent is involved in an advisory business in which compensation is fee-based. Some states require special licensing as an investment advisor for those providing financial planning services. A majority of states require such licensing if a separate fee is charge for such services. The best method of avoiding problems is to be certain that the client understands that you are acting as a life insurance agent. In this regard, state life insurance solicitation regulations require that you inform the prospective purchaser, prior to commencing the sales presentation, that you are a life insurance agent and identify your full name.

You should encourage your client to consult with other professionals (e.g. legal or tax advice) on matters that you are not qualified or licensed to discuss.

Cautions should be taken when using Living Trusts as a financial planning tool. Litigation has been generated against marketers of living trusts, insurance companies and agents where the living trust concept was marketed on a mass basis in connection with the sale of financial products like annuities. While we believe that, in the appropriate circumstances, a living trust can be a valuable planning device, mass distribution of this concept is not appropriate. Please also be aware that annuities offered by North American Company are not designed for use in “Medicaid-friendly” annuity programs.

North American Company does not provide tax or legal advice and we strongly encourage your clients to consult their tax advisor prior to establishing a living trust or purchasing any financial product in connection with a living trust.

Advertising Guidelines

The Compliance Department is pleased to announce enhanced, streamlined procedures for submitting your advertising to our Department for review and approval. Start taking advantage of this ease of doing business by e-mailing your ad to compliance@nacolah.com or faxing it to our dedicated fax number: 312-648-7780. These new methods will expedite the review and approval process and have you selling more. . . faster!

For easy reference, please refer to the advertising checklist found below to assist you in complying with state regulations and market conduct standards. For additional questions, please contact Terri Silvius at 800-800-3656 ext. 27858 or Tracy Michels at ext. 87648.

Advertising Guidelines (cont.)

Advertising Checklist:

Advertisements must have prior written approval by the Company. Advertising would include any material, written or electronic, that is designed for distribution to the general public, including but not limited to:

- Print, radio, TV and any form of media advertising (newspaper, magazine)
- Product brochures, circulars, pamphlets and published articles
- Sales presentations, prepared sales talks, seminar texts, telemarketing scripts and materials
- Newsletters, research and performance reports or summaries
- Prospecting, target market and form letters
- Business cards and letterhead
- Agent recruiting material
- Third party software
- Internet and internet websites or home pages and any other forms of e-commerce

If you are uncertain whether or not something falls within the definition of “advertising”, please contact the Compliance Department for guidance. Without exception, all consumer advertising mentioning North American Company or referencing any of our products and services must be approved by Compliance prior to use. This includes products reference by name, description, rate or features. To ensure your materials are reviewed expeditiously, the following procedures should be taken into consideration. We suggest you review these guidelines prior to submitting any piece of advertising for approval.

Advertising Guidelines (cont.)

- ❑ When an ad is submitted for approval, Compliance will notify you of the form number assigned to the ad. This form number is to be printed in the lower left hand corner of the ad.
- ❑ Advertisements may need to be filed with state departments and/or the NASD, which will add to the approval turnaround time. You will be notified if this is the case.
- ❑ Due to the changing nature of regulations governing advertisements and sales materials, compliance approval is valid for up to 12 months. This time period may be shorter if interest rates are referenced in the ad. Upon expiration, you must resubmit the ad for approval if you continue using the ad.
- ❑ If revisions to your ad are required, you must submit a final copy of the ad with the revisions to Compliance for final approval and filing (if necessary).
- ❑ Include your agency's name as it appears on your agent's license. For example, if an agent is licensed as "John Doe" but is doing business as "City Insurance Agency," "John Doe" must appear on the ad.
- ❑ Always indicate the licensed agent as the contact person. All consumer ads must have the name of the agent, agency (if applicable), address and phone number. If the advertisement will be distributed in the state of California, you are also required to include your state license number.
- ❑ If a variable product is featured, the agent must be identified as a Registered Representative and the name of and relationship to the Broker/Dealer must be disclosed. "Joe Agent is a Registered Representative of Sammons Securities Company, LLC member NASD/SIPC".

Advertising Guidelines (cont.)

- ❑ The product being advertised must clearly be identified as a life insurance policy or annuity contract.
- ❑ The term no cost, disappearing or vanishing may not be used in any advertising materials. In addition, a life policy cannot be billed as an "investment" or "retirement" vehicle.
- ❑ Do not refer to premium payments as "deposits".
- ❑ Indicate all product names registered with a service mark or registered trademark as applicable.
- ❑ If an ad is intended for agent use only, be sure to indicate "For Agent/Broker Use Only. Not Intended for Consumer Solicitation Purposes".
- ❑ Any ad promoting one of our products must describe the policy type, form number and issuing company. A typical disclosure is as follows: Marketing Namesm is issued on form XXXX (group certificate) or Form XXXX (individual contract) or state variations by North American Company for Life and Health Insurance, Chicago, IL. This product, its features and riders may not be available in all states.
- ❑ If a reference is made to any withdrawal feature of the product, include the disclosure, "Withdrawals prior to age 59½ may be subject to IRS penalties".
- ❑ If reference is made to specific interest rates, include the statement, "Interest rates are based on current rates and are subject to change without notice".
- ❑ Reference to any commercial rating—A.M. Best, for example—must incorporate a complete description of the rating: "Rated 'A' (Excellent) for financial strength and overall operating performance when compared to the norms of the life/health

Advertising Guidelines (cont.)

industry”. Also include a statement about the number of categories that a rating service would use to rank a company and where a particular ranking would fall within the total number of categories: “An ‘A’ (Excellent) rating by A.M. Best Company is the third highest rating out of fifteen categories”. If you decide to include rating information on your website be sure to provide full disclosure, or simply link to our website for this information.

- ❑ Any use of statistics or references to any information from an outside source must clearly identify the source of the information including the name and date of the report or publication.

Internet Advertising:

Internet advertising includes home pages and all related pages in an agency/agent website. To submit your site and/or page for approval, complete and submit an Advertising Submission Form along with copies of all relevant web pages including all links and instructions for accessing the site online. Note that approval must be received prior to any website “going live”. Regulations that apply to print Advertising also apply to Internet advertising. Since a website is accessible to all consumers, regardless of where they live, Internet advertising must comply with the advertising requirements of all states.

- ❑ Many websites, including those that market insurance products, may be identified by a marketing name that is different from the name shown on the “official” license for the agency or agent. Please note that a marketing name can easily be construed as a DBA (doing business as) and as such could require that the name be filed with the respective secretary of state office(s) and/or state insurance department(s).
- ❑ Since information contained on a website can be

Advertising Guidelines (cont.)

viewed by virtually anyone, anywhere in the world, include where you are licensed to do business and that you are a domestic U.S. agent/agency. For example: “John Smith, DBA XYZ Life Insurance Agency Inc., a domestic U.S. insurance agency licensed to do business in (states)”, or “licensed to do business in all states except (states)”.

- ❑ When including product information that is for agent use only, please provide the Internet address, User ID and password.

Record Retention

It is important that you maintain client files and documentation properly for future reference. Certain documents should always be maintained. These include:

- ❑ Original sales proposals;
- ❑ A copy of any needs analysis completed during the solicitation;
- ❑ A copy of any sales material used during the sales process;
- ❑ Any written correspondence to or from the policyowner regarding the solicitation, issuance of the policy, or subsequent service of the policy;
- ❑ Documentation of phone calls to or from the policyowner addressing the above issues;
- ❑ Notes from meetings with the policyowner.

State regulations vary regarding the amount of time that client files are to be maintained. However, a general rule of thumb is to maintain all active client files indefinitely and all in-active files for seven years.

Complaint Handling

Consumer complaints generally fall into one of three categories:

- ❑ State Insurance Department Complaints, meaning those that are forwarded directly from the state to North American Company or to you as the agent;
- ❑ Executive Complaints, meaning those that are directed to the Chairman, President or other Senior Officer of the Company; and
- ❑ Direct Complaints, meaning those that are submitted directly to you or to North American Company for response.

It is possible that a consumer complaint may be a combination of all three. If North American Company receives a complaint regarding a policy written by you and the complaint is regarding the sales or servicing of the policy, you will be contacted for your written response. Your written response must address all charges made in the complaint. You will be asked to include copies of any documentation available to support your position. It is very important that you submit your written response within the specified number of days. Because many state insurance departments impose a deadline for the Company's response, the receipt of your written response in a timely manner is essential.

If you receive a complaint directly, develop a written response addressing the issues. If you need assistance in formulating the response, please contact the Compliance Department. If the complaint involves a state insurance department, an attorney, or another regulatory agency, contact the Compliance Department immediately for consultation before any reply is submitted.

Complaint Handling (cont.)

It is inappropriate and unacceptable for any agent to initiate any discussion of a settlement to a complaint without consulting with and gaining permission from the Home Office. In any settlement, a release form approved by the Home Office must be used.

North American Company is committed to fair and ethical treatment of all policyholders. As such, all consumer complaints are taken seriously. If you believe that the allegations are incorrect, we will assist you in defending that position and we will investigate thoroughly. Results can be serious, including state penalties, law suits, policy rescissions, commission reversal, or termination of the producer contract.

North American Company is committed to assisting you in these circumstances. Questions relating to customer relations and complaints should be directed to the Compliance Officer.

Application Guidelines

The application is a part of the insurance contract. If the answers on the application are incorrect, incomplete, or untrue, North American Company may have the right to deny benefits or rescind coverage. Therefore, it is important that the application be filled out completely and accurately.

Be sure your client understands that by signing the completed application forms, he or she is attesting that the information is accurate and complete. Never ask your client to sign a blank application or other document.

Application Guidelines (cont.)

The application is to be submitted to North American Company exactly as completed at the point of sale. The applicant must initial modifications to the application or other sales material subsequent to the signature of the application. Any modification to the application, replacement form, authorization, checks, or other material secured at the point of sale without the approval or knowledge of the applicant is an unethical sales practice, may be illegal, and could result in civil or criminal liability.

Your signature on the application is your personal assurance that the information supplied is, to the best of your knowledge, given voluntarily by an eligible applicant in a complete and accurate manner. Only the licensed agent(s) writing the business should sign the application. The signing of the application by any other producer is a prohibited practice.

Should the client qualify for conditional coverage, do not accept money in excess of the amount specified in the conditional receipt. Remember that, in most states, a conditional receipt provides conditional coverage and should only be referred to as such. Conditional coverage should never be referred to as a binder.

Finally, remember that it is your responsibility to protect the privacy and confidentiality of the information obtained during the underwriting process. Personal information intended to be transmitted to North American Company should be kept in the utmost confidence.

Replacements

Replacements are and continue to be one of the most heavily regulated transactions. Depending on the circumstance, a replacement may or may not be in the best interest of your client. You have a responsibility to make sure that your client has all of the necessary facts in order to determine if the replacement is in his or her best interest. A replacement may be in the client's best interest:

- If the benefit amount can be increased for the same or similar premium;
- If the policy can remain in force longer for the same or similar premium;
- If the accumulation value will increase for the same or similar premium;
- If the premium payment period is shorter for the same or similar premium;
- If the customer can purchase the same benefits for a lower premium.

Comparisons between an existing product and a proposed product must accurately and fairly describe the policies' provisions and values. You should discuss the advantages and disadvantages of any potential replacement with your client. Remember to address:

- Any required evidence of insurability;
- The contestability and suicide provisions of the existing and proposed policy;
- The loan provision and loan interest rate of both policies;
- Any surrender charges and/or expense fees associated with both policies;

Replacements (cont.)

- ❑ The premium requirements of the proposed policy;
- ❑ The present and future values of both policies;
- ❑ The current interest and mortality charges of both policies;
- ❑ The potential tax treatment of the replacement and whether the replacement can qualify as a Section 1035 exchange.

The definition of replacement goes beyond the surrender of one policy and subsequent purchase of another policy. As an agent, you should be aware of all of the transactions that are considered a replacement. For example, a replacement may occur when a policy has been or is to be:

- ❑ Lapsed, forfeited, surrendered, or otherwise terminated;
- ❑ Converted to reduced paid-up insurance, continued as extended term insurance or otherwise reduced by the use of nonforfeiture benefits;
- ❑ Reduced in value through a withdrawal or partial surrender;
- ❑ Reissued with a reduction in cash value;
- ❑ Pledged as collateral or subjected to borrowing where the aggregate loan exceeds a state specified percentage of the loan value of the existing policy; or
- ❑ Amended by reducing or eliminating ancillary benefits, such as waiver of premium or accidental death benefits.

Replacements (cont.)

A replacement can be internal or external. An internal replacement occurs when an existing policy is exchanged for a new policy from the same insurer. An external replacement occurs when a policy is replaced by another insurer. Only you and your client can decide if the replacement is suitable. When a replacement is appropriate, be certain to use the appropriate replacement disclosure forms.

Monitoring Activities – North American Company recognizes that replacement activity varies by product type. For example, carriers with a high volume of term business often experience a higher percentage of replacement activity due to the increasingly lower premium rates available in the marketplace. North American Company monitors replacement activity on an ongoing basis for trend analysis purposes. Should the level of replacement activity for an agent or agency present a concern, the Compliance Officer will investigate the issue further and discuss the issue with the agent and/or agency.

Policy Delivery

The issued policy should be delivered to the owner within 15 days from the date North American Company mails it to you. Policies should never be kept in an agent's file. In addition, you should be aware of all outstanding delivery requirements and assist your client in completing the necessary documents. Remember that the policy is not in force until all delivery requirements have been submitted to North American Company. Failing to return delivery requirements can jeopardize your client's coverage.

Licensing and Contracting

North American Company follows all state licensing regulations regarding agent licensing and appointments. Your license to sell insurance with North American Company requires that you abide by all of the laws, rules, and regulations of any state in which you are licensed to conduct business. In some states, agents are not allowed to take an application prior to licensing and/or appointment.

You should check with your Licensing and Contracting Analyst for state specific rules.

Errors and Omissions Coverage

In the event that a claim is presented against you, your Errors and Omissions carrier should be notified within 24 hours of your receipt of the information. You are accountable for making this notification.

Continuing Education

North American Company believes that continuing education about products, industry, and regulatory issues is critical to being able to provide competent and customer focused sales and service. A variety of resources are available for obtaining this information, including the company, professional trade groups, and independent third party vendors. Specific information regarding the resources that are available can be obtained by calling the Marketing Department.

Questions and Concerns

For questions and concerns regarding market conduct, ethical sales practices, compliance with laws and regulations, or the IMSA Principles and Code, please contact:

Meg Taylor, Chief Compliance Officer
312-648-7712

or

Tracy Michels, Compliance Officer
312-648-7648

For questions and concerns regarding consumer complaints, please contact the Compliance Officer or, for North American Company for Life and Health Insurance and North American Company for Life and Health of New York:

Cheryl Ziegler

Compliance-Consumer Affairs
605-335-5700, ext. 32423

or

Tracy Michels, Compliance Officer
312-648-7648

For assistance from the Marketing Department, please contact your Sales Coordinator. For North American Company for Life and Health Insurance, please contact:

312-648-7600, ext. 10411

Or, for North American Company for Life and Health Insurance of New York, please contact:

516-228-8899, ext. 21608

NOTE: Ongoing compliance information is provided to each Managing General Agency. It is the responsibility of the Managing General Agency to disseminate this information to its producers.