

Remote Sales & Application Process

With the latest COVID-19 social distancing recommendations, we understand today's challenges with meeting your clients in person. Equitable has several processes and resources in place to support your business needs.

You may complete a paper application or electronic application (eApp) via the following:

- 1. Telephone Sales
- 2. Virtual Sales
 - Video Chat Applications (FaceTime, Skype, WhatsApp, and others)
 - Video Conferencing Platforms (Zoom, GoToMeeting, WebEx and others)

It is important your client is fully aware and understands the annuity product being purchased whether the new business application is solicited over the telephone or by a virtual sale. For new clients (defined below), it is important to be extra diligent and mindful of any potential fraud or money laundering red flags and to immediately report any concerns to Equitable's compliance team.

Telephone Sales and Virtual Sales

Virtual Sales: For <u>web-based</u>, <u>face-to-face solicitation</u>, you may complete a new business application utilizing a video chat or video conferencing platform with your client using a paper application or our eApp via FireLight. Virtual sales are the preferred method when you are not able to meet with your clients in person.

• You should always keep copies of the recorded virtual interactions and sale in addition to your normal documentation; meeting notes with date, time, discussion topics, recommendations and decisions, etc.

Telephonic Sales: For <u>solicitations using the telephone</u>, you may complete a new business application over the telephone with your **existing** clients using a paper application or our eApp via FireLight.

• Telephonic sales are not allowed when completing an application with a new client. A new client is defined as someone to whom you have not sold an insurance, annuity or any other financial product in the past.

Sales Requirements: Regardless of how an application is completed, via telephone or virtual, it is important you know the following when meeting with your clients:

- 1. Licensing & Cross-Border Sales:
 - Cross-border sales are not permitted. The client must be located in his/her state of primary residence at the time the application is completed.
 - In all states where any aspect of the solicitation occurs, you must have the appropriate insurance producer license and have completed the product specific training and state required annuity training requirements.



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2. Solicitation:

- Ensure your clients receive all applications, forms and disclosures.
- Ensure your clients receive exact copies (paper or electronic) of all sales material referenced during the sales process.
- Know and understand your clients and obtain the appropriate information to make a suitable recommendation that is in the best interest of the client.
- Ensure your clients understand the annuity you are recommending, as you would during a normal in-person meeting.

3. Anti-Money Laundering & Client Identification:

- You must view the client's government issued picture ID during the sale and verify it matches the client.
- For telephone and virtual sales, we require a copy of the client's government issued ID be included with the completed applications and forms.

Agent & Client Signatures:

- If a paper application will be submitted, make sure your clients send all documentation to your place of business for your signature after they have signed all documents and before you submit to Equitable.
 - In place of a wet signature, we will accept electronic signatures on all new business paperwork signed through DocuSign or other approved vendors.
 - In addition to other methods for submission, we will accept pictures of applications and other required forms that are uploaded via the Agent Portal.
- For applications completed via FireLight, make sure your clients complete their signature ceremony before you complete your signature on all documents.
- **Important Note** Transfer forms and replacement forms may still require wet signature as some financial institutions do not allow for electronic signature. Please confirm with the current carrier/institution if they will accept electronic signatures.

Annuity Contract Delivery for Remote Sales:

We will continue to mail annuity contracts to the agent or client, as indicated on the application, with a delivery receipt. You must deliver an annuity contract to your client in the same state the application was signed. If you are not able to physically deliver your client's annuity contract, you may use a delivery service that can confirm and record the delivery time and location. Examples include FedEx, UPS, USPS and other courier services.