

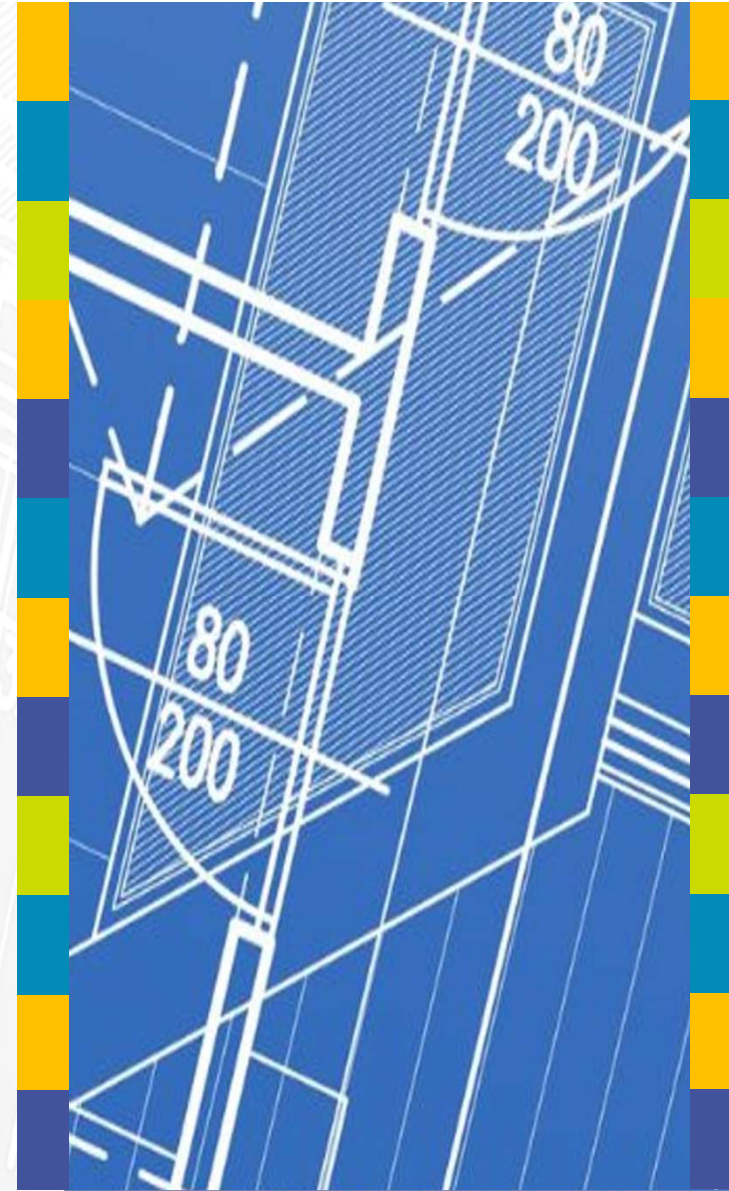


2024 CFTC

LAWS AND REGULATIONS IN THE INSURANCE LIFE CYCLE

#strongfoundation #cftc24

The Compliance & Ethics Forum for Life Insurers



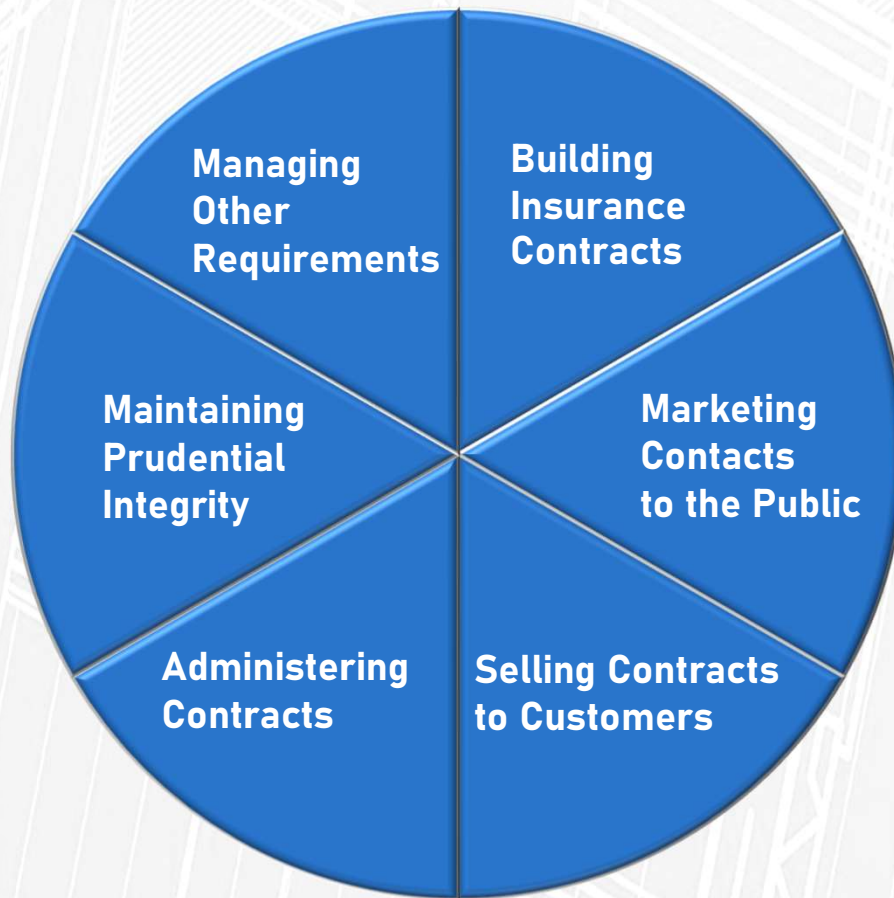
FACULTY



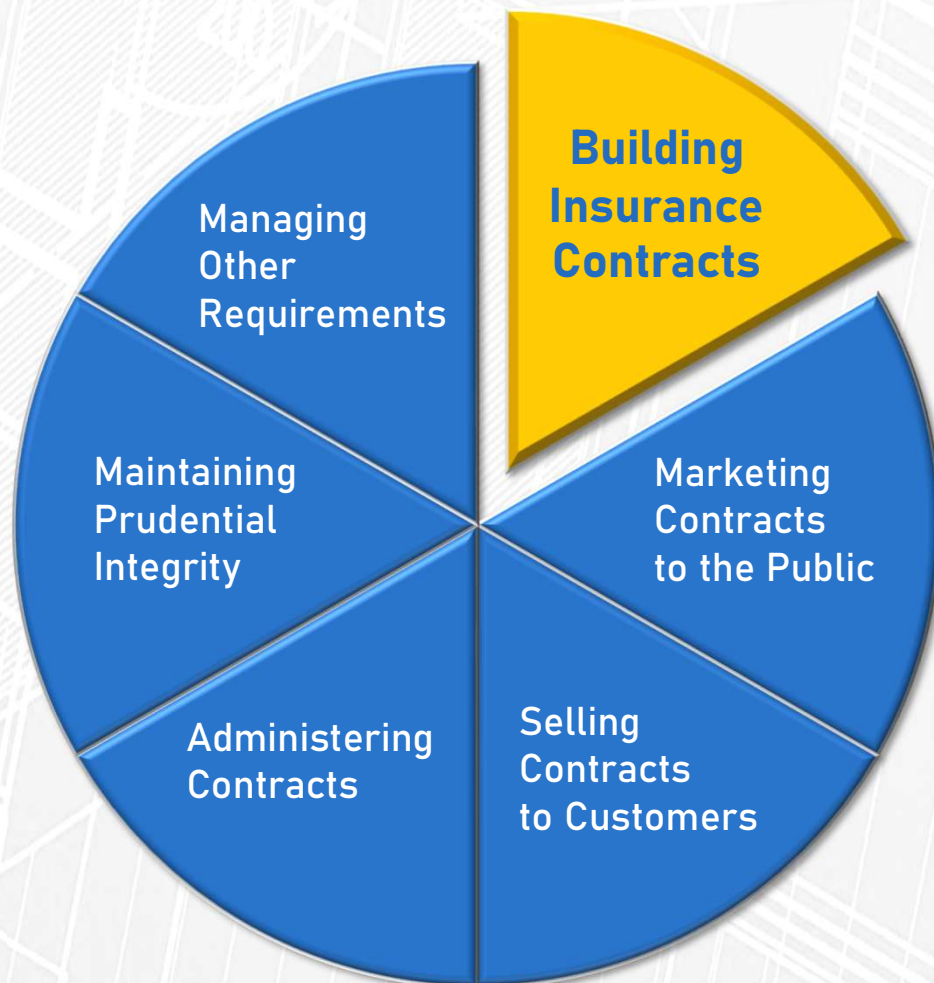
MIKE BRENNAN
DEPUTY GENERAL COUNSEL
COREBRIDGE FINANCIAL



LAWS & REGULATIONS IN THE INSURANCE LIFE CYCLE



BUILDING INSURANCE CONTRACTS



- Primary Regulators: **States, SEC**
- Fixed, Fixed Indexed, or Variable?
- What are the product features, and how are they structured?
- Compliance may do product filing and review risks of inherent customer confusion

MARKETING CONTRACTS TO THE PUBLIC



- Primary regulators:
States, FINRA, SEC, FTC
- Overlapping but independent requirements
- Promote full and fair disclosure and customer understanding
- Compliance may review advertising and manage oversight of communications

SELLING CONTRACTS TO CUSTOMERS



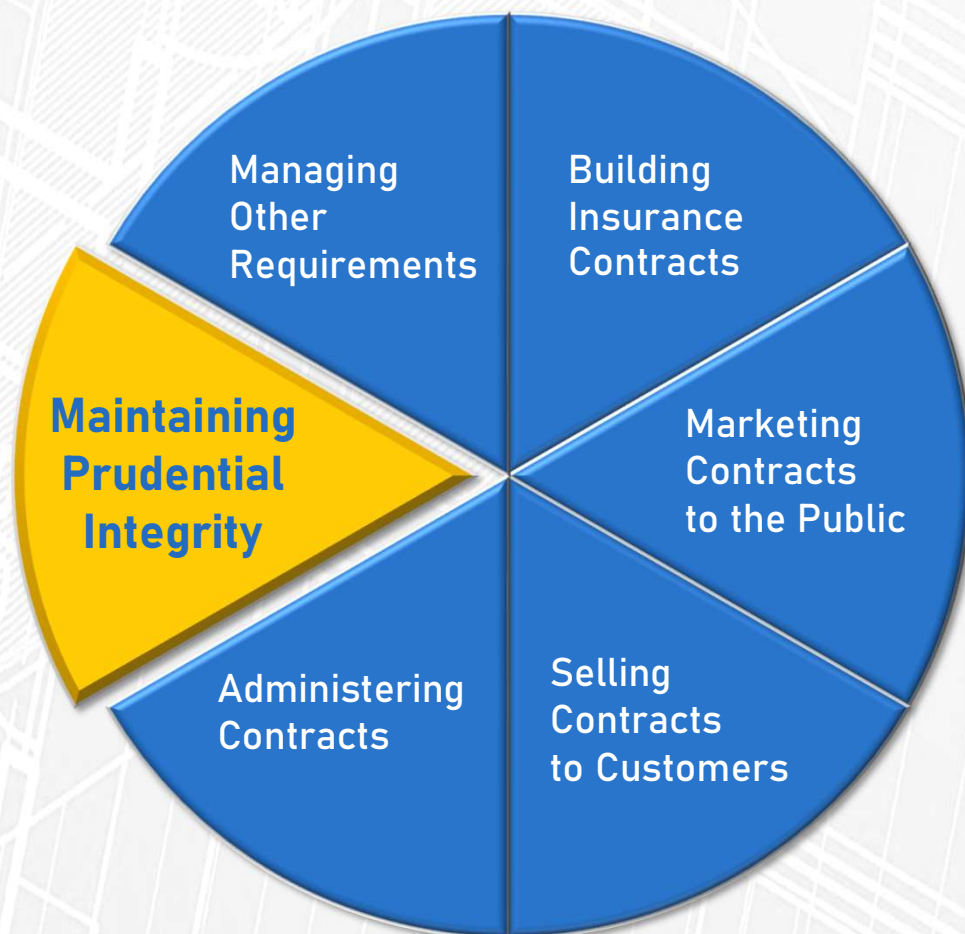
- Primary regulators:
States, FINRA, Limited SEC
- Different Distribution Models:
Broker-dealer supervision triggered?
- Suitability, Best Interest, Anti-Corruption, Do Not Call
- Compliance may perform oversight of supervision, including reviews and surveillance

ADMINISTERING CONTRACTS



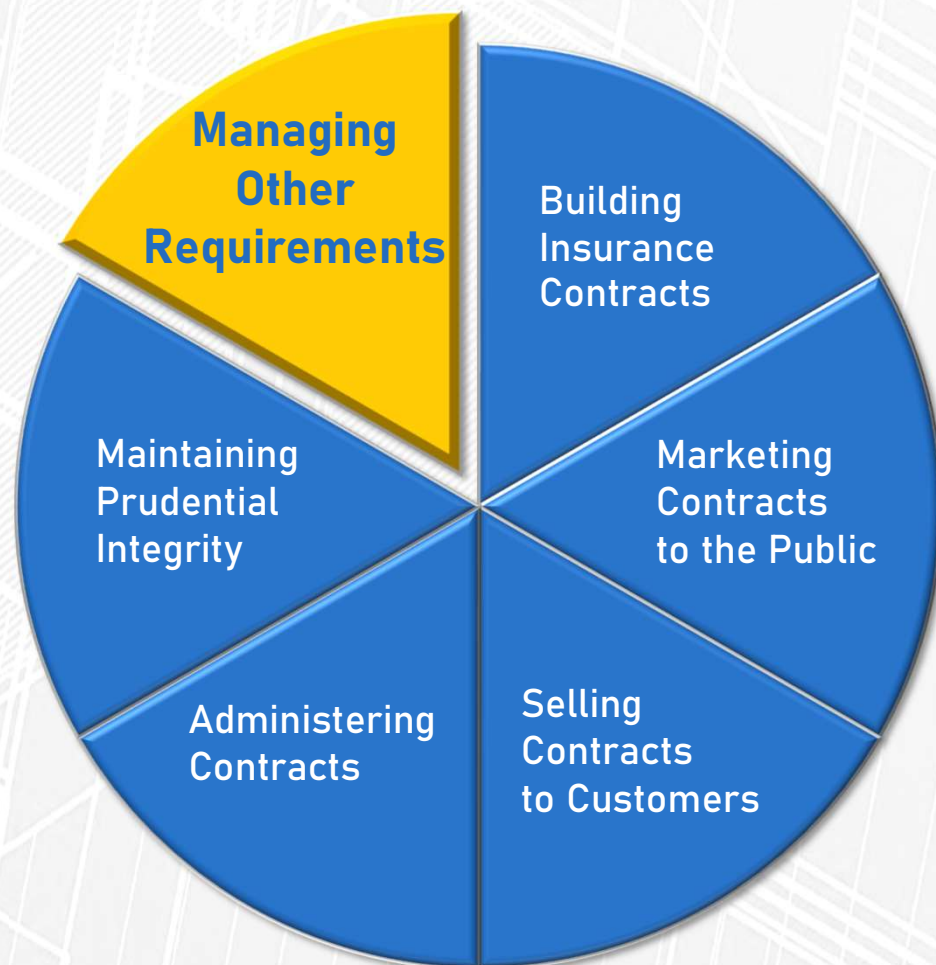
- Primary regulators: **States, SEC, OFAC/FinCEN/IRS, FTC**
- Setup, management, distributions, claims
- Anti-Money Laundering, Privacy/Information Security, 38a-1
- Compliance may lead programs around key risks

MAINTAINING PRUDENTIAL INTEGRITY



- Primary regulators:
States, FINRA, SEC
- General account versus separate account products
- Proper custody, integrity of allocations, fund management
- Compliance may lead Anti-Fraud program, 206(4)(7) program

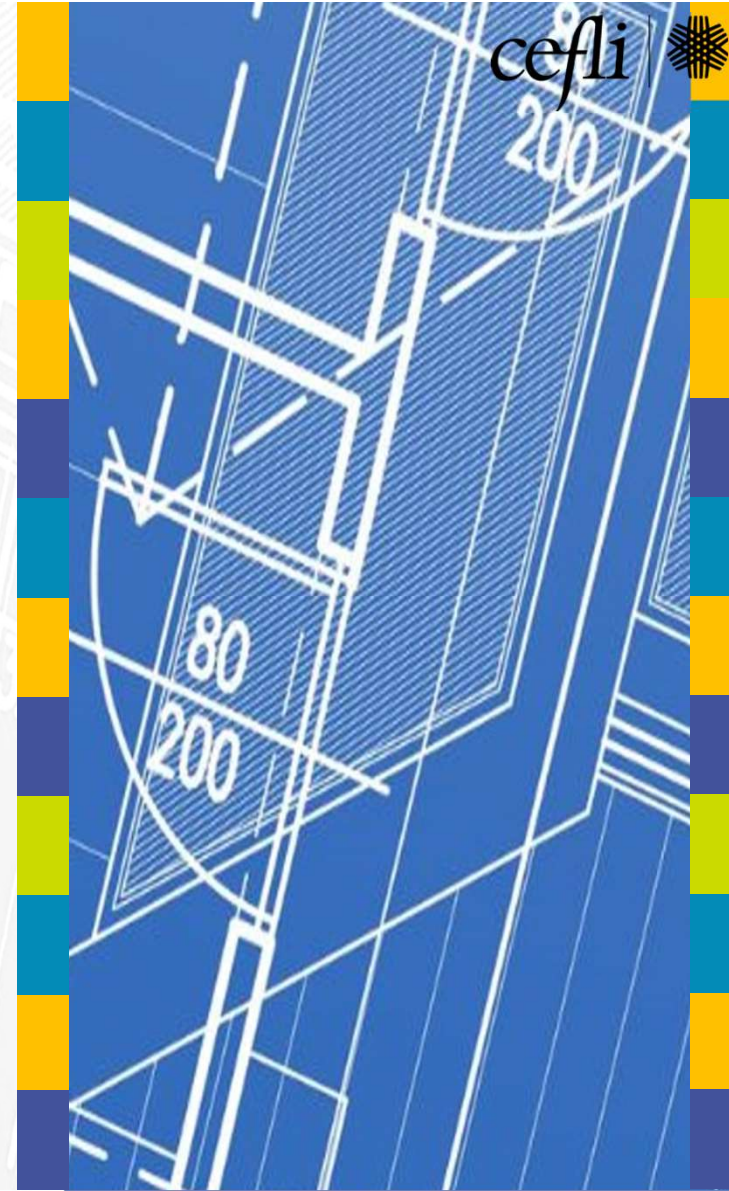
MANAGING OTHER REQUIREMENTS



- Primary regulators: **States, FINRA, SEC**
- Regulatory inquiries, Market Conduct Exams, MCAS, Federal examinations
- Customer complaints, records management, enterprise resiliency
- Compliance may lead programs around key risks, track new regulations

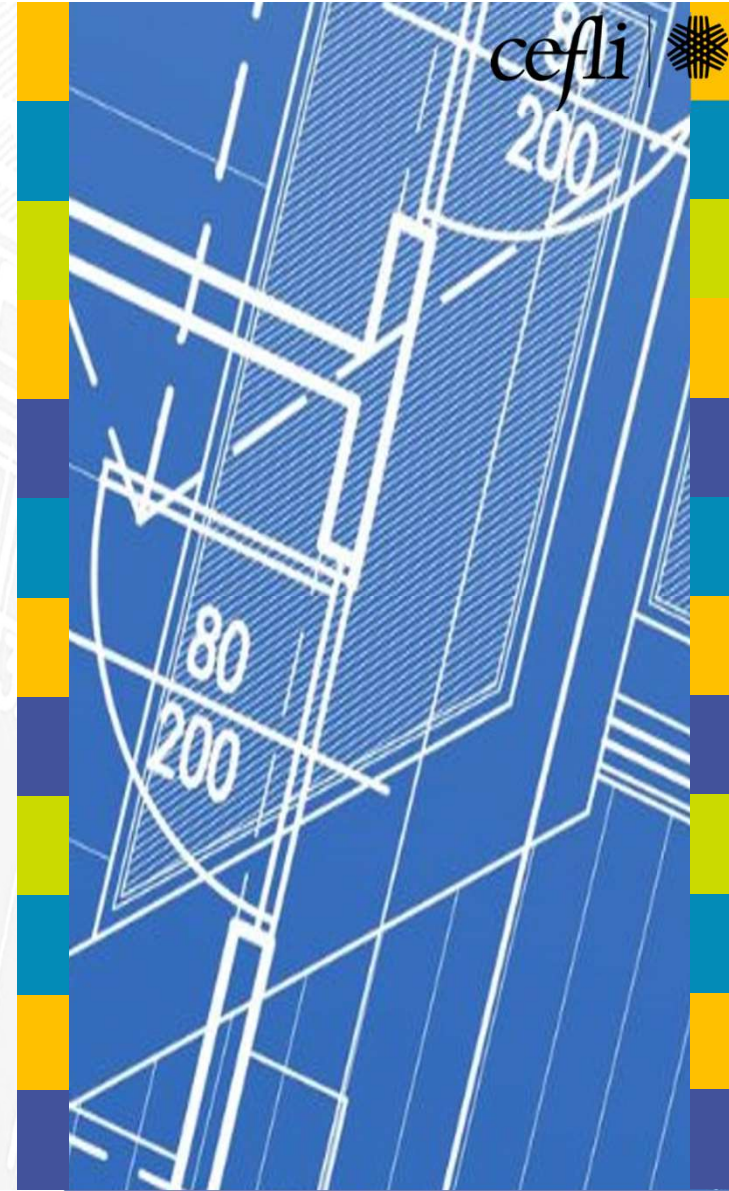
WHY DO WE COMPLY?

- Values, and because it's the right thing to do
- Condition of having a license to do business
- Avoid fines, sanctions, and other penalties
- Federal Sentencing Guidelines
 - Leniency for effective compliance program
 - Elements for an effective compliance program



PRACTICAL PRACTICE POINTS

- The “bad word” within compliance
- Your work is easier (and more effective) if you're not an adversary
- Keep learning!



QUESTIONS, COMMENTS, CONCERNS?

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BREAK

9:45 – 10:00