

**DATE:** June 28, 2021  
**CATEGORY:** **ADVISOR CONTRACTING**  
**TO:** Managing General Agents, Associate General Agents, General Agents  
**SUBJECT:** **Unacceptable Criteria for Contracting**

N° 2021-15

We are committed to ensuring our customers receive the best service possible. The quality of our advisors is therefore one of our most important priorities. In addition, we are also a member of the Canadian Life and Health Insurance Association (CLHIA) and must adhere to their advisor sustainability guidelines.

For these reasons, we conduct additional advisor screening to supplement the initial screening done by the MGA, AGA, or GA. This ensures we have all the information we need to determine if an advisor meets our contracting criteria.

Sometimes our screening reveals certain facts about an advisor that we consider unacceptable criteria for contracting. We must decline entering into a contractual relationship with an advisor whenever any unacceptable criteria are discovered. In order to make the contracting process as simple, fast and easy as possible we have prepared the list below of unacceptable criteria as a reference. If any unacceptable criteria apply to an advisor seeking a contract, you should decline without sending the contracting documents to us. If we receive contracting documents and discover any unacceptable criteria contracting may be declined.

The following are considered **Unacceptable Criteria** for advisor contracting:

- A credit score below 600
- Unpaid collections to creditors
- Undischarged bankruptcy
- Discharged bankruptcy within the last 12 months
- Active bankruptcy proposal, consumer proposal
- Active bankruptcy proposal, consumer proposal within the last 12 months
- History of multiple bankruptcies or bankruptcy proposals, consumer proposals even if discharged or fulfilled
- Outstanding Legal Items in excess of \$5000 either individually or combined
- Conviction of financial crimes (i.e. theft, fraud, forgery, etc.)
- Conviction of serious crimes that could be seen as detrimental to client safety (i.e. assault, rape, weapon possession etc.)
- Any unresolved criminal charges
- Conviction of any case of fronting
- Any unresolved disciplinary action by regulators or insurance councils
- Unpaid debts in excess of \$500 with one of our existing MGA's without repayment efforts
- Unpaid debts in excess of \$500 with other carriers without repayment efforts

If you are uncertain whether you should submit contracting for a particular advisor please send an email with your comments and recommendations to [contracting@empire.ca](mailto:contracting@empire.ca) along with an Advisor Screening Questionnaire and Empire Life Consent and Authorization form. We will review the file and we will provide you with a final decision.

**Reference:**

**Christa Stephenson**, Director, Retail Operations