

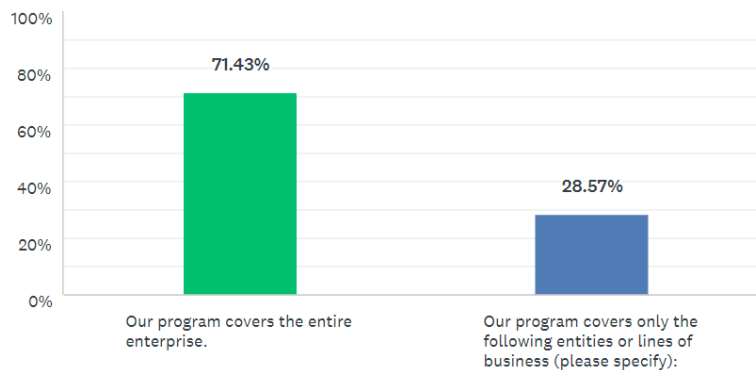
CEFLI Quick Poll

May 2020

Antifraud: Program Structure

Outside of any state-mandated anti-fraud plan, BSA/AML/OFAC program, and Identity Theft Red Flags program, does your company's anti-fraud program cover the entire enterprise or only specific entities or lines of business?

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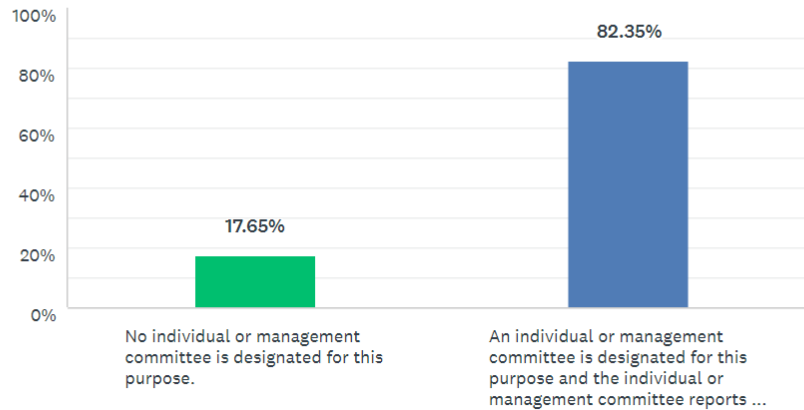
Other:

- Each business has its own program. We are building an enterprise-wide fraud program now.
- Parent company and related insurance company entities.
- Each entity/LOB has own program.
- Life insurance, annuities, and mutual funds.

(More on next page.)

Does your company have either an individual or a management committee designated to manage the company's antifraud risk?

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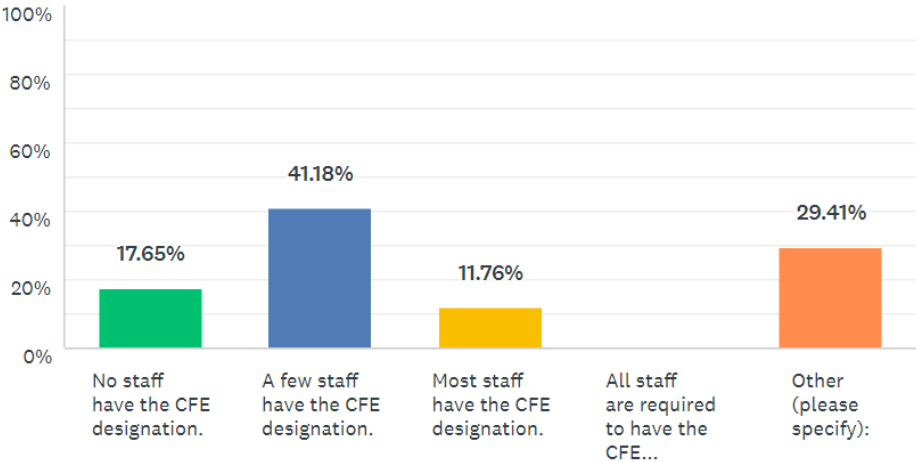
Other:

- We are in the process of hiring a Sr. Director of the Enterprise Fraud Unit who will report into the CCO of the Enterprise. The person and the group will sit in Compliance.
- General Counsel.
- Business Conduct Committee is charged with managing antifraud risk. This committee is part of the enterprise governance structure ultimately reporting to the Board of Trustees.
- Chief Compliance Officer.
- Director of Corporate Compliance.
- Financial Crime Steering Committee,
- SIU Director manages.
- Claims Manager.
- General Counsel.
- General Counsel.
- CCO.
- Legal.
- Chief Compliance Officer.
- CCO.

(More on next page.)

To what extent does your company's compliance staff have the Certified Fraud Examiner (CFE) designation?

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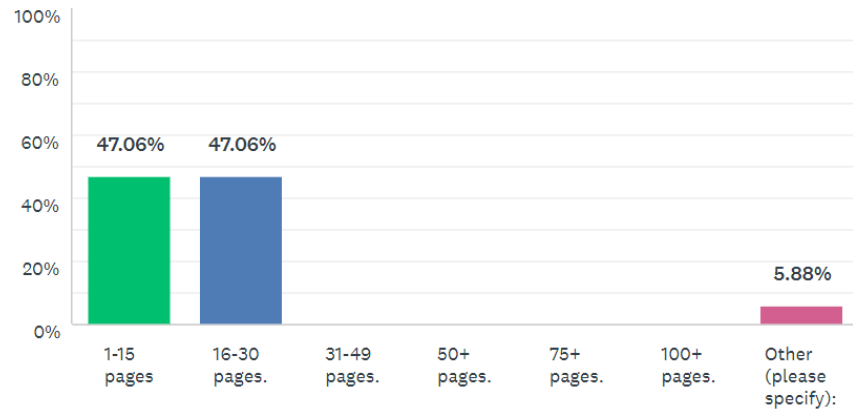
Other:

- Currently, none. The new fraud unit director will be expected to have it.
- SIU Director must have a CFE designation.
- Not sure.
- Some have other designations.
- We utilize the SIU and Anti-Fraud program for our corporate (non-life) parent.

(More on next page.)

What is the average length (number of pages) of the corporate anti-fraud plan your company files with the state Insurance Departments?

Answered: 17 Skipped: 4



Other:

- In process.