



ANTI-MONEY LAUNDERING COMPLIANCE STATEMENT

INTRODUCTION

This statement and Unum’s Anti-Money Laundering Policy (AML Policy) apply specifically to producers who market or sell the following products on behalf of Unum’s insuring subsidiaries (“Unum”):

<u>Companies:</u>	<u>Products:</u>
<ul style="list-style-type: none"> • First Unum Life Insurance Company • Unum Life Insurance Company of America • Provident Life and Accident Insurance Company • Provident Life and Casualty Insurance Company • Paul Revere Life Insurance Company 	<ul style="list-style-type: none"> • VWB Universal Life – VIUL, Fortune, PS 1000 • VWB Interest Sensitive Whole Life – ISWL, PS Plus • Individual Annuities
<ul style="list-style-type: none"> • Colonial Life and Accident Insurance Company 	<ul style="list-style-type: none"> • All universal life policies, such as Universal Life – Policy UL 97 • All whole life policies, such as Lifebridge 96 (Whole Life) – Policy LBCDGP (96)

The attempted use of financial institutions to launder money is a significant problem that has resulted in the passage of stricter laws and increased penalties for money laundering including the USA Patriot Act. Unum has adopted an Anti-Money Laundering Policy (“Policy”), which is designed to establish principles and standards to protect against attempts at laundering money through Unum and/or its products.

As a Unum producer, you can play an important role in monitoring for money laundering risks. Unum maintains a copy of its Policy and other Anti-Money Laundering materials on its Producer website. Unum expects you to review and be familiar with the Policy and any related materials. Failure to comply with Unum’s Policy may subject you to disciplinary action including termination of your Unum Producer Agreement, as well possible civil or criminal penalties.

WHAT YOU CAN DO

As you market or sell the products listed above, here are some useful tips to help guard against a money laundering risk:

Tip 1: Know Your Customer

For the products listed in the table above, it's crucial that Unum be able to gather and maintain information during the application process that accurately identifies the customer. Because most – if not all – of this information may be contained in applications or other forms executed by the customer in the process of applying for Unum products, you play a critical role in helping Unum verify a customer's identity.

Here are some specific questions you should ask and information you should obtain during the application process:

1. **Who is the customer and what information do we have to accurately identify them**, e.g. *customer's name, customer's address, customer's phone number, group or individual customer ID, name of product or service, account/policy number, industry/occupation, social security/tax ID or other unique identifier, date of birth (if individual customer)....*

If we do not have appropriate information to obtain the customer's identification, then we should not enter into a business relationship with that customer.
2. **Are the product or service features appropriate for the customer?**

If no, then we should not enter into a business relationship with that customer.
3. **Are funds paid out of proportion to the expected premium cost or amount?**

If yes, then we should not enter into a business relationship with that customer.
4. **Do you anticipate that there will be large distribution of funds from the relationship?**

If yes, then we should understand why before entering into a business relationship with that customer.
5. **Is the insurance issued proportional to the risk being insured?**

If no, then we should not enter into a business relationship with that customer.

Tip 2: Beware Red Flags

Here's an inexhaustive list of suspicious behaviors or transactions to guard against:

1. The customer seeks to make purchases with large amounts of cash, cash equivalent or checks drawn on different accounts.
2. The customer refuses or is reluctant to complete an application or to otherwise provide all the required information, or the information provided is false, inconsistent or suspicious in nature.
3. The customer attempts to purchase an insurance policy in an amount that is far beyond his, her or its apparent means that has no obvious purpose, or where the source or nature of the funds to be used is suspicious.
4. The customer wishes to buy an insurance product, but is less concerned with the cost, long-term performance, or economic terms than in early surrender or cancellation.
5. The customer seeks to cancel a contract without regard to penalties.
6. The customer demands policy loan or surrender value quickly after policy issuance.
7. There is no apparent relationship between the policyholder/owner and the insured or beneficiary.
8. The source of the customer's funds is unclear or inappropriate, or does not correspond with the customer's known business activities and financial situation.
9. Any activity involving suspected fraudulent sales activities on the part of an agent and/or broker.
10. Failure to comply with application submission or underwriting procedures and guidelines.

Tip 3: Use Your Common Sense

Ultimately, the questions you ask, the information you gather and the suitability analysis you conduct in your interactions with customers will enable you to detect money laundering activity.

Use your common sense when interacting with customers and keep the guidelines of this Statement handy. If you suspect a customer of trying to launder funds through one of the products covered by this Statement, contact your Unum representative immediately.

CONCLUSION

For questions or additional information, go to the Anti-Money Laundering Tab on Unum's Producer website.