

Wells Fargo Advisors General Agent 2014 Handbook



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Wells Fargo Advisors Facts at a Glance

(as of March 31, 2014)

Executive Summary

Wells Fargo Advisors provides investment advice and guidance to clients through 15,146 Financial Advisors and 3,350 licensed bankers in retail stores across the U.S. Wells Fargo Advisors administers \$1.4 trillion in client assets.

Areas of Distinction

- Unique structure and scale that combines the capabilities and best practices available only through a large, national firm with a client focus more typical of smaller firms
- Dedicated to Financial Advisors and their relationships with clients
- Unprecedented choice and flexibility for Financial Advisors and their clients through distinct business channels supported by established products, services, and technology

Multichannel Business Model

10,350 Financial Advisors work in the traditional brokerage channel of Wells Fargo Advisors, LLC, with branch offices located in all 50 states and the District of Columbia. In addition, the firm's in-bank brokerage channel employs 3,125 Financial Advisors and 3,350 licensed bankers located in Wells Fargo bank stores. Financial Advisors and licensed bankers are registered with Wells Fargo Advisors, LLC. The firm's Independent Brokerage Group includes Wells Fargo Advisors Financial Network, the firm's independent representative arm, and First Clearing Correspondent Services, which provides operational, clearing and consultative services to 27,000 financial professionals

Products and Services

- Advisory Services
- Asset Management
- Brokerage Services
- Estate Planning Strategies
- Retirement Planning
- Portfolio Analysis and Monitoring

Retail Client Assets	\$1.4 trillion
Registered Representatives	18,496
Financial Advisors	15,146
Licensed Bankers	3,350
Correspondent Clearing Firms	76

Data is a combination of Wells Fargo Advisors, LLC, Wells Fargo Advisors Financial Network, LLC, and First Clearing, LLC.

Quick Facts

Industry Rank

- Third-largest full-service provider of retail brokerage services in the U.S.*
- Third-largest provider of managed accounts** (as of December 31, 2013)

Broker-Dealers under Wells Fargo & Company

- Wells Fargo Advisors, LLC
- Wells Fargo Advisors Financial Network, LLC
- First Clearing, LLC

Website

wellsfargoadvisors.com

*Based on number of Financial Advisors

**Based on assets

Investment and Insurance Products: ► NOT FDIC Insured ► NO Bank Guarantee ► MAY Lose Value

Wells Fargo Advisors is the trade name used by two separate registered broker-dealers and non-bank affiliates of Wells Fargo & Company: Wells Fargo Advisors, LLC, and Wells Fargo Advisors Financial Network, LLC (Members SIPC). First Clearing (Member SIPC) is a separate broker-dealer of Wells Fargo & Company (First Clearing is a non-bank affiliate). 0114-02348 [83720-v1] ©2014 Wells Fargo Advisors, LLC. All rights reserved. 0000584411 (Rev. 2/11ea)

Channel Distinctions

PRIVATE CLIENT GROUP (PCG)

The Private Client Group (PCG) is the **traditional full service brokerage channel** within Wells Fargo Advisors. There are approximately 10,350 Financial Advisors (FAs) in 900 branches nationwide. PCG is comprised of the following legacy Firms: Wheat First, Butcher Singer, Everen Securities, First Albany, IJL Wachovia, Prudential Securities, A.G. Edwards, and Wachovia Securities.

PCG FIELD STRUCTURE

Regional President (RP) – The RP is the leader of the region and is responsible for the performance of the region and ensuring that it is run in the best interest of the client, branch associates and the Firm. The RP supervises the activities of the regional office and Market/Complex/Branch Managers, and ensures that business is conducted in accordance with regulatory and ethical standards of the Firm. There are currently 10 RPs.

Market Manager (MM) – The MM is responsible for the management of all branch offices within a PCG metropolitan market. The MM's responsibilities include FA recruiting, local marketing, market planning, team development, and client events. Administration, compliance, and operations functions within the market are delegated to a Hub team, typically located with the MM at a large branch within the market.

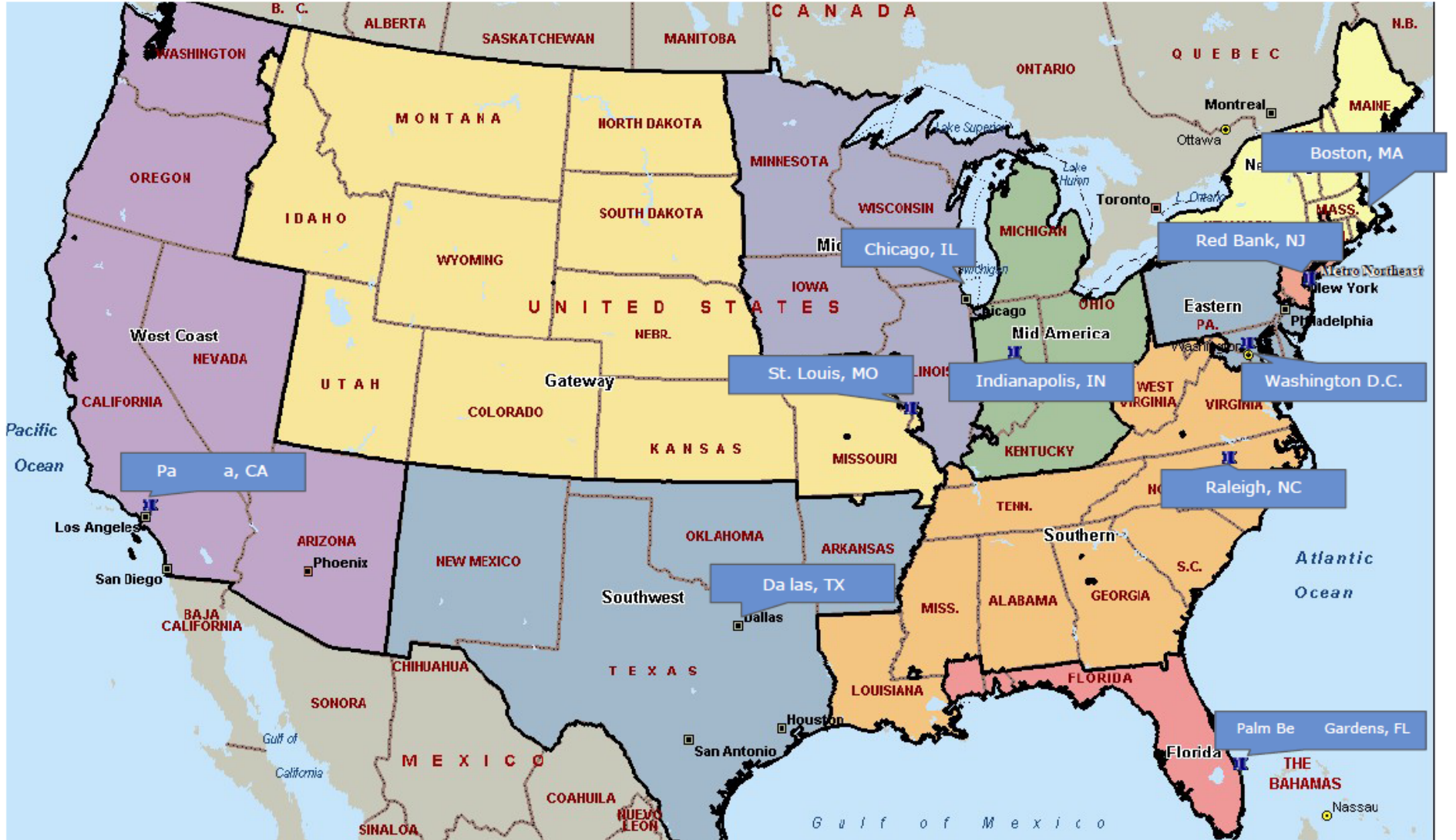
Complex Manager (CM) – The CM is responsible for two or more PCG branch locations. The CM is the direct supervisor for all Branch Managers/Branch Supervisors and/or FAs, and is responsible for recruiting, productivity and leadership, managing the profit and loss statement, developing the business plan, and growing the Complex.

Branch Manager (BM) - The BM is responsible for the management of a PCG branch, which includes recruiting, productivity and leadership, managing the profit and loss statement, developing the business plan, and growing the branch. **BMs are the initial point of contact within the PCG branches.**

Financial Advisor (FA) – The FA is the client relationship manager and provides full brokerage services, including investment and insurance solutions, to clients. FAs are registered with Wells Fargo Advisors, LLC and their insurance licenses are held by Wells Fargo Advisors Insurance Agency, LLC. For insurance sales, the FA serves as the agent of record on all sales, partnering with approved local third party General Agents (GAs) or, via phone, with the Insurance Solutions Center for expert support. An FA has the option to partner with a Wealth Insurance Specialist (WIS) for an FA's High Net Worth cases of \$5 million or above. When a WIS assists with a case, the WIS is the agent of record on the policy. At the end of the first policy year, the contract will be moved to the FA as agent of record.

Wealth Insurance Specialists (WIS) – The WIS is a Wells Fargo Advisors, LLC employed insurance specialist who works primarily with High Net Worth clients (\$5 million Net Worth and above) within the PCG and WBS channels. WISs are registered with Wells Fargo Advisors, LLC and their insurance licenses are held by Wells Fargo Wealth Brokerage Insurance Agency, LLC. WISs serve as the agent of record on life/LTC/DI insurance sales for clients referred to them by FAs. They also partner with external GAs and carriers to provide general insurance-related advice and guidance for FAs, and local FA insurance training.

PCG Regions



WEALTH BROKERAGE SERVICES (WBS)

The Firm's **bank brokerage channel** is called Wealth Brokerage Services (WBS). WBS employs approximately 3,125 FAs and 3,350 licensed bankers*. FAs and licensed bankers are registered with Wells Fargo Advisors, LLC. In partnership with the Community Bank and Wealth Management, FAs provide investment services to clients in both Wells Fargo stores and Wealth hubs.

WBS FIELD STRUCTURE

Senior Directors of Brokerage/Directors of Brokerage (SDBK/DBK) – The SDBKs utilize business development techniques such as conducting investment seminars, participating in community activities, and networking with their Wealth and Community Bank partners to build relationships. The SDBK also refers cross-marketing opportunities to other Wells Fargo channels.

Regional Brokerage Manager (RBM) - RBMs are focused on leading brokerage sales and office revenue goals through active coaching, including management of internal cross-sell, recruiting, and expense management while managing the regulatory supervision of FAs. The RBMs partner with other line-of-business managers and specialists, as well as licensed bankers to uncover cross-sell opportunities and to deliver full-balance-sheet solutions to clients. **RBMs are the initial point of contact within WBS.** Your Relationship Manager can provide you with a current list of RBMs.

Financial Advisor (FA) – The FA may be, but is usually not, the client relationship manager; however, the FA provides full brokerage services, including investment and insurance solutions, to clients in this channel. FAs are registered with Wells Fargo Advisors, LLC and their insurance licenses are held by Wells Fargo Wealth Brokerage Insurance Agency, LLC. For life/LTC/DI insurance sales, the FA may serve as the agent of record on sales, partnering with approved local third party General Agents (GAs) and/or WFA Wealth Insurance Specialists (WISs) or, via phone, with the Insurance Solutions Center for expert support. The FA may also choose to refer clients with life/LTC/DI insurance needs to the WIS for insurance sales; in this case, the WIS will be the agent of record and the FA will receive referral compensation. At the end of the first policy year, the contract will be moved to the FA as agent of record.

Licensed Bankers - Private Bankers (PB) and Wealth Advisors (WA) – The PB/WA is usually the client manager and provides full banking (deposit and credit) and trust services to clients in the Wealth (Private Bank) portion of this channel. PB/WAs are registered with Wells Fargo Advisors, LLC and their insurance licenses are held by Wells Fargo Wealth Brokerage Insurance Agency, LLC. PB/WAs are not permitted to sell insurance. However, they may refer clients with life/LTC/DI insurance needs to FAs or WISs; the PB/WA, if appropriately licensed, may receive referral compensation.

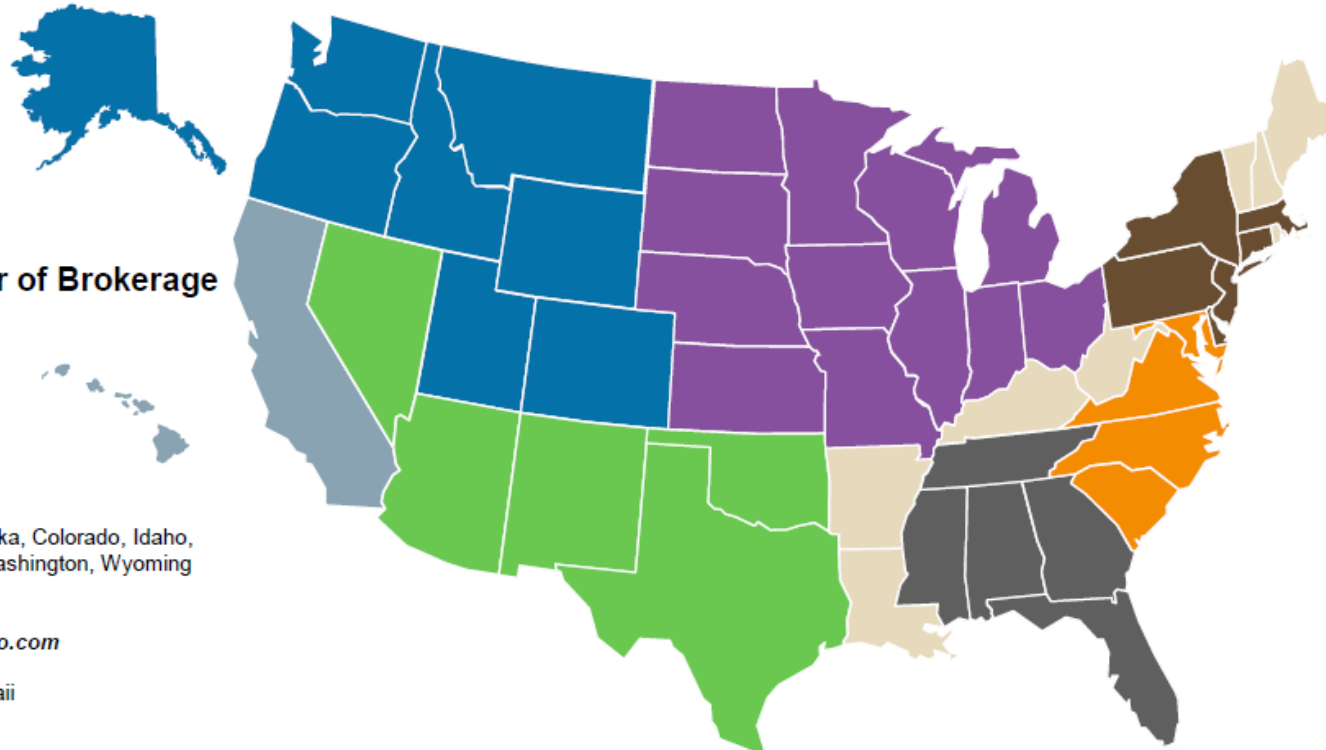
Unlicensed Bankers – The unlicensed bankers are usually the client manager and provide full banking (deposit and credit) and trust services to clients in the Community Bank portion of this channel. Unlicensed bankers are not securities registered or insurance licensed and may not sell insurance. However, they may refer clients with simple term insurance needs to the Wells Fargo Insurance 800# or website and may refer clients with more complex life/LTC/DI insurance needs to FAs or WISs. They may receive nominal referral fees or other nominal credit for these referrals.

Wealth Insurance Specialists (WIS) – The WIS is a Wells Fargo Advisors, LLC employed insurance specialist who works primarily with High Net Worth clients (\$5 million Net Worth and above) within the PCG and WBS channels. WISs are registered with Wells Fargo Advisors, LLC and their insurance licenses are held by Wells Fargo Wealth Brokerage Insurance Agency, LLC. WISs may serve as the agent of record on life/LTC/DI insurance sales for clients referred to them by FAs, by PB/WAs or by unlicensed bankers. They also partner with external GAs and carriers to provide general insurance-related advice and guidance for FAs, and local FA insurance training.

* Licensed Bankers are employed by Wells Fargo Bank, N.A.; Wells Fargo Bank, NA is a banking affiliate of Wells Fargo & Company.

Wealth Senior Directors of Brokerage & Directors of Brokerage

Lincoln Yersin
Senior Managing Director of Brokerage



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 chris.scout@wellsfargo.com

INDEPENDENT BROKERAGE GROUP (FiNet)

The Independent Brokerage Group (FiNet) complements Wells Fargo Advisors' multi-channel client acquisition approach by capitalizing on fast-growing market segments. In this model, independent practices have a full wealth management platform with access to investments, deposits, transactions, credit, trust, insurance, planning tools and retirement offerings.

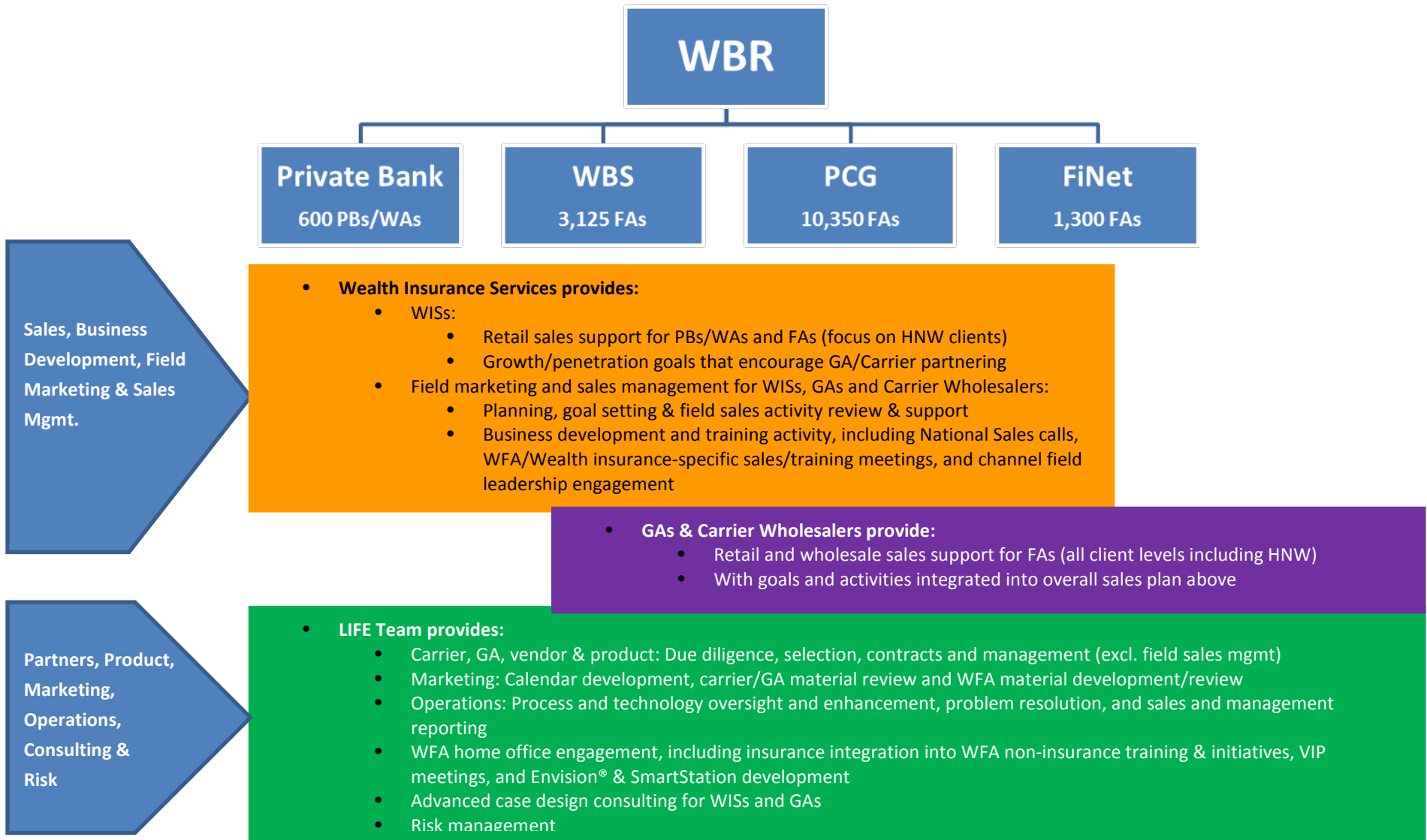
Financial Network (FiNet) - The FiNet channel was created for FAs who want to utilize the products and services of a full service firm with the control of being an independent business owner. Like all Wells Fargo Advisors FAs, they benefit from our Firm's robust offering of products and services. Meanwhile, they exercise the responsibility, judgment and control of owning a business outright. FiNet includes over 560 practices and over 1,100 Financial Advisors.

Branch Manager (BM) - The BM is responsible for the management of a FiNet branch, which includes recruiting, productivity and leadership, managing the profit and loss statement, developing the business plan, and growing the branch. **BMs are the initial point of contact within the FiNet branches.**

Financial Advisor (FA) – The FA is the client relationship manager and provides full brokerage services, including investment and insurance solutions, to clients. FAs are registered with Wells Fargo Advisors Financial Network, LLC and their insurance licenses are held by Wells Fargo Advisors Insurance Agency, LLC. For insurance sales, the FA serves as the agent of record on all sales, partnering with approved local 3rd party General Agents (GAs) or, via phone, with the Insurance Solutions Center for expert support.

Description of the Wells Fargo Advisors Insurance Model

The Wells Fargo Advisors individual distribution model provides the maximum choice to an FA. FAs get to choose whether they want to work with a Wealth Insurance Specialist, a General Agent, Carrier Point-of-Sale, or the Insurance Solutions Center. As for Licensed Bankers, Private Bankers/Wealth Advisors, they do not actively sell insurance. Rather they have the choice to refer the business to a WIS or FA.



Wells Fargo Advisors is the trade name used by two separate registered broker-dealers: Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC, Members SIPC, non-bank affiliates of Wells Fargo & Company. CAR-0214-01269

Expectations – General Agency Representatives

Minimum Production Expectations:

GA and Carrier Point-of-Sale representatives who choose to work in Wells Fargo Advisors are expected to:

- Be a regular and professional presence in branch offices
- Close at least 12 cases per year
- Generate at least \$24,000 of new target premium per year

Consequences for Failing to Meet Production Expectations

Production will be reviewed annually. Each situation is unique and will be evaluated as such. Special consideration will be given to GA POS representatives who:

- Are new to the system (less than 12 months in the system) – We will use activity reports to evaluate new GAs engagement.
- Cover rural areas where regular presence may not be geographically feasible.
- Cover lower-income markets where case work may be more sporadic.

Process/Procedures/Compliance Expectations:

- Execute appropriate documentation and agreements with Wells Fargo Advisors (WFA) indicating agreement to uphold all WFA requirements.
- Provide annual due diligence information to WFA upon request.
- Maintain appropriate licenses, registration, and appointments to conduct business within the applicable jurisdictions.
- Discuss insurance solutions with WFA clients* only with express prior permission of the FA and only then discuss those solutions that are:
 - Suitable and appropriate for the client in the context of their complete financial circumstances, goals and objectives,
 - In compliance with all applicable statutes, regulations and advisory opinions, and
 - Chosen as most appropriate for the client without regard to any cash or non-cash compensation available.
- Present to and assist WFA FAs in soliciting only products on the current WFA Approved Product/Carrier list using only WFA approved sales concepts.
- Use only client-facing sales and marketing materials (including proprietary material and tools) that have been approved by WFA prior to use.
- Submit all applications on behalf of the FA only after FA approval and as required by WFA. This includes, but is not limited to:
 - Submitting all applications to SBIA and waiting for WFA approval prior to submitting an application to a carrier,*
 - Including all WFA required forms in the application package, and
 - Conducting quality reviews of application packages prior to submission to, as much as possible, eliminate Not in Good Order conditions. (See Explanation - Not in Good Order Cases)
- Actively engage with WFA and demonstrate a consistent and reasonable level of activity.

- Provide reports, as requested by their agency and/or WFA, of their activity within WFA.
- Support WFA insurance initiatives through marketing, training, and executing on WFA initiatives.
- Comply fully with WFA's "Third Party Rules of Engagement" and "Cash/Non-Cash Compensation Policy".
- Ensure that all communications containing client confidential data with Wells Fargo (and or SBIA on behalf of WFA) are always sent with encryption.

Consequences for Failing to Meet Procedural Expectations

Where patterns of General Agency Representative non-compliance are observed and/or where the General Agent Representative himself/herself fails to comply with the expectations, appropriate action, up to and including termination of the General Agency Representative's approval to work within WFA may be taken.

**Violations of these expectations are considered particularly greivous. WFA reserves the right to accelerate consequences, up to and including termination of the Representative's privilege to work with WFA FAs, for any offense.*

Explanation - Not in Good Order Cases

One of WFA's goals is to significantly lower the number of GA submitted not-in-good-order (NIGO) applications. To help reduce GA NIGO rates, we have organized NIGO situations into two classes (defined below). To help you manage NIGO cases we will provide, on a monthly basis, each General Agency with a list of their NIGO cases which will include the specific GA point-of-sale (POS) representative on the case and the NIGO classification (i.e. why it was considered NIGO). The two classes of NIGO cases are: Compliance Offenses and Administrative Offenses.

Compliance Offenses

The Compliance Offenses will be tracked and there will be consequences for repeat offenders (as previously outlined in our Expectations - General Agency Representatives). Below is an overview of what constitutes Compliance Offense NIGOs.

Compliance Offenses by their nature are serious infractions of WFA rules and standards. They include, but are not limited to:

- Cases sent to carriers, issued and/or paid prior to CSU approval;
- Cases issued prior to CSU re-approval, when required for offers of "other than applied for";
- Unsuitable recommendations made to clients;
- Carrier and/or product recommended that is not on the WFA approved list; and
- Sale facilitated by a POS rep who is not on the WFA approved list.

For egregious breach of WFA rules and standards, we reserve the right to accelerate consequences, up to and including immediate termination of a GA POS rep's privilege to work within WFA.

Administrative Offenses

Administrative Offenses offer an opportunity for us to collectively improve the FA and client experience with the insurance submission process. We will work with each agency to ensure that GA POS representatives are informed of Administrative Offenses and NIGO situations/cases.

Administrative Offenses are, in general, violations of WFA application submission requirements. They include, but are not limited to:

- Disclosure form not submitted or incomplete;
- Illustration not submitted, not signed or containing incorrect information such as firm/address or agent/proposed insured name;
- No WFA brokerage account number established or indicated;
- FA not appropriately licensed or appointed on app sign date; and
- Inforce illustration not submitted on replacement cases.

The consequences for such Administrative NIGO infractions are:

- Initial offense: Process reminder sent to General Agency and GA POS rep, including "Guide to Processing Business in WFA" (see Wells Fargo Advisors Insurance Submission Process)
- Repeat offenses: Required retraining for GA POS reps (and agencies on how to process business in WFA).

In a situation where a GA POS rep refuses to learn or use the WFA process, we reserve the right to terminate that GA POS rep's privilege to work within WFA.

Consequences for Failing to Comply with NIGO Process

- **First offense** – Verbal warning to General Agency and Representative, and retraining on requirements.
- **Second offense** – Written reprimand to General Agency and Representative.
- **Third offense** – Written reprimand to General Agency, Representative with copies to the Financial Advisor, appropriate WFA field leadership and the Managing Director of Life Insurance.
- **Final offense** – Termination of Representative's privilege to work with WFA FAs.

For the purpose of administering the consequences of Compliance NIGOs, NIGOs will be tracked on a calendar year basis and reported monthly. The intent of these rules is to provide individual GAs with training following each compliance offense so that they will be more aware of the rules and have an opportunity to change their practices to align with WFA policy. As such, if an individual GA receives more than one Compliance NIGO in the course of a month, those NIGOs will be aggregated together and only count as one NIGO for that month so that the GA has the opportunity to receive appropriate notice and training.

* *Violations of these expectations are considered particularly grievous. WFA reserves the right to accelerate the consequences, up to and including termination of the Representative's privilege to work with WFA FAs, for any offense.*

Illustration Guidelines

The individual life insurance product illustration guidelines are to be used for all individual life insurance cases prepared for WFA FA's. Cases may be illustrated outside of these guidelines; however, reasons for any deviations should be documented, in writing, and included with the illustration for CSU review and approval.

General guidelines for all illustrations:

- Do NOT illustrate higher than the maximum rate of returns listed below.
- Do NOT illustrate loans or withdrawals from MEC contracts.
- Do NOT illustrate riders (where charges impact the illustration) with an unrealistic duration (e.g. policies with LTC/chronic care riders should last until age 85).
- Do NOT illustrate variable rate loans – as the loan rate charged may vary resulting in an unrealistically positive illustration.
- Do NOT illustrate Stepped and Graded premium structures.
- Where the carrier software allows, run a middle rate - at current charges - between zero and the maximum illustrated rate.
- Policies used to illustrate income/cash value distributions may be subject to additional CSU review.
- All premium financing cases have special requirements that must be met, please refer to the premium financing training/requirements for details.

The Chart Below Provides Additional Guidance for Specific Policy Types

Policy Type	Minimum Cash Value at age 100	Maximum Illustrated Rate of Return
VUL	25% of initial face amount	7.5%
IUL	25% of initial face amount	7.0%
CAUL	25% of initial face amount	Carriers Current Rate
NLG UL	No minimum CV, but illustration must show policy in force through age 100	Carriers Current Rate
WL	No minimum CV, but illustration must show policy in force through age 100	Carriers Current Rate

VUL = Variable Universal life, IUL = Indexed Universal Life, CAUL = Current Assumption Universal Life, NLG UL = No Lapse Guarantee Universal Life (aka Death Benefit Guarantee UL), WL = Whole Life

Expectations – General Agency

- Execute appropriate General Agency contract(s) and agreements with Wells Fargo Advisors (WFA) indicating Agency agreement to uphold all WFA requirements.
- Provide annual due diligence information to WFA upon request.
- Promptly notify WFA when:
 - New General Agency representatives wish to engage in business at WFA,
 - General Agency representatives terminate their agreement with your General Agency, or
 - General Agency representatives choose to withdraw from the WFA relationship.
- Maintain appropriate agency licenses, registration, and appointments to conduct business within the applicable jurisdictions.
- Supervise General Agency representatives:
 - As required to comply with all applicable statutes, regulations and advisory opinions, and
 - As required to ensure that all WFA requirements are consistently met.
- Prioritize and manage submissions of Agency client-facing sales and marketing materials (including proprietary material and tools) to WFA for approval. (See Marketing Material Review Process)
- Ensure that all Representatives choosing to work in WFA are actively engaged and demonstrating a consistent and reasonable level of WFA activity
- Provide monthly and quarterly reports, as detailed in the General Agency Reporting Requirements document, and as may otherwise be reasonably requested by WFA
- Support WFA insurance initiatives through marketing, training, and executing on WFA initiatives.
- Comply fully with WFA's "Third Party Rules of Engagement" and "Cash/Non-Cash Compensation Policy".
- Ensure all General Agent Representatives have attended required WFA training on all special processes, for example, premium financing.
- Ensure that all communications containing client confidential data with Wells Fargo (and or SBIA on behalf of WFA) are always sent with encryption.

Consequences for Failing to Comply

Where patterns of General Agency Representative non-compliance are observed and/or where the General Agency itself fails to comply with the expectations, appropriate action, up to and including termination of the General Agency contract may be taken.

Marketing Material Review Process

This process applies to all third party materials to be used within Wells Fargo Advisors (WFA) – including the PCG, FiNet, and WBS channels. A summary of the process and an overview of content guidelines for the material are provided below.

Overview

1. Send all requests for marketing material review to LIFEINSMARKETINGAPPROVALS@WELLSFARGO.COM and include the following:
 - a. Completed WFA Insurance Marketing Material Review Request Form (see attached)
 - b. Marketing piece to be reviewed
 - c. FINRA Review Letter (if applicable)

Please note: Materials submitted to other email addresses and/or incomplete requests will not be reviewed.

2. Every effort will be made to review complete submissions by the end of business of the fifth business day following the initial request.
3. Once review is complete, the all parties included on the original request will receive notice showing one of the following statuses outlining WFA's decision:
 - a. **Approved:** Material is approved for use within WFA (all channels) only through the date shown on the approval (no longer than 18 months from approval date). Use beyond this date is prohibited.
 - b. **Changes Required:** Material requires edits as detailed in response. The revised item, with all required changes, made must be resubmitted for review.
 - c. **Declined:** The piece is NOT approved for use in any WFA channel. Responses will include rationale for rejection.

Marketing Material Restrictions

WFA Insurance has put additional guidelines in place to streamline the marketing material approval process. Please follow these guidelines when submitting materials for review as we will not approve more than indicated. These guidelines are as follows:

- **Product Pieces (describes a product and how it works)**-One client use piece and one financial professional piece per product.
- **Concept Materials (describes ways to use insurance for particular purposes)**- Must conform to the WFA insurance marketing message (limit 2 per month).
- **Seminar Materials (client facing seminars)** - Must align with WFA insurance marketing messaging (limit 2 per month).
- **Producer Training Materials (producer facing training)** - Must align with WFA training priorities (limit 2 per month)
- **Prospecting Letters (including business reply mailers)** - Will generally not be approved as these materials are only produced internally.

Special Instructions for Client Facing Material

- Insurance sales and marketing material must provide complete and accurate information.
- Internal Use Only brochures are only to be shared with licensed financial professionals. They are not to be shared with the public.
- Distinguish between products and services. For example, make it clear that life insurance is not a retirement plan but it can provide funding for retirement needs as a secondary benefit. Therefore, do not refer to "plans" or "programs" when only life insurance is presented. Additionally, do not refer to life insurance as an investment or savings plan.
- Sales and marketing material discussing Variable Life Insurance must be filed with FINRA, since Variable Life Insurance products are composed of both insurance and investment components. Additionally, the material may have to be filed with certain states. Include a copy of the FINRA review letter with your submission. FINRA review letters contingent on content changes will not be accepted.
- Sales and marketing material that discusses the use of life insurance for estate planning purposes or estate planning concepts or vehicles must include a tax and legal notice.
- When offering an estate planning consultation and discussing its potential benefits (e.g. minimizing taxes), it must be disclosed that the estate plan may include the recommendation of a life insurance product.
- The standard disclosure used by the Firm is shown below. Note: this disclosure must be boxed and in bold text.

Investment and Insurance Products: ► NOT FDIC Insured ► NO Bank Guarantee ► MAY Lose Value

Wells Fargo Life Insurance Relationships and Marketing Team

David Seifers is the Marketing Manager responsible for this process and will be your primary point of contact regarding marketing material submissions.

Don Davenport - Manager, Relationships and Marketing

Ph. 612-667-3592 Donald.davenport@wellsfargo.com

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Katie Ratkewicz - G.A. Relationship Manager

Ph. 314-955-2934 Katie.ratkewicz@wfadvisors.com

David Seifers-Marketing Manager

Ph. 612-667-8231 David.M.Seifers@wellsfargo.com



WFA Insurance Marketing Material Review Request

Complete all sections below and submit this form along with material to be reviewed and FINRA review letter (if applicable) to LIFEINSMRKTINGAPPROVALS@wellsfargo.com.

1. Contact Information

Date Submitted	<input type="text"/>		
Company	<input type="text"/>		
Contact Name	<input type="text"/>	Phone	<input type="text"/>

2. Material Details

Title	<input type="text"/>		
Reference Number	<input type="text"/>	Revision Date	<input type="text"/>
Date Approved by Carrier Compliance Officer	<input type="text"/>		
Audience:	<input type="checkbox"/> Client Use	<input type="checkbox"/> Advisor Use Only	

3. FINRA Review (required for all client use materials referring to variable products)

FINRA letter attached:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Not Applicable
FINRA Reference Number	<input type="text"/>		

Internal Use Only

Approved by:	<input type="text"/>
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Investments and Insurance Products:

Not Insured by FDIC or any Federal Government Agency	May lose value	Not a deposit of or Guaranteed by a Bank or Any Bank Affiliate
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Wells Fargo Advisors is the trade name used by two separate registered broker-dealers: Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC, Members SIPC, non-bank affiliates of Wells Fargo & Company.

General Agency Reporting Requirements

Monthly Reporting:

- Pending and Paid Sales
 - Agency Name
 - Report Date Range
 - By Status (Pending or Paid)
 - Then by Representative (Name and Territory)
 - Then by FA
 - Show each for each app/policy: Client Name, Carrier, Product, Face Amount, Replacement (Y/N), Target Premium, Excess Premium, Single Premium, and Total Premium
- Activity Reporting
 - Agency Name
 - Report Date Range
 - By Representative (Name and Territory)
 - Show # Branch/Complex Manager Contacts, # FA Contacts (# in person and # phone), # Individual Client Meetings, # Group FA Training Sessions, # Client Seminars

Quarterly Reporting:

- Entertainment, Meals & Gifts
 - Agency Name
 - Report Date Range
 - By Representative (Name and Territory)
 - Then by FA
 - Show for each expense: \$ Amount, Type (Entertainment, Meal, or Gift), Short Description

Ad Hoc Reporting (within 30 days of Event):

- Representative terminations (include reason for termination if for cause or other than voluntary, and listing of WFA cases in the pipeline along with a description of how each will be supported)
- Representative choosing not to work in WFA any longer (include listing of WFA cases in the pipeline along with a description of how each will be supported)
- New representative desiring to work in WFA

Third Party Rules of Engagement

Shown below is the "WFA Third Party Rules of Engagement" document, taken straight from the WFA Partner Guide. It was not written by, or specifically for, insurance people, so you will need to do some investment- to insurance-lingo translations. Please interpret "investment products" to mean all insurance products, whether fixed or variable; "WFA Relationship Management Group" to mean the LIFE team; and "wholesalers" to mean General Agency Representatives and/or Carrier Point-of-Sale Representatives. Importantly, all the rules in this document apply to General Agencies' and their Representatives' work within WFA.

At Wells Fargo Advisors, we want to ensure that all relationships with our partners are successful. This information, along with the cash/non-cash compensation policy, provides guidance on the best ways to work with Wells Fargo Advisors' team members, including all branch associates.

This document applies to companies offering investment products to Wells Fargo Advisors, including but not limited to: mutual funds, insurance, annuities, closed-end funds, exchange traded funds, UIT's, alternative investments, and separately managed accounts.

This document applies to all Wells Fargo Advisors channels including:

- Private Client Group (PCG)
- Independent Broker Group (IBG)
- Wealth Brokerage Services (WBS)

Our commitment to you is to provide timely and useful information to help your firm navigate through the Wells Fargo organization. This commitment is carried out on a day-to-day basis through the Wells Fargo Advisors Relationship Management Group. The Relationship Management Group serves as your central point of contact at Wells Fargo Advisors assisting you with:

- Creation of marketing campaigns and partnerships with others areas of the Firm
- Timely delivery of information through periodic newsletter and frequent e-mail communications
- Information on dates for periodic conference calls, used to provide updates on product, sales, strategy, operational issues, manager research and marketing
- Contact information for branches and Productivity Consultants
- Facilitation of product or operational issues
- Coordination of all contracts and agreements

WORKING IN OUR OFFICES

We appreciate all the time your firm spends providing education and product support to our Financial Advisors. We ask that your wholesalers obtain approval prior to initiating any meeting with the following sales professionals. The approval process varies by channel:

- Private Client Group – contact the branch manager or designee for branch meetings
- Independent Brokerage Group – contact the appropriate office
- Wealth Brokerage Services – contact the Regional Brokerage Managers (RBMs)

Wholesalers should coordinate with the appropriate Sales Management for all group meetings. Unless specifically invited by a Branch Associate, wholesalers are not permitted to freely walk around an office after a meeting or drop in unexpectedly on other branch associates.

In order for your organization to work effectively in our branches we will provide you periodic updates on our branch locations and branch manager information. We require that you report back to us on a **quarterly** basis the activity in our branches including:

- Number of visits and locations
- Type of visits (lunch, seminar, one-on-one meeting, etc.)
- Topics discussed
- Success stories

TRAINING AND EDUCATION EVENTS

All training events (outside of branch presentations) should be coordinated through your Wells Fargo Advisors' Relationship Manager. By coordinating training and education events through the Relationship Management Group you ensure that you are following all Wells Fargo Advisors policies regarding cash/noncash compensation and all rules surrounding training events. Keep in mind:

- Wells Fargo Advisors only allows Financial Advisors to attend training events with other Firm Associates. Financial Advisors may not attend events that involve Financial Advisors from other firms.
- All events, such as due diligence meetings and large training events, require prior Home Office approval and all proposed attendees must go through a formal approval process initiated by the Relationship Management Group. All of the policies surrounding meeting attendance are included in our Cash/Cash-/Non-Cash Compensation Guide and FAQs.

A few things to consider when determining if you would like to sponsor an event:

- The primary purpose of the event must be training and education.
- Attendance by Associates at the event must not be contingent upon achieving any sales targets or goals.
- The event must be held at an appropriate location (i.e., a local office or a facility nearby for local events, or a regional location with respect to regional events).
- The event must occupy a substantial amount of the work-day (i.e. approximately 6 hours per day).
- Training and education support must not be used to pay for the guests of Associates at these events.

APPROPRIATE BUSINESS COMMUNICATION (EMAIL, MAIL, IN-PERSON)

- **Email** - You may provide standard email communications, such as market commentary, fund performance updates, etc. to Associates **only upon the request or via the consent of each Associate**. Emails to Associates who have not requested nor consented to receive them are not permitted. All email messages to Associates must include an opt-out section. No general distribution of any email lists will be provided.

- **Conference Calls** - Associates may attend conference calls hosted by your firm. Communication of conference call logistics can be coordinated by your Relationship Manager and posted to our intranet, if appropriate.
- **Client Communication** - Third Parties are not permitted to correspond directly with any Wells Fargo Advisors' clients, including, but not limited to, marketing letters, welcome letters, proxies, prospectuses, ADV's and change in ownership. ADV's and prospectuses are made available at the time of the account opening and/or upon client request. Exceptions may be outlined in specific agreements with Wells Fargo Advisors and handled by your Relationship Manager.

THIRD PARTY MARKETING COLLATERAL GUIDELINES

- **Internal –**
 - All marketing materials intended for “Internal Use Only” or “Broker/Dealer Use Only” produced by a third party product provider may be used with any Associate as long as it is not used with clients. Marketing materials include, among other things, all sales sheets, brochures, seminars or presentation materials, hypothetical illustrations, etc.
 - All materials that are specific to WFA and mention the Firm, or any group/product within the Firm, must be pre-approved before use. Please submit to your Relationship Manager for approval and an “Approval Code” that must be added to your materials. This includes emails, written materials, etc.
 - **External –**
 - If used by FAs with clients - The FA is responsible for reviewing the materials, obtaining the approval of their qualified supervisor, obtaining a clean FINRA letter and maintaining records of usage in the Branch. WFA FAs can access these policies via the Associates Guide: Section 8, available on InfoMAX.
 - If used by WFA Home Office – Some material may be used by the Wells Fargo Advisors Home Office via posting on InfoMAX or distributed in other ways to FAs. All client-facing materials for “Public Use” must be submitted for review and approval prior to use. Client materials include brochures, fact sheets, seminars and presentation materials, etc.
 - Materials should be submitted to the Relationship Management team and the Product Marketing and Communications mailbox (lifeinsmrktingapprovals@wellsfargo.com) along with the corresponding clean FINRA Advertising Review comment letter (if applicable) for review and approval by a subject matter expert.
 - Remember to use the correct verbiage when referencing the Firm. The brokerage Firm is Wells Fargo Advisors, LLC not Wells Fargo. This is very important as there may be differences in the research, advice and products between the groups.
- Co-branding of marketing material with the Wells Fargo Advisors logo is NOT permitted.

CASH/NON-CASH COMPENSATION POLICIES

At Wells Fargo Advisors we have very specific and in-depth policies around cash and non-cash compensation. Those policies and frequently asked questions that accompany the policy are sent to you on an annual basis or when updated. It your responsibility to ensure that your firm abides by those policies and that all sales representatives from your firm abide by the policy. **A copy of this policy is included in this guide.**

Questions

Your Relationship Manager is your central point of contact at Wells Fargo Advisors. If you have questions about any of our policies and procedures, please contact your Relationship Manager.

Policy could change without notice. This document is for GA use only.

WFA Cash/Non-Cash Compensation Policy

Shown below is the "WFA Cash/Non-Cash Compensation Policy" document, taken straight from the WFA Associate Guide. It was not written by, or specifically for, insurance people, so you will need to do some investment- to insurance-lingo translations. Please interpret "affiliated or unaffiliated third parties" to include insurance carriers, as well as General Agencies and their Representatives; "investment products" to mean all insurance products, whether fixed or variable; "WFA Relationship Management Group" to mean the LIFE team; and "wholesalers" to mean General Agency Representatives. Importantly, all the rules in this document apply to General Agencies' and their Representatives' working within WFA.

SUMMARY

SRO regulations require that Registered Associates base investment recommendations on the suitability of the investment for the client and not be influenced by an offer or receipt of cash and non-cash compensation from a Vendor. Associates may not:

- Accept any cash or non-cash compensation that is preconditioned on the achievement of sales targets or granting access to the Firm's sales force;
- Participate in product and product-category specific sales contests or similar incentives organized by Vendors;
- Allow vendors to sponsor, attend, or pay for client or associate appreciation events such as holiday parties, entertainment events or theater nights; and/or
- Accept payment directly from the Vendor for reimbursement of expenses under the Firm's cash and non-cash compensation policy. All reimbursement payments must be processed through the Firm's systems.

DEFINITIONS

Cash and non-cash compensation:

- Includes any item of monetary value received from a Vendor in connection with the sale and distribution of securities or any other product offered by, or through, the Firm. This type of compensation does not include regular product sales compensation.

The term "Vendor" includes, but is not limited to, companies that:

- Sponsor or distribute investment products; and/or
- Provide services that may be offered by the Firm to its clients

Examples of Vendors include:

- Mutual Fund Companies;
- Investment advisors;
- Wholesalers;
- Distributors;
- Unit investment trust sponsors;
- Trust administration managers;
- 529 plans;
- Affiliated or unaffiliated third parties; and
- Any other third-party sponsors or distributors of investment products or services.

VENDOR GIFTS

Associates may accept certain gifts from Vendors that do not exceed \$100 in total per Vendor per year. Permissible gifts include:

- Merchandise;
- Gift cards or gift certificates redeemable for merchandise or services; and
- Instances where a Vendor provides or pays for a social meal, or tickets for a sporting event, the theater, cultural events, or other comparable entertainment and does not attend the event with the Associate.

Associates may accept Vendor branded promotional items of nominal value. These gifts are not subject to the \$100 per year per Vendor limit.

Associates must refuse the following types of gifts of any dollar amount from Vendors:

- Securities;
- Cash;
- Checks;
- Cash equivalents such as money orders or traveler's checks;
- Gifts checks or gift cards that may be redeemed for cash;
- Loans;
- Charitable donations;
- Discounts;
- Blocks of tickets for distribution to other Associates, clients or prospects; and
- Any other gifts that do not comply with Firm policy.

Gifts are valued at the higher of face value or market value.

OCCASIONAL MEALS AND ENTERTAINMENT

Occasional meals and entertainment (an Entertainment Event) include situations where a Vendor provides or pays for and at least one representative of the Vendor attends:

- Social meal; or
- Sporting event, the theater, cultural events, or other comparable entertainment.

Associates may participate in an Entertainment Event if:

- The Entertainment Event is:
 - Not frequently held, lavish or extensive as to raise any questions of propriety; and
 - Held in the Sales Location's vicinity.
- Participation is:
 - Not preconditioned or based on achievement of sales targets; and
 - Limited to an Associate or a small group of Associates and guests of Associates. Guests of Associates may only include other Firm Associates or members of the Associate's household.
- Clients and prospective clients do not attend the Entertainment Event as a guest of the associate or the vendor who is providing or paying for the event.
- The value of one Entertainment Event (including the cost of the guest's attendance) is less than \$400 per Vendor per year.
- Aggregate value of all Entertainment Events (including the cost of the guest's attendance) in one year does not exceed \$1,000 for the Vendor.

Entertainment Events do not include informal lunches or snacks provided by Vendors to groups of Associates in connection with sales presentations conducted in the Sales Location.

Associates **must not** accept:

- An invitation to attend highly publicized special entertainment or social events such as:
 - Super Bowl;
 - World Series;
 - NCAA Final Four;
 - NHL Stanley Cup
 - NBA Championship;
 - Indianapolis 500
 - Kentucky Derby;
 - Music and entertainments award shows; or
 - Other similar high profile events.
- Contributions from Vendors or third parties toward organized office, holiday or recognition parties, team appreciation events, social outings, large receptions, or other general attendance events:
 - Held exclusively for Associates; or
 - That will include clients and prospects.

Business entertainment items such as tickets are valued at the higher of face value or market value.

ASSOCIATE TRAINING AND EDUCATION MEETINGS

Due diligence and training and education meetings, paid in whole or in part by a Vendor, and conducted by the Firm or Vendor (Training and Education Meetings) consist of:

- Meetings held outside the Sales Location; or
- Informal educational presentations held at the Sales Location.

Associates may not accept payment directly from the Vendor for reimbursement of expenses. All reimbursement payments must be processed through the Firm's systems.

Different requirements apply to each type of meeting as outlined below.

TRAINING AND EDUCATION MEETINGS HELD OUTSIDE THE SALES LOCATION

Associates may attend a maximum of three (3) Vendor-sponsored Training and Education Meetings held outside the Sales Location in one calendar year. The Firm must pre-approve all Training and Education Meetings. Associates must not accept invitations sent directly by the Vendor to the Associate.

The Relationship Management Group of the appropriate product area:

- Must verify that:
 - The Vendor has a current selling agreement with the Firm;
 - Participation by an Associate is not pre-conditioned on the achievement of sales targets or a condition of access to the sales force;
 - The meeting is held exclusively for the Firm and its Associates and associates of other broker/dealers are not permitted to attend; and
 - Clients and prospects are not permitted to attend the meeting.

- Must pre-approve:
 - Vendor sponsorship;
 - The meeting location which must be appropriate such as:
 - The Vendor's local office;
 - A facility (such as hotels with conference facilities) located in the vicinity of such Sales Location or Vendor's local office; or
 - A regional location for regional meetings;
 - The purpose of the meeting as the presentation of due diligence, training or educational information must comprise the majority of the duration of the meeting;
 - The meeting agenda and that the Vendor participates as a speaker for a substantial portion of the meeting; and
 - The list of invited Associates.
- Forwards a list of potential invitees to the Regional Office and the Qualified Supervisor who are given the opportunity to reject any potential invitee.
- Coordinates with the Vendor to notify approved Associates of their invitation.

Upon acceptance of an invitation, Associates must:

- Complete the Vendor Education Meeting Attestation and attest that they:
 - Plan to attend the event in its entirety; and
 - Understand that the meeting's purpose is for training and education; and
- Retain the Attestation in a central file in the Sales Location in accordance with the Firm's Record Retention Schedule.

In connection with a Training and Education Meeting, Vendors **may** pay for:

- Associates' meals, transportation, lodging for the nights of the event;
 - The Relationship Management Group and Vendor may consider additional lodging nights if an additional travel night will lower the overall cost to the Vendor.
- Items directly related to training and education aspects of the meeting (e.g., a booklet of educational materials).

Vendors **may not** pay for:

- Recreational events, tours, or other forms of entertainment; and
- Any expenses related to spouses or guests in attendance.

INFORMAL EDUCATIONAL PRESENTATIONS

Associates may attend informal educational presentations held by the Vendor in the Sales Location if:

- Clients and prospects do not attend these meetings;
- The meeting:
 - Does not include any entertainment events or activities; and
 - Is exclusive to Firm Associates and does not include associates of other broker/dealers; and
- Participation by an Associate is not pre-conditioned on the achievement of sales targets or a condition of access to the sales force.

There is no limit on the number of informal educational presentations an Associate may attend in a year.

Vendors may pay costs related to:

- The presentation; and

- Snacks, refreshments, or informal lunches of nominal value.

SEMINARS FOR THE PUBLIC

Associates may hold sales seminars and meetings for clients and prospective clients in which the expenses are paid in full or in part by a Vendor if:

- Associates follow the Firm's policies for these events
- All event materials, advertisements, invitations and presentations to the public must prominently disclose the Vendor's sponsorship of the event.
- A representative of the Vendor:
 - Attends the seminar;
 - Is recognized as a sponsor of the seminar; and
 - Speaks for a significant amount of time at the seminar.
- The invitation lists all speakers for the event.
- An appropriate meeting location is used such as:
 - The Vendor's local office;
 - A facility (such as hotels with conference facilities) located in the vicinity of such Sales Location or Vendor's local office; or
 - A regional location for regional meetings;
- A significant portion of the seminar is devoted to a general discussion about:
 - The products offered by the Vendor; or
 - Financial training or education.

In connection with a Seminar with the Public, Vendors may:

- Pay for:
 - Meeting room rental;
 - Meals provided to all attendees, including Associates and clients/prospects; and
 - Marketing materials used during the meetings.
- Not pay for:
 - Entertainment associated with the seminar (e.g., round of golf after the meeting); or
 - Associates' travel or lodging expenses for any such meetings.

The Associate or the Firm must pay for any costs associated with a seminar. Vendors may reimburse the Associate or the Firm for these expenses provided that all reimbursement payments are processed through the Firm's systems. Associates may not accept payment directly from the Vendor for reimbursement of expenses.

MEDIA ACTIVITIES AND BUSINESS DEVELOPMENT

Media activities and business development include situations in which a Vendor provides or pays in part or in full for:

- Media activities such as:
 - Paid advertisements on a television or radio broadcast; and
 - Sponsorship of an Associate's television or radio broadcast.
- Business development such as:
 - Software;
 - Sales and marketing literature; and
 - Signage.

Associates may accept vendor sponsorship if:

- Associates comply with all Firm policies;
- Is not pre-conditioned on the achievement of sales targets;
- The media activities is pre-approved in writing by the Qualified Supervisor and retained in a central file in the Sales Location;
- Is prominently disclosed to clients:
 - On advertisements, signage, marketing materials, and output from software programs; and
 - During media broadcasts and advertisements.

CHARITABLE EVENTS AND CONTRIBUTIONS

Associates may not:

- Request or solicit Vendors to
 - Make a charitable donation or contribution; or
 - Sponsor any community activity; and/or
- Attend charitable events as the guest of a Vendor if a client is also present as a guest of the Vendor.

Associates who attend a charitable event as a paid guest of a Vendor:

- Must be accompanied by a representative of the Vendor; and
- Comply with all Firm policies including dollar limitations outlined in the “Occasional Meals and Entertainment” section.

REIMBURSEMENT PROCESS

To obtain reimbursement from a Vendor for cash and non-cash compensation expenses, Associates must:

- Send a “Vendor Reimbursement Request Letter” to the Vendor with copies of all receipts.
 - This letter requests the Vendor to make the reimbursement check payable to the Firm.
 - Vendors affiliated with the Firm may journal reimbursement funds to the sales Location RC number in lieu of payment by check.
- Submit the “Vendor Reimbursement Request Form” along with the Vendor’s reimbursement check and other required documentation to the Qualified Supervisor for review and approval.
 - All requests for reimbursement of \$1,000 or more also require Regional Office approval.
- Upon receipt of all required approval(s):
 - Retain a copy in the Sales Location of:
 - Vendor Reimbursement Request Letter;
 - Vendor Reimbursement Request Form;
 - All invoices and receipts paid by the Associate;
 - Seminar Attendee Long and invitation, if applicable; and
 - Vendor’s reimbursement check, made payable to the Firm, if applicable; and
 - Submit a reimbursement request through the Firm’s expense management systems.

In addition, Associates may submit any reimbursement requests for costs not reimbursable by the Vendor through the Firm’s expenses management systems.

Policy could change without notice. This document is for GA use only.

The following Frequently Asked Questions provide additional guidance in understanding and adhering to Firm policy.

General Questions			
What is considered cash and non-cash compensation?		Broadly defined, cash and non-cash compensation includes any item of monetary value received from a vendor in connection with the sale and distribution of securities or any other product offered by, or through, the Firm. Examples are provided in the chart below.	
CASH	MERCHANDISE	MEALS & ENTERTAINMENT	MEDIA & BUSINESS DEVELOPMENT
<p><u>Permitted</u></p> <ul style="list-style-type: none"> -Gift cards -Gift certificates -Expense reimbursements <p><u>Not Permitted</u></p> <ul style="list-style-type: none"> -Securities -Loans -Charitable donations -Discounts -Monetary Gifts -Any gift cards redeemable for cash 	<p><u>Permitted</u></p> <ul style="list-style-type: none"> -Promotional items -Gifts of nominal value -Seminar supplies -Printing costs <p><u>Not Permitted</u></p> <ul style="list-style-type: none"> -Collectibles -Artwork -Briefcases -Award plaques 	<p><u>Permissible Events</u></p> <ul style="list-style-type: none"> -FA training -Due diligence events -Travel -Meals -Sports outings -Charitable event <p><u>Not Permitted</u></p> <ul style="list-style-type: none"> -Holiday parties -Lavish meals -Appreciation events 	<p><u>Permissible</u></p> <ul style="list-style-type: none"> -Activities -Radio show sponsorship -Signage -Marketing literature -Proprietary software <p><u>Not Permitted</u></p> <ul style="list-style-type: none"> -Non-proprietary -Software -Software support -Lead lists -Professional designations & certifications
What should I ask myself before I offer a form of non-cash compensation?		What category of non-cash compensation is this? Is it Firm Associate training? Is it a seminar with the public? Is it entertainment? Is it a nominal gift?	
Is it appropriate for me to reimburse a Firm Associate directly for cash or non-cash compensation and related expenses?		No. Vendors may not directly pay or reimburse Firm Associates for expenses incurred at meetings, seminars or other events or for other items that may be considered cash or non-cash compensation.	
Vendor Gifts			
Gift Guidelines			
Can Firm Associates accept gifts from vendors that are worth less than \$100.00?		Yes. Firm Associates may accept gifts (other than securities and monetary gifts) from vendors that do not exceed \$100.00 per calendar year, per vendor.	
Can Firm Associates accept a		No. Monetary gifts include cash, checks, money	

monetary gift from a vendor?	orders, electronic funds or any type of gift that can be exchanged or deposited as cash.
Can Firm Associates accept a gift card or gift certificate from a vendor?	Yes, but the certificate must be redeemable for merchandise or services. Firm associates are not permitted to accept a gift card or certificate that is: <ul style="list-style-type: none"> - Redeemable for cash; or - Valued at more than \$100.
I'm a fund marketing rep and I'm hosting a conference for FAs to promote new funds. I'm giving away digital cameras as a door prize. Is this a gift that Firm Associates can accept?	Yes, so long as the value of the camera is within the \$100 limit. The camera or other similar items trigger the gift rule because the door prize is in relation to the securities business.
Promotional Gifts	
Can Firm Associates accept gifts of a promotional nature from a vendor?	Yes. If the gift is of nominal value and displays the vendor's logo or other similar branding. Promotional gifts do not count against the \$100.00 limit.
What are examples of promotional gifts that do not count towards the limit?	Examples include branded coffee mugs, t-shirts, golf balls, umbrellas, etc. If the gift does not contain the vendor logo or branding or if it contains a logo but is not of nominal value, the value of the gift will count towards the \$100.00 annual limit. For instance, a standard iPod with a vendor's logo is not an acceptable gift as its value exceeds the \$100 annual limit.
Associate Training and Education, and Due Diligence Meetings	
How do due diligence events differ from training and education meetings?	For purposes of the Firm's policy, due diligence events and training and education meetings are considered "training and education meetings." Generally, due diligence meetings are lengthy, require travel to a vendor's primary office location and provide detailed information about a product that the Firm is using. These meetings generally involve the vendor providing information to Firm Associates about a product after that product is approved for use by the Firm.
How do I know if a Firm Associate may attend vendor training, an Associates meeting or vendor-sponsored due diligence meeting?	Firm Associates must be pre-approved by the Qualified Supervisor and the Relationship Management Group such as the mutual fund, insurance or annuity director to attend vendor meetings outside of their Sales Locations. Firm Associates cannot accept invitations to due diligence events directly from a vendor.
Are Firm Associates limited to the number of training and education events that they may attend?	Firm Associates may attend an unlimited number of informal educational presentations or meetings that are held at their Sales Location or its vicinity. Firm Associates may attend up to three vendor-sponsored training and education meetings held outside the Sales Location in one

	calendar year.
Client Attendance	
Can Firm Associates bring clients or prospects to training and education meetings?	No.
Location	
What is an acceptable location for training and education meetings?	Appropriate locations generally mean: -The Firm Associate's Sales Location; -The vendor's local office; -A facility (e.g., hotels with conference facilities) located in the vicinity of such offices; or -A regional location for regional meetings.
Education vs. Entertainment	
How do I determine whether a meeting I would like to sponsor is considered educational per the Firm's policy?	Apply the "podium test." If an event spends the majority of the agenda on "podium" type activities such as presentations, then it is considered training and education. If an event spends the majority of the agenda on meals, cocktail hours, and golf, or "non-podium" events, the event is considered entertainment.
I'm planning a three-hour vendor education meeting. The actual presentation is only 30 minutes followed by a cocktail hour and dinner. Is this considered an educational or entertainment event?	Entertainment. The education or training portion of the meeting must fill the majority of the total duration of the event in order to be considered training and educational meeting. If the 3-hour meeting consisted of a 1.5- hour presentation following by a 1.5-hour reception, then it would be considered educational in nature and subject to the occasional meals and entertainment event rules.
Sporting, Recreational or Social Events	
Can I pay for Firm Associate golf rounds associated with a training and education meeting or trip?	No. Vendors are not permitted to reimburse Firm Associates for, or make payments toward, recreational events (e.g., golf or tennis outings), tours or other forms of entertainment while at a location for the purpose of training or education.
Family	
Can a vendor pay for, or reimburse a Firm Associate for expenses incurred by an Associate's spouse at a training and education meeting?	No. Vendors are not permitted to make payments or reimbursements for expenses related to spouses or other guests in attendance.
Invitations	
Can I invite a Firm Associate to a meeting directly?	No. Firm Associates are not permitted to accept invitations directly from a vendor.
I'm sponsoring an event with another B/D, can a Firm Associate attend?	No. Firm Associates are only permitted to attend meetings that are exclusive to the Firm and its Associates.
Payment/Reimbursement	
Can a vendor pay for or reimburse a Firm Associate for a training or a due	A Vendor may reimburse a Firm Associate for reasonable costs of meals, lodging and

diligence meeting?	transportation, conference facility rental and non-cash benefits directly related to the training and education aspects of the meeting (e.g., a booklet of educational materials). Vendors may not reimburse Firm Associates for costs associated with spouse or family member travel, meals, lodging, etc. Firm Associates may not be reimbursed directly by vendors. All vendor reimbursements must be submitted through the Firm.
Occasional Meals & Entertainment	
Can a Firm Associate accept an occasional meal, ticket to a sporting event or theater or any other comparable entertainment event from a vendor?	Yes. Firm Associates may accept such an invitation as long as the events are infrequent, not lavish, and would not raise any questions of propriety. Dollar limits apply as outlined below.
I offered to sponsor a client appreciation dinner event, is this appropriate?	No. Vendors may not sponsor or reimburse Firm Associates for client appreciation dinners or other entertainment events.
Maximum Dollar Amounts	
What is the maximum dollar value that a Firm Associate can accept for a meal or other single-occasion benefit?	The maximum dollar benefit is \$400 per person, per single event, per vendor. If the Firm Associate shares the benefit with a guest(s), then the value of the benefit received by those individuals is included in the \$400 total. For example, if the Firm Associate and a family member attend dinner with a vendor, the cost of dinner for both individuals must not exceed \$400 limit.
What is the Firm's guideline for the maximum aggregate value of meals, tickets, entertainment, etc. received annually from a specific vendor?	The maximum annual aggregate amount per person is \$1000 per calendar year per specific vendor. If the Firm Associate shares the benefits with guests, the cost of their meals, tickets, entertainment, etc. is counted towards the \$1000 maximum limit.
Vendor Attendance	
If I offer a Firm Associate tickets to an event or offer to pay for a meal, do I have to attend?	Yes. The vendor or a representative of the vendor must attend the event with the Firm Associate to have the event qualify as a business entertainment event. If the vendor does not attend the event, then the cost of the meal, ticket or event is considered a gift and subject to the gift rules (\$100).
Can a Firm Manager accept sporting events tickets and randomly distribute them if offered by a vendor?	No. Firm Managers may not accept gifts such as tickets for distribution at his or her discretion. The occasional meal, ticket, or entertainment exception is available only on an individual basis.
Frequency	
What is considered frequent meals and entertainment events that would potentially cause concerns?	- A frequent event may be a vendor offering a Firm Associate tickets to four of eight (half) of the local football team's home games.

	<p>- An infrequent gift would be if the vendor offered a Firm Associate tickets to one of the eight home games.</p> <p>The value of the tickets must be taken into consideration. These costs must be reviewed against the \$400 per event and \$1000 annual limit.</p>
Clients and Family Members	
If a vendor offers a Firm Associate tickets to an event or offers to pay for a meal, can clients or prospects also attend?	No. Clients and prospects cannot attend such events as a Firm Associate's guest or as a guest of the vendor who is providing or paying for the event. As a reminder, vendors cannot pay for client entertainment, including attempts to split such costs with a Firm Associate.
If a vendor offers a Firm Associate tickets to an event or offers to pay for a meal, can a Firm Associate's family member or another Firm Associate also attend?	Yes. Household members and other associates can attend an occasional meal or event but you must include their costs in the maximum limits per event, per vendor, as indicated above.
Sporting, Recreational or Social Events	
What is considered a high profile event, and are they allowed?	No, the Firm prohibits attendance at high profile events. Examples include, but are not limited to, the Super Bowl, World Series, Stanley Cup and other exclusive sporting events. Additionally, highly publicized and exclusive, equestrian, sailing, golf, black-tie, music and entertainment award or events are prohibited.
<p>I offered a Firm Associate a ticket to a professional football playoff game. The face value of the ticket is \$375, but:</p> <p style="padding-left: 40px;">A) I paid a premium and got the ticket for \$450.</p> <p style="padding-left: 40px;">B) I paid \$250, getting the ticket at a discount.</p> <p>How do I apply the policy to these circumstances?</p>	<p>The "compensation" associated with the cost of the event is the higher of market value or face value.</p> <p>A) The market value associated with the event ticket (\$450) is greater than the face value (\$375). The market value paid exceeds the occasional meals and entertainment policy limit.</p> <p>B) The market value associated with the event ticket (\$250) is less than the face value (\$375). Although the market value is less, the "compensation" is the face value of the ticket. The face value is less than the occasional meals and entertainment policy limit.</p>
Holiday Parties	
Can a Firm Sales Location accept gifts, contributions, or reimbursements from a vendor for their holiday party?	No. A vendor cannot contribute to, or provide reimbursements for, group entertainment such as office or holiday parties or similar events sponsored or conducted by the Firm Sales Location or the Firm.
Associate Group Events	
Can I take a group of Firm Associates from a Sales Location out	Yes, only if you take a limited group (not the entire Firm Sales Location or department)

for a meal?	specifically selected by you and not pre-conditioned on a sales target.
Can a vendor purchase an informal lunch or snack for a group of Firm Associates in connection with a sales presentation conducted in the Firm Sales Location?	Yes. An occasional breakfast, luncheon, or snack of nominal value offered as part of a sales presentation or educational meeting is acceptable.
Seminars for the Public	
Payment / Reimbursement	
Can a vendor pay for or reimburse a Firm Associate for the costs of an upcoming seminar that the Firm Associate will be holding with support from that vendor?	Firm Associates may not be reimbursed directly by a vendor. See the Vendor reimbursement below. Vendor payment or reimbursement in connection with seminars is limited to: <ul style="list-style-type: none"> - Meeting room rental costs; - Reasonable costs of meals provided to all attendees, including Firm Associates, clients or prospects; and - The cost of any marketing materials used during the meetings. In addition, the vendor must attend the seminar, be recognized as a sponsor and speak at the event.
Can a vendor pay for or reimburse a Firm Associate for their travel and lodging expenses to a vendor sponsored client/prospect meeting?	No. Vendors cannot pay or reimburse a Firm Associate for any portion of the travel or lodging expenses related to client seminars.
Can a vendor pay a hotel directly for a meeting room and snack expenses incurred for a client seminar?	No. Vendors cannot pay hotels directly for any costs incurred from a client seminar.
What is an acceptable location for seminars with the public?	Appropriate locations generally mean: <ul style="list-style-type: none"> - The Firm's Sales Location; - The vendor's local office; or - A facility (e.g., hotels with conference facilities) located in the vicinity of such offices, or a regional location for regional meetings. The type and quality of the facility used should correspond with the Firm's corporate image.
Vendor Attendance	
Does a representative from the vendor have to attend a client event sponsored by that vendor?	Yes. A representative of the sponsoring vendor must attend and present at such events even if only one client or prospect attends (e.g., dinner attended by a client and his/her Registered Firm Associate). If the vendor does not attend, then the cost of the event is considered a gift and gift rule would apply.
Since a vendor is required to attend a vendor sponsored client or prospect event, does the Firm	Optional. If the meeting is paid for in whole or in part by a vendor, the vendor must speak and a significant portion of the meeting must be

Associate have to talk about the vendor's products and services?	dedicated to a general discussion related to either the products offered by the vendor or material that is educational in nature.
Does the vendor have to speak for the majority of the event?	No. The vendor must speak but not for the majority of the event.
Disclosure	
Must a Firm Associate disclose if a vendor is sponsoring a client or prospect meeting?	<p>Yes. The Firm Associate must disclose that the vendor is sponsoring the event:</p> <ul style="list-style-type: none"> - On the invitation, slide show and materials specifically created for the event (other than general brochures handed out at the event); and - Announce this information to attendees during the event. <p>The specific language required is "This seminar is sponsored and financially supported by (Fund, Insurance Company or Annuity Company, or General Agency)." The Firm Associate must submit all written materials to the Compliance Advertising Review (CAR) group for review and pre-approval.</p>
Must the Firm Associate disclose if a vendor is speaking at a client / prospect meeting?	Yes. The Firm Associate must disclose the speakers on the invitation. CAR must review and approve the invitation before its distribution.
Client Appreciation	
Can a vendor pay or reimburse a Firm Associate or the Firm Associate's Sales Location for the expenses of a "client appreciation event" at a local restaurant?	No. Expenses for a "client appreciation event" whether for an individual or a group do not qualify as client/prospect sales seminars and meetings. Vendors cannot attend or sponsor these types of events or reimburse the Firm Associate for any portion of its costs.
Charitable Events	
Can a Firm Associate ask a vendor to sponsor, pay, or reimburse him or her for the expenses of a charity golf tournament at a local course?	No. Firm Associates cannot solicit or accept charitable donations or sponsorships for charitable events from vendors.
Media and Business Development	
Software	
What is media and business development?	Media and business development are both closely related tools that are generally used to further expand the Firm Associate's business base, communicate with clients, or enhance the way the Firm Associate is doing business. Firm Associates must fully disclose to clients any vendor contribution associated with media or business development activities and tools.
Can a vendor sponsor or contribute to a Firm Associate's radio show?	Yes. A vendor can contribute to or sponsor a Firm Associate's radio show if the contribution is not preconditioned on the achievement of a sales target. During the show, the sponsorship

	must be disclosed.
Can a vendor provide a Firm Associate a software package?	Yes. If the software is proprietary and product specific (e.g., ABC Fund Company's ABC Hypothetical Performance Software), the Firm Associate may accept the software if the Firm Associate is able to fully disclose to clients that the vendor has sponsored or provided the tool. Exception: Insurance companies and insurance general agents are not permitted to provide Firm Associates with proprietary insurance illustration or financial/estate planning software.
Can a vendor pay for or reimburse a Firm Associate for the costs of a non-proprietary software package?	No. A vendor cannot pay for or reimburse a Firm Associate for the costs of an outside software service (e.g., Lipper, Morningstar, etc.).
Can a vendor offer a Firm Associate a business development service at a deep discount from retail price?	No. A vendor cannot provide a Firm Associate a special service at an exclusive price.
Can a vendor purchase prospect mailing lists or other sales tools for a Firm Associate's use?	No. Firm Associates are not permitted to accept prospect mailing lists or any general business support from a vendor where a sponsorship is not transparent to the client.
Can a vendor pay for a general newspaper advertisement that describes a Firm Associate's general services?	Yes. A vendor can contribute to a general advertisement. However, the Firm Associate must clearly disclose the vendor's sponsorship on the advertisement.
Approval Requirements & Acceptable Methods of Payment	
Can a vendor pay or reimburse a Firm Associate directly for incurred expenses?	No. Firm Associates may not receive under any circumstances payments directly from a vendor. Firm Associates may submit the Vendor Reimbursement Request Letter to the vendor which specifies that all reimbursement checks are made payable to the Firm not the Firm Associate. Affiliated vendors may journal the funds to the Sales Location AU in lieu of payment by check.
Miscellaneous	
Can a vendor provide gifts or other compensation to a Firm Branch Office Manager (BOM) in exchange for the promise of access to the sales force?	No. The BOM or any other Firm Associate cannot accept gifts or compensation in exchange for any promise or guarantee to a vendor.
A vendor has offered to rent his vacation condo to a Firm Associate for \$500 a week. It usually rents for \$2,000 a week. Does rental property fall under the non-cash compensation rules?	Yes. Discounts on rental property are subject to the gift rule. The associated value of the rental property is the published rate or the rate generally offered to the public.

Wells Fargo Advisors Insurance Submission Process

- FA must validate that he/she is appropriately licensed and appointed PRIOR TO solicitation by accessing the G2 Producer Licensing database found on SmartStation.
 - FA resident / branch state
 - Policy owner/Client(s) resident state
 - Trust domiciled state
 - Application signed state
 - LTC certification (if applicable)
- For assistance, FA can contact the Licensing & Appointment team at:
 - For WBS - 800-743-7210 Option 3, Fax 866-354-8566, wbslicensing@wellsfargo.com
 - For PCG and FiNet – 866-297-8705 Option 3, Fax 866-354-8566, wfainsurancelicensing@wellsfargo.com
- View InfoMax (Products>Insurance>Licensing & Appointments) for more information
- FA contacts General Agent (GA) for product, illustration and sale assistance. If there is a replacement, an inforce illustration must be provided.
- FA presents suitable and appropriate insurance solutions to the client. GA may provide expert support on behalf of the FA in client meetings.
- FA completes all carrier and Wells Fargo required forms with client, with GA assistance, as necessary.
 - Insurance Client Suitability Worksheet (complete electronically via SmartStation/Trading/Other Trading/Insurance Solutions, print and sign; do NOT use a pre-printed copy as this form is dynamic and changes based on the answers provided to some questions)
 - Life Insurance Disclosure(s)
 - All required carrier application and forms
 - Inforce illustrations on replacements
 - Provide the client with "A Guide To Buying Insurance" (this does not need to go to the GA, SBIA or CSU)
- FA opens a brokerage account via the New Account Opening tool (NAO). Account titling between the brokerage account and insurance application MUST match. The client is considered the owner of the insurance policy.
- GA reviews all forms for completeness and forwards copies to The Insurance Solutions Center (SBIA) for facilitation of Central Supervision Unit (CSU) review and approval.
- SBIA enters the case into the system of record; performs verification of licensing and appointments; reviews for good order; packages documents for CSU review and notifies the FA and the GA of CSU approval upon receipt.
- After notification of CSU approval, GA orders underwriting requirements; forwards application and paperwork to carrier for processing. CSU approval MUST be obtained prior the application submission to the carrier.

- GA provides FA updates throughout the underwriting process and also reports milestone events to SBIA.

If the carrier offer is “other than applied for” the GA is not to accept the offer until the case has been re-reviewed and approved by CSU (and Advanced Case Design, if Premium Finance involved). The FA is required to update the Insurance Client Suitability Worksheet and submit it with a revised illustration to SBIA (with GA assistance, as necessary) to log and submit for CSU re-review.

Wells Fargo Advisors, (WFA), requires that in certain situations, cases are returned to CSU for re-review. This is required to ensure that as situations change, WFA can ensure continued suitability. WFA's CSU re-review guidelines are listed below.		
Change	Yes, requires CSU re-approval	No, does not require CSU re-approval
Premium	Same benefit value with cost increase by 10% or more	Same benefit value with cost the same or lower.
Benefit Value (Death or Income)	Benefit value decrease by 10% or more with same cost	Benefit value increase with same cost.
Premium and Benefit Value	Change of 10% or more of both will require a re-review (higher cost and or lower benefit value)	Change of less than 10%
Rating / Class	Change of 10% or more of either the premium or benefit value due to a rating or class change will require a re-review (higher cost and or lower benefit value).	No change or lower cost / higher benefit value due to a rating or class change.
Financials	Change or update to lower a client's financial information such as income, net worth, or liquid net worth will require a re-review.	Not Applicable
Carrier	If the carrier changes, the application should be treated as a new application – not as a re-review.	Not Applicable
Product	If the product changes, the application should be treated as a new application – not as a re-review.	Not Applicable

- Issued policy is mailed from carrier to GA who reviews for accuracy. GA forwards copies of policy spec pages and unsigned delivery requirements to SBIA. GA releases policy to FA/Branch for delivery.
- FA must complete the Policy Delivery Log.

- FA delivers the policy to the client as soon as received.
- FA sends delivery requirements including the initial premium to GA, who will review and forward to carrier for processing.
- GA will send copies of all delivery requirements to SBIA; updates are entered into the SBIA system and SBIA will work with carrier to ensure that commissions are paid.
- FA will be able to view compensation details on reports within 10-14 days of submitting delivery requirements.

Wells Fargo Advisors GA Case Coversheet

To: Key Client Specialist _____

General Agency: _____

GA General Contact information (Case Manager):

Name: _____

Telephone: _____

Email: _____

POS/SVP: _____

Client Name: _____

FA Name: _____

Date application received at GA: _____

We have verified that the Producer submitted the WFA Suitability online

Included in transmittal: (Copies only; originals are not needed)

- Wells Fargo Advisors Insurance Disclosure Statement (ALL CASES)
- Carrier application and all carrier forms
- As sold signed illustration
- For Replacement cases, **current inforce illustration**
- Signed/Completed Carrier Asset Allocation (variable products only)
- Reg 60 paperwork if applicable

Note: Please update your Key Client Specialist during the underwriting process.
Any material changes to a case may require WFA re-approval prior to issue.
Please notify your Key Client Specialist to discuss Wells Fargo Advisor mandates for reapproval.

Special Handling Notes:

Insurance Solutions Center
 14601 27th Avenue North, Suite 101
 Plymouth, MN 55447-4819

Insurance Client Suitability Worksheet

The Insurance Client Suitability Worksheet can be found on SmartStation/Trading/Other Trading/Insurance Solutions under the Suitability Tab.

Insurance Client Suitability Worksheet

PRODUCER INFORMATION

Section 1

Producer Name		WFA Branch Code	
Channel / Region		*Producer Rep Code	<input type="text"/>
ELID (A#)		TOTAL SCORE	
			0

Section 2: Insured/Owner Information

Section 2

INSURED / OWNER INFORMATION


*Insured First Name	NEW	*Last Name	CLIENT
*Date of Birth	Month <input type="text"/> Day <input type="text"/> Year <input type="text"/>	*City	<input type="text"/>
*Address	<input type="text"/>	*Zip	<input type="text"/>
*Resident State	<input type="text"/>		
*Day Phone	(<input type="text"/>) <input type="text"/> - <input type="text"/> <input type="text"/>		
*Additional Insured	<input type="text"/>		
*Is the insured the owner of the policy?	<input type="text"/>	WFA Brokerage Account #	<input type="text"/>

SAMPLE

Question	Response	Section Score	Suitability Considerations
1	*The policy owner is a:	0	
2	*Is the policy owner a citizen of or domiciled in the U.S.?		

Insurance Disclosure Form- Sample

Proof #6



Insurance Disclosure Statement

Proposed Insurance Company <input style="width: 95%;" type="text"/>	
Proposed Product Name <input style="width: 95%;" type="text"/>	Initial Quoted Premium Amount \$ <input style="width: 15%;" type="text"/>
Does this case involve a replacement (including exchange)? <input type="checkbox"/> No <input type="checkbox"/> Yes (see #14 below)	Surrender Charges on Existing Policy \$ <input style="width: 15%;" type="text"/>

Wells Fargo Advisors (WFA), your Financial Advisor (FA) and Wealth Insurance Specialist (WIS) want to help you achieve your long-term financial objectives. We value our relationship with our clients and want to help you make informed decisions about your financial future. Before you purchase an insurance policy, we want to make sure you understand the following:

1. **GUARANTEES** – An insurance policy is a long-term financial product offered by insurance companies. Any guarantees offered in an insurance policy are backed by the claims-paying ability of the issuing insurance company. The features that are guaranteed do not mean you cannot lose money and in fact there is no guarantee that you will earn any return on your investment. In most cases, the guaranteed features are effective upon the insured's death.
2. **FREE-LOOK PERIOD** – You may cancel your insurance policy within a certain number of days (usually 10 days) after it is delivered to you, entitling you to a refund. Your refund may be less than your initial purchase if the market value of your variable insurance policy declined during this free-look period. Please refer to the prospectus (if applicable) and the policy for more details.
3. **SURRENDER CHARGES** – Some insurance policies have significant surrender charges for a specified period of time. In some instances the surrender charge may extend up to 20 years. **THE SURRENDER CHARGE MEANS THAT YOU MAY NOT GET ALL YOUR MONEY BACK IF YOU SURRENDER YOUR POLICY.** The liquidity of insurance is limited. In the case of a full or partial surrender (defined as withdrawals in excess of the allowable amount specified by the issuing insurance company or a decrease in face amount), you will incur penalties during the surrender charge period, as described in your insurance policy.
4. **COMPENSATION** – Your FA and WFA, along with WFA and a non-bank insurance agency subsidiary (an Affiliate Insurance Agency) of Wells Fargo & Company (WF), receive standard and non-standard compensation from the insurance company for the sale of this insurance product. This compensation may vary depending upon the product that is sold and the issuing insurance company. If you have questions about what compensation will be paid to your FA or WIS for the purchase of an insurance policy, please ask your FA, WIS or Relationship Manager.
5. **TAX CONSIDERATIONS** – Please refer to "A guide to buying insurance" for general tax information. Neither WFA nor your FA or WIS can offer tax, legal, accounting and/or qualified plan advice. You are encouraged to contact your tax advisor regarding this transaction.
6. **FEES AND EXPENSES** – In order for your insurance policy to stay in effect, you must pay premiums. Prior to accepting your policy, you should consider your ability to pay these premiums on a long-term basis. If you fail to pay your premiums, your policy may lapse, and you may lose your insurance coverage. Please refer to "A guide to buying insurance" for more information regarding other fees and expenses.
7. **SELECTION OF ISSUING COMPANY** – WFA and an Affiliate Insurance Agency take many factors into consideration in deciding whether to offer an insurance company's product. Among those factors are: product features, company financial strength, rating, claims paying history, and other company data, and the ability of the insurance company to partner with WF, an Affiliated Insurance Agency or WFA in other arrangements such as the reinsurance of this and other products. In selecting products for sale, we have not reviewed every insurance product available for purchase.
8. **WELLS FARGO FINANCIAL INTERESTS AND POTENTIAL CONFLICTS OF INTEREST** – As a diversified financial services company, WFA pursues business opportunities with insurance companies as well as other companies whose products WFA distributes. Specifically with respect to insurance, WFA may actively pursue a strategy of seeking business relationships such as reinsurance with companies whose products we sell.

SAMPLE

561845 (Rev 15 – 04/14) Signatures required on Page 3 Page 1 of 3

Our business relationships with any particular company will not be the same as other companies. Therefore WFA may earn a greater return in distributing the products of one company compared to those of another. The Affiliated Insurance Agency has no ownership interest in and is not under common control with the insurance company that is issuing this insurance policy.

9. **REINSURANCE** – Reinsurance is the practice in which one insurance company (called the reinsurer) assumes some or all of the liability of another insurance company on insurance policies it has issued. WF affiliates currently act as a reinsurer for one or more insurance companies that issue insurance products through other affiliates. Such arrangements can result in either a financial gain or loss to those affiliates. We anticipate that there will be other such reinsurance arrangements with insurance companies in the future.
10. **AFFILIATES** – This insurance policy is being purchased through an Affiliate Insurance Agency and WFA. This policy is underwritten by a third party independent of WF and WFA, and the policy may be transferable by the issuing insurer to another insurance company. Affiliates of WF, with which WFA is also indirectly affiliated, have business relationships with some insurance companies including the management of sub-accounts within certain insurance policies and these affiliates are compensated for providing their services to the insurance companies. For more detail on affiliate relationships, please refer to “A guide to buying insurance” available at www.wellsfargo.com or www.wellsfargoadvisors.com.
11. **APPROVAL** – All applications to purchase or exchange an insurance policy are accepted subject to the review and approval of a registered principal of WFA. You should not consider your insurance purchase to be final until you receive written confirmation from the issuing insurance company.
12. **WELLS FARGO N.A., TRUST AND AGENCY CLIENTS WITH A FINANCIAL ADVISOR AS A RELATIONSHIP MANAGER** – In assisting you with your decision to purchase insurance, your FA and/or WIS is not acting as Relationship Manager with respect to a trust or bank agency account, but instead acting as a licensed insurance agent. Additionally, with your permission, your FA may have used information about investments and financial position obtained as Relationship Manager for a trust or bank agency account.
13. **COMPLEX STRATEGIES** – If this insurance is being purchased as part of a complex leveraging, estate planning or business planning strategy, it is important to understand that these types of strategies can be complicated. Projected results may depend not only on the insurance policy performance, but the performance of other policies, plans and parties. In addition, you may be required to contract separately with a lender and/or a third-party administrator (TPA). WFA does not provide TPA services.
14. **REPLACEMENTS** – A policy replacement or tax-free 1035 exchange should only be considered if the transaction is in your best interest and current objective cannot be met by continuing or modifying existing coverage and/or buying additional insurance. Over time, a customer’s insurance needs and objectives may change for a variety of reasons.

You should review the following if you are considering replacing a life insurance policy:

- The existing coverage may have more favorable policy provisions, loan interest rate or tax treatment.
- Consult a tax advisor with questions about tax consequences of a replacement.
- Your present insurance company may be able to modify your existing plan on terms that may be more favorable to you than completely replacing your current policy with a new policy.
- You will be subject to a new contestability period and suicide clause.
- You will be subject to underwriting and your insurability may have changed.
- The premium rate for your current coverage may be lower or its cash values could be higher.
- A surrender charge may affect all or part of the value of your existing policy.
- Initial issue expenses may be charged on the new coverage.
- The basis for crediting interest or earnings under a new policy may be different than the basis used in your current policy.
- The information contained in the in-force illustration for your existing policy and the hypothetical illustration for the proposed policy.
- You should not discontinue your existing insurance coverage until the replacement policy has been issued, delivered and reviewed by you.

By signing below, I/we acknowledge that:

- I/we have received, read and understand this Insurance Disclosure Statement.
- I/we have received, read and understand "A guide to buying insurance" which contains important information about insurance, including how compensation is paid to Well Fargo Advisors, my Financial Advisor and/or Wealth Insurance Specialist for insurance sales and compensation relationships between Wells Fargo Advisors and insurance companies. Please read the information carefully and retain it for your reference.
- If this transaction is a replacement, I/we have received and understand all relevant sales materials including a hypothetical illustration of the proposed policy, the in-force illustration of the existing policy and prospectus (if applicable). In addition, I/we have reviewed and compared policy features, including any surrender charges as shown on page 1, and are authorizing a policy replacement.
- I/we are aware that Wells Fargo Advisors may assign/reassign my policy(ies) to another insurance licensed Wells Fargo Advisors representative.
- I/we understand that if I/we have retained a third party entity to act as my/our agent, I/we are responsible for implementing their specific insurance recommendations.
- I/we understand that insurance is not insured by the Securities Investor Protection Corporation (SIPC) for losses of the principal amount invested.
- I/we have received a copy of the Wells Fargo U.S. Consumer Privacy Notice prior to acquiring an insurance policy.
- To help fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain verify and record information that identifies each person who opens an account.
- The purchase of an insurance policy is not conditioned upon and does not require purchase, use or maintenance of any checking savings or other bank account product, service or extension of credit through Wells Fargo or its affiliates. Likewise, the purchase, use or maintenance of a checking, savings or other bank account product, service or extension of credit through Wells Fargo is not conditioned upon and does not require purchase or maintenance of any insurance policy. In addition, I understand that I am not prohibited from purchasing insurance through any unaffiliated third party.

Furthermore, we encourage you to visit our websites at www.wellsfargo.com or www.wellsfargoadvisors.com for additional information.

Print Proposed Insured's Name <input type="text"/>	Proposed Insured's Signature X	Date <input type="text"/>
Print Proposed Joint Insured's Name <input type="text"/>	Proposed Joint Insured's Signature X	Date <input type="text"/>
Print Proposed Owner's Name (if different than Proposed Insured) <input type="text"/>	Proposed Owner's Signature (if different than Proposed Insured) X	Date <input type="text"/>
Print Proposed Joint Owner's Name (if different than Proposed Joint Insured) <input type="text"/>	Proposed Joint Owner's Signature (if different than Proposed Joint Insured) X	Date <input type="text"/>
Print FAWIS Name <input type="text"/>	FAWIS Signature X	Date <input type="text"/>

Investment and Insurance Products:

Not Insured by FDIC or any Federal Government Agency	May Lose Value	Not a Deposit of or Guaranteed by a Bank or any Bank Affiliate
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Wells Fargo Advisors, LLC is a registered broker-dealer and separate non-bank affiliate of Wells Fargo & Company.

Approved Insurance Carriers/Products for GA Use

Type	Approved Carrier	Approved Products
Individual Life Insurance	American General	AG Select-A-Term, AG Secure Lifetime/Survivor GUL II, AG Choice Indexed GUL, Elite UL, ROP Select-A-Term, Elite Global Plus II
	AXA Equitable	BrightLife Protect, BrightLife Grow, Athena SUL series, AXA Equitable Term 151 series, Incentive Life Optimizer series, Incentive Life Legacy II, Survivorship Incentive Life Series 149, Interest Sensitive WL, Corporate Owned Incentive Life
	ING	Term Smart 10-20, ROP Endowment Term 20-30, Strategic Accumulator SUL, UL-CV, UL-ECV, IUL Protector, IUL-GDB, IUL Global, IUL Global Choice, Corporate VUL, VUL-CV, VUL-DB, VUL-ECV, SVUL-CV
	John Hancock	Protection UL series, UL/SUL '13 series, Protection VUL '12, Protection SVUL, Premier Life UL '11, Accumulation Indexed UL '14, Accumulation UL/VUL/SVUL '09, Term 10-20, Survivorship Term, Corporate VUL, Protection IUL '13, Protection SIUL '13, ULG '13, SULG '13
	Lincoln National	Preservation Edge SVUL, VUL One (2014 series), SVUL One (2013), AssetEdge VUL (2009), AssetEdge Exec VUL, LifeCurrent UL, LifeReserve UL/IUL, LifeReserve IUL Accumulator, LifeReserve Protector, LifeGuarantee UL/SUL (2013), LifeElements 10-30
	Met Life	GLT 10-30, Guarantee Advantage UL, Provider UL, Legacy Advantage SUL, Equity Advantage VUL, Promise WL series
	Nationwide	YourLife IUL, YourLife NLG SUL II, YourLife Protection VUL, YourLife Term 10-30, YourLife Accumulation VUL, YourLife Current Assumption UL, YourLife SVUL, YourLife NLG UL '13, Next Generation Corporate VUL, Future Executive UL/VUL
	Pacific Life	Versa Flex Pro II, Versa Flex NLG, Prime UL, Prime UL-NLG, Estate Preserver III, Indexed Accumulator IV, Indexed Performer LT, Indexed Estate Preserver, Prime IUL, Select Estate Preserver VI, Select VUL, Prime VUL, Flex XV, Flex Protector II, PS SVUL
	Principal	Term 2012 series, UL Protector IV, SUL Protector II, UL Flex II, UL Accumulation II, VUL Income III, Exec VUL II, Benefit VUL II
	Protective Life	Custom Choice 10-30, Survivorship Term 10-30, ProClassic UL, Advantage Choice UL, Survivor UL, Premier III
	Prudential	Term Elite 10-30, Term Essential 10-30, ROP Term 15-30, UL Plus, Universal Protector, Index Advantage UL, SUL Protector, Custom Premier II, VUL Protector, Founders Plus
Transamerica	Trendsetter Super YRT and 10-30, Trendsetter Express 10-15, Trendsetter LB10-30, TransUltra SP, TransUltra Plus, TransACE CV/UL/SUL, TransProtector, TransSecure II	
Type	Approved Carrier	Approved Products
Individual LTC Insurance	John Hancock	Custom Care III Benefit Builder, Custom Care III
	Transamerica	TransCare II, TransCare III and Transamerica Secure
Individual Disability Income Insurance	Met Life	Omni Advantage series, Omni Select series, Omni Essential series, Salary Saver series, Expense Plus, Buy Sell Protector, Income Guard
	Principal	Series 700 Individual DI Solutions including: Disability Income Insurance, Core Value Income Protection, Key Person Replacement, Overhead Expense, Disability Buy-Out and DI Retirement Security

Other Carriers and Products are available to FA's through direct carrier relationships. Approved list may change without notice. Approved products in NY may differ. Please check current list prior to presenting solutions to an FA

Approved Insurance Sales Concepts

Client	Planning Category	Approved Concepts/Solutions	
Individual Clients	Family Protection	Life Insurance Needs Analysis	
		Income Maximization	
	Education Planning	Education Funding with Life Insurance	
	Retirement Planning	Supplemental Retirement Income Plan	
	Estate/Legacy Planning		Irrevocable Life Insurance Trust (ILIT)
			Charitable Remainder Trust (CRT)
			Intentionally Defective Grantor Trust
			Dynasty Trust
			Estate Maximization
			Estate Equalization
			Annuity Maximization
			IRA Maximization
			Muni Bond Maximization
Charitable Gifting			
Premium Financing*			
Business Clients	Continuity Planning	Key Person Life Insurance	
	Key Employee Recruiting/Retention	Endorsement Split Dollar	
	Executive Benefits		Executive Bonus
			Controlled Executive Plans
			Section 79 Plans**
			Split Funded Defined Benefit Plans**
			COLI – NonQualified Executive Deferral Plans**
COLI – Supplemental Executive Retirement Plans**			

Approved list may change without notice. Please check current list prior to presenting solutions to an FA.

- * FA is required to work with a GA or WIS in offering these plans. Additional approvals are required, see next page for details. Once the above mentioned premium finance review is completed the case should follow the WFA insurance submission process, including the “other than applied for” requirements, that has been previously outlined in this manual.
- ** FA is required to work with a GA or WIS in offering these plans. A Third Party Administrator (TPA) will be needed to administer these benefits. Wells Fargo Advisors does not recommend or endorse any TPA. The client is free to engage the TPA they wish to use to administer the plan.

Prohibited Insurance Sales Concepts

The following concepts are prohibited within WFA. This applies to new business and servicing transactions.

Prohibited Concepts
412(e)
412(i)
419
Life Insurance in an IRA
Private Placement Life Insurance
Premium Financing with no exit strategy other than death
Premium Financing with Variable Life or Variable Universal Life
Captive Programs used for Life Insurance
The "Dolgoff Plan"
Accounts Receivable Finance
CHOLI (Charitable Owned Life Insurance insuring large group donors in one package for outside investors)
IOLI (Investor Owned Life Insurance)
STOLI (Stranger Owned Life Insurance)
Intergeneration Split Dollar where a discount is used

WFA Special Case Situations

Special Case Situations:

Non-Resident Alien/Foreign National Business:

We can write individual life insurance, DI, or LTC on an international/NRA client provided that:

- The WFA client is a US citizen living abroad or a resident alien in the US, and
- Only our currently approved domestic carriers are utilized, and
- The client has a legitimate US address, and
- The client is in the US to sign the application, and
- The carrier will accept the application given full disclosure of the citizenship/residency status

Please note: WFA does not have the contracts, licensing and controls in place to write individual life insurance on clients who do not meet the above criteria and we do not write offshore/foreign products.

Specialty Risk Disability Insurance:

WFA representatives can write specialty disability insurance (e.g. pro athlete) through select syndicates of Lloyds of London and Ace America. These syndicates are accessed via Peterson International and Pro Financial. Since these products are accommodative and require special processing each solicitation requires advanced notice to the WFA LIFE Relationships and Marketing Team. Prior to solicitation please contact the LIFE Relationships and Marketing Team for details.

Premium Financing – Special WFA Procedures/Forms

Where it is suitable and appropriate, WFA will approve, on a case-by-case basis, premium financed life insurance strategies for high net worth clients (target client profile of \$50,000,000 net worth and \$3,000,000 liquid net worth). While premium financing may be very suitable and appropriate for some clients, it is an advanced strategy and not without risk. FAs are required to work with GAs or WISs who has been trained on WFA's policies and processes concerning premium financing. In addition to working with a trained GA or WIS, there is a specific supplemental client disclosure that needs to be reviewed and signed by the client and pre-approval of any premium financing proposal is required prior to client presentation.

Wells Fargo's Private Bank premium financing group is available to assist with the lending component.

WFA CLIENT PROFILE GUIDELINES

- Net worth in excess of \$50,000,000 (others may be considered based on client relationship)
- At least \$3,000,000 of liquid assets
- Planned life insurance premium to be financed is over \$350,000 per year, or over \$1,000,000 single loan amount
- Capable of making premium payments from cash flow or current assets
- Sophisticated – has active internal or external financial planning, legal and accounting advisors
- Purpose of insurance is well defined
- Client is not engaging in a IOLI or STOLI transaction

WFA STRATEGY DESIGN GUIDELINES

- Total amount financed is less than 50% of client's liquid assets
- Shorter term premium payments
- Loan repayments scheduled
- ***Interest is not capitalized***
- No VUL/VWL policies
- Loan structure matches premium structure
 - If not, identify source of additional premium (i.e. if loan is less than anticipated premiums)
- ***Exit strategy, other than death, is defined***
 - Where continuing the policy is required, look at viable repayment strategies (grantor assets, GRATs, Loan Buyout)

All GAs are required to successfully complete the WFA premium financing training.

FA PREMIUM FINANCING REVIEW/APPROVAL PROCESS

- Trained GA or WIS completes the training requirement (participation in the training webcast). Attendance will be recorded at the webcast.
- FA engages a trained GA or WIS to assist in this transaction.
- FA, with GA assistance, completes and submits (via email to: Casedesign@wellsfargo.com), the Advanced Case Design (ACD) Initial Review Form (see pages 32-33). The Initial Review Form can be found on InfoMAX (InfoMAX > Products > Insurance > Forms).
- - Confirm that the client profile satisfies the minimum requirements
 - Explain the rationale for the premium financing request
 - Define the exit strategy for loan repayment
 - Outline the parameters of the design that will be stress tested
- ACD performs a concept review and, if approved, performs the stress testing. FA will be notified of the results by email.
- If the concept review and stress testing are approved by ACD, FA, with assistance of the GA, creates a formal client proposal and submits it to CSU for approval prior to client presentation. CSU will e-mail their approval and attach the proposal.
 - If approval is not provided, a reason will be given. It may require re-designing the financing strategy or product configuration.
- FA, with assistance of the GA, conducts the client meeting. If the client agrees to proceed with the insurance application, then in addition to the typical forms completed for a life insurance application, a Supplemental Insurance Disclosure (see page 34-35) must be completed as well. The Supplemental Disclosure form may be found on InfoMAX (InfoMAX>Products>Insurance>Forms)
- If the carrier offer is more highly rated than what was applied for then an additional stress test must be performed by ACD to ensure that the premium financing design is still viable.
- Once the above mentioned premium finance review is completed, the case should follow the WFA Insurance Submission Process, including the "other than applied for" requirements that have been previously outlined in the manual.

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Advanced Case Design Review Form

Premium Financing Case Review

Instructions: Complete and submit via email to Casedesign@wellsfargo.com or fax to 704-715-4002.

Submitter Information

Wealth Insurance Specialist/General Agent	WIS/GA Training Attestation? <input type="checkbox"/> Yes <input type="checkbox"/> No	Date of Request
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Rationale for Life Insurance Need

Policy Information

Primary Insured Name	Date of Birth
Joint Insured Name (if applicable)	Date of Birth
Net Worth	Liquid Assets
Policy Type <i>Variable Universal Life is not permitted</i> <input type="checkbox"/> Whole Life <input type="checkbox"/> Indexed Universal Life <input type="checkbox"/> Universal Life <input type="checkbox"/> Survivorship Life	Product Type <input type="checkbox"/> GUL/GSUL <input type="checkbox"/> Indexed <input type="checkbox"/> Current Assumption Product
Initial Death Benefit	Premium Amount <input type="checkbox"/> Single Premium <input type="checkbox"/> Annual Premium

Loan Information

Issuer	Loan Amount	
Loan Interest Rate	Rate Basis (e.g. Libor Plus 150)	Initial Loan Term

Rationale for Premium Financing

Define the Exit Strategy

Advanced Case Design Use Only

Step 1: Concept review

Approved Declined

Reason

Advanced Case Design Name	Signature	Date
---------------------------	-----------	------

Step 2: Stress test

Approved Declined

Reason

Advanced Case Design Name	Signature	Date
---------------------------	-----------	------

Step 3: Proposal

Approved Declined

Reason

Advanced Case Design Name	Signature	Date
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Approved Declined

Reason

Central Supervisory Unit Name	Signature	Date
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Investment and Insurance Products:

Not insured by FDIC or any Federal Government Agency	May Lose Value	Not a Deposit of or Guaranteed by a Bank or Any Bank Affiliate
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Insurance company products are offered through nonbank insurance agency affiliates of Wells Fargo & Company and are underwritten by unaffiliated insurance companies.

Wells Fargo Advisors is the trade name used by two separate registered broker-dealers: Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC, Members SIPC, non-bank affiliates of Wells Fargo & Company.



Supplemental Insurance Disclosure Statement Premium Financing

Name of Proposed Insurance Company	
<input type="text"/>	
Name of Proposed Product	Initial Premium Amount
<input type="text"/>	\$ <input type="text"/>

Premium financing is complex and projected results may depend not only on the life insurance policy performance, but the performance of other contracts, plans and parties.

By signing below, you indicate that you have reviewed and understand the specific considerations and disclosures listed below:

1. You should consider a premium financing arrangement only if you:
 - a. Have a legitimate need for life insurance,
 - b. Believe that financing the purchase allows you to more effectively use the assets you would otherwise use to pay the insurance premiums,
 - c. Have a specific plan for paying off the loan other than from the insurance policy proceeds, and
 - d. Have the ability and plan to pay any loan interest due at least annually.
2. You have considered and understand the following risks:
 - a. The insurance policy credited interest rate, cost of mortality and policy expenses may change over time and may change in a different direction than your loan interest rate. If the insurance policy interest rate is lower than expected and/or the loan interest rate is higher than expected, the plan may not achieve your goals. Likewise if the insurance policy cost of mortality or policy expenses are higher than expected and/or the loan interest rate is higher than expected, the plan may not achieve your goals.
 - b. At the death of the insured, if the loan is still in effect, the life insurance benefit paid to the policy beneficiary(ies) may be reduced by the amount of the outstanding loan and any accrued interest and/or loan penalties. If the lender has foreclosed on the policy or the amount owed to the lender exceeds the insurance policy benefit, there may be no benefit remaining for the policy beneficiary(ies).
 - c. If the life insurance policy is surrendered while the loan is still in effect, the policy owner may be subject to income tax liability on any policy gain, even through the surrender proceeds may be paid to and/or retained by the lender.
3. **IT IS IMPERATIVE THAT YOU REVIEW THIS PROPOSED TRANSACTION WITH EXPERT TAX, LEGAL AND/OR ACCOUNTING ADVISORS.** Neither WFA, nor any of its representatives, can offer tax, legal or accounting advice related to this specific insurance purchase or the premium financing transaction.
4. You are solely responsible for the selection of the lender, evaluation of the terms of any loan or financing agreement offered and the decision to enter into a particular premium financing transaction. You may use Wells Fargo Bank, N.A. or an unaffiliated third party for the loan or financing agreement.
5. If you choose Wells Fargo Bank, N.A. to provide the financing for this transaction, you acknowledge that:
 - a. Wells Fargo & Company affiliates and their representatives may receive compensation for both the financing transaction and the life insurance transaction.
 - b. The underwriting, pricing and issuance of any life insurance policy is in no way a condition of or contingent upon receipt of financing through Wells Fargo Bank, N.A.
 - c. The underwriting, pricing and issuance of any loan is in no way a condition of or contingent upon purchase of the life insurance through Wells Fargo Advisors.

By signing below, I/we acknowledge that I/we have read and understand the disclosures above that apply to the premium financing contemplated in conjunction with this proposed life insurance purchase. I/we hereby release and hold WFA, and their respective directors, officers, employees and representatives, harmless from any and all claims, demands, expenses, actions, causes of action, or suits of any kind or nature, both known and unknown, arising out of, related to, or in any manner connected with the premium financing contemplated and/or entered into in connection with the proposed life insurance purchase.

Print Proposed Insured's Name <input type="text"/>	Proposed Insured's Signature ✕	Date <input type="text"/>
Print Joint Proposed Insured's Name <input type="text"/>	Proposed Joint Insured's Name ✕	Date <input type="text"/>
Print Proposed Owner's Name (if different than Proposed Insured) <input type="text"/>	Proposed Owner's Signature (if different than Proposed Insured) ✕	Date <input type="text"/>
Print Proposed Joint Owner's Name (if different than Proposed Joint Insured) <input type="text"/>	Proposed Joint Owner's Signature (if different than Proposed Joint Insured) ✕	Date <input type="text"/>
Print FA/WIS Name <input type="text"/>	FA/WIS Signature ✕	Date <input type="text"/>

Investment and Insurance Products:

<input type="checkbox"/> Not Insured by FDIC or any Federal Government Agency	<input type="checkbox"/> May Lose Value	<input type="checkbox"/> Not a Deposit of or Guaranteed by a Bank or Any Bank Affiliate
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Wells Fargo Advisors is the trade name used by two separate registered broker-dealers: Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC, Members SIPC, non-bank affiliates of Wells Fargo & Company.

[Print](#)

[Clear](#)

LIFE Insurance Team

Linda Need, Managing Director, Life Insurance

linda.need@wellsfargo.com

Phone: 704-715-8170

Kristin Hernandez, Admin

kristin.d.hernandez@wellsfargo.com

Phone: 704-383-5250

Market Growth & Development The Market Growth & Development team is responsible for partnering with the WFA distribution leaders to develop channel-specific strategic plans for growing the life business. This team also focuses on market and producer segmentation analysis and meeting planning.			INSURANCE SALES SUPPORT For local, in-person support, you have access to: <ul style="list-style-type: none"> • PCG & FiNet: <ul style="list-style-type: none"> • Approved General Agents • Approved Carrier Point-of-Sale Reps • See InfoMAX > Products > Insurance > GA/POS Support for the approved list. • WBS: <ul style="list-style-type: none"> • Wells Fargo Wealth Insurance Specialists (WISs) • Approved General Agents • Approved Carrier Point-of-Sale Reps • See InfoMAX > Products > Insurance > GA/POS Support for the approved list.
Primary Contact	E-mail Address	Phone Number	
Bruce Colbeck	bruce.colbeck@wellsfargo.com	314-955-5030	
Relationship & Marketing The Relationship & Marketing team is responsible for nurturing and monitoring relationships with our carriers and GA partners and for enhancing how insurance is marketed through all Wells Fargo distribution channels.			When not using local, in-person support, you have access to: Insurance Solutions Center , a centralized phone team that provides phone/email-based illustrations, case design and sales support exclusively for Wells Fargo Advisors FAs. <ul style="list-style-type: none"> • Call 866-769-2936 <ul style="list-style-type: none"> • Option 1 for Term Insurance • Option 2 for Permanent Insurance • Option 3 for Disability & LTC Insurance • Option 4 for Commission questions (all products) • Fax 508-770-0149 • Mail (Term, Disability & LTC Insurance): SBIA, 542 Main Street, Worcester, MA 01608 • Mail (Permanent Insurance): SBIA, 14601 27th Avenue North, Suite 101, Plymouth, MN 55447
Primary Contact	E-mail Address	Phone Number	
Don Davenport	donald.k.davenport@wellsfargo.com	612-667-3592	
Diane Casey	diane.k.casey@wellsfargo.com	612-667-4654	
Katie Ratkewicz	katie.ratkewicz@wellsfargo.com	314-955-2934	
David Seifers	David.seifers@wellsfargo.com	612-667-8231	
Operations & Vendor Management The Operations & Vendor Management team is responsible for managing and streamlining all operational processes, interfacing with internal technology and accounting partners, as well as leading our partnerships with key vendors SBIA and AIM.			LICENSING & COMPLIANCE <ul style="list-style-type: none"> • PCG & FiNet: <ul style="list-style-type: none"> • 866-297-8705, Option 3 • wfainsurancelicensing@wellsfargo.com • WBS: <ul style="list-style-type: none"> • 800-743-7210, Option 3 • wbslicensing@wellsfargo.com
Primary Contact	E-mail Address	Phone Number	
Peter Landry	peter.j.landry@wellsfargo.com	704-715-8164	
Patrick Fahy	patrick.r.fahy@wellsfargo.com	704-715-8185	
Brandy Lamberth	brandy.n.lamberth@wellsfargo.com	612-667-2740	
Michelle Radtke	michelle.j.radtke@wellsfargo.com	612-667-8889	
Advance Case Design The Advance Case Design team is the center of excellence for technical knowledge on advanced uses of life insurance in financial, estate, and business planning applications. This team is also responsible for consulting with producers on individual High Net Worth client situations and delivering supplemental, advanced training across all distribution channels.			
Primary Contact	E-mail Address	Phone Number	
Craig Averill	craig.averill@wellsfargo.com	704-715-8174	
Chris Bilodeau	chris.bilodeau@wellsfargo.com	704-715-3002	
Rosemary Spivey	rosemary.spivey@wellsfargo.com	704-715-8171	
Raegan Whitaker	raegan.whitaker@wellsfargo.com	314-955-2859	

SBIA/Insurance Solutions Center Support Team

Primary Contact	Role	E-mail Address	Phone Number
Brian Mason	Managing Director, SBIA	bmason@sbia.com	763-852-0755
Rosie Jasinek	Director of Operations	rjasinek@sbia.com	763-852-0744
Michelle Peterson	Manager, Broker Services	mpeterson@sbia.com	763-852-0746
Linda Wagner	Support for TIME Financial and WIS	lwagner@sbia.com	763-852-0735
Connie Wagener	Support for Millennium Brokerage and PLAN	cwagener@sbia.com	763-852-0748
Alyssa Wester	Support for Capitas Financial and Mercury Financial	awester@sbia.com	763-852-0738
Pam Meleen	Support for Highland Capital and Insurance Designers	pmeleen@sbia.com	763-852-0766
Joe Nolle	Support for Saybrus Partners	jnolle@sbia.com	508-770-0364

Other WFA Resources

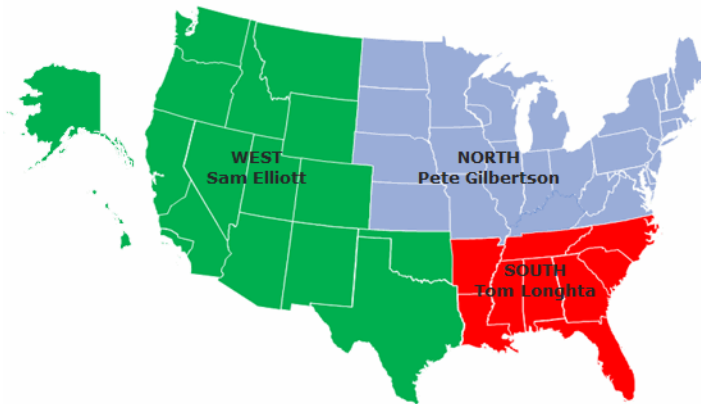
Department	Phone Number
Envision Support Team	888-474-6676
Contact Management: Client Mining	800-775-7021, Option 7
Annuity Sales Support	1-800-339-6600
WFA Estate Attorneys	314-875-2420
Trust Support - Kevin Shaughnessy	314-955-3197

Group Insurance Opportunities:

WFA representatives cannot write group insurance contracts. FA's/WIS with group insurance opportunities should refer those to a Sales Executive from Wells Fargo Insurance. Below is a list of contacts that can help address group insurance referrals. Please note: At this time there is no compensation or referral fee available for the WFA representative. There are other benefits of referring, including building a relationship with other Wells Fargo Team Members who can refer asset management, estate planning, and other opportunities to WFA.

WFI Resources: Group Insurance			
Region	Regional Managing Director	E-mail Address	Phone Number
West	Bob Volkel	650-413-4418	robert.volkel@wellsfargo.com
North	Mike Mascolo	973-261-9101	michael.mascolo@wellsfargo.com
South	Peter Moore	904-351-7470	peter.moore@wellsfargo.com

IBC New Regional Structure January, 2014



WFA Wealth Insurance Specialists (WISs)

WIS	WBS Region*	E-mail Address	Phone Number
Robert Chewning	National Manager, Life Insurance	robert.chewning@wellsfargo.com	704-715-8168
Matt Curran	Great Lakes, Southeast, Mid-Atlantic, Northeast	matthew.curran@wellsfargo.com	203-917-1304
Steve Matter	California, Mountain Northwest, Southwest	steve.matter@wellsfargo.com	949-253-4331
Mike Stockalper	California	mike.stock@wellsfargo.com	858-622-6922
Gary D. Ruff	California	gary.d.ruff@wellsfargo.com	415-222-3117
Lilian Tsi	California	lilian.tsi@wellsfargo.com	408-691-8687
Claudia Schumacher	California	claudia.schumacher@wellsfargo.com	310-285-5919
Vince Mastro	California	vincent.mastro@wellsfargo.com	559-437-3178
Joe Rhodes	California	joseph.e.rhodes@wellsfargo.com	916-788-4529
Mike Dinardo	California	michael.dinardo@wellsfargo.com	213-253-7250
Kit Carson	California	kit.carson@wellsfargo.com	949-253-4209
Ed Hellier	Great Lakes	ed.hellier@wellsfargo.com	612-316-3672
Jeff Tomski	Great Lakes	jeffrey.j.tomski@wellsfargo.com	248-723-3093
Paul Neri	Great Lakes	paul.neri@wellsfargo.com	612-667-4378
John Blaha	Great Lakes	john.blaha@wellsfargo.com	216-378-2762
Ansel Kay	Mid-Atlantic	ansel.kay@wellsfargo.com	843-724-1237
John Taylor	Mid-Atlantic	john.p.taylor@wellsfargo.com	864-467-2831
Barry Cronin	Mid-Atlantic	barry.cronin@wellsfargo.com	704-383-8727
Scott Enoch	Mid-Atlantic	scott.h.enoch@wellsfargo.com	804-697-6788
Jorge Fuentes	Mid-Atlantic	jorge.fuentes@wellsfargo.com	703-760-5543
Dave Melfi	Mountain Northwest	david.melfi@wellsfargo.com	720-947-6606
Brett Balch	Mountain Northwest	brett.a.balch@wellsfargo.com	503-886-4646
Arthur Gravanis	Northeast	arthur.gravanis@wellsfargo.com	212-981-3952
Michael Moskowitz	Northeast	michael.moskowitz@wellsfargo.com	732-219-6025
Lee McManus	Northeast	lee.mcmanus@wellsfargo.com	215-670-7577
Vic Heineman	Northeast	victor.heineman@wellsfargo.com	908-598-3382
Kevin Welsh	Northeast	kevin.m.welsh@wellsfargo.com	484-280-1043
Mike Tivnan	Northeast	michael.s.tivnan@wellsfargo.com	617-312-0422
John Crockenberg	Southeast	john.s.crockenberg@wellsfargo.com	904-351-7520
Steve Schumacher	Southeast	steve.schumacher@wellsfargo.com	813-225-4362
Cary Lucas	Southeast	cary.c.lucas@wellsfargo.com	404-504-2801
Tanya Pages	Southeast	tanya.pages@wellsfargo.com	305-789-4926
Olin Barnes	Southeast	olin.b.barnes@wellsfargo.com	205-877-5818
Kit Carson	Southwest	kit.carson@wellsfargo.com	949-253-4209
Chuck Adam	Southwest	chuck.adam@wellsfargo.com	713-319-1122

What NOT to do in WFA

OPERATIONS

- Recommend an insurance solution that is not suitable for the client
- Submit an application prior to an FA getting their carrier appointment in place.
- Submit an application without the necessary WFA paperwork (Insurance Disclosure form and Client Suitability form).
 - Forget to remind FA to complete Client Suitability Worksheet via SmartStation/Trading/Other Trading/Insurance Solutions with every insurance case submitted.
 - Forget to remind FA that a brokerage account needs to be opened through the NAO system for any CASH Value insurance sale. (No brokerage account is required for term, traditional LTC, or DI.)
 - Leave the Replacement information blank on the Disclosure form.
- For a replacement policy, submit an application without an inforce illustration or with an inforce illustration that is over 6 months old. **AN INFORCE ILLUSTRATION IS REQUIRED FOR ALL CASH VALUE POLICIES BEING REPLACED!**
- Show a VUL subaccount allocation as 100% in the Money Market or Fixed Account. **WFA REQUIRES AN ADDITIONAL ALLOCATION REFLECTING THE CLIENT INVESTMENT OBJECTIVES AND RISK TOLERANCE BE INCLUDED FOR CSU APPROVAL.**
- Submit an illustration that does not follow the WFA Illustration Guidelines. (See page 10 of the Handbook)
- Submit an application to the carrier prior to Central Supervisory Unit (CSU) approval.
- Use an unapproved product or carrier.
- Discuss compensation with the WFA FA.
- Forget to follow the special procedure on a premium financing case.

FIELD ENGAGEMENT

- Use unapproved sales or marketing materials.
- Send emails to FA's without prior approval.
- Communicate or correspond directly with any WFA client without the FA's approval.
- Fail to get appropriate field management approval prior to making a WFA office visit.
- Walk around a WFA office and drop in unexpectedly on other FAs after an arranged FA or client meeting.
- Exceed Cash/Non-Cash Compensation rules.
- Sponsor sales contests or provide incentives to use your General Agency, a specific carrier or specific products.
- Utilize an unapproved sales concept.

WFA Resources

Tools for FAs

Envision® Process – A dynamic process offered at Wells Fargo Advisors. *Envision* is designed to help clients live the one life they have the best way they can, without undue financial sacrifice and overexposure to risk. Combining goal based advice with sophisticated statistical modeling, *Envision* Planning creates an effective easy-to-understand process for prioritizing and achieving the client's most important life goals.

EPIIC - Envision Plan Information Center is an interactive tool designed to help an FA manage his Envision relationships by providing key "Need to Know" items and possible sales opportunities pertaining to a client's Envision plan.

InfoMAX – Internal Intranet available to FAs in all channels. FAs can access client-approved marketing material, sales ideas, performance information, product overviews, commission rates, carrier and GA contacts and phone numbers, among many other marketing tools. Each product department has dedicated pages to promote their products, and each channel has its own version on InfoMAX.

SmartStation – Brokerage platform that allows FAs an enhanced experience for servicing their business needs. The platform has integrated proven applications under a single framework that allows for simpler sign-ons, internet accessibility, short-cut navigation, household and account quick search, and integrated market data content. Some enhanced features include industry-leading investment planning, timely market data with research and has unified work flow linking users to relevant back-office support.

Insurance Solutions – A SmartStation application that allows FAs to obtain quotes and submit applications for some approved term, LTC and SPL insurance products. This application also is a means for an FA to check whether or not they are properly licensed and appointed to offer a carrier's insurance products.

Marketing Tools

Beyond the Bell – Wells Fargo on Demand allows team members to watch programs on their desktops anytime they choose. Beyond the Bell is designed to harness the products and services available to better serve clients. This is a weekly program that offers timely advice as well as investment solutions.

Business Development Daily – Daily sales, revenue ideas available on the home page of InfoMAX. The target audience for this publication is our FA base in all channels.

Branch News Leader – Weekly email sent on Mondays to PCG branch managers. Newsletter contains pertinent product/operational updates, recruiting details and sales/revenue ideas (WBS version – WBS RBM Weekly).

Branch Brief – Weekly email sent on Wednesdays to PCG FA's (similar content to Branch News Leader). Newsletter contains pertinent product/operational updates and sales/revenue ideas (corresponding versions for each channel).

eAlert – Weekly Insurance email sent out to FA's that have signed up to receive insurance updates. This is one way the Insurance Team communicates upcoming Live Meetings, product updates, sales ideas, etc.

Wells Fargo Advisors Personal Trust Services PCG Trust Partner Grid



Identify the Successor Trustee options for your client - visit InfoMAX story name: [Successor Trustee Decision Tree](#)

	Wells Fargo IFS	Advisory Trust (Wilmington Trust)	Reliance Trust Co.
Assets Under Management	\$121 Billion	\$39.7 Billion	\$72 Billion
Custody assets	Wells Fargo SEI system (shadowed to WFA SmartStation-BETA)	WFA SmartStation-BETA (shadowed to Advisory Trust)	WFA SmartStation-BETA (shadowed to Reliance Trust Co.)
Account Minimum	Starts at \$500,000 Varies - see below	\$500,000	\$500,000
Investment Products	Wells Fargo IFS products	WFA advisory products -Separate accounts and firm discretionary PIM	WFA advisory products -Separate accounts and firm discretionary PIM
FA Role	Relationship manager	Relationship manager and investment manager	Relationship manager and investment manager
Fees/FA Compensation for Irrevocable Trust (fees and account minimums for other services may vary, refer to applicable fee schedules for details)	BUNDLED FEE to the client WFA FA receives a percentage of the client fee to grid -50% (\$500,000 - \$1 million) -70% (Above \$1 million) <u>Client fee for Irrevocable Trusts:</u> First \$500,000: 1.65% Next \$500,000: 1.40% Next \$1 million: 1.20% Next \$3 million: 1.00% Over \$5 million: .80% (Third party investment fees passes through to client.)	UNBUNDLED FEE to the client WFA FA receives wrap fee on WFA Advisory products <u>Advisory trustee fees:</u> First \$1 million: .50% + WFA Advisory Products Fee Next \$2 million: .40% + WFA Advisory Products Fee Next \$2 million: .30% + WFA Advisory Products Fee Next \$5 million: .25% + WFA Advisory Products Fee Over \$10 million: .20% + WFA Advisory Products Fee ~Advisory Trust's minimum annual fee: \$3,500 (WFA receives no additional revenue on Advisory trustee fees)	UNBUNDLED FEE to the client WFA FA receives wrap fee on WFA Advisory products <u>Reliance trustee fees:</u> First \$2 million: .50% + WFA Advisory Products Fee Next \$3 million: .40% + WFA Advisory Products Fee Over \$5 million: .30% + WFA Advisory Products Fee ~Reliance Trust's minimum annual fee: \$3,500 (WFA receives no additional revenue on Reliance trustee fees)
Fiduciary Products	Managed Discretionary	Trust managed, client directed	Trust managed, client directed
Estate / Death Settlements and Successor / Future Appointments*	Estate settlement and successor trustee services - (\$1 million in investable assets at time of service)	Limited successor appointments Need co-trustee or local attorney to assist	Estate settlement not available in the following states - AZ, HI, KY, LA, SC, UT, VA, WV, WA
Services •Minimums refer to ongoing management of trusts. See above minimum for estate settlement and successor trustee services. •Available in trust or managing agent account structures	Revocable Trust - (\$500,000) Irrevocable Trust - (\$500,000) Managed IRA - (\$250,000) Business Advisory Services - Pre-Acceptance Required Legacy Trust - (\$5 million) International Trust - (\$2 million) Philanthropic - (Trust \$500,000 Foundation \$2 million) Special Needs Trust - (\$1 million) Oil, Gas and Mineral Mgmt. - Pre-Acceptance Required Real Estate Asset Mgmt. - Pre-Acceptance Required	Revocable Trust Irrevocable Trust Life insurance trusts – Limited Estate settlements – Limited Charitable trusts Foundations Special needs trusts – Limited Delaware trusts Asset protection trusts Guardian accounts - Limited	Revocable Trust Irrevocable Trust Life insurance trusts Estate settlements – Limited Charitable trusts Foundations Endowments Planned giving Delaware trusts Asset protection Guardian accounts - (\$500,000)

*A nomination as successor trustee and/or executor/personal representative is not an acceptance of these roles. Acceptance of these appointments are contingent upon review of the documents, assets, and all applicable circumstances at the time the successor trustee, executor, personal representative is asked to serve.

Wells Fargo affiliates may be paid a referral fee in relation to clients referred to Wells Fargo Bank, N.A.

Wells Fargo Bank, N.A. offers various advisory and fiduciary products and services. Financial Advisors of Wells Fargo Advisors, LLC and Wells Fargo Investments, LLC, separate non-bank affiliates, may refer clients to the bank for an ongoing or one-time fee. The role of the financial advisor with respect to bank products and services is limited to referral and relationship management services. The bank is responsible for the day-to-day management of the account and for providing investment advice, investment management services, and wealth management services to clients. The Financial Advisor does not provide investment advice or brokerage services to Bank accounts.

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0213-04460

Data Mining for Insurance Opportunities

(SmartStation)

IRA Max (Currently own IRA, Age 60-80, Liquid net worth \$500,000 or more)

Click Advisors tab

My Book

Custom Queries

Under Global tab, select appropriate Rep Code(s) and check all boxes in Display Options box

Then select Account tab

Under Account Category select IRA

Then select Profile tab

Under Liquid Net Worth select E-\$500,000-\$999,999, G, H & I-\$10,000,000

This will give you Liquid net worth \$500,000 or more

Under Client Age enter from 60 to 80

Then click Update

Click Submit

Choose sort option box click OK

Report will be generated

IRA Activity Summary – RMDs

Click Advisors tab

My Book

Analysis Workbook

Business Dev

IRA Activity Summary

Select IRA in the IRA Plan Type box

Type 70 or 70.5 in the From box next to Client Age:

Click the Submit button

Click on the Filter Icon 

Click on the First Row of Data for Each Column starting with the Rep Code through the AUM columns

Example: click on the circled data

<u>Distribution</u> <u>Last Yr</u>	<u>Curr Yr</u>	<u>AUM as of</u> <u>10/13/2010</u>
\$.00	\$.00	\$1,013,731.91

These fields will be added to the Report fields section on the left side of the window.

Type =0 in the YTD_Distribution Value field to find those that have not had a RMD this year (Or type <\$ to find YTD_Distribution under a certain figure)

Click the Filter button and the results will be displayed.

Annuity Max (Current Annuity lists)

Click Advisors tab

My Book

Analysis Workbook

Business Dev


Positions by Product

Select appropriate Branch and Rep Code(s)

Select "Annuity" under Security Type

Click the Submit button

There are 2 ways to view the clients in your book that have an annuity

One way to view a list of clients that own a particular annuity is to click on the blue drill down arrow 

Another way to get a list of all clients and all annuities in your book is to click View All Details

Reports will be generated

Long-Term Care (Liquid net worth \$500,000 or more, ages 45-70)

Click Advisors Tab

My Book

Custom Queries

Under Global tab, select appropriate Rep Code(s) and check all boxes in Display Options box

Then select Profile tab

Under Liquid Net Worth select E-\$500,000-\$999,999, G, H & I-\$10,000,000

This will give you Liquid net worth \$500,000 or more

Under Client Age enter From 45 to 70

Click update

Click Submit

Choose sort option box click OK

Report will be generated

Linked Benefit (Liquid net worth \$500K+, ages 50-70, Cash accts)

Click Advisors tab

My Book

Custom Queries

Under Global tab, select appropriate Rep Code(s) and check all boxes in Display Options box

Then select Balance tab

Under Money Market or Cash, put in the values you want to search for

Then select Profile tab

Under Liquid Net Worth select E-\$500,000-\$999,999, G, H & I-\$10,000,000

This will give you Liquid net worth \$500,000 or more

Under Client Age enter From 50 to 70

Then click Update

Click Submit

Choose sort option box click OK

Report will be generated

ILIT Reviews (Current Trusts)

Click Advisors tab

My Book

Custom Queries

Under Global tab, select appropriate Rep Code(s) and check all boxes in Display Options box

Then select Account tab

Under Account Category select Trusts

Then click Update

Click submit

Choose sort option box click OK

Report will be generated

Click on the account number

Then select the Client Management tab

This will bring up the account information

Business Owners

Click Advisors tab

My Book

Contact Search

Click Profile and Preferences tab

Click Profile field arrow

Select Business Owner

Click OK

Click Search

Results will show at the bottom of the screen

Muni-Bond Max (Currently own IRA, Age 60-70, Liquid net worth \$500,000 or more)

Click Advisors tab

My Book

Analysis Workbook

Business Dev

Positions by Product

Select MUNICIPAL BOND in the Security Type: field

Click the Submit button

Click the View All Details button when the results appear

This displays the list of the accounts and Muni Bond position

Retirement Supplement: age 35-60, income 200k+ *

Click Advisors tab

My Book

Custom Queries

Under Global tab, input data in (*) required fields and check desired boxes in Display Options box

Click Update

Click Profile Tab

Check Annual HH Income category and select items D-I (use Ctrl click to select the multiple options)

Check Client Age category and enter 35 in **'from'** field and 60 in **'to'** field.

Click Update

Click Submit

Choose desired sort option in Choose Sort Option pop up and click OK.

Report will generate.

*Report will show Annual HH Income brackets starting at \$200k+.

Rep Code	Account Number	Account Name	Household Name	Annual HH Income	Client Age
▶ 1000	1000-1000	1000-1000	1000-1000	D - \$200,000 - \$499,999	52 Yrs 01 Mo
▶ 1000	1100-1000	1100-1000	1100-1000	C - \$100,000 - \$199,999	54 Yrs 09 Mo
▶ 1000	2000-1000	2000-1000	2000-1000	D - \$200,000 - \$499,999	52 Yrs 01 Mo
▶ 1000	3000-1000	3000-1000	3000-1000	C - \$100,000 - \$199,999	43 Yrs 02 Mo
▶ 1000	4000-1000	4000-1000	4000-1000	D - \$200,000 - \$499,999	52 Yrs 01 Mo

Muni Max: Muni holdings over 250k

Click Advisors tab

My Book

Analysis Workbook

Business Dev

Positions by Product

Input data in (*) required fields

Select MUNICIPAL BOND in the Security Type: field

Click the Submit button

Click the View All Details button when the results appear

This displays the list of the accounts and Muni Bond position.

*The report can be sorted by clicking on the Market Value column or by exporting the report into Excel.

Security Description	Security Symbol	CUSIP Number	Rep Code	Account Number	Account Name	Home Phone	Business Phone	Account Category	Quantity	Price	Market Value
VA ST 5.0%11/01/22		92817Q578						Per Trust	225,000.000	\$117.70	\$264,829.50
ROANOKE VA 5.0%07/01/25		770082AA3						Per Trust	225,000.000	\$106.63	\$239,913.00

High Net Worth Estate Planning: 5mm+ NW

Click Advisors tab

My Book

Custom Queries

Under Global tab, input data in (*) required fields and check desired boxes in Display Options box

Click Update

Click Profile Tab

Check Stated Net Worth category and select items H-I (use Ctrl click to select the multiple options)

Click Update

Click Submit

Choose desired sort option in Choose Sort Option pop up and click OK.
Report will generate.

Wells Fargo Advisors, LLC

Run Date: 06/28/2013 11:22:01

Custom Query as of 06/27/2013

Rep Code	Account Number	Account Name	Household Name	Stated Net Worth
▶ 1000	0000-100	TRAD CORP	TRAD (BENEFIT)	I - >\$10,000,000
▶ 1000	0000-000	GENERAL SERVICE	GENERAL SERVICE (H)	H - \$5,000,000 - \$9,999,999
▶ 1000	0000-000	TRAD (BENEFIT)	TRAD (BENEFIT)	I - >\$10,000,000

For questions on how to produce reports contact SmartStation Navigation:

PCG: 800-775-7021

WBS: 800-775-7031

FiNet: 877-252-1404



Insurance products are offered through nonbank insurance agency affiliates of Wells Fargo & Company and are underwritten by unaffiliated insurance companies.

Securities and Insurance Products:

NOT INSURED BY FDIC OR ANY FEDERAL GOVERNMENT AGENCY	MAY LOSE VALUE	NOT A DEPOSIT OF OR GUARANTEED BY A BANK OR ANY BANK AFFILIATE
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