

WORLD FINANCIAL GROUP INSURANCE AGENCY, LLC
WORLD FINANCIAL INSURANCE AGENCY OF HAWAII, INC.
WORLD FINANCIAL INSURANCE AGENCY OF MASSACHUSETTS, INC.
WFG INSURANCE AGENCY OF PUERTO RICO, INC.

Advertising Guidelines for Life Licensed Agents
Updated July, 2021

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ADVERTISING OVERVIEW

Definition

Advertising, a form of communication for marketing that is used to encourage, persuade or influence an audience - viewers, readers or listeners and including groups - to continue to take action or take new action. Advertising is any manner, method, or activity by which an agent through the use of any media makes known to the general public.

In addition to these guidelines, please refer to the Agent Insurance Guide for more information on how to represent WFG through the use of logos, signage, communication, etc.

Agent Insurance Guide: MyWFG.com>Resources>Logos, Images & Signage under Advertising Resources> Guidelines. Here

Who can submit Advertising Material

Only SMDs and above (Level 20 and above) can submit material for review. All material must be submitted through Red Oak (see Instructions for Advertising Review section).

Types of Advertising

An Advertising Review submission is based on content, if any of the listed types of advertising include content related to the following, you must submit the material for review:

- Sales Contest
- Recruiting
- Training
- Life insurance/Securities (must be licensed or registered)
- Product types or a specific product provider
- Any material for the use with the public

All material must follow the advertising guidelines outlined within this document as well as follow all applicable state laws.

Team names cannot be used with the public; only allowed for internal use only.

Advertising includes, but is not limited to, the following:

- Agendas
- Billboards
- Books
- Brochures
- Business cards
- Checklists
- Flyers
- Invitations
- Magazine articles and/or ads

- Newspaper articles and/or ads
- Online articles & interviews
- Podcasts
- Posters
- Presentations (BPMs)
- Prospecting letters or emails sent to more than 25 individuals in a 30-day period
- Product Provider materials
- Radio shows and/or ads
- Recruiting material and/or ads
- Sales Contests
- Seminar handouts, invitations and presentations
- Signs (Including billboards and electronic bulletin boards)
- Surveys
- Television shows and/or ads
- Training Materials
- Videos (YouTube, etc.)
- Social Media/Website Postings (Facebook, Twitter, LinkedIn, etc.)
 - Approved: Facebook, Twitter, Monster, LinkedIn, YouTube, Instagram
 - o **Not approved**: Angie's List, Craigslist, Yelp, Tik Tok, Facebook Live

Advertising Requiring Review

Any type of advertising that contains the following content must be sent to WFG Advertising Compliance for review prior to first use. Each advertising piece must be submitted through Red Oak, which is accessible on MyWFG.com.

- 1. Sales Contest
- 2. Recruiting
- 3. Training or educational materials
 - Any document used to teach associates and agents about recruiting, building and selling
- 4. Life insurance
- 5. Product types or specific product providers
 - SMDs, EMDs and CEOs are **not** permitted to create and submit material with product or provider information
 - EVCs and above are permitted to submit material with provider products and logos. They must receive written permission from the product provider and submit for review to Red Oak.
- 6. Any material for the use with the public
- 7. BPMs
 - An agent must be an WFG EVC (Level 87) or higher to submit a non-company-created Business Presentation Meeting(BPM)

Reviewed Advertising must include:

1. WFG logo

- o Here
- 2. The WFG life insurance agency tagline (see the section titled Life Insurance Taglines)
- 3. The agent's license number if your state's Department of Insurance (DOI) requires it
- 4. Other disclosures if applicable (see TAGLINES, DISCLAIMERS AND FOOTNOTES section)

Instructions for Advertising Review

Submit the advertising submission via Red Oak, which has a seamless sign on from MyWFG.com.

- SMDs (Level 20) and higher can submit material to Compliance for consideration and review.
- Create and submit a separate case for each advertising/sales literature piece submitted.
- A User Guide and Instructional Video is available to help guide you through the submission process.
- You will receive a final status notification from Red Oak once the submission has been processed.
- Approvals for materials expire in 12 months, unless otherwise indicated.
- You should save a copy of all approved advertising submissions to verify approval, if needed, and the tracking number for reference.
- If you have any questions about Red Oak, please email ShRed Oakinformation@Transamerica.com.

SALES CONTESTS

All sales contests (<u>Sales Contest Disclosure Form</u>) must be submitted to WFG Advertising via Red Oak for approval. The sponsor of the sales contest must receive approval **prior to** conducting the contest.

Important: If the contest sponsor intends to use a flyer, poster, brochure or other material related to the sales contest, he/she **must submit these materials** via Red Oak in a separate submission for review and approval.

General Guidelines

- Sales contests cannot be structured so as to favor a particular product or provider.
 - All products offered through WFGIA must be equally weighted.
 - Contest must be based on WFG points.
- Sales contests cannot be based primarily on recruiting.
 - Recruiting may be a component of the sales contest, but the contest must be primarily based on production.
 - Contests based primarily on recruiting may violate state statutes or industry regulations.
- Product providers may not contribute to the prizes or awards offered through the contest.
- A sales contest cannot take place at the same time, location, and dates as a home office sponsored contest, e.g. Hawaii
- As of July 1, 2019, sales contests sponsored by WFG agents are not permitted to include any
 points derived from the sale of securities products and advisory services.

If you have a flyer or other material that you want to use to promote the sales contest, it must adhere to the following guidelines:

- It cannot include the Transamerica logo since points generated to win the contest are through WFGIA
- It must include the following two contest disclaimers:

Sales Contest Disclosures

The following disclosures need to be included on any materials or information you produce or provide regarding a sales contest.

- 1. For internal use only. Not for distribution to the public. (This text should be in bold type on any materials or communication about the contest.)
- 2. This sales contest is being sponsored by (Insert the Agent Sponsor's Name) an Independent Contractor of World Financial Group Insurance Agency, LLC. and/or its subsidiary agencies (collectively WFGIA). All points are generated through the sale of products and services offered through WFGIA-approved product providers.

TAGLINES, DISCLAIMERS AND FOOTNOTES

LIFE INSURANCE COMPANY TAGLINES

Use one of the following taglines according to the state(s) in which you will distribute your advertising, brochure or other piece.

If it will be used on a public website or if it could possibly be seen by people in several states, use the following tagline:

World Financial Group Insurance Agency, LLC, World Financial Group Insurance Agency of Hawaii, Inc., World Financial Group Insurance Agency of Massachusetts, Inc., World Financial Insurance Agency, LLC and/or WFG Insurance Agency of Puerto Rico, Inc. - collectively WFGIA offer insurance products. Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

If the piece will **not** be distributed in California, Hawaii, Massachusetts and Puerto Rico, use the following tagline:

World Financial Group Insurance Agency, LLC (WFGIA) offers insurance products. Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

If the piece will be distributed in California only, use the following tagline:

World Financial Insurance Agency, LLC offers insurance products. WFGIA Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

The agent is required to include their insurance license number.

If the piece will be distributed in Hawaii only, use the following tagline:

World Financial Group Insurance Agency of Hawaii, Inc. (WFGIA) offers insurance products. WFGIA Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

If the piece will be distributed in Massachusetts only, use the following tagline:

World Financial Group Insurance Agency of Massachusetts, Inc. (WFGIA) offers insurance products. WFGIA Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

If the piece will be distributed in Puerto Rico only, use the following tagline:

WFG Insurance Agency of Puerto Rico, Inc (WFGIA) offers insurance products. WFGIA Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300. WorldFinancialGroup.com.

Rule of 72 Disclosure

WFGIA agents must use the following approved description and graphic when illustrating the Rule of 72.

Divide 72 by an annual interest rate to calculate approximately how many years it takes for money to double (assuming the interest is compounded annually). Keep in mind that this is just a mathematical concept. Interest rates will fluctuate over time, so the period in which money can double cannot be determined with certainty. Additionally, this hypothetical example does not reflect any taxes, expenses, or fees associated with any specific product. If these costs were reflected the amounts shown would be lower and the time to double would be longer.

72 ÷ 2% = 36 At 2% money nearly doubles every 36 years		72 ÷ 4% = 18 At 4% money nearly doubles every 18 years		72 ÷ 6% = 12 At 6% money nearly doubles every 12 years	
Years	Amount	Years	Amount	Years	Amount
Initial Amount	\$10,000	Initial Amount	\$10,000	Initial Amount	\$10,000
35	\$19,999	18	\$20,258	12	\$20,122
70	\$39,996	36	\$41,039	24	\$40,489
		53	\$79,941	36	\$81,473
				48	\$163,939

Success/Results Footnote

Please use the following verbiage when referencing how people can be successful or have good results by becoming an agent.

Many people have experienced various levels of success with World Financial Group Insurance Agency, LLC. However, each individual's experiences vary. This statement is not intended to nor does it represent that any individual results are representative of what all participants achieve when following the company's system.

Tax-Related Verbiage & Disclosure

WFGIA agents are not tax advisors, so they should not offer tax advice. Tax advantaged verbiage may only be used when describing certain tax-advantaged products, but you must use the following tax disclosure tagline:

Neither World Financial Group Insurance Agency, LLC, its affiliated companies, **nor its agents** may provide tax or legal advice. Anyone to whom this material is promoted, marketed, or recommended should consult with and rely on their own independent tax and legal professional regarding their particular situation and the concepts presented herein.

World Financial Group Insurance Agency, LLC, World Financial Group Insurance Agency of Hawaii, Inc., World Financial Group Insurance Agency of Massachusetts, Inc., World Financial Insurance Agency, LLC and /or WFG Insurance Agency of Puerto Rico, Inc. (collectively WFGIA), offer insurance products.

WFGIA Headquarters: 11315 Johns Creek Parkway, Suite 100, Johns Creek, GA 30097-1517. Phone: 770.453.9300 WorldFinancialGroup.com.

Materials Not Requiring Review

The following types of advertising do not need to be submitted for review:

- Advertising pieces on the <u>Advertising Compliance Download Center</u> (ACD) that are non-securities related
 - The piece cannot be altered in any way, with the exception of replacing personal information (e.g. name, phone number, email information), or it will be considered unapproved
- Notification of attending a public appearance is not required (seminars or booths, i.e. job fairs)
- <u>Social media</u> (unless it includes information on life insurance, recruiting, training, product types and/or product providers)

GUIDELINES FOR CREATING ADVERTISING MATERIALS

- "Earnings Representations":
 - Any oral, written or visual claim that conveys, expressly or by implication: (a) a specific level or range of actual or potential sales, or (2) gross or net income or profits, including but not limited to representations that either explicitly or implicitly suggest that lifestyle

- purchases including homes, vehicles, vacations and the like are related to income earned.
- Any statement, representation or hypothetical scenario from which a prospective independent salesperson could reasonably infer that he/she will earn a minimum level of income;
- Any chart, table or mathematical calculation demonstrating possible income, actual or potential sales, or gross or net profits based upon a combination of variables;
- Marketing materials or advertising explicitly describing or promising potential income amounts, or material-based lifestyles of independent salespeople;
- Any award or announcement of compensation describing the earnings of any current or past salesperson. A company's sales incentive awards, trips or meetings, and/or commissions, overrides bonuses or other compensation, shall not be considered earnings representations unless they are accompanied by express indication of their value.
- WFG and its Sales Representatives/Agents must comply with the following standards (Code of Ethics):
 - May not engage in deceptive, unlawful or unethical practices with regards to statement about product, earnings and income opportunities, recruiting and comparisons to other direct selling companies/agencies or salespeople.
 - It shall be considered an unfair and deceptive recruiting practice to require an sales representative/agent/associate to purchase a product.
 - Claims about products and services cannot be misleading and must be substantiated by competent and reliable evidence. Further, misleading, or unsubstantiated comparisons of another company's opportunities, products or services are prohibited.
 - At the beginning of sales presentations, Sales Representatives/Agents/Associates shall truthfully and clearly identify themselves, their company (WFG/TFA/WFGIA), the nature of their company's products and services, and the reason for the solicitation. Contact with the consumer/client/prospect shall be made in a polite manner and during reasonable hours. A demonstration or sales presentation will conclude upon the consumer's/prospect's/client's request.
 - Earnings representations must be truthful, accurate and presented in a manner that is not false, deceptive, or misleading. Prospective salespeople must be given sufficient information to understand that earnings may vary significantly and must be presented with sufficient information to conduct a reasonable evaluation of the opportunity to earn income. Earnings representations that give the impression of lifestyle opportunities must be clearly substantiated. Any sales and earnings representations must be documented and substantiated.
 - Any fees charged to become an independent salesperson/associate/agent shall relate directly to the value of materials, product or services provided in return.
 - WFG shall provide adequate training to enable salespeople to operate ethically.
 Additionally, WFG shall prohibit their Sales Representatives/Agents from marketing or requiring the purchase by others of any materials that are inconsistent with WFG's policies and procedures.

What to Consider

When creating advertising materials, please consider the following:

- The overall visual impact of the material
- The nature and tone of the subject matter
- The clarity and context of the material
 - Is it fair and balanced?
 - Could someone consider the material confusing or misleading?

Advertising Material Requirements

When creating materials, you must:

- Use the current approved company logo.
- Ensure a balanced discussion of information, e.g., include features and benefits as well as risks and drawbacks.
- Include appropriate disclosure(s) and tagline(s) in no less than an 8 point or larger font size
- Know if references to materials that are not of your own creation require that permission be attained and, if so, then the following must be added to the material: "Used with permission."
- Ensure clarity when creating recruiting advertisements by representing the business as an opportunity.
- Use "For Internal Use Only" on all pieces that are for agents' eyes only, such as internal sales contests and internal training materials.
- Include sources and dates for facts or statistics used so someone can easily find the information.
- Ensure the source of the information is dated two (2) years or less, which is considered current.
- Abide by copyright laws by ensuring that you have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others (e.g., McDonalds, iPad logos or photos, hotel logos and photos, etc.) by providing a copy of the written permission letter/email with the submission.
- Include the phrase "no obligation" when referencing any life insurance or any fixed annuity products.
- Ensure correct placement of company logos, taglines, contact information, etc.
 - See WFG Brand Guidelines

Prohibited Advertising Activities

- Changing materials that have been pre-approved and are available for download from MyWFG.com and the ACD, and/or combining or using portions of WFG corporate copyright-protected materials.
- The use of specific product types or specific product providers. To use the logos or mention specific product providers an agent must be an EVC or above and have permission from product provider.
- If you are not licensed to offer or sell a particular product then it cannot be included in the advertisement(s)/sales literature that you are creating.
- Distorting the WFG logo. (See the Brand Guidelines: MyWFG.com>Recruiting & Selling > Marketing>Marketing Resources>Guidelines> Brand Guidelines>pg. 2-5
- The use of the terms "risk-free", "no risk", "no fees", "no charge", "safe", and similar language when referencing life insurance or fixed annuity products.

- The following job-related verbiage: job, hire, position, interview, apply, candidates, full-time
 position, part-time position, franchise, employment, employee, or any other verbiage that might be
 perceived as job-related verbiage. In addition, you cannot request an individual to submit a
 resume.
- The use of the words "retirement plan" or "retirement fund" as WFGIA agents are not financial planners.
- Reference to an Outside Business Activity
- Any reference(s) to Aegon.
- Any references to Transamerica. See the Transamerica Name Usage section.
- The use of superlatives such as "best", "greatest", or "excellent", etc.
- The use of phrases, words or graphics that are promissory, exaggerated, unwarranted or misleading, such as "Worry free", "Guaranteed", etc.
- The use of words or phrases such as "all", "full", "complete", "unlimited", "as high as", and similar words and phrases that exaggerate any benefits beyond the terms of the policy.
- Implying that past performance indicates future results.
- Implying or inferring that you or WFGIA and any of its affiliated companies offer tax or legal advice.
- Solicited and unsolicited communications via automatic dialing systems, telephone, artificial or prerecorded voice messages, text messages, ring-less voicemail drops, email or mass communications is not allowed per regulations listed:
 - Telephone Consumer Protection Act (TCPA)
 - Controlling the Assault of Non-Solicited Pornography And Marketing Act (CAN-SPAM)
- Endorsing a particular product or service as this creates suitability issues.
- The use of pictures of dollar bills, piles of gold, stacks of coins or other symbols depicting great or accumulated wealth.
- The use of alarming statements (scare tactics) that may cause excessive or unfounded fear and anxiety.
- Criticizing other representatives, professionals, products and/or companies.
- Blogs.

Approved Keywords

The following words and phrases are permitted for use in materials:

- Asset Accumulation
- College Funding
- Debt Management Agents cannot give advice but an agent can explain that this is part of developing a financial strategy
- Deferred Compensation
- Disability Insurance Policy
- Estate Preservation
- Executive Bonus
- Fixed Annuities, Fixed Insurance
- Indexed Annuities/Products
- IUL (Indexed Universal Life)
- Key Person Insurance

- Life Insurance Premium Financing
 - Long Term Care Insurance Policy
 - o Premium
 - Split Dollar
 - Whole Life Insurance

Unapproved Keywords

These words and phrases cannot be used:

- 401(k)/Rollovers
- 403(b)/Rollovers
- 457/Rollovers
- 7702 Plans
- Active Money Management
- Advisor
- Can only make money or cannot lose money
- Consult, Consultant or Consulting
- Crash-proof
- Eliminate risk
- Expert
- Financial Planning
- Estate Planning
- Estate Tax Proof
- Expansion Plan
- Health Plans
- Income Planner, Income Specialist
- Insurance Consultant
- Investment or Investment Planning
- Interest Plan
- IRAs, Roth IRAs
- Loans
- Market-like returns
- Mortgage or mortgage refinancing
- Pension Plans
- Private Pension Plans
- Professional Money Management
- Profit Sharing Plans
- Saving Account
- Savings Plan
- Saving Vehicle
- Sole Proprietor 401(k)
- Tax saver plan
- Variable Annuity

- VUL (Variable Universal Life) Annuity
- Wealth Management

Protecting Our Brand and Using the Transamerica Name

Every associate and agent create an impression in the mind of the public, our consumers, and future potential agents. World Financial Group Insurance Agency, LLC, and its affiliated agencies (WFGIA) are Transamerica companies. WFGIA agents and associates are independent contractors and are only authorized to represent themselves as an agent or associate, respectively, of World Financial Group Insurance Agency, LLC. This applies to both client and recruiting communications.

WFGIA agents and associates **should never** recruit or give the impression that they are recruiting to Transamerica. Transamerica Financial Advisors (TFA) registered representatives must clearly communicate that in order to become affiliated with (TFA), new recruits must first affiliate with WFGIA. Registered representatives can obtain more information on the guidelines in this area by reviewing the "Communications with the Public" section of the TFA Registered Representative and Investment Advisor Representative manuals found in the TFA section of MyWFG.

Additional Marketing and Advertising Guidelines

WFGIA Associate Acknowledgement and Confidentiality Agreement

This is the form that new recruits sign if they are not licensed. These recruits are charged a processing and background fee of \$100 to join.

WFGIA Agent Agreement

This is the form that new recruits sign if they are licensed. These recruits are charged a processing and background fee of \$125 to join.

Agent Insurance Guide: MyWFG.com>Resources>Logos, Images & Signage under Advertising Resources> Guidelines. Here

Cold Calls

Caller Identification

Before any calls are made, please ensure you are following state laws and regulations regarding the contacting potential with solicited person.

Every WFGIA agent must, upon making contact with the solicited person, identify himself/herself by the following:

- First and last name
- The agent's title & WFGIA
- The purpose of the call

Under no circumstances should a WFGIA agent misrepresent his/her title, position, capacity or qualification for the purpose of gaining access to the solicited person, for increasing the probability of making a sale, or for any other reason.

A caller should disclose the purpose of the call. Under no circumstances should a caller provide erroneous information, such as stating that the call is "not a solicitation" or that it concerns an "emergency" or "critical" situation, or that it is of a "personal" nature.

Automated Dialing/Message Systems:

- WFGIA prohibits solicited and unsolicited communications via automatic dialing systems, telephone, artificial or prerecorded voice messages, text messages, ring-less voicemail drops, email or mass communications is not allowed per regulations listed:
 - Telephone Consumer Protection Act (TCPA)
 - Controlling the Assault of Non-Solicited Pornography And Marketing Act (CAN-SPAM)

Calls Made to Prospects/Do Not Call List

A caller is not permitted to call a prospect's home if the telephone number is on the state, federal or company "Do Not Call" lists. Do Not Call search is on MyWFG.COM. Therefore, all telephone numbers must first be checked against the "Do Not Call" list. <u>Please read the Compliance Bulletin: Telephone,</u> Text, and Fax Advertising/CAN-Spam Policy for more details.

Debt Management

WFG agents cannot give debt management advice.

Social Media

The information below applies only to WFGIA agents or associates. TFA Registered Representatives need to consult with TFA Advertising for any social media inquiries. Advertising using social media follows the same guidelines as any advertisement.

Networking Sites

When using the approved networking sites for business purposes, it's very important that WFGIA agents' social network pages present them in an appropriate and professional manner. Please remember that, as a WFGIA agent, you are not only presenting yourself to potential clients, but you are representing WFGIA and the integrity and quality of our brand.

Social networking sites, such as Facebook, LinkedIn and Twitter, can be great for staying in touch and networking with business associates, friends and prospects. Just like any tool, however, it's only effective as long as it's used correctly.

A WFGIA agent can use more than one social networking site for either their personal use or their professional use. If you choose to create a social networking account for your professional use, then it is very important to adhere to the following caveats:

• It is very important that you present yourself in an appropriate and professional manner.

• It's equally important to understand the highly regulated environment in which you work and follow the rules.

Social Networking Best Practices

As a financial services professional meeting with potential and current clients and recruits, a WFGIA agent or associate is a direct reflection upon our company's image. The same is true when an agent communicates with the general public using social networking sites.

For example, posting on Twitter, i.e. tweeting, is posted on the internet for the general public's consumption. When the public reads the tweet, they believe the WFGIA agent who posted the tweet is also expressing the opinions and beliefs of WFG as a company. As far as they are concerned, the WFG agent is WFG. So please be vigilant regarding the reputation management of WFG. What a person says and does, and how a person conducts themselves matters, and it reflects on both the person who posted and the entire WFG organization. Reputation management is a 24-hour a day responsibility. WFG encourages you to have fun with your posts, but always remember to conduct yourself with the utmost professionalism and decorum, and with the highest of ethics. A million positive accomplishments can be discredited by one foolish act, post or tweet. As a WFGIA agent, you are one of components of the WFG reputation. In short, a WFG agent represents the brand.

In that context, please adhere to the guidelines listed below. (Relate to all social media sites)

- Think before tweeting. Twitter is a public forum, which means anyone can read it: an upline, a team, a colleague, a regulator, a client, a friend or a family member.
- **Be very diligent before posting on a social networking site.** Use caution and ensure that what you type is exactly what you intend to say.
- Make sure that what is being tweeted is relevant and substantive. Don't tweet for the sake of tweeting. Make sure that a tweet is meaningful and of interest to the reader.
- **Don't use tweets to discuss products**, product specifics, commissions, payouts, or anything related to these topics.
- **Don't feel obligated to respond to someone's tweet(s).** This is especially true if the person is a stranger. Additionally, evaluate Direct Messages (DMs) and determine how or if a DM needs a response. If the comment is derogatory or inflammatory, especially about the company, then please do not respond.
- If you use the WFG name or brand in anyway on social media, you are to refrain from opinion-based banter.
- If a tweet was inadvertently posted on Twitter do not panic. Consider these options:
 - Try to remove it.
 - If that does not work, take a step back to evaluate other options. Take solace in the fact that
 each tweet can only have a maximum of 280 characters so it may not be as problematic as
 you may think. If the tweet is problematic, then post another tweet to mitigate the
 circumstances.
- **Don't stretch one comment across multiple tweets**. If you can't say it in 280 characters, you may be saying too much. If you have an extended message, consider using e-mail instead.

- Do you tweet a lot, and what is considered "a lot?" This is a common concern of many who use Twitter. Unless you have a reason to tweet, don't! This is the quickest way to be classified as a spammer. As you're followers build up, your twitter habits may naturally follow suit. Sending out 10-20 messages a day on Twitter is fine. It's even perfect for some of your followers. Still others complain that people who tweet excessively push other messages off their Twitter page. The bottom line: Only you can determine what's right for you and the message you want to get out to your followers. If you have something important to share, go forth and tweet.
- Don't discuss Aegon or Transamerica.
- Apply the old adage, "Don't discuss politics and religion at the dinner table" to your tweets. We have clients and agents of all political persuasions and religious organizations.
- Watch your language. Casual language is fine. The laid-back environment of Twitter encourages it, but offensive talk is off limits. If you wouldn't say it to your client or teammate face-to-face, then don't post it on Twitter.
- Rude behavior is as unacceptable on any social media site as it is in life. Whether overtly or covertly, it is never appropriate to post mean-spirited or disrespectful tweets.
- **Don't link** your Twitter account or any other social networking site to worldfinancialgroup.com or any of its other public websites as this is a regulatory infraction.
- Do not discriminate.
- Do not argue.

Testimonials and Endorsements

We allow client testimonials/endorsements on social media websites as long as they are not promissory, do not mention specific products and do not mention anything securities- or investment-related. At any time, WFGIA can decide to have them removed. An agent should use good judgment and if they question a testimonial, they should contact the appropriate Advertising Compliance department. Those who post testimonials/endorsements cannot be compensated in any way.

Websites

Agents can have a website **only** if it is through one of WFG's approved website vendors:

- Broadridge Advisor Solutions (Formerly Emerald Connect)
- FMG Suite
- Yext

No other website vendors can be used.

Website Domain Name Guidelines

In an effort to standardize and create continuity among WFGIA agents' websites, a set of protocols must be followed regarding the registration of website domain names. Following are approved domain name arrangements with examples:

- Your Last Name
 - o <u>www.Smith.com</u>

- Your First and Last Name
 - o www.JohnSmith.com
- Your First, Middle Initial and Last Name
 - o www.JohnPSmith.com
- Your Name with Designation
 - o www.JohnSmith-ChFC.com
 - o www.SmithCLU.com
- WFG with Your Name
 - o www.WFG-Smith.com
 - o www.WFG-JohnSmith.com
 - o www.Smith-WFG.com
- WFG with the Name of your Neighborhood or Retail Complex Name
 - o www.WFG-Northside.com

Note: City, state, or county cannot be used

- Any of the following extensions are acceptable:
 - o .com
 - .net
 - o .biz
 - o .us
 - o .info

Domain name CANNOT include Transamerica, Aegon or team names.

Team names cannot be used with the public; only allowed for internal use only.

Email Name Guidelines

In an effort to avoid potential customer confusion about the services being offered from WFGIA agents, email names should avoid using titles that might obscure the actual services being provided. Names such as, "WealthPlanning", "MakingMoney", "FinancialPlanners" are examples of email names that should be avoided.

The best practice is to follow the website domain name guidance and simply use your name. Please remember that the use of team names with the public is a prohibited practice.

Violations of Advertising Guidelines

Advertising that is not submitted for review and has not been approved is subject to the following.

Corrective action taken may include:

- Additional training
- Letter of Caution
- Fines
 - o Fines cannot be placed into long term debt.
- Suspension
- Termination

WFGIA and its affiliates reserve the right to monitor and review posts, comments or discussions. If WFGIA Supervision detects a violation(s) of this policy the matter will be escalated to WFGIA Management for review and may result in a request to remove the content. WFGIA Management will review the posts to determine the severity of the policy violation and the appropriate level of corrective action to take.