

## Compliance Bulletin

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**Publication Date: May 20, 2021**

**Effective Date: Immediately**

### **Annual Reminder on Advertising Guidelines**

The purpose of this bulletin is to remind all appointed agents of Forethought Life Insurance Company (“Forethought”) of their responsibilities regarding advertising guidelines, as required by the NAIC Advertisements of Life Insurance and Annuities Model Regulation. Both the securities and insurance industries have adopted mandatory standards applicable to all forms of advertising, sales and marketing material in order to protect clients and the general public.

Forethought is built on a foundation of a deeply held commitment to integrity, compliance and ethical conduct. This bulletin is being provided as a reminder of the important regulatory requirements that apply to the solicitation and sale of Forethought’s products.

Please take the time to review this information and contact Forethought’s Compliance Department at [compliance@gafg.com](mailto:compliance@gafg.com) if you have any questions.

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## **ADVERTISING AND SALES MATERIAL APPROVAL**

### ***What should be reviewed?***

All advertising and sales materials that discuss, promote or present Forethought products to your clients should be reviewed to ensure that all such materials have been approved by Forethought’s Compliance Department. Advertising and sales material include, but are not limited to:

- Advertisements
- Web site content and social media
- Sales illustrations
- Presentation and seminar materials
- Forms, graphs or pictures
- Email templates
- Videos
- Event invitations
- Brochures
- Any other written, printed or electronically produced information that describes the benefits, features, performance, or cost of Forethought products.

**Reminder: Whenever updates to advertising and sales materials are received, be sure to dispose of all previous versions.**

### ***How do I know if material has been approved?***

Approved advertising and sales material will contain a Forethought form/tracking number printed in the lower left corner of the pages.

***What if a printed or electronic piece has not been approved?***

If the piece does not appear to be approved, it cannot be used. All promotional materials created for sales, training, explanatory or other purposes in connection with the solicitation of Forethought products, including generic advertising, illustrations and/or training materials must have written approval by Forethought prior to use.

Please ensure that you also follow your firm's procedures for advertising and sales materials.

***Can I change something that has already been approved?***

No. Once an advertising/sales piece has been approved by Forethought Compliance and has a form/tracking number printed on it, no changes are permitted, no matter how material or immaterial.

***What happens if I use unapproved sales material?***

The use of unapproved sales materials may result in the termination of your appointment with Forethought.

***How do I submit sales materials or contact Forethought with questions or comments?***

For questions or comments regarding Forethought advertising and sales material, please contact your manager or the Global Atlantic Compliance Team at [compliance@gafg.com](mailto:compliance@gafg.com).

***What are the standards that apply to advertising and sales material?***

The content of all material must, among other things:

- Be based upon principles of fair dealing and good faith
- Provide a fair, balanced and sound basis for evaluating the facts
- Avoid language that is exaggerated, promissory, vague, unsubstantiated or inflammatory

In addition, the following general standards apply to all advertising, sales and marketing materials and must be adhered to at all times:

- No unrealistic claims of performance, service, quality or "value-added" are allowed
  - Material information may not be omitted. This includes the requirement to fully disclose the risks associated with the product or service being discussed
  - False or misleading statements must be avoided
  - Past performance may not be used to imply future results
  - Statistical information must disclose the source and the date of the information and must be current
  - Comparisons that disparage the competition are prohibited
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## ILLUSTRATIONS

An illustration is an important tool in most annuity sales, providing prospects with tangible representation of the value and importance that annuities can provide in retirement planning. An illustration can play a crucial role in turning your prospect into a client.

When using an illustration with a consumer, you should fully explain that it is hypothetical in nature. You should point out the illustration's assumptions and limitations and the fact that values in illustrations are hypothetical and are not guaranteed results.

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Thank you for taking the time to review these important reminders. If you suspect any violations or abuse of Forethought policies, please report them by sending an email to [compliance@gafg.com](mailto:compliance@gafg.com).

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