

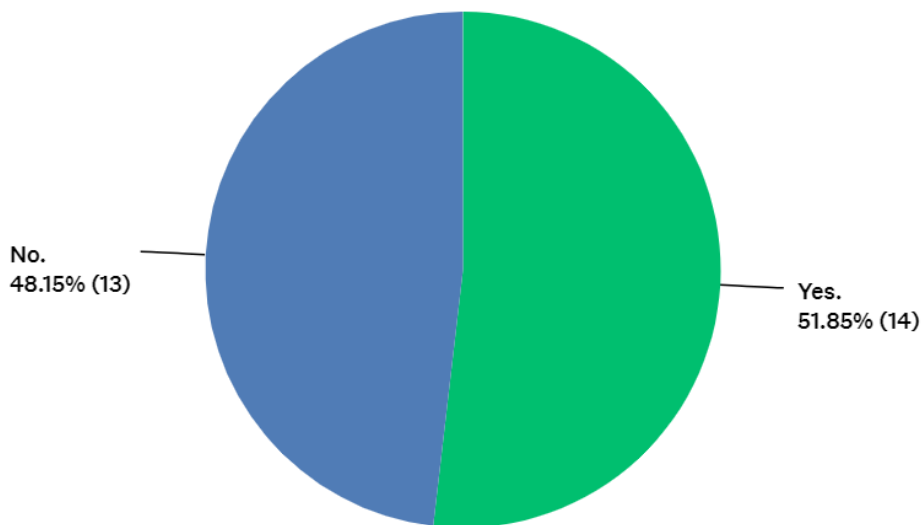
CEFLI Quick Poll

June 2020

Compliance Shared Support and FTE Count

Is your Insurance company part of a large financial services company or group that includes other financial services activities (e.g., a broker-dealer, registered investment advisor, asset management company, etc.)?

Answered: 27 Skipped: 0

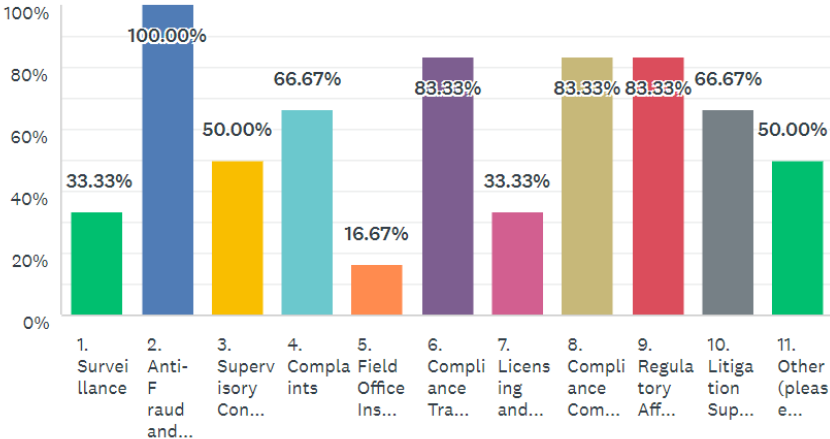


Individuals who responded “No” were not asked to complete the remainder of the survey.

(More on next page.)

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

Answered: 6 Skipped: 21



ANSWER CHOICES	RESPONSES
1. Surveillance	33.33% 2
2. Anti-Fraud and Anti-Money Laundering	100.00% 6
3. Supervisory Controls Testing	50.00% 3
4. Complaints	66.67% 4
5. Field Office Inspections	16.67% 1
6. Compliance Training	83.33% 5
7. Licensing and Registration	33.33% 2
8. Compliance Communications Review Group/Advertising/Social Media	83.33% 5
9. Regulatory Affairs	83.33% 5
10. Litigation Support	66.67% 4
11. Other (please specify): Responses	50.00% 3

Specific Responses to “Other”:

- Ethics Program, Risk Management.
- The insurance company and the broker-dealer have their own compliance units performing the above responsibilities.
- Ethics, Code of Conduct.

(More on next page.)

Only six companies (three medium and three large) who indicated they were part of a larger financial services group, completed the resource questions on the survey. However, half of those responses were incomplete.

Due to the low number of responses, full survey data is provided below since the sample size was not large enough to establish trends that could be summarized.

Large company responses:

Company 1:

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

2. Anti-Fraud and Anti-Money Laundering

3. Supervisory Controls Testing

4. Complaints

6. Compliance Training

9. Regulatory Affairs

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

2-8 FTE, 3- 3FTE, 4-3 FTE, 9 - 2 FTE's

(More on next page.)

Company 2:

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

1. Surveillance

2. Anti-Fraud and Anti-Money Laundering

6. Compliance Training

7. Licensing and Registration

8. Compliance Communications Review Group/Advertising/Social Media

9. Regulatory Affairs

10. Litigation Support

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

#1, .05%, #2, .05%, #6, .05%, #7, 05%, #8, .1%, #9, 05%, #10, .05%

Company 3:

Q3

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

1. Surveillance

2. Anti-Fraud and Anti-Money Laundering

4. Complaints

6. Compliance Training

8. Compliance Communications Review Group/Advertising/Social Media

9. Regulatory Affairs

10. Litigation Support

11. Other (please specify)::

Ethics, Code of Conduct

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

Respondent skipped this question

(More on next page.)

Medium company responses:

Company 1:

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

2. Anti-Fraud and Anti-Money Laundering

3. Supervisory Controls Testing

4. Complaints

5. Field Office Inspections

6. Compliance Training

8. Compliance Communications Review Group/Advertising/Social Media

9. Regulatory Affairs

10. Litigation Support

11. Other (please specify)::

Ethics Program, Risk Management

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

Shared Service/Matrix Organization

Company 2:

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

2. Anti-Fraud and Anti-Money Laundering

8. Compliance Communications Review Group/Advertising/Social Media

9. Regulatory Affairs

10. Litigation Support

11. Other (please specify)::

The insurance company and the broker dealer have their own separate compliance units performing the above responsibilities. s

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

Company 3:

Q3

Please check all areas in which insurance company compliance staff provides support to an affiliates or to the parent company.

2. Anti-Fraud and Anti-Money Laundering

3. Supervisory Controls Testing

4. Complaints

6. Compliance Training

7. Licensing and Registration

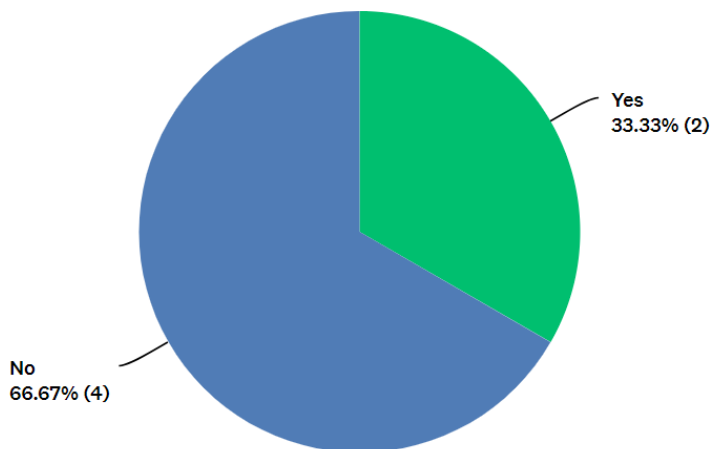
8. Compliance Communications Review Group/Advertising/Social Media

Please indicate, for each area you checked in response to Q3, the approximate FTE count (to the nearest .25 FTE) that supports an affiliate or the parent company of the insurance company. For example, if 10 staff comprise the insurance company's Licensing and Registration department and three of the staff provide full time support to the insurance company's affiliated broker/dealer while one staff member supports the insurance company's affiliated investment advisor 25% of the time, your response to this question, for that compliance support area, would be: #7 = 3.25 FTE.

2: 2 3: 1 4: 1.5 6: 1.75 7: 9 8: 3

Does your insurance company have a charge back process in place whereby the parent company or affiliate supported by insurance company compliance staff, receives reimbursement for the support?

Answered: 6 Skipped: 21



(End.)