



Workplace Division

MARKET CONDUCT POLICY

Allstate Workplace Division is committed to the highest ethical market conduct in the sale of insurance products, to include individually sold life insurance, annuities and long term care products. This involves more than complying with applicable laws and regulations. We at AWD must also commit ourselves to:

1. Conduct business according to high standards of honesty and fairness and to render that service to our customers which we would demand for ourselves by striving to:
 - a. Determine the insurable needs or financial objectives of our customers and provide products which help meet those needs and objectives.
 - b. Constantly improve our sales and marketing practices.
2. Provide competent and customer-focused sales and service by assuring that those involved in the sales process:
 - a. Are of good character and business repute, and have appropriate education, qualifications, and training.
 - b. Are duly licensed, appointed or otherwise qualified under applicable state law.
 - c. Are knowledgeable of our products and operation.
 - d. Participate in continuing education.
3. Engage in active and fair competition by:
 - a. Refraining from disparaging competitor insurance companies.
 - b. Providing to our customers information they need when considering insurance replacement.
4. Provide advertising and sales materials that are clear as to purpose, and honest and fair as to content by:

- a. Using this material in a manner consistent with the needs of the customer, based upon fair dealing and good faith, and with a sound basis in fact.
 - b. Using sales materials which are sufficiently comprehensible.
 - c. Using illustrations which are accurate, fair, and complete and contain appropriate disclosure.
5. Provide for fair and expeditious handling of customer complaints and disputes by:
- a. Identifying, evaluating, and handling complaints in compliance with the law.
 - b. Making good faith efforts to resolve complaints and disputes.
6. Maintain a system of supervision and review that is reasonably designed to achieve compliance with these principles through:
- a. Policies and procedures designed to comply, and monitor our compliance, with this policy statement and applicable laws.
 - b. A system of supervision of our market activities in order to monitor our compliance with this policy statement and applicable laws.
 - c. Providing compliance training for employees and producers.

The principles outlined above form the basis of the Insurance Marketplace Standards Association (“IMSA”). AWD, through its underwriting company American Heritage Life Insurance Company, is committed to maintaining membership in IMSA and to promoting compliance in our organization and throughout our industry with the principles outlined above.

David A. Bird
President, Allstate Workplace Division