

## Senior Supplemental Insurance

800 Crescent Centre Dr.  
Suite 200  
Franklin, TN 37067

## Code of ethical conduct

---

As a representative (producer and/or employee of one or more of the Aetna companies (“Company”), it is my professional responsibility to:

1. Make recommendations and present products based on an analysis of the insurable needs for financial objectives of the customer.
2. Strive to provide each customer with an understanding of the nature of any recommended product and its features, and to provide honest and accurate disclosure for an informed customer purchasing decision.
3. Treat each customer with respect and dignity and protect the privacy of each customer’s personal information.
4. Establish and maintain the trust and confidence of every customer by delivering high quality service.
5. Present the Company, its products and the industry in a fair and professional manner.
6. Improve professional skills through continuing education and increased knowledge of industry issues and products.
7. Keep informed of and comply with applicable laws, regulations and Company requirements.
8. Communicate my concerns about activities or conditions that may be in violation of this guide.

## What it means

---

### *CODE 1:*

#### **Make recommendations and present products base on an analysis of the insurable needs or financial objectives of the customer.**

In making recommendations to a customer, we believe our producers should have reasonable grounds to believe that the recommendation addresses the customer’s insurable needs or financial objectives. Each customer’s circumstances should be discussed, including relevant financial information. The customer’s need for insurance and investment products should be thoroughly reviewed and values, benefits and costs of existing coverages and products should be considered when making recommendations.

We strongly encourage the use of fact finding and needs analysis tools to assist producers in determining customers’ needs and objectives. The Company has a number of tools available to assist producers.

### *CODE 2:*

#### **Strive to provide each customer with an understanding of the nature of any recommended product and its features, and to provide honest and accurate disclosure for an informed customer purchasing decision.**

We believe producers should have an understanding of the features and operations of the products that are presented and provide customers with information that is consistent with making appropriate buying decisions. Our producers should clearly identify the product being sold and provide balanced, complete information on features, benefits, costs, limitations and contract terms.

We are committed to providing clear, straightforward and factual sales and advertising materials. Therefore, all advertisements referring to any of Aetna companies or their products must be approved in writing prior to use.

The advertising approval process, Company standards and related laws and regulations are available from your Company’s Compliance Department at (615) 807-7500.

# Guide to Ethical Market Conduct

Page 2 of 3

## What it means...continued

---

We believe that replacement of an existing insurance or annuity policy must be appropriate for the customer and meet his or her needs or financial objectives. From a customer's perspective, an appropriate replacement is also one that is justified from either an economic or personal standpoint. The provisions, features and benefits of both the current and proposed product should be considered in relation to the client's needs, circumstances and goals. Some examples of the types of provisions that should be considered are: premium rate differences, differences in suicide and incontestability provisions for individual life insurance and pre-existing conditions, waiting periods, elimination periods, and probationary periods for health insurance policies. In addition, factors such as the age and health of the customer must be considered. Producers are expected to provide all material information that the customer needs in order to ascertain whether replacement of an existing policy or contract is appropriate.

All replacements must be in compliance with applicable regulations and Company rules. Many states require accurate written comparisons of existing and proposed contracts to be provided to the customer when proposing a replacement. Producers are expected to know and comply with these requirements.

CODE 3:

### **Treat each customer with respect and dignity and protect the privacy of each customer's personal information.**

In our normal course of business, we are in a position to accumulate personal information about our clients. We believe our integrity and the confidence entrusted to us by our customers are the foundation on which we build our business success. We acknowledge that customers place their trust in our producers and employees and that nothing should jeopardize that trust. In addition, we must comply with applicable regulatory requirements governing the use of personal information.

CODE 4:

### **Establish and maintain the trust and confidence of every customer by delivering high-quality service.**

We are committed to providing quality products and services. We expect our producers and employees to make a commitment to our clients to provide and maintain competent sales and service. We promote industry education and require all producers and employees to have the appropriate qualifications and training to perform their functions.

Maintaining customer trust and confidence requires that we respond promptly and thoroughly to customer complaints. Aetna defines a customer complaint as a written or documented verbal communication received by our Company or its representative which primarily expresses a grievance. Producers should notify the Compliance Department at (615) 807-7500 if a complaint is received.

CODE 5:

### **Present the Company, its products and the industry in a fair and professional manner.**

We believe that ethical sales practices are essential for success in today's business and regulatory environment. We will not engage in unfair competition, including making disparaging or misleading remarks about a competitor. To support fair competition, we will make accurate representations of our Company and products to customers. We will comply with all applicable state insurance laws and regulations with respect to competing in the marketplace.

CODE 6:

### **Improve professional skills through continuing education and increased knowledge of industry issues and new products.**

We view ongoing education in our industry as fundamental to competent and customer-focused business practices. Education generally consists of current knowledge regarding industry issues, emerging trends, laws and regulations and product information. Various resources are available for producers and employees to further their professional skills, including the Company, professional trade groups and independent third-party vendors.

CODE 7:

### **Keep informed of and comply with applicable laws, regulations and Company requirements.**

We are committed to complying with all applicable laws and regulations and our Guide to Ethical Market Conduct. Each producer and employee is expected to adhere to all requirements regarding the sale and marketing of our products. Failure to comply with laws, regulations and Company policies could result in disciplinary actions up to and including termination of the relationship. We will maintain and enforce policies and procedures to reasonably ensure compliance, including a system for monitoring sales practices, effectiveness of training and communicating all Company requirements.

# Guide to Ethical Market Conduct

Page 3 of 3

## What it means...continued

---

*CODE 8:*

### **Communicate any concerns about activities or conditions that may be in violation of this Code.**

If you have a concern about what constitutes appropriate conduct for you or anyone else, inform the Company of your concern by calling the Aetna Alert Line at (888) 891-8910. We will provide a timely response to questions about appropriate producer or employee conduct.

Producers must maintain appropriate licenses and appointments as required by the applicable jurisdictions in which they sell and solicit business. If you are a producer and your license is lapsed, revoked or otherwise terminated you should notify us immediately.

Federal Law prohibits an individual from engaging in the business of insurance if the individual (a "prohibited person") has been convicted of certain felony crimes. It is Aetna's practice to screen potential producers and employees in order to identify prohibited persons. If you failed to disclose a previous felony conviction, or if you subsequently are convicted of a felony, contact your Company's Compliance Department for further instructions. Your convictions may or may not prevent you from representing (or being employed by) an Aetna company- it depends upon the facts and requires legal analysis.

## Concluding remarks

---

For purposes of applying the Guide to Ethical Market Conduct, we consider producers to include independent agents, brokers and other types of producers, as well as employees, who are engaged in the solicitation and negotiation of insurance products.

The Guide to Ethical Market Conduct does not address all situations that may arise in the course of doing business. If you have specific questions or concerns regarding laws and regulations or Company requirements that cannot be addressed at a local level, please contact the Company's Compliance Department directly.