

Guide to Ethical Market Conduct

A vital element for the success of CMFG Life Insurance Company is a strong commitment to high standards of business practices and market conduct in the insurance marketplace. This Guide lays out the business practices and values that are fundamental to our company and industry.

This Guide represents our company's views of how all distributors and employees must operate on a daily basis and creates the foundation of our market conduct philosophy.

As a representative (distributor and/or employee) of CMFG Life Insurance Company, it is my responsibility to:

Make recommendations and present products based on an analysis of the insurance needs or financial objectives of the customer.

It is the policy of the Company to market and sell products which meet our customer's insurable needs or financial objectives.

The Company expects its agents, brokers, representatives, and employees to assist customers in determining the customers' insurable needs and financial objectives in the marketing and sale of its products, including the use of fact finding and needs analysis tools.

Provide each customer with an understanding of any recommended product and its features, and to provide honest and accurate disclosure for an informed customer purchasing decision.

We believe agents, brokers, representatives, and employees should have an understanding of the features of the products that are being presented to a customer that is consistent with making appropriate buying decisions. The agents, brokers, representatives, and employees should clearly identify the product being sold and provide complete information on features, benefits, costs, fees, charges, limitations, and contract terms.

The Company will provide its agents, brokers, and representatives with sales, marketing, and/or descriptive materials explaining the insurer's product features and operations and will permit only materials approved by the Company to be used in the sale of its products.

It is important that illustrations be used appropriately in sales presentations. The Company will provide clear, understandable, and complete disclosures about the premiums, costs, values, benefits, and appropriately disclose guaranteed and non-guaranteed elements.

We believe that replacement of an existing insurance or annuity product 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 agents, brokers, representatives, and employees should refrain from making deceptive or misleading criticism, disparagement or characterizations of a competitor's products.

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

We view ongoing education as fundamental to competent and customer-focused business practices. We encourage participation in continuing education programs or the use of educational communications for agents, brokers, representatives, and employees in the sales process.

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 agents, brokers, representatives, and employees to make a commitment to our customers to provide and maintain competent service.

Maintaining customer trust and confidence requires that we respond promptly and thoroughly to customer complaints. The Company will have procedures for tracking, responding to, analyzing, and working towards eliminating the root cause of complaints received from customers and regulators.

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

We are committed to complying with all applicable laws and regulations. Each agent, broker, representative, 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.
