

ANNUITY SUITABILITY CERTIFICATION

(Date)

_____ (hereinafter, the “Broker-Dealer”) certifies to Prudential Annuities Life Assurance Corporation (“PALAC”), Prudential Insurance Company of America (“PICA”), Pruco Life Insurance Company (“Pruco of AZ”) and in New York, Pruco Life Insurance Company of New Jersey (“Pruco of NJ”); (collectively, “Prudential Annuities”) that pursuant to the requirements of The National Association of Insurance Commissioners (“NAIC”) Suitability in Annuity Transactions Model Regulation (“The Model Regulation”) as it is enacted in jurisdictions in which the Broker-Dealer solicits or sells fixed and/or variable annuity products, and any other adopted state regulation germane to requirements for Suitability in Annuity Transactions, for the period of January 1, XXXX through December 31, XXXX.

- The Broker-Dealer has developed, maintains and enforces written supervisory procedures to comply with the FINRA Conduct Rules, including, but not limited to, FINRA Rule 2111 and FINRA Rule 2330, and applies all procedures therein to variable and/or fixed annuity sales (where required by state insurance law). Broker-Dealer also confirms that it is utilizing the Reg BI safe harbor provision when selling fixed annuities.
- The Broker-Dealer has developed and maintains a training program instructing all producers to gather information concerning a customer’s financial status, tax status, investment objectives, risk tolerance, and all other required information under FINRA Conduct Rules and State Insurance Law, and other reasonable information prior to recommending the purchase or exchange of an annuity contract.
- Where applicable under state law, the Broker-Dealer has developed a system to ensure all producers have completed all required Continuing Education training courses and product specific training with respect to any Prudential Annuities products they sell in accordance with Prudential's product training standards.
- As applicable in New York, Broker-Dealer has established and maintains a system of supervision for recommendations of sales transactions involving both new and in-force annuity and life insurance products issued by The Prudential Insurance Company of America, Pruco Life Insurance Company, Pruco Life Insurance Company of New Jersey or Prudential Annuities Life Assurance Corporation that are or were delivered or issued for delivery in the state of New York (“NY Products”), and such system of supervision includes, but is not limited to, standards and procedures for: (i) the collection of a consumer’s suitability information with respect to sales transactions involving NY Products; (ii) the documentation and provision of disclosure required by New York insurance regulations, including the relevant suitability considerations and product information, both favorable and unfavorable, that provide the basis for any recommendation with respect to sales transactions involving NY Products; and (iii) the auditing and/or contemporaneous review of recommendations of sales transactions involving NY Products to monitor Registered Representatives’ compliance with the obligation to act in the best interest of consumers.

Prudential Annuities may rely upon this certification. Prudential Annuities may, but is not required to, independently review, audit, inspect or otherwise test the Broker-Dealer’s compliance with the provisions of The Model Regulation.

The undersigned certifies that he or she is a senior manager of the broker dealer firm listed above delegated the responsibility of supervising and controlling the insurance company annuity contract sales practices for all sales personnel of the Broker-Dealer.

(Senior Manager Signature)

(Date)

(Print Name)

(Print Title)