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Anti-Money Laundering training requirement updated to allow 2-year renewals

Effective immediately, Anti-Money Laundering (AML) training requirements¹ for AIG Life & Retirement have been updated to allow for training renewals every 2 years. Previously, proof of AML training was required annually. Any financial professional appointed with an AIG Life & Retirement business now has a 2-year window to renew their AML training, dating back to the last date of AML training completion.

Note: AML training is not required for the sale of Select-a-Term or QoL Flex Term life insurance policies.

Approved AML training vendors

The following vendors are approved by AIG to provide AML base or refresher training:

- LIMRA- Quest CE- RegEd- Success CE- Web CE- SuranceBay

- If in any given two-year period a financial professional completes AML training through a source other than those listed above, they will still need to complete training through one of the vendors listed above to meet AIG's requirement.
- If a financial professional has already completed a course from one of the approved vendors above for another carrier, AIG will accept that course. Please provide a copy of the CE Certificate, Course Completion Record, or Certificate of Completion so we may update our records. See email addresses by Business Line/Product below.
- For all vendors except LIMRA, the certificate is required to establish proof of completion. At a minimum, such certificate must reflect the training vendor's name, course name, student's name, completion date and course number, if available. If you do not have these records, see our FAQ on the next page for additional details.

LIMRA AML training available at no cost

AML training is available at no cost through LIMRA to all appointed financial professionals. Visit <u>aml.limra.com/login</u>. If you are unsure of your user name or password, see our **FAQ** on the next page.

Contacts for certificate submissions and questions are designated below

Business Line / Product	Certification submissions and questions	General questions about our AML program
AIG Annuities / IMO products	IMOBGALicensing@aig.com	IMOBGA_PendReport@aig.com
AIG Life Insurance / All products except Term ²	Contracting.Research@aig.com	AMLofficer@aglife.com

^{1.} These requirements may not apply if the financial professional is FINRA-registered and the broker-dealer is tracking AML training under FINRA Rule 3310 (Anti-Money Laundering Compliance Program).

2. AML training is not required for the sale of Select-a-Term or QoL Flex Term life insurance policies.

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AIG Life & Retirement consists of four operating segments: Individual Retirement, Group Retirement, Life Insurance and Institutional Markets. It includes the following major U.S. life insurance companies: American General Life Insurance Company; The Variable Annuity Life Insurance Company; and The United States Life Insurance Company in the City of New York.

Life insurance and annuities issued by American General Life Insurance Company (AGL), Houston, TX except in New York, where issued by The United States Life Insurance Company in the City of New York (US Life). Certain annuities are issued by The Variable Annuity Life Insurance Company (VALIC), Houston, TX. Issuing companies AGL, US Life and VALIC are responsible for financial obligations of insurance products. AGL does not solicit, issue or deliver policies or contracts in the state of New York. VALIC, AGL and USL, its employees, representatives do not provide tax or legal advice. Products and services may not be available in all states and product features may vary by state.

Securities products are distributed by AIG Capital Services, Inc. (ACS). Member FINRA, 21650 Oxnard Street, Suite 750, Woodland Hills, CA 91367-4997. All companies are members of American International Group, Inc. (AIG).

AML training: Frequently Asked Questions (FAQ)

Q: Why is AML training required?

A: Due to the direct nature of the relationship between a financial professional and the customer, insurance companies are required to integrate financial professionals into their anti-money laundering (AML) programs and to provide ongoing training.

Q: If training is being validated or checked by AIG, how long will my training remain valid?

A: AML training expires upon its two-year anniversary. For example, if you complete AML training on September 1, 2022, the training will be valid through September 1, 2024.

Q: What happens if my AML training expires?

A: AML training is verified when you submit a new application. If our records show your AML training has expired:

- For the Life Insurance business, a requirement will be posted to any new cases you submit until new AML training is completed using an approved vendor.
- For the Annuities business, the Licensing team will contact you for proof of completion of a new AML training course using an approved vendor prior to issuing the policy.

Q: I work for a bank or broker-dealer with its own AML training program. Do I have to complete training separately through an AIG-approved vendor?

A: Most likely, no. Every year AIG's Financial Crimes Group (FCG) distributes questionnaires to the banks and broker-dealers (B-D) appointed with AIG. This questionnaire includes questions regarding the bank's or B-D's AML training. As long as the bank or B-D returns the completed questionnaire and FCG confirms the responses to the AML training questions are satisfactory, FCG will accept training provided by that bank or B-D. The acceptance of the bank's or B-D's training means that the representative does not need to take any other AML training course from an approved vendor.

Q: I am newly appointed with AIG and I already took training with an approved vendor for another carrier within the past two years. What sort of proof do you require?

- **A:** Please provide a copy of the CE Certificate, Course Completion Record, or Certificate of Completion to the appropriate contact listed on page 1 so we may update our records. For all vendors except LIMRA, the certificate is required to establish proof of completion. At a minimum, such certificate must reflect the training provider's name, course name, student's name, completion date and course number, if available.
 - For RegEd, we will accept a screen print of RegEd's Course Completion Record. For authentication purposes, the screen print must include the secure reged.com URL.

Q: LIMRA doesn't provide completion certificates. How will you know when I have completed the course?

A: If you completed your LIMRA course while appointed with AIG, we will be notified automatically once you complete the course. If you've taken a LIMRA course within the past two years for another carrier prior to being appointed with AIG, you can receive credit by providing a screen print from the LIMRA website showing the course title and date completed.

Q: I'm new to LIMRA. What is my user name and password for LIMRA training?

A: For most people, the LIMRA user name will be the National Producer Number (NPN). If you do not know your NPN and would like to look it up, visit the National Insurance Producer Registry's at NIPR.com. The "password" for first-time users is your last name in all lower-case letters. Please be sure to include any spaces or special characters like apostrophes and hyphens.

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