



## We're here to help

# We've made annuity transactions easier amid social distancing

At AIG, our job is to always be there for our customers. That's why, in response to the coronavirus, we've introduced new interim processes to ensure you can continue your business with us, uninterrupted. We've started by eliminating the need to get your client's signature in-person, in many circumstances.

## Emails

### Send emails to: [AIGAnnuityService@aig.com](mailto:AIGAnnuityService@aig.com)

- AIG will accept both pre- and post-issue documents by email.
- You can email photos of signed post-issue documents, if your firm will allow this process.
- Emails will be treated the same as an incoming fax.
- All procedures that apply to incoming faxes will also be applicable to email submissions.
  - **For example:** Distribution request emails must have a completed and signed distribution form attached.
- Please send one email per policy request. Multiple policy transactions should not be combined into one email.
- Constructive receipt is the time AIG receives the email in the appropriate mailbox.
- If the sender has used a "key" or "password" protected encryption, the timestamp for constructive receipt will be the time we have everything needed to open the attachment.
- Upon receiving your email submission AIG will send you a "bounce-back" email confirmation with the same subject line.

## New photo submissions

### AIG can now accept photos of forms for service requests!

- Email must be sent to [aigannuityservice@aig.com](mailto:aigannuityservice@aig.com).
- Converting photos of service forms to PDFs at the user level will generally lead to the best results. There are a number of free apps for iOS devices in the Apple App Store and for Android devices in the Google Play Store that allow you to do this.
- We also can accept photos of forms taken from devices like smartphones and tablets when converting photos to PDF is not an option.

*\* For best results submit the highest possible quality photos. Low photo quality can lead to unreadable submissions and will be considered not in good order. Higher quality photos will generally have larger file sizes when submitters are given an option. For example, use 'actual size' when emailing a photo of a form taken directly from an iPhone.*

*Continued*

## New business (pre-issue)

If the application is in good order, we will process it as usual, without any delays

### Not In Good Order

- If an application comes back “not in good order,” your clients or their beneficiaries can now verbally agree to changes on a recorded call. We will issue the contract and send a prefilled application with the policy pages out to your client to sign.
  - The contract will be restricted for any distributions until AIG has received the signed prefilled application back.
  - Neither the agent nor owner will be able to view the policy on the AIG Annuities website until we have received the signed prefilled application.

### Replacement paperwork, Owner Acknowledgment and Client Profile (if applicable)

- These forms require a signature and date; however, you can simply email or fax a copy to [AIGAnnuityService@aig.com](mailto:AIGAnnuityService@aig.com) or the fax number provided at the top of each form.
- AIG will also accept photos of forms by email when sent to [AIGAnnuityService@aig.com](mailto:AIGAnnuityService@aig.com). For best results, submit the highest quality photos possible; illegible requests will be considered not-in-good-order.
- Missing or corrected information on these documents can be provided via a recorded line with your client.

### Contract delivery

- To maintain Social Distancing rules, effective April 1, we are delivering policy packets directly to the contract owner’s address of record, so there is no need to meet in person. This will be in effect until further notice.
- A Delivery Receipt will not be required to be returned to AIG as we will be tracking the delivery of the policies to the end consumer
- You, as the agent of record will receive a copy of the contract data page by mail and can view policy details on [www.aig.com/connext](http://www.aig.com/connext). If you have not already registered, follow the prompts online after clicking “Not Registered?” or use our step-by-step guide.

## Servicing<sup>1</sup>

- Copies of forms and supporting documentation will be accepted including copies of Death Certificates for claim processing.
- Copies of signatures will be accepted for all distribution types, including transfers directly to another carrier (1035 Exchange or Qualified Transfer).
- For not in good order items that previously required a client or beneficiary signature or initial, we have expanded the number of items for which we will allow the resolution to take place on a recorded line with the authenticated policy owner or beneficiary on the call.

<sup>1</sup> The need for original documents (certified copy) and additional authentication such as Notary and MSG will be reviewed on a case by case basis for risk.

- All types of disbursements can be sent both electronically (EFT) or via paper check.
  - Check or EFT cannot be made payable for the benefit of any third parties.
  - For electronic distributions the request must be complemented with a copy of the check and it needs to pass AIG's bank verification processes. In cases, where bank verification cannot be made, a call-out will be made and if not feasible a paper checks will be distributed to the address of record.
  - For paper check distributions requested to an alternate address, we will make a call-out to the policy owner for confirmation.

**Account Owners**  
**(800) 242-4079**

**Financial Professionals**  
**(888) 438-6933**

Visit [www.aig.com/connext](http://www.aig.com/connext) to view your book of business, get contract values, or download important documents and service forms.

## Addendum

# Virtual Sales of Annuities

Due to the current health situation, conducting face-to-face sales meetings may not be possible, and producers may be utilizing technology to support the sales process. Services such as Skype for Business, Webex, and other virtual web-conferencing systems are just some of the solutions that allow for producers to conduct virtual face-to-face meetings with their clients.

Please refer to your broker-dealer or home office policies for guidance regarding virtual sales tools that are approved for your use. It is important to note that this bulletin does not replace or supersede any of your home office policies or procedures.

Important Reminder: As an AIG selling partner, it is your responsibility to protect against the unauthorized access to your client's non-public information.

If you are conducting virtual sales for annuities, the following is a list of important compliance considerations:

### Solicitation, Licensing, and eSignature Submissions

The state in which the client signs the application is the solicitation state.<sup>1</sup> It is the producer's responsibility to validate the client's signing location. **The solicitation state is not dependent on the producer's location.** Producers are prohibited from selling or engaging in any sales activity without being properly licensed or registered for securities products, appointed, and trained in accordance with the requirements of the state where the solicitation takes place, the application is signed, and the contract is delivered.

When meeting virtually with a client to complete an application and forms using an electronic order entry platform (such as FireLight, AnnuityNet, etc.), electronic signatures<sup>2</sup> may only be obtained using the pre-approved electronic signature protocols contained within AIG-approved platforms.

#### Please note some important state exceptions:

Generally, New York residents must be issued a New York contract, which means that the client must sign the application in New York.

For a New York resident to be issued a contract in another state, the New York resident must be solicited to purchase the contract outside of New York. The producer must establish that a sufficient nexus (connection) exists between the solicitation state and the client and a Cross-Border Exception form must be submitted.<sup>3</sup> Also, a New York resident must have an address outside of New York for delivery of a contract issued in another state.

Utah and Massachusetts residents may only be issued a contract for their respective resident states and the producer must be properly licensed in the respective state.

<sup>1</sup> Annuity contracts are ordinarily solicited in the client's state of residence. However, on occasion there are valid reasons why an application may be taken in another state where the producer has established that a valid nexus exists between that non-resident state and the client.

<sup>2</sup> The use of electronic signatures may be restricted in certain states, such as New York.

<sup>3</sup> Please see the AIG Annuities Cross Border Exception Bulletin for more information.

## Anti-Money Laundering (AML) and Know-Your-Client Guide

As the initial point of contact with the client, you are the front-line of defense against potential money laundering activity or other fraudulent activity. Especially in the case of a virtual sale, it is important that you obtain appropriate information to verify the identity of all parties to the contract (Owner, Annuitant, Payor, Beneficiary and Beneficial Owner, where applicable).

The following information should be reviewed during your virtual meeting:

1. Social Security number
2. Current driver's license or current state issued identification card
3. Physical home address (no P.O. Box)
4. Mailing address (if different from physical home address)
5. Date of birth
6. Country of birth
7. Current passport and/or visa number (if driver's license or state issued identification card is not available)

The information to verify identity should **not** be provided with your submission of the application, unless it is a requirement of the New Business process. However, a record that you have verified the information listed above should be kept in your client's file and immediately retrievable, if necessary.

If you encounter potentially suspicious activity, such as a customer unwilling to provide the required identity information, you should contact your Compliance Officer or report the information via email to [AMLOfficer@aglife.com](mailto:AMLOfficer@aglife.com).

## Other Important Considerations

When conducting virtual sales, producers must still ensure that clients have a complete and accurate understanding of the product, as is the case in any sales situation.

Prior to or at the time of sale, producers must provide the client with copies of any sales materials being used (e.g., prospectus, Owner Acknowledgment & Disclosure Statement (OA), hypothetical illustrations, product brochures, etc.).

Producers should ensure that up-to-date documentation is kept in the clients' files.

Important note regarding variable annuities: The information contained herein is representative of the policies and methods of the issuing insurance companies and is not intended to replace or circumvent broker-dealer policies and procedures. Your broker-dealer may have additional or different requirements. Please ensure your business practices are consistent with your broker-dealer's instructions and permissible activities.

## Contact Us

If you have any questions, please contact the AIG Annuity Compliance team at [AnnuityCompliance@aig.com](mailto:AnnuityCompliance@aig.com).

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1-800-987-1204 (website assistance)

[aig.com/annuities](http://aig.com/annuities)

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