

Reminder of laws regarding telemarketing practices

As part of Corebridge Financial's ongoing commitment to comply with all applicable federal and state telemarketing laws, we would like to remind you of the telemarketing law requirements, particularly the Telephone Consumer Protection Act (TCPA), that pertain to your practices.

Corebridge Financial expects all independent producers to comply with all federal and state telemarketing laws when promoting its life insurance products underwritten by American General Life Insurance Company (or in New York, The United States Life Insurance Company in the City of New York). Specifically, Corebridge Financial:

- Does not authorize calls using an Automatic Telephone Dialing System as defined in the TCPA;
- Does not authorize calls using an artificial or prerecorded voice message without prior express written consent from the recipient;
- Does not authorize calls to phone numbers registered on federal, state, or a company's internal Do-Not-Call registries without prior express written consent from the recipient;
- Does not authorize the use of offshore vendors for any telemarketing or lead sourcing activities;
- Requires independent producers to ensure their telemarketing and lead sourcing are TCPA-compliant; Does not authorize telemarketing before 8 a.m. or after 9 p.m. in the local time of the recipient, without caller ID activated, with disguised or spoofed caller IDs, or without being registered as a telemarketer (if the state requires); and
- Does not authorize you to represent that you are calling on behalf of Corebridge Financial or any of its affiliates or otherwise suggest that you are calling on behalf of any entity other than yourself or your organization.

Failure to comply with the TCPA and other state telemarketing requirements may result in penalties ranging from \$500 to \$40,000 per call, potential lawsuits, significant legal defense fees, and full indemnification responsibility to Corebridge Financial for any resulting settlements or judgements.

Please see the following pages for additional information and guidelines by topic.

More information and resources

For additional information about the Telephone Consumer Protection Act (TCPA) and best practices, see:

- [Producer Sales Practices Manual](#)
- [Stop Unwanted Robocalls and Texts \(FCC page for consumers\)](#)
- [Federal Trade Commission](#)
- [TCPA Compliance Checklist: Best Practices for Your Marketing](#) (Blog post on [activeprospect.com](#))
- [Beginner's Guide to the TCPA](#) (CompliancePoint.com article)
- [The Complete Guide to TCPA Compliance](#) (TCN.com article)

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Responsibility to know and comply with applicable telemarketing laws

Independent producers are responsible for knowing and complying with all federal and state telemarketing laws and should seek independent legal advice to ensure compliance. The Telephone Consumer Protection Act (“TCPA”) and other similar state laws govern the use of technology, including calls, texts, or faxes, to consumers that prohibit conduct including, but not limited to, the following:

- Calls to phones using an Automatic Telephone Dialing System (“Autodialer”);
- Calls using an artificial or prerecorded voice;
- Calls to phone numbers registered on federal, state, or a company’s internal Do-Not-Call (“DNC”) registries;
- Calls before or after certain hours;
- Calls without caller ID activated;
- Calls with disguised or spoofed Caller IDs; and
- Failure to register as a telemarketer (if the state requires).

Failure to comply with the TCPA and other state telemarketing requirements may result in penalties ranging from \$500 to \$40,000 per call, potential lawsuits, significant legal fees to defend against such suits, and full indemnification responsibility to Corebridge Financial for any resulting settlements or judgements.

Calls and texts using an automatic telephone dialing system are prohibited

Corebridge Financial does not authorize any independent producer to use an Automatic Dialer to send any form of communication, including calls, ringless voicemails, texts, or faxes. An Automatic Dialer (sometimes called an ATDS) is defined as equipment which has the capacity to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers. 47 U.S.C. § 227(a)(1).

Corebridge Financial expects that any telemarketing calls or texts, which promote its products, will be placed by a live person using a traditional phone or cell phone and not using an Automatic Dialer.

Calls and voicemails using an artificial or prerecorded voice without prior written consent are prohibited

Corebridge Financial does not authorize any independent producer to use an artificial or prerecorded voice to send any form of communication, including calls or ringless voicemails without prior written consent. Although the TCPA does not provide a definition of an artificial or prerecorded voice, it includes at a minimum a generated voice or recorded voice message.

Calls and texts to numbers on Do-Not-Call list are prohibited

Independent producers must also comply with federal and state DNC requirements. This requires, at a minimum, that independent producers:

- Obtain all DNC lists including the federal, state (if applicable), and internal lists (Corebridge Financial's internal DNC list will be made available to you);
- Scrub any leads against the applicable federal, state, and internal DNC lists;
- Not call or text any phone number registered on any federal, state, or internal DNC list; and
- Submit any request by a called party to be placed on Corebridge Financial's internal DNC list, including the person's name and telephone number, within 48 hours.

The independent producer must have procedures in place to comply with all applicable DNC requirements. If the person or their phone number is on any DNC list or is a third-party lead, then prior express written consent is required before the person may be contacted as described in the next section.

Independent producers must conduct their own TCPA-compliant lead sourcing

Independent producers may call established customers or leads who provided their phone number to the independent producer unless the person is on a federal, state, or internal DNC list or the person's contact information was obtained as a third-party lead. In which case, prior express written consent is required before the person may be contacted.

Independent producers are expected to conduct their own TCPA-compliant telemarketing and use leads generated from their own efforts. The prior express written consent for the independent producer to contact the called party includes, at a minimum, the following:

- A clear and conspicuous written disclosure from the telephone subscriber or customary user to allow the independent producer to contact him or her about Corebridge Financial products;
- A written record that independent producer can easily and readily retrieve and provide to Corebridge Financial, within at least (2) business days of Corebridge Financial's request; and
- A process to ensure written consent records are maintained for at least four years from the date of the call or text.

As an example, consent should contain the following language:

By submitting this request, I EXPRESSLY CONSENT TO RECEIVE MARKETING AND INFORMATIONAL PHONE CALLS AND TEXT MESSAGES FROM OR ON BEHALF OF [Independent Producer Name] and Corebridge Financial, using any form of technology, including an automatic telephone dialing system or an artificial or prerecorded voice, about Corebridge Financial's products and services, at the phone number provided, including my wireless number, even if I am on a federal, state, or internal do-not-call registry. I acknowledge that consenting is not required to make a purchase and that I may call [Independent Producer Name] or Corebridge Financial and make a purchase without signing this form and consenting to such communications. Standard messaging and data rates apply for text messages.

Prohibition on Offshore Vendors and Requirements for U.S. Based Lead Sourcing The use of offshore telemarketing, or lead generation vendors, is strictly prohibited. Independent producers must verify that their U.S. based vendors act in compliance with the TCPA and other state and federal telemarketing laws. This includes obtaining exemplary proof from the lead and/or telemarketing vendor that the vendor has actual evidence of prior written consent from all leads and that the consents are not stale, i.e., older than ninety (90) days. This proof must include, at a minimum, the following information:

- Name of consenter;
- Phone number of consenter;
- Date of consent;
- Language of the written consent;
- URL of the website used to obtain the written consent;
- Screenshots of how the website or other medium appeared when the written consent was obtained;
- IP address of the consenter; and
- A Trusted Form certificate or equivalent for the consent.

Independent Producers must periodically re-verify that their authorized U.S. based vendors are acting in compliance with the TCPA and other state and federal telemarketing laws.

Independent producers must make clear that they are not calling on behalf of or at the behest of Corebridge Financial or any of its affiliates

As an independent producer, you are not contacting potential customers on behalf of Corebridge Financial or its affiliates and Corebridge Financial does not request or demand that you telemarket to potential customers.

Accordingly, you must not represent that you are calling on behalf of or at the behest of Corebridge Financial or its affiliates. You must not suggest that you are calling on behalf of any entity other than yourself or your organization.

Other requirements

Independent producers are also responsible for ensuring compliance with all other federal and state telemarketing laws, which includes, at a minimum, the following:

- Independent producers should not telemarket before 8:00 a.m. or after 9:00 p.m. in the local time of the potential insured or any day when telemarketing is prohibited by law or regulation;
- The independent producer may not enable Caller ID Block or otherwise disguise or spoof their Caller ID;
- During the call, independent producers must identify the name of the calling individual, the independent producer's company, and disclose that the purpose of the call is to discuss insurance products; and
- If you practice in a state that requires telemarketers to register with a state agency, the Independent Producer should verify the applicable requirement and satisfy the same.

Nothing in this bulletin should be deemed legal advice from Corebridge Financial. You should consult with your own attorneys regarding your specific obligations under applicable laws and regulations.

Thank you for reading and acknowledging this bulletin. Corebridge Financial appreciates its independent producers' efforts to promote its life insurance products using telemarketing practices that are lawful and that comply with Corebridge Financials' authorized practices.