

High-net-worth foreign national market

Program overview and underwriting guidelines

March 2021



Solutions that move with your clients' needs

Today's high-net-worth clients may live or come from all over the world, but many share the same life insurance needs.

Our many years of knowledge and expertise can help clients who have ties to the United States navigate the generational wealth transfer process with a program and underwriting guidelines designed specifically for the high-net-worth foreign national (HNWFN) market.



Advisory: This material does not offer advice or consider the impact of applicable state or foreign laws and regulations or income or estate tax treaties between the U.S. and other countries upon prospective insureds and policyowners. The laws and regulations of some countries may limit or prevent their residents or citizens from purchasing life insurance outside of their country of residence. Eligible Clients should be advised to consult with their own tax, legal and financial planners to ensure compliance with their particular home foreign country requirements.



Who is an “Eligible Client?”

- High-net-worth foreign nationals with a regular and ongoing connection to the U.S. who have a need for life insurance.
- U.S. citizens or permanent residents (i.e., green card holders) living abroad for more than 12 weeks per year.

Note: Generally, U.S. citizens and permanent residents will be considered under domestic underwriting requirements. A “permanent resident” is a U.S. resident with a green card who intends to remain permanently in the U.S. and has multiple other evidences of permanence, such as owning a home, marriage to a U.S. citizen or long-term U.S. employment.

Submission cover letter

Cover letters are very important when submitting life insurance applications and are a mandatory program requirement for this market. A well-written cover letter should:

- Introduce the client.
- Provide coverage details and the client’s insurance needs.
- Confirm client’s nexus or connections to the U.S.
- Outline the client’s current health and medical history.

Please review our “Tips for an effective client cover letter” flyer (LIM-1549) for more information.

Who qualifies to be insured?

Basic Underwriting Qualifications

A proposed insured must be an Eligible Client who has all of the following:

- A temporary U.S. visa or valid passport.
- A global net worth of at least \$2 million (U.S.).
- A U.S. nexus/connection.

U.S. Nexus/Connection

The Eligible Client must satisfy *one* of the following U.S. nexus/connection requirements:

- Own real estate in the U.S.
- Own a business in the U.S.
- Be an employee of a U.S. domiciled company.
- Have primary employment at a company located in the U.S.
- Have U.S. tax liability.
- Have immediate family residing in the U.S.
- Travel on a regular or ongoing basis to the U.S. for business or pleasure.
- Have a U.S. bank account or brokerage account.

Note: If the U.S. bank account or brokerage account is the only nexus/connection, we require a \$25,000 minimum balance that’s at least one month old.

Note: Evidence of a U.S. nexus/connection must be documented in a cover letter and in section 5b of the Symetra Life Insurance Solicitation, Sales and Services Agreement form.

Disqualifications

The following proposed insureds will not qualify:

- Missionaries
- Judges, politicians, government officials
- Journalists
- Military, police, security personnel
- Professional athletes and entertainers
- Proposed insureds with aviation risks
- Proposed insureds traveling to any country where an adverse U.S. travel advisory has been issued

Who can own the policy?

Currently, we allow *two* types of ownership:

- **Direct ownership** by individual foreign nationals.
An IRS W-8BEN form is required in all cases with direct ownership.
 - The owner/insured is responsible for confirming that the laws and regulations of their country allow for their direct ownership of the applied-for life insurance policy.
- **U.S. ownership** for individual foreign nationals.

Acceptable types of U.S. ownership include:

- An immediate family member who resides and is a permanent resident in the U.S. and separately satisfies all the insured's "Basic Underwriting Qualifications" (listed on previous page).
- A U.S. corporation, partnership or limited liability company, provided the entity has a valid U.S. Tax Identification Number (TIN) and is the beneficiary of the policy.
- A U.S. trust with a valid TIN, provided the trust is the beneficiary of the policy.

Notes:

- Applicants should consult with a tax and legal professional to ensure they obtain the appropriate tax ID for the U.S. trust which will own the policy.
- The trust and trustee must complete the Symetra Trustee Certification form.

How is the policy solicited and delivered?

- All solicitation must take place in the U.S., while the insured and policyowner (if different) are legally and physically present in the U.S.
- Solicitation includes the entire insurance process: marketing, illustration, application, underwriting, medical examinations and tests.
- The application and any additional forms must be completed, wet signed and dated by the applicant while the applicant is in the U.S. Electronic applications and electronic signatures are not allowed.
- The signature date on all forms must be the date the applicant and/or insured signed, not the date the application is submitted (if different). Please be sure all forms are fully completed and in good order so the applicant is not required to return to the U.S. to correct and sign the forms again.
- If applicable, the Department of Homeland Security Records Consent Form (Form I-94) allows Symetra to verify when the applicant enters and departs from the U.S.
- Medical examinations performed outside the U.S., in a U.S. embassy in a foreign country or on a vessel in international waters will not be accepted.
- All policies must be delivered to the policyowner or to the designated *Attorney-in-Fact* in person, in the U.S., by the producer in the state where the policy was applied for and issued. The state of issue is the state where significant U.S. nexus is evident. If the U.S. nexus is different from the application and solicitation state, please complete the Foreign National Confirmation of Additional Location (FN CoAL) form (LU-1100).
- All initial and subsequent premium payments must be paid in U.S. dollars from a U.S. bank account held in the name of the policyowner. We reserve the right to accept or reject transfers to and from a bank or other financial institution based on regulatory restrictions or Symetra's payments policy.

What are Symetra's medical underwriting requirements?

In addition to our routine medical underwriting requirements, all of the following apply:

- All medical examinations and labs must be completed in the U.S.
- Where applicable, a five-year medical history from all appropriate physicians and medical facilities must be provided.
- Attending physician statements must be provided in English or translated into English by a non-related, certified third-party translation agency. Symetra will reimburse up to \$300 for the cost of translations, if the policy is issued and placed in-force.

What are Symetra's financial underwriting requirements?

Based on the face amount applied for, in addition to our routine financial underwriting requirements, we may also require, at our discretion, one or more of the following:

- Verification in writing of all financial documentation by an independent third party, such as a CPA or attorney.
- Letters of reference from financial institutions with account values and duration or relationship. If not provided, detailed account statements must be submitted to support the declarations of financial worth.
- A minimum of two years of resident country tax returns.
- Business tax returns for the past two years, including all schedules if the business comprises more than 15% of the net worth and is not reported as "pass-through."
- Valid evidence of ownership of property outside of the U.S. and the most recent tax assessments.

Is premium finance allowed in the high-net-worth foreign national market?

- Premium finance of high-net-worth foreign national cases is available for an Eligible Client with a net worth of at least \$5 million and an annual income of at least \$200,000.
- For additional information, please review the Premium Financing Guidelines (LIM-1419) and Premium Financing Checklist (LIM-1420).

What are the due diligence requirements?

In addition to domestic Anti-Money Laundering (AML) and Office of Foreign Assets Control (OFAC) procedures:

- The identity of the Eligible Client must be verified with a copy of a valid passport or U.S. visa.
- The I-94 arrival and departure records will be reviewed.
- The W-8BEN beneficial owner tax withholding and reporting form will be reviewed.
- Enhanced due diligence will be used to determine if an Eligible Client is:
 - A "politically exposed person" (PEP), which includes individuals who are, or have been, entrusted with prominent public functions or their family members and close associates; or
 - Living in a country designated as a "tax haven," a Financial Action Task Force (FATF) money laundering designation, or a Financial Crimes Enforcement Network (FinCEN) special measures high risk countries or jurisdictions.
- The underwriter will conduct an online records and PEP search on all policyowners and insureds who are foreign nationals or non-U.S. residents and will determine if the owner/insured's country of residence is on the tax haven, FATF, or FinCEN list.
- If there is a positive result for any of the queries, the application must be referred to the Symetra AML Compliance Team for review. Symetra may order third-party reports and require additional documentation.

What are the guidelines for post-issue communications?

- All post-issue communications regarding the policy, including premium notices, will be mailed to a street address of record in the U.S. A post office box address is not an acceptable address of record.
- The policy's death benefit is payable in USD to a U.S. mailing address or a U.S. bank account.
- We strongly suggest European Union customers direct all correspondence to their U.S.-based *Attorney-in-Fact*.

What are Symetra's underwriting parameters?

	"A" Countries	"B" Countries	"C" Countries
Eligible issue ages*	18-75	18-75	18-70
Available products	Fixed permanent & term	Fixed permanent & term	Fixed permanent & term
Risk classes	All risk classes	Preferred and Standard	Standard
Maximum table rating	Table D	Table D	Table D
Capacity	\$20 million	\$20 million	Facultative only
Jumbo limit	\$35 million	\$35 million	\$35 million
Minimum face amount**	\$1 million	\$1 million	\$1 million

* Minimum issue ages may vary by product. Please refer to the specific product facts sheets for more information.

** Minimum face amount is \$1 million for each policy. Smaller policies can not be combined to meet the minimum requirement.

Symetra country code classification list and capacity

Country lists and/or ratings and capacity will change as world conditions change. At its discretion, Symetra may change a country's rating and/or capacity at any time. Check with Symetra's underwriting department prior to submitting a case. For countries not shown below, coverage is not available.

Eligible countries may change as laws change or Symetra becomes aware of such changes in these countries prohibiting or restricting the ability of their residents and citizens to buy, own or purchase U.S. life insurance.

"A" Countries			
American Samoa	Denmark	Latvia	Poland
Andorra	Dominica	Liechtenstein	Portugal
Anguilla	Estonia	Lithuania	Qatar
Antigua and Barbuda	Falkland Islands	Luxembourg	Saint Kitts and Nevis
Argentina	Finland	Macao	Saint Lucia
Aruba	France	Malaysia ³	Saint Vincent & the Grenadines
Australia	French Polynesia	Malta	San Marino
Austria	Germany	Marshall Islands	Singapore
Bahrain	Greenland	Martinique	Sint Maarten
Barbados	Grenada	Mauritius	Slovakia
Belgium	Guadeloupe	Monaco	Spain
Bermuda	Hong Kong	Montenegro	Sweden
British Virgin Islands	Hungary	Montserrat	Switzerland
Brunei	Iceland	Netherlands	Taiwan
Canary Islands	Ireland	Netherlands Antilles	Turks and Caicos
Cayman Islands	Ireland (Northern)	New Caledonia	U.S. Virgin Islands
Chile	Israel ¹	New Zealand	United Arab Emirates
Cook Islands	Italy	Northern Mariana Islands	United Kingdom
Costa Rica	Japan	Norway	Uruguay
Curacao	Korea, South	Oman	Vatican City
Cyprus	Kosovo ²	Palau	Virgin Islands
Czech Republic	Kuwait	Panama	

“B” Countries

Algeria	Fiji	Paraguay
Armenia ⁴	French Guiana	Peru
Azerbaijan ⁵	Georgia ⁶	Samoa
Bahamas	Indonesia	Saudi Arabia
Bhutan	Jamaica	Seychelles
Brazil	Jordan	Solomon Islands
Cape Verde / Cabo Verde	Kazakhstan	Suriname
China	Maldives	Thailand
Colombia	Mexico ⁷	Tonga
Dominican Republic	Moldova	Vietnam
Ecuador	Mongolia	
Federated States of Micronesia	Morocco	

“C” Countries (Facultative only)

Belize	Guatemala	Philippines
Bolivia	Honduras	South Africa
El Salvador	India	

¹ Except Gaza Strip/West Bank.

² Individual consideration with Serbia borders.

³ Individual consideration in some areas.

⁴ Except disputed Nagorno-Karabakh region.

⁵ Except Nagorno-Karabakh.

⁶ Except Abkhazia and S. Ossetia.

⁷ Individual considerations for Sinaloa, Colima, Michoacán, Guerrero and Tamaulipas.

Juveniles

Coverage for juveniles is available and all of the following requirements apply:

- The juvenile must be a U.S. citizen and have a valid U.S. passport or U.S. birth certificate.
- A copy of the passport main pages or the U.S. birth certificate must be submitted with the life insurance application.
- An APS will be required on all cases.
- At least one parent must have life insurance coverage with Symetra and comply with all of our program qualification requirements. This is a mandatory requirement.*
- The owner of the policy must be a parent. A copy of the owner's passport must be submitted with the life insurance application.
- All initial and subsequent premium payments must be paid in U.S. dollars from a U.S. bank account held in the name of the policyowner.
- Coverage is only available for “A” and “B” countries and the only product available at this time is Symetra CAUL.

	Eligible issue ages 15 days up to age 3	Eligible issue ages From age 3 up to age 15
Available product	Symetra CAUL	Symetra CAUL
Risk classes	Juvenile only	Juvenile only
Minimum face amount	\$100,000*	\$100,000*
Maximum face amount	\$100,000*	\$500,000*
Parent's minimum face amount*	\$1 million	\$1 million

* Unless state laws mandate different maximum limits.

Why Symetra?

Three guiding principles form the foundation for how we make decisions: **Value, Transparency and Sustainability**—or **VTS**. Simply put, **VTS** defines how we do business inside and out. What does it mean?



- **Value:** Products and solutions people need at a competitive price—backed by dedication to excellent customer service.
- **Transparency:** We communicate clearly and openly so people can understand what they are buying.
- **Sustainability:** Our products stand the test of time. We're financially disciplined so we'll be here when customers need us.

To learn more about Symetra,
visit www.symetra.com.



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Guarantees and benefits are subject to the claims-paying ability of Symetra Life Insurance Company.

This is not a complete description of Symetra's high-net-worth foreign national (HNWFN) market program. It may have new or amended rules and restrictions, and is subject to change in order to be compliant with requirements in the client's home jurisdiction. The program is subject to change without notice.