



DOL Fiduciary Ruling Carrier Responses

| CARRIER | Will you have a Source of Funds question on your application (or as a separate addendum)? | Do you have or are you creating a 84-24 Form? | When will we receive the 84-24 Form? | Will your 84-24 Form be required at application or on delivery? |
|-------------------------------|---|---|--------------------------------------|--|
| American General | No | No | N/A | N/A |
| American National | No, as it relates to life business. No changes | No, not for life business | N/A | N/A |
| AXA | Yes, we haven't determined the precise mechanism for collecting this information, but are considering adding the question to our Financial Professional Certification by end of 3Q. | At the moment we are not. The PTE 84-24 has always run, and continues to run, between the financial professional and their client. The pre-DOL Regulation status of 84-24 has to be restored for the time being. | N/A | N/A |
| Brighthouse* | A Source of Funds Disclosure Form is to be left with the prospective owner at the time of application | N/A | N/A | N/A |
| Global Atlantic | The Agent / Producer Report has been revised to include the following question: Will a distribution from a qualified plan or IRA be used to pay any portion of the initial or future premiums on this policy? | No 84-24 being created. From sales that are covered by the DOL Fiduciary Rule, we will require an Addendum to the Producer Contract stating that the producer is complying with applicable fiduciary standards, as well as the conditions of any applicable prohibited transaction exemption. | N/A | N/A |
| John Hancock | We have made no changes, amendments or additions to our application in light of the DOL rule, but do have a general Source of Funds questions on our application as a general inquiry and not specific to identify DOL related sales. | As a product provider we are not in a position to create or mandate the particular exemption an advisor chooses to use, or the form of the 84-24 disclosure for all of the various types of independent producers who bring us business through their various relationships. Our understanding is that a proper 84-24 form must disclose all potential conflicts of interest; such as, a standard form, provided by a carrier, is likely to fall short on both the substance of the disclosed conflicts as well as the analysis necessary to ensure the producer has met their obligation as a fiduciary to identify, consider, and disclose all the necessary conflicts. Accordingly, we will not be providing an 84-24 Form, no such forms need to be provided to us in a sale subject to the DOL rule, and if we are provided an executed exemption for any sale we will not be reviewing or considering it for its accuracy or sufficiency. | N/A | N/A |
| Legal and General | | | | |
| Lincoln Financial | No | Yes, a 84-24 template is being created | June 12th | The 84-24 template will not be required and Lincoln will not be collecting this information as part of the application or policy delivery process. |
| Mutual of Omaha Nationwide | | | | |
| Principal | Principal will not allowing 412i business going forward | Principal is not utilizing 84-24, but instead the BICE for RMD's moving into life insurance. The actual BIC contract is not required until 1/1/18 and will be relying on the exemption after June 9 | N/A | N/A |
| Protective | | | | |
| Prudential | No | No | N/A | N/A |
| Securian | Yes, a Source of Funds question will be on the application | A sample 84-24 Form can be forwarded upon request | At your request | N/A |
| SBLI | The DOL Fiduciary Rule does not apply to SBLI's life insurance sales. During the transition period, June 9, 2017 through January 1, 2018, SBLI will continue to monitor any future revisions and/or postponements by the DOL and will advise accordingly. | | | |
| Symetra | | | | |
| Transamerica | Not at this time | We do not offer products impacted by 84-24 at this time | N/A | N/A |

***Brighthouse - Effective May 26, 2017, Brighthouse Financial will no longer accept permanent life product sales that are subject to ERISA. That will explicitly prohibit Qualified plans. Non-Qualified plans will be available only after filling out additional questions on our business owner supplement to ensure that the plan will not be subject to ERISA.**

The information contained here is a summary of information obtained from the carriers listed as of June 2017. No guarantee either expressed or implied is given regarding the accuracy of the information provided. One Resource Group is not liable for any obligation created from the use of this information. Refer to carrier-specific underwriting guidelines and bulletins for complete details.

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