## **COMPLIANCE DEPARTMENT, DISTRIBUTION NETWORKS**



## PROCEDURE 4 (updated October 1st, 2021)

The term "supervisor" refers to the person supervising the trainee concerned during the probationary period.

Please note that the same logic used in the procedure below can be used by trainees and their supervisors to perform transactions for existing insurance or annuity contracts using eSignature eXpress electronic signature process.

For each of these steps, unless otherwise specified:

- The client and the trainee must be present for the calls (by phone or videoconference);
- The supervisor's presence during calls is optional.

PROCEDURE – REMOTE SALES – INSURANCE - WITH REPLACEMENT – PROBATIONARY PERIOD  The PDF version of the Prior Notice of Policy Replacement can be downloaded from the AMF website.		
Procedure – New insurance product with replacement eSignature eXpress electronic signature		
	TRAINEE INTRODUCTION (BY PHONE OR VIDEOCONFERENCE)	
Preliminary Step	<ol> <li>The trainee must send the client the information on their business card, including their title and the agency contact information. This information can be sent with their first email to the client, using their email signature. The email signature must be complete.</li> </ol>	
	2) The trainee must send the <i>Disclosure Statement</i> (F13-743A-1) to the client. This document is available in the <i>Document Centre</i> . It must be sent at the time of sale, at the latest.	
Step 1	GATHER INFORMATION (BY PHONE OR VIDEOCONFERENCE)	
	<ol> <li>Clients should be able to explain or read the contracts they have in effect currently, if applicable, so that these can be adequately reflected in the FNA.</li> </ol>	
	2) If it is necessary for the trainee or the supervisor to be familiar with an in-force contract the client currently has or any other documents related to the client's financial situation, the client must send them these documents.	
	3) With regard to the contract to be replaced, clients must send a complete copy so that the trainee and supervisor can familiarize themselves with the contract in order to be able to assess whether the replacement is to the client's benefit and to correctly complete the notice of replacement.	

# **COMPLIANCE DEPARTMENT, DISTRIBUTION NETWORKS**



Step 2	Preapproval of recommendations by the supervisor (by phone or videoconference)
	<ol> <li>The trainee and the supervisor must be present for the call.</li> <li>The supervisor must verify the FNA and the notice completed by the trainee and request corrections,</li> </ol>
	<ul><li>if necessary.</li><li>3) The supervisor must preapprove the insurance illustration prepared by the trainee and the recommendations the trainee will discuss with the client.</li></ul>
	<ul> <li>4) Before the next step, the supervisor must add the following note to the client file:         <ul> <li>I confirm that I have verified the FNA and the notice, preapproved the insurance illustration and the following recommendations which the trainee will discuss with the client: LIST THE RECOMMENDATIONS THE TRAINEE WILL DISCUSS WITH THE CLIENT.</li> </ul> </li> </ul>
Step 3	Present the FNA conclusions and make recommendations (by phone or videoconference)
	1) If using videoconferencing, the trainee can share their screen with clients to familiarize them with the FNA while explaining their conclusions.
	2) It is <u>strongly recommended</u> at this stage that clients be sent <u>a copy of the FNA and an illustration of the product</u> by e-mail following the procedure detailed in Step 9. The obligation to send a copy of the FNA and the illustration to the client upon delivery of the contract at the latest will therefore have been met.
Step 4	READ THE COMPLETED NOTICE OF REPLACEMENT (BY PHONE OR VIDEOCONFERENCE)
	If using videoconferencing, trainees can share their screen with clients to familiarize them with the notice while explaining their conclusions.
Step 5	COMPLETE THE INSURANCE APPLICATION, THE F1E, THE F6 AND ALL OTHER FORMS THAT MAY BE NECESSARY USING THE CODE AND NAME OF THE TRAINEE AS THE ADVISOR
	<u>This step must be done over videoconference</u> because the trainee <u>must share their screen</u> with the client the entire time they are filling out the insurance application and the declaration of insurability. The client must be able to see what is being entered electronically.
	It is <u>strongly recommended</u> that a note be added to the client file mentioning that this screen sharing took place. Of course, <u>no modifications may be made</u> to the insurance application or to the declaration of insurability afterwards, unless the trainee has another videoconference with the client, with the screen sharing activated.
	If this is a new client to whom the trainee has not sold a product in the past <b>OR</b> if it is a universal life insurance application, the trainee must verify the client's identity.
	<ul> <li>The client must present a legible piece of identification during the videoconference. Saving a screen capture of the piece of identification <u>is prohibited</u>.</li> </ul>
	For universal life insurance application, a double validation of identity must be performed. See the <u>corresponding procedure</u> in this regard.



Step 6	USE ESIGNATURE EXPRESS TO SEND THE F1E, THE NOTICE OF REPLACEMENT, THE F6 AND ANY OTHER FORMS THAT MAY BE NECESSARY, AS APPLICABLE, TO THE CLIENT FOR THEIR SIGNATURE, BEFORE THE TRAINEE HAS SIGNED THEM AND THEY HAVE BEEN COUNTERSIGNED BY THE SUPERVISOR
	In regard to the notice of replacement, the trainee has to make sure to have the client sign it, along with the other forms of the transaction, in the electronic signature ceremony to obtain proof of the client's signature in the electronic evidence certificate provided by eSignature eXpress ("the certificate").
	As eSignature eXpress sends an email to the client at the end of the signature ceremony allowing the client to download all of the documents present in the signature ceremony, it is considered that this process is equivalent to obtaining proof that the notice of replacement was sent to the client within the prescribed time period. However, it is important that the certificate provided by eSignature eXpress is kept in the client file.
Step 7	SUBMIT THE APPLICATION IN EVO AND SEND ALL OTHER DOCUMENTS FOR THE TRANSACTION BY EMAIL TO THE AGENCY'S ADMINISTRATIVE STAFF
	The administrative staff will send a copy of the notice of replacement to the replaced insurer within the prescribed period, as applicable. Proof that this was sent will be noted in the client file in Equisoft/connect (Client manager) by the administrative staff.
Step 8	DOCUMENT MANAGEMENT
	Perform the usual document management in Equisoft/connect (Client manager) and make detailed notes in the client file. Make sure to make a note of the means the trainee and supervisor used to communicate with the client remotely.
Step 9	DELIVERY OF THE FNA AND THE CONTRACT TO THE CLIENT
	Delivery of the FNA
	Warning! The new contract delivery process means that the trainee must now take charge of the delivery of the FNA to the client and ensure that the client's file is properly documented in this regard
	<ul> <li>If the FNA was not sent to the client in Step 3, the FNA must be handed over to the client on delivery of the contract at the latest. It is necessary to use a method that provides evidence in the client file that the FNA was sent no later than on the date the trainee contacted the client in the contract delivery process.</li> </ul>
	<ul> <li>Ideally, proof of delivery of the FNA (e.g. written confirmation from the client) should be kept in the client file to demonstrate that the FNA has not only been transmitted but also received by the client.</li> </ul>
	<ul> <li>The trainee must therefore no later than on the date he contacts the client in the contract delivery process, send the PDF version of the FNA by email to the client, adding a password to the PDF to protect the personal information it contains (see the guide on how to add a password to a PDF).</li> </ul>

## **COMPLIANCE DEPARTMENT, DISTRIBUTION NETWORKS**



• If the email is sent from Outlook, the trainee will have to index the email in the client file in Equisoft/Connect (Client manager).

#### • Electronic Contract Delivery

- When communicating with the client in the contract delivery process, the trainee must:
  - Review the contract with the client, explaining the major provisions of the contract,
  - Verify with the client that the coverage(s) are what the client applied for.

#### **ADDITIONAL INFORMATION:**

- 1) When speaking on the phone, trainees must sure that they are talking to the right client. It may be necessary to request confidential information from the client in order to confirm identity (date of birth, products they have with iA, recent transactions, etc.).
  - The trainee must write a clear and precise note about this in the client file. The use of videoconferencing can facilitate client identification.
- 2) During a remote conversation, in which it can be difficult to interpret a client's non-verbal behaviour, it is even more important for the trainee to ensure that the client understands. The trainee must make sure to thoroughly confirm that the client understands the transaction they are completing together.
- 3) Each of the steps presented in the table above must be properly documented in the notes in the client file. <u>Detailed notes are particularly important in the context of remote transactions</u>.