




Anti-Money Laundering and Sanctions: Awareness and Compliance

Anti-Money Laundering and Sanctions: Awareness and Compliance 

Introduction


Welcome





It is estimated that trillions of dollars are laundered every year. Proceeds from money laundering can come from or fund serious crimes like fraud, public corruption, and terrorism, and the trafficking of drugs, weapons, or humans. Money laundering and terrorist financing undermines society and destabilizes economies and governments.

All countries in which MetLife does business have passed laws that make money laundering and terrorist financing a crime.

This course will reaffirm your comprehension of Anti-Money Laundering (AML) including the applicable laws and MetLife Compliance programs as well as introduce any new regulatory stipulations or procedures.

Click the next arrow to continue.



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Introduction


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Anti-Money Laundering and Sanctions: Awareness and Compliance 


Introduction




Objectives

By the end of this course, you will be able to:

- Define money laundering and terrorist financing.
- Recall the three stages of money laundering.
- Recognize the importance of Anti-Money Laundering/Counter Terrorism Financing (AML/CTF) laws and regulations.
- Comply with MetLife's Sanctions Compliance Program, including list-based and country-based sanctions.
- Identify the warning signs of potential suspicious activity.
- Locate resources and country specific policies.

Click the next arrow to continue.



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Objectives

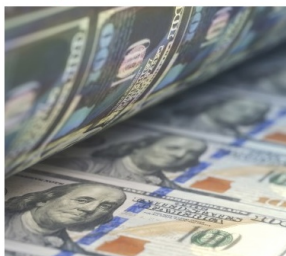
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What is Money Laundering and Terrorist Financing?

Introduction

Click each **image** to learn more.



Money laundering



Terrorist financing

Important: Both terrorists and money launderers use the same methods to move funds to avoid detection and disguise the link between the source of funds and the terrorism.

Click the **next arrow** to continue.



What is Money Laundering and Terrorist Financing?

Introduction

Click each **image** to learn more.

Money laundering

Money laundering is the process of disguising the true source of illegally-derived funds, securities, or other “dirty” assets to create the appearance of “clean,” legitimate funds.

Terrorist financing

Terrorist financing is the use of funds to support terrorist acts or terrorist organizations. The funds can be either legitimate or illegally-derived. They may be used directly in terrorist acts, or used by terrorist organizations to fund mundane operating expenses like training, transportation, food, or rent.

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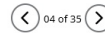
It is Your Duty

As a global organization, MetLife and its employees and affiliated persons are subject to certain laws of the United States, as well as the laws of the countries in which we operate. These laws require financial institutions to take steps to detect and prevent money laundering and terrorist financing.

Employees and affiliated persons who fail to comply with MetLife's Global Anti-Money Laundering Policy, or with AML/CTF, and sanctions laws and regulations could face termination of their relationship with MetLife.

Failure to comply also could result in severe criminal and civil penalties for MetLife and its employees and affiliated persons, including imprisonment, fines, forfeiture of property, or other enforcement actions by regulatory or law enforcement authorities.

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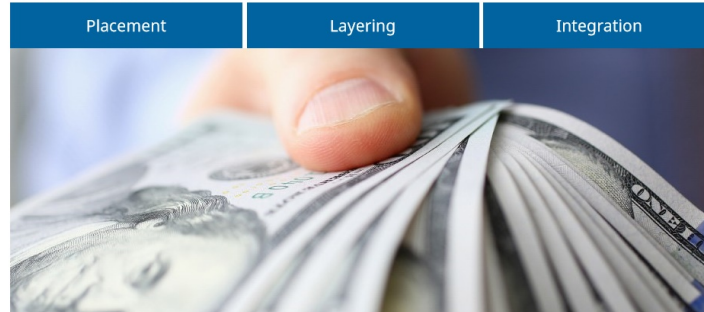
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The Three Stages of Money Laundering

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Money laundering consists of three stages:

*Click each **tab** to learn more.*



*Click the **next arrow** to continue.*



The Three Stages of Money Laundering

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Placement

The launderer introduces the illegal, “dirty” proceeds into the financial system.

Example: The purchase of a life insurance policy with illegal funds.

Layering

A series, or “layers”, of transactions intended to separate and conceal the source of the funds from their illegal origin are enacted. This usually involves multiple products or accounts to “wash” the funds.

Example: The proceeds from surrendering the new insurance policy early that are then used to purchase other financial assets or products, like an annuity.

Integration

The process of re-introducing the illicit funds into the economy in what appears to be normal transactions in order to create the perception of legitimacy. These funds appear “clean”.

Example: The proceeds from an early surrender of the annuity purchased with illegal funds

are deposited into a checking account at a bank and appear to be the proceeds of legitimate transactions.

**Anti-Money Laundering and Sanctions:
Awareness and Compliance**


MetLife

The Three Stages of Money Laundering

Insurance Companies

Why would a money launderer target an insurance company?

Insurance companies offer covered products, which are products that have cash value or investment features, like whole or permanent life insurance policies or annuities. Money launderers purchase these products to eventually receive a check from an insurance company, legitimizing their funds.



Click the next arrow to continue.

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The Three Stages of Money Laundering

Knowledge Check

Both terrorists and money launderers use the same methods to move funds to avoid detection and disguise the link between the source of funds and the terrorism.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

SUBMIT



Knowledge Check

Both terrorists and money launderers use the same methods to move funds to avoid detection and disguise the link between the source of funds and the terrorism.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

Feedback when correct: Yes, that is correct!

Feedback when incorrect: That is not correct.

The Three Stages of Money Laundering

Knowledge Check

Match the example to the correct stage of money laundering.

Select the correct option from the drop-down, and then click **Submit**.

| | |
|------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| The purchase of a life insurance policy with illegal funds. | Placement |
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Take a look at the correct answers.

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Sanctions

Introduction



Intergovernmental bodies, international bodies, and local governments worldwide keep lists of people and entities that are known criminals and money launderers like terrorists, arms dealers, human, drug, or weapons traffickers, or war criminals. Legitimate companies and industries must use these lists, called sanctions lists, to ensure that they avoid conducting any business with these known criminals.

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Sanctions

What is OFAC?

The United States uses economic and trade sanctions to further national security and United States foreign policy goals and initiatives. The Office of Foreign Assets Control (OFAC) is part of the United States Department of Treasury and prohibits certain transactions (trade, financial, or other dealings) by administering and enforcing sanctions.




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 **Sanctions**

Why Must MetLife Employees and Affiliated Persons Comply with OFAC?

OFAC sanctions apply to "U.S. Persons". "U.S. Persons" is a broad definition and includes all MetLife businesses.




Because MetLife is a company based in the United States, all MetLife businesses and operations must comply with OFAC sanctions programs. In addition to OFAC, MetLife must comply with sanctions lists maintained by international bodies like the United Nations, intergovernmental bodies like the European Union, and local governments.

The two main OFAC sanctions programs include:

- Comprehensive country-based sanctions, and
- List-based sanctions

Let us take a look at each of these now.

*Click the **next arrow** to continue.*

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Sanctions

List-Based Sanctions and Specially Designated Nationals

OFAC maintains a list of sanctioned individuals and entities, known as Specially Designated Nationals, or SDN. The reasons for listing vary, but in most cases, **all business dealings with a listed person or entity are strictly prohibited**, wherever they are located.

Click each image to learn more.



Click the next arrow to continue.



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Click each image to learn more.

Above 50%

An entity is considered sanctioned if one or more SDNs in the aggregate own or have interest in 50% or more of the entity, even if the entity is not expressly named on the SDN list.

Below 50%

For entities in which SDN ownership or interest is significant but does not reach 50%, or an SDN has control by means other than a majority ownership, contact your Local Compliance Officer.

Comprehensive Country-Based Sanctions

OFAC's comprehensive country-based sanctions prohibit engaging in most activities with the relevant country or government, any agent of that government, or individuals residing in the sanctioned country.

The countries subject to comprehensive sanctions are:

- Cuba
- Iran
- Syria
- North Korea



Click the image to view an example.

Click the next arrow to continue.



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Click the image to view an example.

No payment may be made to the sanctioned country, and the beneficiary of the transaction must not reside or be located in the sanctioned country.

OFAC also prohibits indirect transfers into sanctioned countries, such as:

- Reimbursement of medical claims for services rendered in sanctioned countries
- Checks issued in non-sanctioned countries to residents of sanctioned countries

MetLife's Sanctions Compliance Program

MetLife screens all customers, beneficiaries, employees, third parties, and other relevant parties against OFAC Sanctions Lists and other locally required lists. Screening occurs at various stages of the business relationship.

*Click the **image** to view an example.*



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*Click the **image** to view an example.*

MetLife may **not** do any business with SDNs in violation of Sanctions laws.

MetLife may **not** conduct business with or provide services (for example, coverage) to an individual or entity residing or located in a sanctioned country.

MetLife may **not** do indirectly that which it is prohibited from doing directly.

When Should I Escalate Sanctions Matters?

Do **not** transact business and immediately contact your Local Compliance Officer if:

- You are unsure if a person or entity is subject to list-based or country-based sanctions
- You receive a payment request to a person or entity on a sanctions list or located in a sanctioned country
- The residency and/or nationality of a customer, beneficiary, or third party is in a sanctioned country

Important: All employees and affiliated persons are responsible for ensuring compliance with MetLife's Sanctions Compliance Program.



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Knowledge Check

Which of the following are true of MetLife's Sanctions Compliance Program?

*Select all that apply, and then click **Submit**.*

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SUBMIT



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Feedback when correct: Yes, that is correct!

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Know Your Customer (KYC)

What is KYC?

A primary defense against becoming unwittingly involved in money laundering, terrorist financing, or other criminal activity is Know Your Customer (KYC). The KYC program is used to determine the true identity of a customer, and the type of activity that is normal and expected from the customer.

MetLife must take reasonable steps to identify customers, and if necessary, beneficial owners, and relevant parties by documenting and verifying the accuracy of the information collected. KYC documentation requirements may vary by local law. However, at a minimum, MetLife employees and affiliated persons must collect the following documentation for each customer.



Individual

Entity

Click each **Individual** and **Entity** to learn more.

Click the **next arrow** to continue.



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Click each **Individual** and **Entity** to learn more.


Individual

- Name
- Citizenship/Residency
- Date of Birth
- Physical Residential Address

- Government-Issued Identification Number
- Unexpired government issued identification, like a passport
- Source of funds/source of wealth

Entity

- Formation document
- Registered address
- Owners and officers
- Source of funds/source of wealth

Anti-Money Laundering and Sanctions: Awareness and Compliance 

Know Your Customer (KYC)

What is KYC? (continued)


MetLife can only conduct business with customers:

- Whose income, assets, and funds are derived from legitimate sources; and
- Who are not listed on a sanctions list.

A Customer Identification Program (CIP), and a Customer Due Diligence (CDD) program are part of the KYC program. Together, these programs not only verify and establish the identity of customers, but also assess the risks that each customer presents and help identify unusual activity for each customer.

Anything identified as unusual may be considered a warning sign or red flag.

Click the next arrow to continue.



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What is KYC? (continued)


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**Anti-Money Laundering and Sanctions:
Awareness and Compliance** 

Know Your Customer (KYC)

Knowledge Check

A new customer would like to open a new account. As part of the KYC program, you have collected the customer's name, date of birth, and citizenship/residency.

Which of the following must you also collect?

*Select all that apply, and then click **Submit**.*

- Physical residential address
- Government-issued identification number
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SUBMIT

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Take a look at the correct answer.


Physical residential address

Government-issued identification number

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**Anti-Money Laundering and Sanctions:
Awareness and Compliance**



Warning Signs

Overview

MetLife employees and affiliated persons should be aware of money laundering indicators at various stages of the business relationship. Indicators of money laundering are warning signs, also known as red flags.

Completing Know Your Customer (KYC) and Customer Due Diligence (CDD) allows you to identify red flags and suspicious activity.

While certain transactions, activity, or unusual behavior may indicate money laundering, it is also possible for red flags to appear in legitimate transactions.

Red flags and warning signs simply mean additional investigation is required. MetLife employees and affiliated persons must be able to identify red flags, review alerts, and escalate any concerns or unusual activity to your **manager or to your Local Compliance Officer as soon as possible**.

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Anti-Money Laundering and Sanctions: Awareness and Compliance 





Warning Signs

How Do I Identify Red Flags and Warning Signs?

The following are examples of red flags:
*Click each **warning sign** to learn more.*

-  [Redacted]
-  [Redacted]
-  [Redacted]
-  [Redacted]
-  [Redacted]

Note: Additional red flags are noted in MetLife's Global AML Policy. *Click the **next arrow** to continue.*

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How Do I Identify Red Flags and Warning Signs?

The following are examples of red flags:

*Click each **warning sign** to learn more.*

Transactions that do not make business sense

Unusual account requests or activities

Insufficient, incomplete, or suspicious client information

Customer purchasing products with termination features, and without concern for costs, penalties, or performance

Unclear source of funds

Note: Additional red flags are noted in MetLife's Global AML Policy.

Warning Signs

Willful Blindness

Willful Blindness is a situation in which a person intentionally ignores facts despite suspecting that a transaction may involve money laundering or terrorist financing.

Under AML/CTF law, Willful Blindness is considered the same as having actual involvement in money laundering and can be considered a criminal offense. Both MetLife and the employee or affiliated person involved can be prosecuted.



Click the image to view an example.

Click the next arrow to continue.



Willful Blindness

Willful Blindness is a situation in which a person intentionally ignores facts despite suspecting that a transaction may involve money laundering or terrorist financing.

Under AML/CTF law, Willful Blindness is considered the same as having actual involvement in money laundering and can be considered a criminal offense. Both MetLife and the employee or affiliated person involved can be prosecuted.

Click the image to view an example.

Example: If an employee or affiliated person suspects that a customer may be laundering illegal proceeds through MetLife and that person deliberately refuses to ask questions or escalate concerns, MetLife and the employee or affiliated person could be found to have knowingly engaged in the illegal transaction.

Warning Signs

Knowledge Check

If you suspect that a customer may be laundering illegal proceeds through MetLife and you do not ask questions, you could be found to have knowingly engaged in the illegal transaction.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

SUBMIT



Knowledge Check

If you suspect that a customer may be laundering illegal proceeds through MetLife and you do not ask questions, you could be found to have knowingly engaged in the illegal transaction.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

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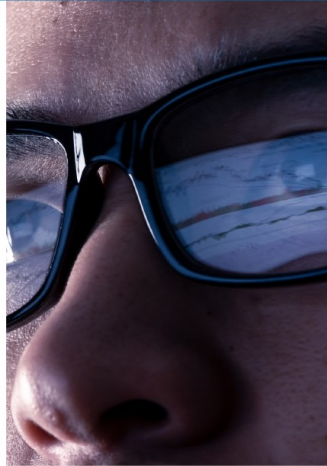
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Suspicious Activity

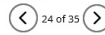
Overview

AML/CTF laws require financial institutions like MetLife to take steps to detect and prevent money laundering and terrorist financing.

In addition to identifying warning signs and red flags, surveillance and transaction monitoring reports are a crucial component for quickly and efficiently detecting unusual or suspicious activity that could indicate potential money laundering or terrorist financing.



Click the next arrow to continue.



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Suspicious Activity

Types of Suspicious Activity

Suspicious or unusual activity includes any transaction that:

Click each image to learn more.



Disguises Funds



Avoids Reporting



Has No Purpose



Is Unusual

Note: Additional examples of suspicious activity are noted in MetLife's Global AML Policy.

Click the next arrow to continue.



Types of Suspicious Activity

Suspicious or unusual activity includes any transaction that:

*Click each **image** to learn more.*

Disguises Funds

Involves funds believed to be derived from illegal activity, or is intended to disguise funds or assets derived from illegal activity

Avoids Reporting

Is designed to avoid transaction reporting requirements under applicable law or regulation.


Has No Purpose

Has no apparent business or lawful purpose.

Is Unusual

Is not typical or expected from the particular customer and for which there is no reasonable explanation.

Note: Additional examples of suspicious activity are noted in MetLife's Global AML Policy.

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Suspicious Activity


Cash Transactions

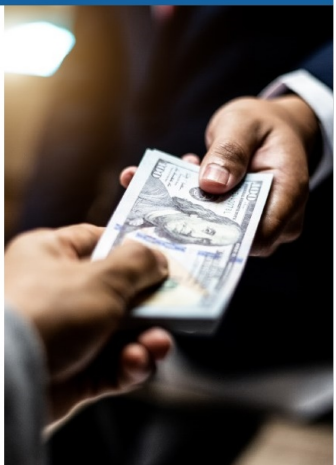
Employees and affiliated persons must be alert to cash transactions that may lead to money laundering or other suspicious activity. These also include structured transactions to avoid cash reporting or identification requirements.

Cash equivalents can be used for structuring transactions. A cash equivalent is something besides currency that is considered the same as cash. Examples of cash equivalents are cashier's checks, money orders, bank drafts, and traveler's checks.

Many countries have a law requiring financial institutions to report customers' cash transactions. Reportable cash transactions are defined by local law and include specific thresholds and deadlines for reporting.

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Suspicious Activity





Structuring

Structuring is breaking up a big transaction involving cash or cash equivalents into several smaller transactions to avoid certain reporting or identification requirements. Structuring is a basic and very common indicator of money laundering.



*Click the **image** to view an example.*

*Click the **next arrow** to continue.*

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Structuring

Structuring is breaking up a big transaction involving cash or cash equivalents into several smaller transactions to avoid certain reporting or identification requirements. Structuring is a basic and very common indicator of money laundering.

*Click the **image** to view an example.*

Example: A business with \$17,000 USD in cash to deposit breaks it into two deposits: one of \$9,000 USD and the other of \$8,000 USD, with specific intent to evade the reporting requirement.

Suspicious Activity

Knowledge Check

You notice that a customer has made ten smaller deposits of \$9,999 USD each, on the same day, totaling \$99,990 USD.

You believe these deposits are suspicious and may be an effort to disguise the source of the funds. What should you do next?

*Select the appropriate answer, and then click **Submit**.*

- Escalate your concerns to your manager or to your Local Compliance Officer as soon as possible.
- Notify the customer that you suspect illegal and suspicious activity and that you are going to report her to the proper authorities.
- Complete a Suspicious Transaction Report.
- All of the above.

SUBMIT



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Take a look at the correct answer.

Escalate your concerns to your manager or to your Local Compliance Officer as soon as possible.


**Anti-Money Laundering and Sanctions:
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Filing and Reporting Requirements





Overview

As already mentioned, a MetLife employee or affiliated person should immediately contact their manager or Local Compliance Officer if that person identified warning signs (red flags) or believes there is an attempt to launder money, finance terrorism, or engage in other illicit activities.

Local Compliance will further investigate the activity and relevant facts and determine whether local law requires reporting that suspicious activity.



Click the next arrow to continue.

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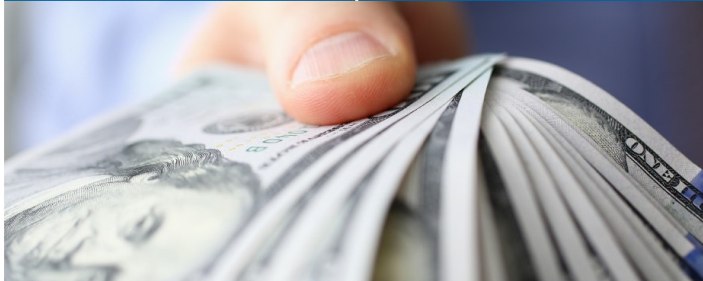
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The Reporting of Suspicious Activity

Click each **tab** to learn more.

Currency Transaction Report

Suspicious Transaction Report (STR)



Click the **next arrow** to continue.



The Reporting of Suspicious Activity

Click each **tab** to learn more.

Currency Transaction Report

Because cash transactions may be an indicator of money laundering or terrorist financing, the law generally requires financial institutions to report all cash and cash equivalent transactions above a specific threshold, whether it is one transaction or multiple, related transactions by a specific deadline. These are known as “Currency Transaction Reports.”

Suspicious Transaction Report (STR)

Requirements vary from country to country, but generally, MetLife is required to file a STR, or Suspicious Activity Report (SAR) if it has a reason to suspect that the activity may be related to criminal activity, money laundering or terrorist financing.

MetLife must file the required report with the appropriate government entity or regulator by the specified deadline stated in local law.

Your Responsibilities

Confidentiality

Suspicious activity investigations and reporting require strict confidentiality. Pending, active, or closed investigations should never be discussed with anyone who does not have a business need to know.

Tipping Off

Employees and affiliated persons should **NOT** inform or notify any person suspected of being involved in illegal or suspicious activity. It is a **crime** to notify the person that the activity has been reported to authorities or is being investigated by the government.



Click the next arrow to continue.



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Resources

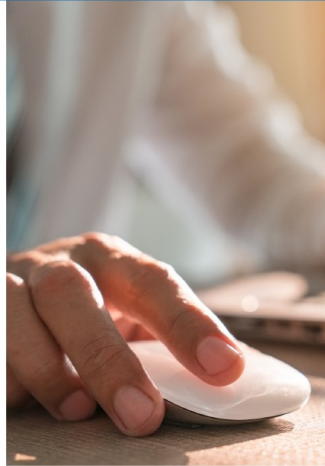
Resources

For more information on money laundering, terrorist financing, MetLife AML compliance programs, regulatory stipulations, or procedures, please visit the following:

- [Global AML Policy](#)
- OFAC Home Page: <https://www.treasury.gov/about/organizational-structure/offices/pages/office-of-foreign-assets-control.aspx>
- The current SDN List is available on OFAC's website at: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

For questions or concerns: Contact your manager, Local Compliance Officer, or the Global Financial Crimes Unit at anti-corruption@metlife.com

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Resources

Global AML Policy

Click a country to view the AML policy/policies.

- | | |
|-------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
|  Bahrain |  Poland |
|  Cyprus |  Portugal |
|  Egypt |  Qatar |
|  Greece |  Romania |
|  Jordan |  Russia |
|  Kuwait |  Turkey |
|  Lebanon |  UAE |
|  Oman |  Ukraine |


Global AML Policy

Click a country to view the AML policy/policies.

- Bahrain
- Cyprus
- Egypt
- Greece
- Jordan
- Kuwait
- Lebanon
- Oman
- Poland
- Portugal
- Qatar
- Romania

- Russia
- Turkey
- UAE
- Ukraine

Anti-Money Laundering and Sanctions:
Awareness and Compliance



Conclusion

Conclusion

Money laundering and terrorist financing is a big problem with even bigger consequences.

Be sure to:

- **Comply** with MetLife's Sanctions Compliance Program, including list-based and country-based sanctions
- **Comply** with applicable AML/CTF laws and regulations
- **Be alert** to unusual and suspicious activity that might indicate possible money laundering
- **Adhere** to customer acceptance and KYC policies, including customer due diligence and sanctions screening and rules
- **Report** unusual or suspicious customer activity and maintain confidentiality
- **Locate** and study local resources and policies related to anti-money laundering compliance

Click the next arrow to continue.




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compliance

Anti-Money Laundering and Sanctions: Awareness and Compliance 

Attestation

Certification Statement

All employees and affiliated persons must read, understand, and agree to abide by MetLife's Anti-Money Laundering policies and procedures.




I confirm my understanding and continuing compliance with the rules, policies, and procedures of MetLife as outlined in the Anti-Money Laundering policies and procedures, as well as my compliance with all applicable laws and rules.

(México: Additionally, I understand that Terrorism Financing means providing or collecting funds either, directly or indirectly with the intention of using them or knowing that they will be used to commit acts of terrorism.)

Failure to comply with any of the rules, policies, and procedures and any of the requirements of regulatory authorities, may result in termination of my relationship with MetLife.

Yes, I certify my understanding and agreement with these statements. **Acknowledge**

*Click **Acknowledge** to continue.*

Assessment

Certification Statement

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*Click **Acknowledge** to continue.*

Are You Ready?

It is time to assess your knowledge.

To help gauge your mastery of the information presented in the Anti-Money Laundering and Sanctions: Awareness and Compliance, please answer the following 10 questions. A mastery score of 80% or greater is required to confirm your knowledge of the material.

Please note: During the assessment, the only buttons available are **SUBMIT**, **CONTINUE**, and **HELP**. Clicking **HELP** displays instructions on how to complete the various types of questions.

Read each question carefully, follow the instructions on the page to indicate your response, select the best answer, and then click **SUBMIT**. After you answer the last question, your score is processed.

Good luck!

Click the next arrow to continue.



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Good luck!

Assessment

Question 1 of 10

Money laundering is the process of disguising the true, illegal source of funds, securities, or other “dirty” assets for the purpose of creating the appearance of “clean,” legitimate funds.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

SUBMIT



Question 1 of 10

Money laundering is the process of disguising the true, illegal source of funds, securities, or other “dirty” assets for the purpose of creating the appearance of “clean,” legitimate funds.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

Feedback when correct: Yes, that is correct!

Feedback when incorrect: That is not correct.

Assessment

Question 2 of 10

Which of the following are the three stages of money laundering?

Select ALL that apply, and then click Submit.

- Placement
- Implementation
- Integration
- Layering

SUBMIT



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Assessment

Question 3 of 10

Match the corresponding description to the correct stage of money laundering.

Select the correct option from the drop-down, and then click **Submit**.

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| The launderer introduces the illegal proceeds into the financial system. | Placement |
| Series, or "layers", of transactions intended to separate and conceal the source of the funds from their illegal origin. This usually involves multiple products or accounts. | Layering |
| The process of re-introducing the illicit funds into the economy in what appears to be normal transactions in order to create the perception of legitimacy. | Integration |

SUBMIT



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Assessment

Question 4 of 10

While visiting Cuba, a customer decides to schedule a medical procedure at a local hospital. MetLife can make the payments to which of the following?

*Select the appropriate answer, and then click **Submit**.*

- The client
- The doctor/hospital
- All of the above
- None of the above

SUBMIT



Question 4 of 10

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- The doctor/hospital
- All of the above
- None of the above

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Assessment

Question 5 of 10

Entities in which SDN ownership or interest is significant but does not reach 50%, or a SDN has controls by means other than a majority ownership, are considered sanctioned.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

SUBMIT



Question 5 of 10

Entities in which SDN ownership or interest is significant but does not reach 50%, or a SDN has controls by means other than a majority ownership, are considered sanctioned.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

Feedback when correct: Yes, that is correct!

Feedback when incorrect: That is not correct.

Question 6 of 10

Which of the following countries are subject to comprehensive sanctions under OFAC?

*Select ALL that apply, and then click **Submit**.*

- Cuba
- Iran
- Syria
- North Korea

SUBMIT



Question 6 of 10

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Assessment

Question 7 of 10

Which of the following are pieces of documentation must MetLife employees and affiliated persons collect under KYC.

Select ALL that apply, and then click Submit.

- Name
- Date of Birth
- Physical residential address
- Source of funds/source of wealth

SUBMIT



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Assessment

Question 8 of 10

Your customer insists on surrendering a policy, though it will result in a penalty. Additionally, the customer wants MetLife to send the check directly to his cousin, whom the customer had not previously mentioned to the agent.

Should you move forward with this transaction?

*Read the scenario, select the appropriate answer, and then click **Submit**.*

- Yes
- No

SUBMIT



Question 8 of 10

Your customer insists on surrendering a policy, though it will result in a penalty. Additionally, the customer wants MetLife to send the check directly to his cousin, whom the customer had not previously mentioned to the agent.

Should you move forward with this transaction?

*Read the scenario, select the appropriate answer, and then click **Submit**.*

- Yes
- No

Feedback when correct: Yes, that is correct!

Feedback when incorrect: That is not correct.

Assessment

Question 9 of 10

Which of the following can result in termination of a relationship with MetLife, fines or imprisonment?

Select ALL that apply, and then click **Submit**.

- A customer consistently overpays her premium with cash and then asks the MetLife agent for a reimbursement check for the overage. The agent never asks any questions because he just wants to provide the best customer service.
- An administrative assistant overhears that a Suspicious Transaction Report was filed on her fiancé. She calls him and demands that he explain himself.
- A MetLife office is contracting a telecom vendor for IT and communications services. The vendor is on a sanctions list, but was never screened. The vendor submitted an invoice for payment, which MetLife paid.

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Assessment

Question 10 of 10

MetLife is required to file STR if it has a reason to suspect that the activity may be related to criminal activity, money laundering or terrorist financing.

*Select the appropriate answer, and then click **Submit**.*

- True
- False

SUBMIT



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Anti-Money Laundering and Sanctions: Awareness and Compliance 

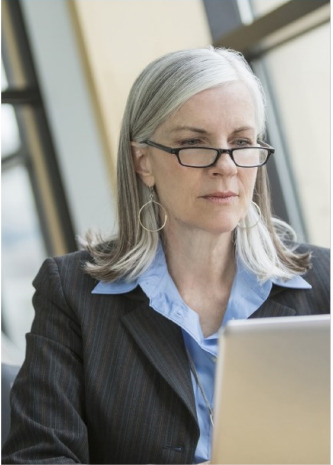
Assessment

Process Assessment

You have completed the assessment. It is now time to process the assessment and retrieve your score.

*Click **PROCESS ASSESSMENT** to continue.*

PROCESS ASSESSMENT




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Anti-Money Laundering and Sanctions: Awareness and Compliance 

Assessment

Review Assessment


You have completed the assessment for this course.

Your score is **XXX%** (**XXX points**)

You did not score 80% or greater. Please review the portions of the course where you experienced problems. Once you have completed the review, you must complete the assessment again.

*Click **Try it Again** to retake the assessment.*
OR
*Click **Exit** to review the appropriate material before retaking the assessment.*

Try it Again



☰ ? < 35 of 35 >

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Anti-Money Laundering and Sanctions: Awareness and Compliance 

Assessment




Congratulations

You have successfully completed the assessment for this course!

Your score is **XXX% (XXX points)**

*Click **Exit** to close the assessment.*

Exit

  35 of 35 

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