

January 21, 2008



Seminar guidelines and requirements

Aviva USA is committed to providing honest, fair and full information to all prospective clients to assist them in making appropriate purchases. This bulletin addresses agents' use of seminars in their sales process and sets forth Aviva USA's guidelines and requirements for seminars used to generate interest in all Aviva-company products.

While agents owe all their customers the same obligations and duties, age and state in life can influence how certain material is received by a seminar attendee. Both state and federal regulators have noted that seminars aimed at retirees and those 65 and older present unique challenges. While these guidelines and requirements apply to all seminars, agents should be particularly vigilant in providing fair and balanced seminars to seniors.

Two general principles should be followed for any seminar:

1. Attendees need to know the reason they have been invited to the seminar and the purpose of any follow-up meetings. To ensure this, agents must follow these guidelines:

- **Identify yourself.** Agents must appropriately identify themselves as an insurance agent.
- **Identify what you are selling.** The product being presented must be clearly identified as life insurance or an annuity and attendees must know that the agent intends to solicit a sale if they choose to schedule a follow-up appointment.
- **Free should mean free.** Agents should not offer a free report or analysis at a discounted value when the listed regular price is exaggerated or is never actually paid by anyone. Agents also should be clear that there is no obligation to do business with the agent, agency or insurer.
- **Welcome other advisors.** Agents should welcome family and other advisors at follow-up appointments or meetings. This is particularly important when working with seniors - no attempt should be made to isolate a senior when they are making a financial decision.

2. It is important that any seminar provide accurate, balanced information to the attendees. In furtherance of that goal, the Company requires that the seminar presentation:

- **Not create false sense of urgency.** Agents may not imply an excessive sense of urgency to act or to sign up for the seminar. This would include using phrases like "emergency" or "you must act now."

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- **Not use scare tactics.** Agents must not exaggerate fears of financial problems in the future or consequences if they fail to act immediately. This includes unbalanced presentations that imply that government programs will completely fail, taxes will increase significantly or that ones savings will be lost due to spiraling health care costs.

- **Present clear information.** The sales piece, as a whole, must not lead an average person to reach any false conclusions. Seminar materials should not contain untrue, deceptive or misleading statements or create misleading implications by omitting information.

- **Product information must be complete and accurate.** For example:

A. Present balanced information. Materials must not exaggerate product characteristics, liquidity, safety or guarantees and must not differ from those used in the contract, illustration or company marketing material. Conversely, product restrictions must not be omitted when they are necessary to provide an accurate, full and fair picture of the product offered.

B. Use proper facts. Interest crediting rates must not be higher than those values illustrated or depicted in marketing materials, and it needs to be disclosed prominently that such rates are not guaranteed.

C. Explain assumptions. Materials that depict premiums and possible withdrawals/loans from products must provide the assumptions made, including age, sex, underwriting class, product type, loan type and any other pertinent assumptions of the example.

D. Focus on insurance aspects. With respect to life insurance, the agent should not make the accumulation features the exclusive emphasis. The life insurance features must be highlighted. Agents should note prominently that the life insurance agent, agency and insurer are prohibited from giving tax or legal advice.

- **Testimonials should be freely offered.** Any testimonials used must come from people with no ties to the agent. Testimonials may not be in exchange for compensation and should be used with written consent from the person or organization providing the testimonial. The consent must have been obtained within one year from the date of use.

Please note that certain states have laws and regulations that impose additional requirements and restrictions on seminar selling activities. Please check your state's laws prior to promoting or conducting a seminar.

As a reminder, under the [Aviva Advertising Guidelines](#), all seminar materials are required to be submitted to the home office for review prior to use. This would include not only the seminar materials themselves, but also any letters, advertisements, etc. used to attract people to the seminar.