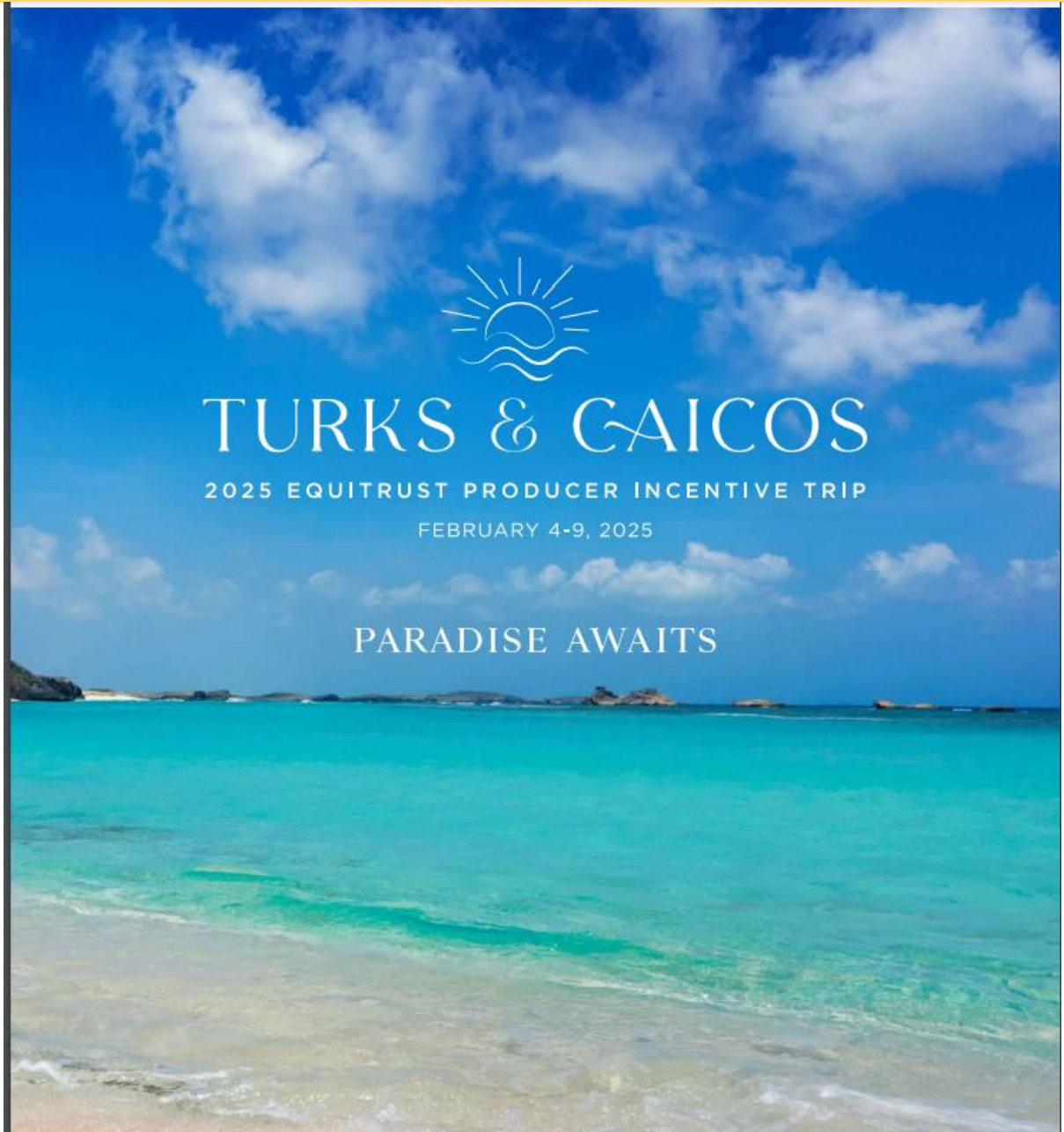


Annuities Sales Incentives: Trips and Bonuses



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NAIC Model Rule has Not Changed the Status Quo

- Elizabeth Warren's Staff produced reports in 2015 and 2017 documenting conflicts of interest in annuities sales incentives.¹
- The 2020 NAIC Model "Annuity Suitability & Best Interest Standard" implies by its use of "best interest" terminology that it addresses those conflicts. It does not.

- It also provides:

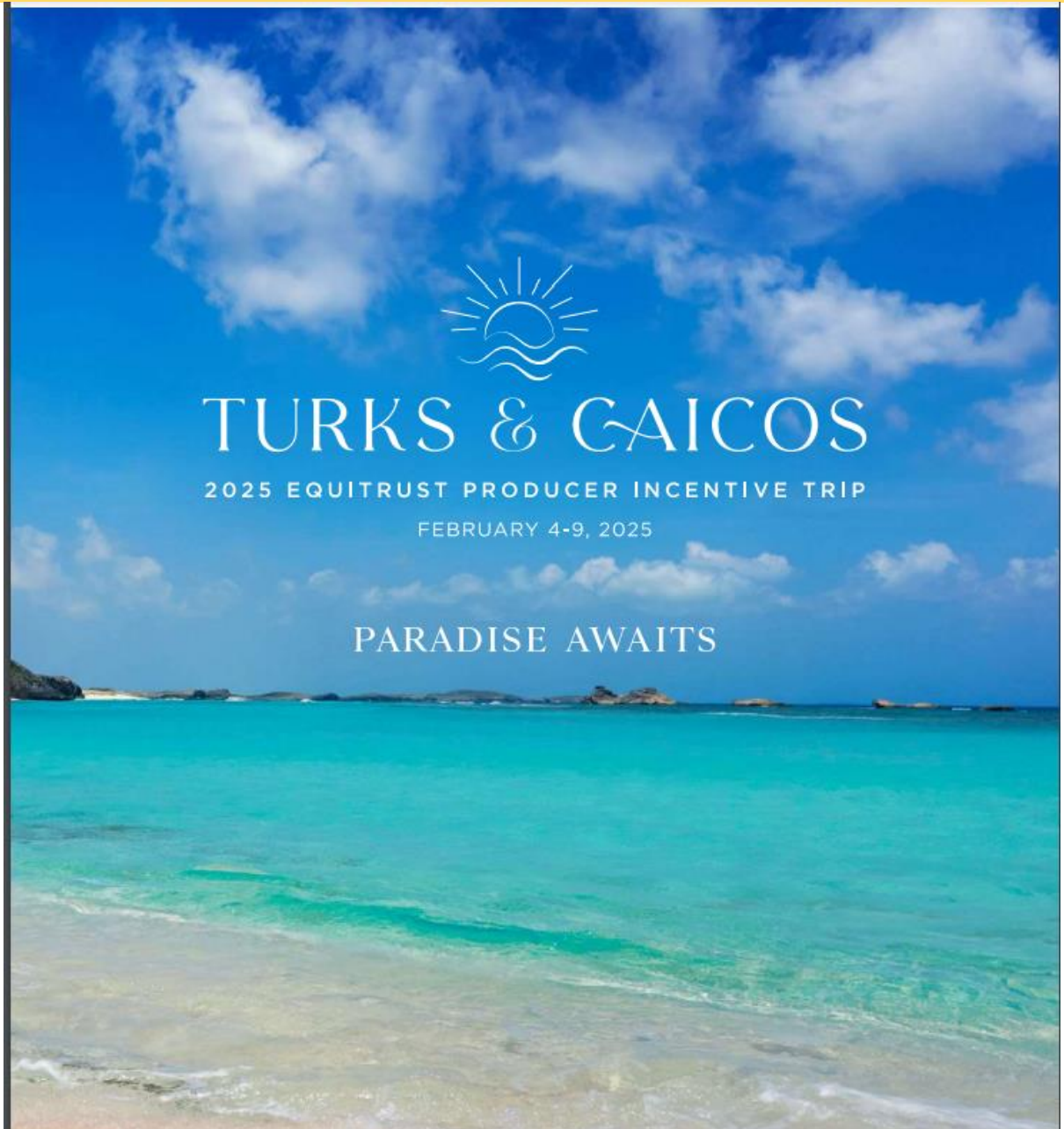
§6.C.(2)(h) The insurer shall establish and maintain reasonable procedures to identify and **eliminate any sales contests, sales quotas, bonuses, and non-cash compensation** that are based on the sales of specific annuities within a limited period of time. The requirements of this subparagraph are not intended to prohibit the receipt of health insurance, office rent, office support, retirement benefits or other employee benefits by employees as long as those benefits are not based upon the volume of sales of a specific annuity within a limited period of time;

- However, it defines material conflict of interest as excluding cash and noncash compensation and contains the following drafting note to the provision above:

The intent of Subparagraph (h) is to prohibit sales contests, sales quotas, bonuses and non-cash compensation based on the sale of a particular product within a limited period of time, but not to prohibit general incentives regarding the sales of a company's products with no emphasis on any particular product.

- Companies continue to offer trips and bonuses as incentives for the sale of fixed indexed annuities (FIA) though the incentives are not limited to a single FIA or product. Sales of FIAs typically only are regulated by states, most of which have adopted the NAIC model rule. The examples below are not the result of a comprehensive search.

EquiTrust 2025 Trip to the Turks and Caicos



- Brochure cover, available at <https://www.simplicitydesmoines.com/wp-content/uploads/sites/19/2023/11/Turks-Caicos-brochure.pdf>

EquiTrust 2025 Trip to the Turks and Caicos



ACTIVITIES

WELCOME TO ISLAND TIME

There's no better place to enjoy the beauty of the sea, sand and skies than stunning Turks & Caicos. Choose from a variety of island activities, including:

Deep-sea fishing — Whether you're an experienced angler or an avid spectator, the deep-blue waters of the islands present the ideal canvas for a deep-sea fishing adventure. Catch a mahi-mahi, tuna, marlin or another of the sea's big-game species.

Reef fishing — Reef fishing is suitable for all skill levels, and you're practically guaranteed to have the fish biting quickly. You might pull in a yellowtail snapper, barracuda or even a lionfish!

Horseback riding in the ocean — If you've never had the unique experience of sight-seeing by horse, this is your chance! Ride across the fine sand of the beach, wading through crystal-clear ocean waters as you take in the glorious scenery.

Snuba — An easy-to-master cross between scuba-diving and snorkeling, snuba offers the opportunity to explore the colorful marine life surrounding the islands. Get a fish-eye view of fascinating sea creatures and other treasures of the ocean.

Spa — Enjoy being pampered with your own soothing, tailored spa experience — perhaps a massage, facial or pedicure.

Golf — Enjoy 18 holes on the pristine fairways and gorgeous greens of the Royal Turks & Caicos Golf Club. This championship course was rated Best Caribbean Golf Course by USA Today's 2023 10 Best Reader's Choice.

Kayaking — Get up close and personal with diverse wildlife as you embark on a kayaking adventure. Make friends with local sea turtles, stingrays, baby lemon sharks and more as you paddle through the warm sea waters.

Group events — EquiTrust-sponsored meals and events will be offered at a variety of the area's finest restaurants. Networking with other sales professionals in paradise — this is the life!

- Activities (not educational), available at <https://www.simplicitydesmoines.com/wp-content/uploads/sites/19/2023/11/Turks-Caicos-brochure.pdf>

EquiTrust 2025 Trip to the Turks and Caicos

BEGIN QUALIFYING TODAY FOR YOUR ISLAND ADVENTURE!

Ensure your hard work is rewarded by beginning your quest now to qualify for the 2025 EquiTrust Producer Incentive Trip. We look forward to congratulating you for a job well done — February 4-9, 2025, in magnificent Turks & Caicos!

QUALIFICATIONS

- Applications must be received between November 1, 2023, and October 31, 2024, and must be issued by November 15, 2024.
- The top 40 producers meeting production requirements will be selected at the end of the qualification period.
- Minimum production/business requirements — **\$5 million** in production credit on **5** or more cases of eligible business.
- Eligible products include all currently offered EquiTrust products.
 - Production credit equals 100% credit for all Fixed Index Annuity products and ChoiceFour[®], and 50% credit for Certainty Select[®] (MYGA) and Confidence Income[®] (SPIA).
 - Internal exchange sales that meet our internal exchange program rules will be given 50% production credit.
- Premium received on existing contracts either pending or issued will not be eligible toward production credit.
- Qualifying contracts must be in force at the time of travel.



- Incentives, available at <https://www.simplicitydesmoines.com/wp-content/uploads/sites/19/2023/11/Turks-Caicos-brochure.pdf>

Pinnacle Financial Services, Global Atlantic Financial Group 2025 Incentive Trip



A coastal oasis awaits

Peak Producer Circle
The Ritz-Carlton, Half Moon Bay
Half Moon Bay, California
April 25-28, 2025

Join Global Atlantic's Peak Producer Circle, a trip for our most successful financial professionals, and experience the breathtaking scenery of Half Moon Bay along the picturesque California coast.

*See qualifications for details.



- Incentive trip, available at <https://pfsinsurance.com/wp-content/uploads/2024/01/Incentive-Trip-Flyer-2024-Qualification-Period-IMO.pdf>

Pinnacle Financial Services, Global Atlantic Financial Group 2025 Incentive Trip

Qualifications

December 1, 2023 – December 31, 2024

- Contracts must be issued during qualification period to be considered for eligibility

Minimum \$4 Million Production Credit

- \$1 production credit for every \$1 for eligible product sales
- \$1 production credit for every \$2 for SecureFore (MYGA) sales
- Must include 5 or more issued contracts
- At least \$2 million of production credit must be non-MYGA sales

Eligible products

- | | | | |
|---|---|--|--|
| • ForeAccumulation II
fixed index annuity | • ForeIncome II
fixed index annuity | • SecureFore
fixed annuity | • ForeCertain
income annuity |
| • Income 150+ SE
fixed index annuity | • ForeCare
fixed annuity with long term care benefits | - 50% of SecureFore sales will be applied towards production credit. | |

Exclusions

- Free looked contracts

This offer is only available for IMO contracts sold through an IMO.

Eligible producers are those that are in good standing during the qualification period and do not have any debit balance. Product Availability may vary by state or intermediary.

- Incentives, available at <https://pfsinsurance.com/wp-content/uploads/2024/01/Incentive-Trip-Flyer-2024-Qualification-Period-IMO.pdf>

American National, Life & Annuity Distribution Marketing Conference 2025

AMERICAN NATIONAL
Life and Annuity Distribution
Marketing Conference

**IRELAND
2025**


We hope that you will qualify to join us for the
Life and Annuity Distribution - 2025 Marketing Conference!

You and a guest could escape for a wonderful **six day and five night** stay and experience historic site seeing, shopping and entertainment in Dublin where you'll stay at **The Shelbourne**. Also enjoy the beautiful Irish countryside where you'll stay at the **Adare Manor** in Limerick, Ireland.

Please review the Qualification Rules and set your sights on Success. For Agent Use only. Not for distribution or use with consumers.

- Brochure cover, available at https://files.urlinsgroup.com/acton/ct/1878/p-190c/Bct/-/-/ct36_0/1/dap?sid=TV2%3AaggXyzzaBQ

American National, Life & Annuity Distribution Marketing Conference 2025

2025		Life and Annuity Distribution Conference Conference Dates: May 24-30, 2025										
Official Qualification Requirements												
Eligibility	The Top 80 Qualifiers. Licensed representatives of the Company who qualify in accordance with the official requirements are eligible for an invitation to attend. The licensed representative must be contracted and in good standing with the Company at the time the conference is held.											
Qualification Period	January 1, 2024 through December 31, 2024. Applications must be issued and paid (all issue requirements satisfied) by the final cutoff date of December 31, 2024. A minimum life persistency of 80% is required on all business placed during the qualification period and continuing in force through January 31, 2025.											
Minimum Qualifications	<ol style="list-style-type: none"> \$125,000+ of Conference Credit AND 12 New Policies <p>Variable products are not eligible for conference credit. Conference credit is based upon the following formula:</p> <table border="0"> <tr> <td>100%</td> <td>On paid Life business up to commissionable target first-year premium and (except as noted below)</td> </tr> <tr> <td>4%</td> <td>For paid Individual Annuities.</td> </tr> <tr> <td>4%</td> <td>For paid Group Annuities.</td> </tr> <tr> <td>5%</td> <td>For first-year Single Premium UL.</td> </tr> <tr> <td>10%</td> <td>For Universal Life Excess.</td> </tr> </table> <p>Standings are reported on in-force business, and conference credits are not assignable. The company reserves the right to amend the annuity conference credit if any Department of Labor restrictions on compensation on qualified annuities sales go into effect.</p>		100%	On paid Life business up to commissionable target first-year premium and (except as noted below)	4%	For paid Individual Annuities.	4%	For paid Group Annuities.	5%	For first-year Single Premium UL.	10%	For Universal Life Excess.
100%	On paid Life business up to commissionable target first-year premium and (except as noted below)											
4%	For paid Individual Annuities.											
4%	For paid Group Annuities.											
5%	For first-year Single Premium UL.											
10%	For Universal Life Excess.											
What to Expect in 2025:												
Invitation	Conference attendance is available only to those who qualify and are invited by the Company to attend. The qualifier may bring only one guest. The guest must be accompanied by the qualifier and must be 18 years of age or older to attend the conference. An individual who qualifies and receives an invitation and who, for any reason, is unable to attend the conference is not entitled to any other compensation, nor may the qualifier substitute in his/her stead any other person.											
Expenses	Federal/state income tax incurred as a result of attending the conference is the responsibility of the qualifier. A 1099 in the amount of the "fair market value" of the trip will be issued. It is suggested that participants consult their tax advisor in regard to tax treatment. American National will provide: <ul style="list-style-type: none"> Air transportation and transfers from the nearest major airport to and from the conference destination Taxes and tips necessary to complete the included portions of the conference Hotel accommodations Specified meals Expenses for Tour/Activity sponsored by American National 											
<p>Important: Any deviation from the conference program is at the qualifier's expense and subject to availability. All additional travel expenses must be paid in full by the participant prior to the conference. American National may, if necessary, amend the rules governing qualification requirements for the 2025 Conference during the qualification period.</p> <p>Conference qualification may not be available to all representatives. Contact your Marketing Organization for verification. Not available for New York.</p> <p>For Agent Use Only; Not for Distribution or Use with Consumers.</p>												
		AMERICAN NATIONAL INSURANCE COMPANY 888-501-4043 lad.americannational.com										
		LAD10055 01.24										

- Incentives, available at https://files.urlinsgroup.com/acton/ct/1878/p-190c/Bct/-/-/ct36_0/1/dap?sid=TV2%3AaggXyzaBQ
- Note the statement: "The company reserves the right to amend the annuity conference credit if any Department of Labor restrictions on compensation on qualified annuities sales to into effect." This undermines the ACLI's implication that the DOL would not be significantly more protective than the already "robust" NAIC model rule.

Financial Brokerage 2025 Trip to Cabo San Lucas



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OLD WORLD LUXURY IN *Cabo San Lucas* — Luminous Pacific Coast —



Old World Luxury on Cabo's Luminous Pacific Coast

Step into a world of unforgettable moments at Pueblo Bonito Sunset Beach Golf & Spa Resort. Situated within the exclusive residential development of Quivira Los Cabos and overlooking the Pacific Ocean in sun-kissed Cabo San Lucas, family-friendly Pueblo Bonito Sunset Beach is a luxury resort blissfully secluded on a private coastal bluff. This prime location offers both tranquility and convenient access to the vibrant downtown corridor of Cabo San Lucas. In addition to an array of restaurants and The Market at Quivira, an enticing culinary food hall, the resort offers the award-winning Armonia Spa, private beach privileges and exclusive access to the Jack Nicklaus Signature course at Quivira Golf Club, a thrilling layout that scales the heights at Land's End.

Qualify with:	
\$50,000	of Paid Annualized Tier 1 LIA Premium or
\$1,250,000	of Paid Tier 1 Annuity Premium
Any combination of 50,000 Success Shares	

Qualification Period
January 1, 2024 - December 31, 2024.
Business submitted in 2024 and paid by March 31, 2025.

- Incentive Trip, available at <https://financial-brokerage.com/cabo-san-lucas-2025/>

Athene 2025 FIA Production Bonus

Make 2024 your best year yet
Athene FIA Production Bonus for Individuals



Thank you for your continued business and for all you do to help your clients retire successfully. To recognize the contribution of top producers to our shared success, we're offering an added production bonus for Individuals that applies to qualifying Athene fixed indexed annuity (FIA) sales in the IMO channel throughout 2024.¹ **Take advantage of this opportunity to make 2024 your best year ever.**

The sky is the limit to how much you can earn in 2024!

Consider the potential payout:

Total FIA issued premium	Production bonus paid	Cumulative bonus paid
\$3 million	\$15,000	\$15,000
\$5 million	\$10,000	\$25,000
\$10 million	\$25,000	\$50,000
\$15 million	\$50,000	\$100,000
\$20 million	\$100,000	\$200,000
Every additional \$5 million	\$50,000	

Qualifying sales include business issued between January 1 and December 31, 2024

- To qualify for the bonus, applications must be received by Athene "in good order" and have an issue date no later than December 31, 2024.
- Payments will be made in the month after production milestones are met.² For example, if \$10 million in production is reached in July, the bonus would be paid no later than August 31.
- Bonuses are based on individual production only. Aggregating premium across multiple producers will not be allowed.

Help clients retire more confidently

Fixed indexed annuities are a sought-after solution for clients who want to retire confidently. With competitive rates, guaranteed income and the protection from market loss, Athene FIAs feature exclusive index crediting strategies designed to promote stability and capture growth potential in diverse market environments.

For more information on Athene FIAs or production bonus qualifications, contact the best Sales Desk in the business at 888-ANNUITY (266-8489).

¹ You must have an active contract with Athene and be in good standing to receive a bonus payment. **Production bonus applies to qualifying IMO production only. Business sold through a Broker Dealer or Bank does not qualify.** Bonus payments will only be paid upon reaching production thresholds. Athene may modify or discontinue the production bonus at any time without advance notice to you.

² Bonus payments will be paid by Athene to all qualifying producers no later than January 31, 2025. Production from licensed-only producers may qualify and compensation will be paid per standard procedure to your upline. Athene reserves the right to chargeback in the event of free-looks/chargebacks during and after the incentive is complete. All decisions regarding the terms of the production bonus, including the calculation and payment of the bonus, are at Athene's sole discretion.

INVESTMENT AND INSURANCE PRODUCTS ARE: • NOT FDIC INSURED • NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY • NOT A DEPOSIT OR OTHER OBLIGATION OF, OR GUARANTEED BY, THE BANK OR ANY OF ITS AFFILIATES • SUBJECT TO INVESTMENT RISKS, INCLUDING POSSIBLE LOSS OF THE PRINCIPAL AMOUNT INVESTED

25029

For financial professional use only. Not to be used with the offer or sale of annuities.

(11/30/23)

- Production Bonus, available at <https://athenecentral.widen.net/s/lmwf526rnr/25029>

Corebridge Financial, AGL Fixed Index Annuities 2024 FIA Production Bonus

Annuities



2024 Elite Producer Compensation Program (EPCP)

We're excited to share that Corebridge Financial will continue to offer independent agents additional compensation opportunities with the Elite Producer Compensation Program (EPCP) for the 2024 calendar year. Please see important details below.

Elite Producer Compensation Program Overview

Additional compensation is only available on fixed index annuities issued by the American General Life Insurance Company (AGL)¹. Agents who qualified for the program in 2023, will carry over their **Compensation Tier** earned at the end of 2023 into the 2024 calendar year, with additional compensation paid at that level beginning with their first sale. Agents must achieve \$1,000,000 of net qualifying paid premium on commissionable fixed index annuities issued by AGL and offered through our IMO / BGA distribution partners to qualify for the program. Once qualified, agents will earn an additional compensation percentage on future sales during 2024 as follows:

Elite Producer Compensation Program Overview		
Compensation Tier*	Additional Compensation %	Applicable Net Qualifying Paid Premium Amount (in MM)
Tier 0	0.00%	\$0 - 1 MM
Tier 1	0.50%	\$1 - 3 MM
Tier 2	0.75%	\$3 - 5 MM
Tier 3	1.25%	\$5 - 10 MM
Tier 4	1.50%	\$10 MM+

* Each tier is activated for prospective sales and is not retroactive to sales prior to qualification.

Initial Qualification Example: Once an agent reaches \$1 MM of net qualifying fixed index annuity premium for certain contracts issued by AGL, then the next \$2 MM will earn an additional 0.50% in compensation. Once \$3 MM of net qualifying premium has been achieved the agent will earn an additional 0.75% in compensation on future sales, etc. When an agent reaches \$10 MM or more in net qualifying fixed index annuity premium, all future qualifying sales during the program period will earn an additional 1.50% in compensation.

¹ Products issued by the United States Life Insurance Company in the City of New York (US Life) are not included in this program.

For back office and agent use only. Do not distribute to the public.

- Additional compensation incentives, available at <https://www.bsibroker.com/incentive%20details/aig%20elite%20producer%20comp%20program%202023.pdf>

Footnotes

1. Staff of Sen. Elizabeth Warren, *Villas, Castles, and Vacations: 2017 Edition*, 1, Feb. 2017
https://www.warren.senate.gov/files/documents/2017-2-3_Warren_DOL_Rule_Report.pdf ; Staff of Sen. Elizabeth Warren, *Villas, Castles, and Vacations: How Perks and Giveaways Create Conflicts of Interest in the Annuity Industry*, 3-5, Oct. 2015,
https://www.warren.senate.gov/files/documents/2015-10-27_Senator_Warren_Report_on_Annuity_Industry.pdf