

# Anti-Money Laundering Policy

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Lincoln National Corporation and its affiliates and subsidiaries (“Lincoln Financial”), as responsible members of the financial services industry, oppose money laundering and other activity which facilitates money laundering or the funding of terrorist or criminal activities. Lincoln Financial is strongly committed to comply with all laws and regulations designed to combat money laundering activity, including those rules and regulations requiring the reporting of transactions involving currency, certain monetary instruments, and suspicious activity.

Lincoln Financial has established an anti-money laundering program that is reasonably designed to comply with Section 352 of the USA Patriot Act and FINRA Rule 3310.

Lincoln’s anti-money laundering program includes:

- Anti-Money Laundering “Know Your Customer” policies and procedures;
- the designation of an Anti-Money Laundering Compliance Officer;
- a Customer Identification Program in accordance with Section 326 of the USA Patriot Act;
- a prohibition against dealing with foreign shell banks;
- compliance with regulations administered by the US Department of the Treasury’s Office of Foreign Asset Control;
- reporting of suspicious activity to government authorities in accordance with applicable law, including Section 356 of the USA Patriot Act;
- anti-money laundering training; and
- an independent testing for compliance.

Policy Owner: Anti-Money Laundering Compliance Officer  
Policy Owner Department: Enterprise Ethics & Compliance  
Version Number: 2  
Effective Date: 1/29/2020  
Last Revision Date: 3/26/2014  
Last Review Date: 2/5/2021  
Next Review Date: 2/5/2022