

## High-net-worth foreign national market

Program overview and underwriting guidelines



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# Solutions that move with your clients' needs

In today's world, your high-net-worth clients may live or come from all over the world, but many share the same life insurance and wealth transfer needs.

Our many years of knowledge and expertise can help clients living abroad or with ties to the United States navigate the wealth transfer process with underwriting guidelines designed specifically for the high-net-worth foreign national (HNWFN) market.





#### Who is an "Eligible Client?"

- High-net-worth foreign nationals with a regular and ongoing connection to the U.S. who have a need for life insurance.
- U.S. citizens or permanent residents (i.e., green card holders) living abroad for more than 12 weeks per year. Generally, U.S. citizens and permanent residents will be considered under domestic underwriting requirements.

**Note:** A "permanent resident" is a U.S. resident with a green card who intends to remain permanently in the U.S. and has multiple other evidences of permanence, such as owning a home, marriage to a U.S. citizen or long-term U.S. employment.

Advisory: This material does not offer advice or consider the impact of applicable state or foreign laws and regulations or income or estate tax treaties between the U.S. and other countries upon prospective insureds and policyowners. The laws and regulations of some countries may limit or prevent their residents or citizens from purchasing life insurance outside of their country of residence. Eligible Clients should be advised to consult with their own tax, legal and financial planners to ensure compliance with their particular home foreign country requirements.

#### Who qualifies to be insured?

#### **Basic Qualifications**

A proposed insured must be an Eligible Client who has all of the following:

- A temporary U.S. visa or valid passport.
- A global net worth of at least \$2 million (U.S.).
- A U.S. nexus/connection.

#### **U.S. Nexus/Connection**

In addition, the Eligible Client must satisfy *one* of the following U.S. nexus/connection requirements:

- Own real estate in the U.S.
- Own a business in the U.S.
- Be an employee of a U.S. domiciled company.
- Have primary employment at a location of a company in the U.S.
- Have U.S. tax liability.
- Have immediate family residing in the U.S.
- Travel on a regular or ongoing basis to the U.S. for business or pleasure.
- Have a U.S. bank account or brokerage account.

**Note:** If the U.S. bank account or brokerage account is the only nexus/connection, we require a \$100,000 minimum balance that's at least three months old.

**Note:** Evidence of a U.S. nexus/connection must be documented in a cover letter.

#### **Disqualifications**

The following proposed insureds will not qualify:

- Missionaries
- Judges, politicians, government officials
- Journalists
- Military, police, security personnel
- Professional athletes and entertainers
- · Proposed insureds with aviation risks
- Proposed insureds traveling to any country where an adverse U.S. travel advisory has been issued

#### Who can own the policy?

Currently, we allow two types of ownership:

- **Direct ownership** by individual foreign nationals. An IRS W-8BEN form is required in all cases with direct ownership.
  - The owner/insured is responsible for confirming that the laws and regulations of their country allow for their direct ownership of the applied-for life insurance policy.
- U.S. ownership for individual foreign nationals.

Acceptable types of U.S. ownership include:

- An immediate family member who resides in the U.S. and separately satisfies all the insured's "Basic Qualifications" (listed on previous page).
- A U.S. corporation, partnership or limited liability company, provided the entity has a valid U.S. Tax Identification Number (TIN) and is the beneficiary of the policy.
- A revocable or irrevocable U.S. trust with a valid TIN, provided the trust is the beneficiary of the policy.

#### Notes:

- In the case of a revocable trust without a TIN, the insured must provide a valid SSN.
- With all revocable trusts, the grantor of the trust must provide his/her valid SSN.
- In the case of a U.S. corporate bank or institutional trustee located in the U.S., a TIN must be provided.

#### How is the policy solicited and delivered?

- All solicitation must take place in the U.S., while the insured and policyowner (if different) are legally and physically present in the U.S.
- Solicitation includes the entire insurance process: marketing, illustration, application, underwriting, medical examinations and tests.
- The application and any additional forms must be completed, wet signed and dated by the applicant while the applicant is in the U.S.
- The signature date on all forms must be the date the applicant and/or insured signed, not the date the application is submitted (if different). Please be sure all forms are fully completed and in good order so the applicant is not required to return to the U.S. to correct and sign the forms again.

- If applicable, the Department of Homeland Security Records Consent Form (Form I-94) allows Symetra to verify when the applicant enters and departs from the U.S.
- Medical examinations performed outside the U.S., in a U.S. embassy in a foreign country or on a vessel in international waters will not be accepted.
- All policies must be delivered to the policyowner or to the designated Attorney-in-Fact in person, in the U.S., by the producer in the state where the policy was applied for and issued. The state of issue is the state where significant U.S. nexus is evident. If the U.S. nexus is different from the application and solicitation state, please complete the Foreign National Confirmation of Additional Location (FN CoAL) form.
- All initial and subsequent premium payments must be paid in U.S. dollars from a U.S. bank account held in the name of the policyowner. We reserve the right to accept or reject transfers to and from a bank or other financial institution based on regulatory restrictions or Symetra's payments policy.

#### What are Symetra's underwriting parameters?

Eligible issue ages	For A and B countries: 18-75 For C and D countries: 18-70 (See the country list on Page 6)	
Available products	Symetra fixed permanent life insurance	
Risk classes	A countries: All risk classes. B countries: All risk classes except Super Preferred Non-Nicotine and Standard Plus Non-Nicotine. C and D countries: At best, Standard. Maximum table rating on all risk classes is Table D.	
Capacity	Automatic capacity for A and B countries is \$20 million, with a jumbo limit of \$35 million. Facultative capacity only for C and D countries.	
Minimum face amount/death benefit	\$1,000,000 Note: Bundling of contracts to meet the \$1 million requirement (e.g., two \$500,000 policies) is not acceptable.	

### What are Symetra's medical underwriting requirements?

In addition to our routine medical underwriting requirements, all of the following apply:

- All medical examinations and labs must be completed in the U.S.
- Where applicable, a five-year medical history from all appropriate physicians and medical facilities must be provided.
- Attending physician statements must be provided in English or translated into English by a non-related, certified third-party translation agency. Symetra will not cover the cost of translations.

### What are Symetra's financial underwriting requirements?

Based on the face amount applied for, in addition to our routine financial underwriting requirements, we may also require, at our discretion, one or more of the following:

- Verification in writing of all financial documentation by an independent third party, such as a CPA or attorney.
- Letters of reference from financial institutions with account values and duration or relationship. If not provided, detailed account statements must be submitted to support the declarations of financial worth.
- A minimum of two years of resident country tax returns.
- Business tax returns for the past two years, including all schedules if the business comprises more than 15% of the net worth and is not reported as "pass-through."
- Valid evidence of ownership of property outside of the U.S. and the most recent tax assessments.

#### What are the due diligence requirements?

In addition to domestic Anti-Money Laundering (AML) and Office of Foreign Assets Control (OFAC) procedures:

- The identity of the Eligible Client must be verified with a copy of a valid passport or U.S. visa.
- The I-94 arrival and departure records will be reviewed.
- The W-8BEN beneficial owner tax withholding and reporting form will be reviewed.
- Enhanced due diligence will be used to determine if an Eligible Client is:
  - A "politically exposed person" (PEP), which includes individuals who are, or have been, entrusted with prominent public functions or their family members and close associates; or
  - Living in a country designated as a "tax haven," a Financial Action Task Force (FATF) money laundering designation, or a Financial Crimes Enforcement Network (FinCEN) special measures high risk countries or jurisdictions.
- The underwriter will conduct an online records and PEP search on all policyowners and insureds who are foreign nationals or non-U.S. residents and will determine if the owner/insured's country of residence is on the tax haven, FATF, or FinCEN list.
- If there is a positive result for any of the queries, the application must be referred to the Symetra AML Compliance Team for review. Symetra may order thirdparty reports and require additional documentation.

### What are the guidelines for post-issue communications?

- All post-issue communications regarding the policy, including premium notices, will be mailed to a street address of record in the U.S. A post office box address is not an acceptable address of record.
- The policy's death benefit is payable in USD to a U.S. mailing address or a U.S. bank account.
- We strongly suggest European Union customers direct all correspondence to their U.S.-based *Attorney-in-Fact*.

#### Symetra Country Code Classification List

Country lists and/or ratings will change as world conditions change. At its discretion, Symetra may change a country's rating at any time. Check with Symetra's underwriting department prior to submitting a case. For countries not shown below, coverage may be available on a facultative reinsurance basis.

Eligible countries may change as laws change or Symetra becomes aware of such changes in these countries prohibiting or restriciting the ability of their residents and citizens to buy, own or purchase U.S. life insurance.

"A" Countries			
American Samoa	Denmark	Latvia	Poland
Andorra	Dominica	Liechtenstein	Portugal
Anguilla	Estonia	Lithuania	Qatar
Antigua and Barbuda	Falkland Islands	Luxembourg	Saint Kitts and Nevis
Argentina	Finland	Масаи	Saint Lucia
Aruba	France	Malaysia <sup>3</sup>	Saint Vincent & the Grenadines
Australia	French Polynesia	Malta	San Marino
Austria	Germany	Marshall Islands	Singapore
Bahrain	Greenland	Martinique	Sint Maarten
Barbados	Grenada	Mauritius	Slovakia
Belgium	Guadeloupe	Monaco	Spain
Bermuda	Hong Kong	Montenegro	Sweden
British Virgin Islands	Hungary	Montserrat	Switzerland
Brunei	Iceland	Netherlands	Taiwan
Canary Islands	Ireland	Netherlands Antilles	Turks and Caicos
Cayman Islands	Ireland (Northern)	New Caledonia	U.S. Virgin Islands
Chile	Israel <sup>1</sup>	New Zealand	United Arab Emirates
Cook Islands	Italy	Northern Mariana Islands	United Kingdom
Costa Rica	Japan	Norway	Uruguay
Curacao	Korea, South	Oman	Vatican City
Cyprus	Kosovo <sup>2</sup>	Palau	Virgin Islands
Czech Republic	Kuwait	Panama	

"B" Countries

D Countries		
Algeria	Fiji	Могоссо
Armenia <sup>4</sup>	French Guiana	Paraguay
Azerbaijan⁵	Georgia <sup>6</sup>	Peru
Bhutan	Indonesia	Samoa
Brazil	Jamaica	Saudi Arabia
Cape Verde / Cabo Verde	Jordan	Seychelles
China	Kazakhstan	Solomon Islands
Colombia	Maldives	Suriname
Dominican Republic	Mexico <sup>7</sup>	Thailand
Ecuador	Moldova	Tonga
Federated States of Micronesia	Mongolia	

<sup>1</sup> Except Gaza Strip/West Bank.

<sup>2</sup> Individual consideration with Serbia borders.

<sup>3</sup> Individual consideration in some areas.
<sup>4</sup> Except disputed Nagorno-Karabakh region.

<sup>5</sup> Except Nagorno-Karabakh.

<sup>6</sup> Except Abkhazia and S. Ossetia.

<sup>7</sup> Individual considerations for Sinaloa, Colima, Michoacán, Guerrero and Tamaulipas.

# Why Symetra?

We love what we do. Symetra provides annuities, life insurance and employee benefits that help people live with financial security and confidence, and we've done it for more than 60 years. Like our icon—the swift—we're quick, hardworking and nimble in serving our customers. We can help your clients' financial future take flight.



Three guiding principles form the foundation for how we make decisions: Value, Transparency and Sustainability—or VTS. Simply put, VTS defines how we do business inside and out. What does it mean?

- Value: Products and solutions people need at a competitive price backed by dedication to excellent customer service.
- **Transparency:** We communicate clearly and openly so people can understand what they are buying.
- **Sustainability:** Our products stand the test of time. We're financially disciplined so we'll be here when customers need us.

To learn more about Symetra, visit www.symetra.com.



Symetra Life Insurance Company 777 108th Avenue NE, Suite 1200 Bellevue, WA 98004-5135 www.symetra.com

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Life insurance is issued by Symetra Life Insurance Company, 777 108th Ave NE, Suite 1200, Bellevue, WA 98004. Products are not available in all U.S. states or any U.S. territory.

Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

This is not a complete description of Symetra's high-net-worth foreign national (HNWFN) market program. It may have new or amended rules and restrictions, and is subject to change in order to be compliant with requirements in the client's home jurisdiction. The program is subject to change without notice.

# Underwriting requirements and preferred guidelines



For high-net-worth foreign national market use only

#### **Requirements for Symetra Fixed Permanent Life Insurance Products**

Face Amount	Ages 18-40	Ages 41-50	Ages 51-69	Ages 70-75
\$1,000,000- \$3,000,000	Paramed Exam Urinalysis Full Blood Financial Supplement	Paramed Exam Urinalysis Full Blood Financial Supplement	Paramed Exam Urinalysis Full Blood EKG Financial Supplement	Paramed Exam Urinalysis Full Blood EKG Rx Check Senior Supplement Financial Supplement
\$3,000,001- \$5,000,000	Paramed Exam Urinalysis Full Blood Financial Supplement Third Party Financials	Paramed Exam Urinalysis Full Blood Financial Supplement Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Financial Supplement Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Senior Supplement Financial Supplement Third Party Financials
\$5,000,001– \$10,000,000	Paramed Exam Urinalysis Full Blood Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Senior Supplement Financial Supplement Inspection Report Third Party Financials
\$10,000,001 and above	Paramed Exam Urinalysis Full Blood EKG Rx Check Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Financial Supplement Inspection Report Third Party Financials	Paramed Exam Urinalysis Full Blood EKG Rx Check Senior Supplement Financial Supplement Inspection Report Third Party Financials

#### See next page for full requirement definitions.

Additional tests may be required for some applicants.

For ages 69 and under, the Paramed Exam, Full Blood, Urinalysis and EKG are all valid for up to 12 months after being performed; for ages 70 and above, they are valid for up to 6 months. All applicants ages 70 and over are required to have a paramed administered Senior Supplement.

For death benefit option C, order requirements for 1.5 times the face amount.

Applicants in CA, ME and VT must complete an MHI, exam, PM, UA and full blood with every application.

To complete the Financial Supplement, please use Symetra form LUC-32.

#### **Requirement Definitions**

#### **MHI (Medical History Interview)**

A part 2 interview about health history and nicotine use.

#### Paramed Exam

This exam is completed by a paramedical company and includes a Medical History Interview and Physical Measurements.

#### **Full Blood**

A blood sample drawn by a paramedical company from a vein in the arm and tested for a variety of body system functions—kidney, liver, lipids, sugars, as well as HIV.

#### Urinalysis

A urine sample taken by a paramedical company and used to test for protein, sugar, nicotine, and drugs of abuse, and may include HIV.

#### **EKG (Electrocardiogram)**

Recorded by a paramedical company and is used to study and record the electrical activity of the heart.

#### **Rx Check**

A prescription database check.

#### **Senior Supplement**

An exam completed by a paramedical company where cognitive questions are asked and mobility tests are performed. Cognitive questions may involve word recall, clock drawings and questions around activities of daily living.

#### **Financial Supplement**

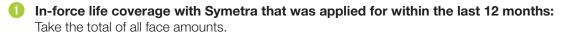
This may include tax returns covering the past two years, brokerage statements, bank accounts, or real estate assessments. Financial statements may be required on business cases at lower face amounts or other applications with complex financial arrangements. To complete the financial supplement, please submit Symetra form LUC-32 or any supporting financial documentation by a third party.

#### **IR (Inspection Report)**

A telephone interview with the applicant that includes the verification of their medical, employment and financial history.

#### **Exceptions to Above Underwriting Requirements**

In some instances, the face amount used to determine underwriting requirements will be larger than the amount on the application. These instances include:



- 2 Guaranteed Insurability Option (GIO): Add the applied-for GIO amount to the face amount.
- **Oeath Benefit Option C:** Multiply 1.5 times the face amount.

#### **Ordering Medical Requirements**

#### Here are some things to keep in mind when scheduling the exam:

1. Call a Symetra-appointed paramedical service company.

Preferred Paramed Provider		
ExamOne	1-877-933-9261	

Other Approved Paramed Providers		
APPS	1-800-635-1677	
EMSI	1-800-872-3674	

These companies will help you locate an office for the city where you want to schedule the exam.

- 2. Confirm the specific exam and tests required with the examiner.
- **3.** Follow up on your appointments with the examiner. Mention that you would like to be notified when scheduling is confirmed, or when the exam is completed.

For the customer-facing piece titled "Important information about your life insurance exam" (form number LU-521), please contact the Symetra Life Sales Desk at 1-877-737-3611 or lifesales@symetra.com between the hours of 8 a.m. and 6 p.m., Eastern Time.

Lab results are available to the applicant upon request.

#### **Preferred Underwriting Guidelines**

	Super Preferred Non-Nicotine	Preferred Non-Nicotine	Standard Plus Non- Nicotine/Preferred Nicotine	
Medical History	Standard insurance risk and no history of type I diabetes, cancer or cardiovascular disease			
<b>Family History</b> (Disregard family history if the insured is age 70 and over)	No death of parent or sibling prior to age 65 from heart disease, coronary artery disease or cancer	No death of parent or sibling prior to age 60 from heart disease or coronary artery disease		
Nicotine Use	No use of nicotine products within 60 months	No use of nicotine products within 36 months	No use of nicotine products within 12 months <b>Preferred Nicotine:</b> Nicotine use OK	
Current Exam Results				
Blood Profile	Normal Cholesterol/HDL ratio 4.5 or less TC < 300	Normal Cholesterol/HDL ratio 5.5 or less TC < 300	Normal Cholesterol/HDL ratio 6.5 or less TC < 300	
Blood Pressure	135/85 max for ages 20-50 and 140/90 max for ages 51+	135/85 max for ages 20-50 and 140/90 max for ages 51+	140/90 max for all ages	
Weight	See Height/Weight Chart			
Alcohol and/or Drug Use	No counseling or treatment ever	No counseling or treatment in past 10 years	No ratable history	
Driving	No more than two moving violations in past three years No DWI in ten years		No more than three moving violations No DWI in five years	
Other	No motor vehicle racing		N/A	

#### **Height/Weight Chart**

	Super Preferred Non-Nicotine	Preferred Non-Nicotine	Standard Plus Non-Nicotine/ Preferred Nicotine
Height	Unisex Weight	Unisex Weight	Unisex Weight
4.8	124	135	143
4.9	129	139	148
4.10	133	142	153
4.11	138	147	159
5 feet	144	153	164
5.1	151	159	170
5.2	157	165	176
5.3	162	171	183
5.4	167	177	188
5.5	172	182	193
5.6	176	187	198
5.7	182	193	205
5.8	187	198	211
5.9	193	205	217
5.10	198	210	221
5.11	203	216	228
6 feet	209	222	236
6.1	214	227	241
6.2	219	233	248
6.3	223	240	254
6.4	229	246	261
6.5	234	252	267
6.6	240	259	275
6.7	245	266	282

#### Symetra's Fixed Permanent Life Insurance Products



Symetra Life Insurance Company 777 108th Avenue NE, Suite 1200 Bellevue, WA 98004-5135 www.symetra.com

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Coverage and eligibility are not available in all regions or to all people.