

DATE: May 1, 2020 **N° 2020-14**
CATEGORY: Investments
TO: National Accounts
SUBJECT: Guidelines for National Account Temporary Covid-19 Non Face to Face Investments

Announcement:

To support National Accounts during the COVID-19 crisis Empire Life is temporarily allowing Non-Face-to-Face (NFTF) sales of investment products outside of its Fast & Full Investment Application platform. The NFTF sales process that each National Account has implemented for their Investment Advisors must adhere to the guidelines below. The process to complete an administrative form that requires a client signature (subject to the restrictions below) may also use the guidelines below.

Obtaining remote signatures for applications and administrative forms except: <ul style="list-style-type: none">Beneficiary Change FormsOwnership Change FormsClaimant Forms	<ul style="list-style-type: none">Advisor confirms the identity of the client they are dealing with for purpose of completing the application.Use an e-signature platform reviewed and approved by the National Account.Client can print and sign the document while the advisor watches via video conference and scans back to the advisor.Advisor documents interaction to client file.
Signature witness	<ul style="list-style-type: none">For the purpose of witnessing client signatures, viewing of client signing using video conferencing/screen sharing technology is acceptable.
Sending documents to clients	<ul style="list-style-type: none">Advisor confirms email address with client via current records, telephone or video conferencingDocuments must be sent via secure means such as encrypted email or through National Account client portals
AML/ATF Requirements	<ul style="list-style-type: none">All requirements continue to be requiredVerification of identity requires dual process verification as per FINTRAC guidelines
Other Compliance Requirements (ie privacy consent, CASL, Advisor Disclosure, etc)	<ul style="list-style-type: none">All requirements continue to be requiredWhere signature is needed, e-signature or print and sign as per above

Notes:

- If National Accounts will be handling any of the above areas differently, please provide a description to us so we may understand your process.
- Empire Life retains the right to audit the National Account's processes.
- These measures are temporary Covid-19 measures to allow National Accounts to sell investments non face to face using paper applications and/or fillable PDFs .
- Advisor must be licensed for and located in the jurisdiction where the client signs the application.

Reference

Stephanie Wisniewski, Director, Retail Operations