

ANICO's Anti-Money Laundering Requirements

American National Insurance Company implemented an AML program to comply with federal anti-money laundering regulations for insurance companies in May 2006. The regulations apply to all individual life insurance and annuities (includes individually sold group products), individual registered life insurance and annuities, and group registered variable annuities. AML training is required for every ANICO producer and is offered at no cost to producers appointed with ANICO.

Mandatory Training Requirements:

1. Completion of LIMRA's basic AML training course. LIMRA's training course is offered at no cost to producers appointed with ANICO at www.aml.limra.com. If a producer has completed LIMRA training, confirmation will be provided to ANICO by LIMRA a few days after appointment is processed.

Or

Provide valid certification that the producer has completed AML training through an alternate ANICO approved course. If AML training has been completed through an alternate ANICO approved course, producers must provide a valid certification of that training with their contracting paperwork. Such certification should include their name, name of the training course completed, and the date training

was completed. A list of approved courses is also available at IMG's Web site. ANICO will make the final determination as to whether a specific training course will satisfy basic AML training requirements.

2. Completion of ANICO's Company-Specific training course (Company Guide to Anti-Money Laundering Program). This requirement can be met by completion of one of the following options:
 - Submission to ANICO of Form 3779 (Application to Represent ANICO with a revision date of 06/06 or later) at the time of contracting. New producers must be given a copy of Form 475 (Company Guide to AML Training Program) at the time of contracting.
 - Submission to ANICO of the version of Form 4475 that includes a Receipt and Acknowledgement section.
 - Through E-Agent, which is available at IMG's Web site (in order to access E-Agent, producers will need their ANICO Personal Code, which is assigned at the time of appointment).



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