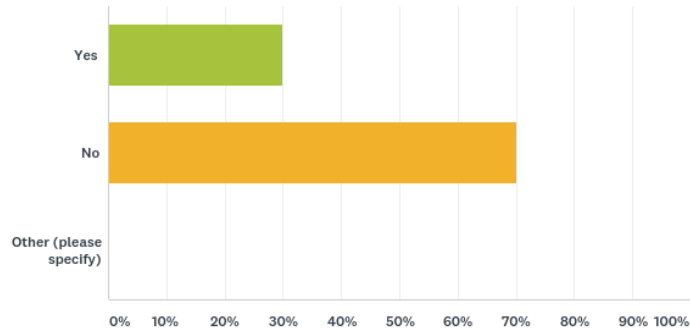
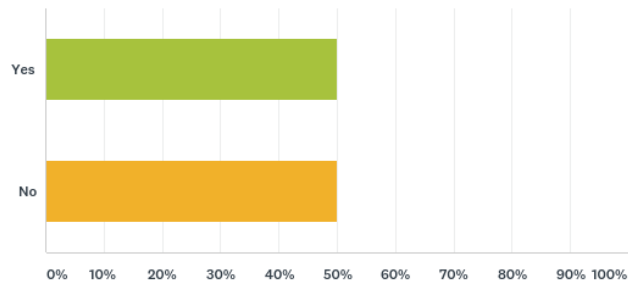


CEFLI Quick Poll
June 2019
Bank Distributors: Customer Verification Practices (26 responses)

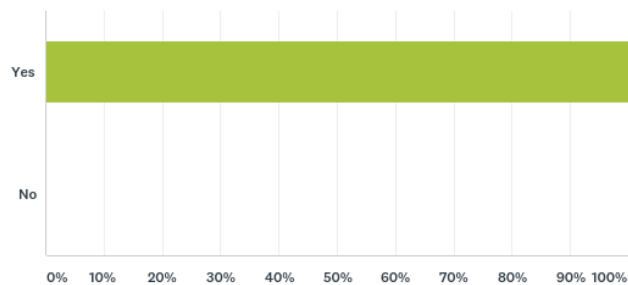
Q1 Does your company distribute any AML covered products through bank distributors?



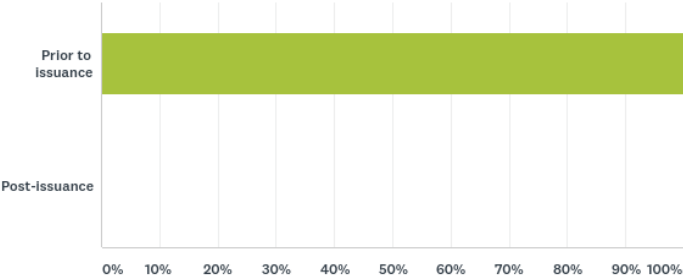
Q2 For AML covered products sold through a bank distributor do you rely solely on the bank's AML and KYC programs for customer verification?



Q3 Do you have a process to verify the policyowner's name against other information in the application (such as SSN, DOB, address) using third party tools (i.e., Accurant, Clear, Equifax)?



Q4 Do you run your verification process prior to issuing the policy or post-issuance?



Q5 Any additional comment regarding bank distributor customer verification practices?

- We have found some cases where the bank's CIP verification process had an error, hence our having our own new customer ID verification process to help plug that gap.