

Verity Financial Group - Policies and Procedures Regarding Variable Insurance Products

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- All securities services provided in connection with the offer and sale of variable products will be provided only through dual representatives who are: (1) registered representatives of the broker-dealer, (2) licensed by an appropriate state regulator as insurance agents in the states in which they do business, and, (3) when required under applicable state insurance law, appointed insurance agents of the insurers for which they solicit applications for variable products.
- If any dual representative is subject to a bar imposed by the SEC or FINRA, suspended by the SEC or FINRA from association with a broker-dealer, or subject to any final order from a state insurance commission or state securities commission (or agency or officer performing like functions) that bars or suspends the dual representative from being associated with an insurance agency or broker-dealer, the insurance agency will terminate or suspend that dual representative from all variable product sales activities.
- Dual representatives will adhere to the terms contained in the Compliance Manual and Written Supervisory Procedures provided by the registered broker-dealer.
- Only dual representatives may receive or handle customer funds routed through the registered broker-dealer and the insurance agencies. Furthermore, only dual representatives may receive or handle customer funds or securities in connection with the sale of variable products.
- Unregistered employees will only have clerical or ministerial involvement in variable products transactions, will not engage in any securities activities that are not clerical or ministerial, and will not receive any compensation based on transactions in variable products or the provision of advice with respect to variable products.
- Unregistered employees will not handle or maintain customer funds or securities in connection with transactions in variable products.
- Unregistered employees will not recommend any variable products, give investment advice with respect to variable products, discuss the merits of any variable products, or handle any question that might require familiarity with variable products. Unregistered employees will refer all variable products-related questions to dual representatives.
- Unregistered employees will adhere to all pertinent elements of the Compliance Manual and the Written Supervisory Procedures of the registered broker-dealer, including but not limited to policies addressing privacy of customer information and cybersecurity.
- The insurance agency, or any of its associated persons, may not be the payee (or in the case of electronic fund transfers, the direct recipient) of any customer funds intended for the purchase of variable products. All customer funds payments must be made solely to the insurance company issuing the variable product. Checks made in any other manner will be returned.