

Program Guide

Symetra Underwriting Guidelines for Foreign Nationals and Non-U.S. Residents



Symetra's Permanent Life Insurance

Symetra's experienced underwriting team is swift to serve with foreign national and non-U.S. resident underwriting for certain "Eligible Clients."

Who is an "Eligible Client?"

- Foreign citizens with clear residency or business connections to the U.S. who have a need for life insurance. The policyowner must have a valid U.S. tax identification number and a U.S. street address.
- 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 the 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 house, marriage to a U.S. citizen or long-term U.S. employment.

Note: Residents of Guam, Puerto Rico, and the U.S. Virgin Islands are U.S. residents for the purposes of these guidelines.

Who qualifies to be insured?

Basic Qualifications

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

- A temporary visa or a color copy of a valid passport,*
- A global net worth of at least \$5 million (U.S.),
- A basic understanding of the English language, and
- The following physical and financial presence in the United States:
 - A minimum of 15 days stay in the U.S. annually;
 - An existing U.S. financial presence, including a U.S. bank account; and
 - U.S. assets sufficient to justify 25% of the amount of coverage applied for held in the U.S. in the name of the policyowner for a minimum of six months prior to application.

U.S. Nexus

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

- Have a U.S. residence.
- 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 a U.S. account with a \$500,000 minimum balance (at least six months old, if this is the only U.S. nexus).

Note: Evidence of a U.S. nexus must be documented on the application or in a cover letter.

Note: The following will not alone be considered a satisfactory U.S. nexus:

- Close family members residing in the U.S.; or
- Visits to the U.S. several times a year for personal reasons.

Disqualifications

The following proposed insureds will not qualify:

- Missionaries
- Judges, politicians, government officials
- Journalists
- Military, police, security personnel
- Professional athletes and entertainers
- Proposed insureds travelling to any country where a U.S. travel advisory has been issued

* We may also request a W-8BEN.

Who can own the policy?

- The insured can own his/her own policy, subject to the specific requirement of the insured's country of residence.
- A U.S. citizen or permanent resident can own his/her own policy, even when travelling outside of the U.S. on a long-term basis.
- If the proposed insured is a Foreign National, U.S. ownership is usually required. Acceptable types of U.S. ownership include:
 - An immediate family member who resides in the U.S. and separately satisfies all of the insured's "Basic Qualifications" (listed above).
 - 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.

Note: In the case of a revocable trust without a TIN, the insured must provide a valid SSN.

Note: In the case of a U.S. corporate bank trustee located in the U.S., a TIN must be provided.

Note: With all revocable trusts, the grantor of the trust must provide his/her valid SSN.

How is the policy solicited and delivered?

- All solicitation (including telephone, mail and electronic deliveries) 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, tests and inspections.

Note: Medical examinations performed at a U.S. embassy outside of the U.S. or on a vessel in international waters will not be accepted.

- 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.
- All policies must be delivered to the policyowner in person, in the U.S., by the producer in the state where the policy was issued. The state of issue is the state where significant U.S. nexus is evident.

Note: Confirmation that all insurance transactions took place in the U.S. must be documented on the application or in a cover letter.

What are Symetra's underwriting parameters?

Eligible Issue Ages	18-75 for A and B countries 18-70 for C and D countries (See the country list on the back page)
Available Products	Symetra Accumulator IUL, Symetra UL-G and Symetra CAUL
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 are 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

What are Symetra's medical underwriting requirements?

In addition to Symetra's routine medical underwriting requirements, all of the following apply:

- All medical examinations and labs must be completed in the U.S.
- 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, third-party translation agency. Symetra will not cover the cost of translations.

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What are Symetra's financial underwriting requirements?

In addition to Symetra's routine financial underwriting requirements, we may also require, at our sole discretion, one or more of the following:

- A minimum of two years of resident country tax returns;
- Business tax returns for the past two years, including all schedules if 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 assessment;
- Verification in writing of all financial documentation by an independent third party, such as a CPA or attorney; and/or
- Letter of reference from financial institution with account value and duration or relationship. If not provided, detailed account statements must be submitted to support the declarations of financial worth.


What are the due diligence requirements?

In addition to normal anti-money laundering 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 visa.
- Enhanced due diligence will be used to determine if an Eligible Client is:
 - A "politically exposed person" ("PEP"), which includes current and former senior foreign political figures, their immediate family members and close associates. By virtue of position and influence, a PEP requires heightened scrutiny; or
 - Living in a country designated as a "tax haven" or Financial Action Task Force ("FATF") on Money Laundering jurisdiction.
- The underwriter will conduct an internet 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 FATF/Tax Haven list.
- If there is a positive result for either search, the application must be referred to the Anti-Money Laundering Compliance Unit, which will assess any risk posed by the proposed insured or policyowner.

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 to a U.S. mailing address or a U.S. bank account.

 **Advisory:** This material does not 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 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 foreign country requirements.

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Symetra Country Code Listing

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

"B" Countries		
Armenia ¹	French Guiana	Niue
Azerbaijan ²	Georgia ³	Paraguay
Bahamas	Indonesia	Peru
Bhutan	Jamaica	Russian Federation ⁴
Brazil	Jordan	Samoa
Cape Verde/Cabo Verde	Kazakhstan	Seychelles
China (Metropolitan areas only)	Maldives	Solomon Islands
Dominican Republic	Mexico (Excluding Juarez and Mexico City)	Suriname
Ecuador	Moldova	Thailand
Federated States of Micronesia	Mongolia	Tonga
Fiji	Morocco	Trinidad and Tobago

¹ Except disputed Nagorno-Karabakh region

² Except Nagorno-Karabakh

³ Except Abkhazia and S. Ossetia

⁴ Except Chechnya

Country lists and/or ratings will change as world conditions change. Symetra may change a country's rating, at its sole discretion, at any time. Check with Symetra's Underwriting department prior to submitting a case.



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

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This Symetra underwriting program may have new or amended restrictions and is subject to change without notice.