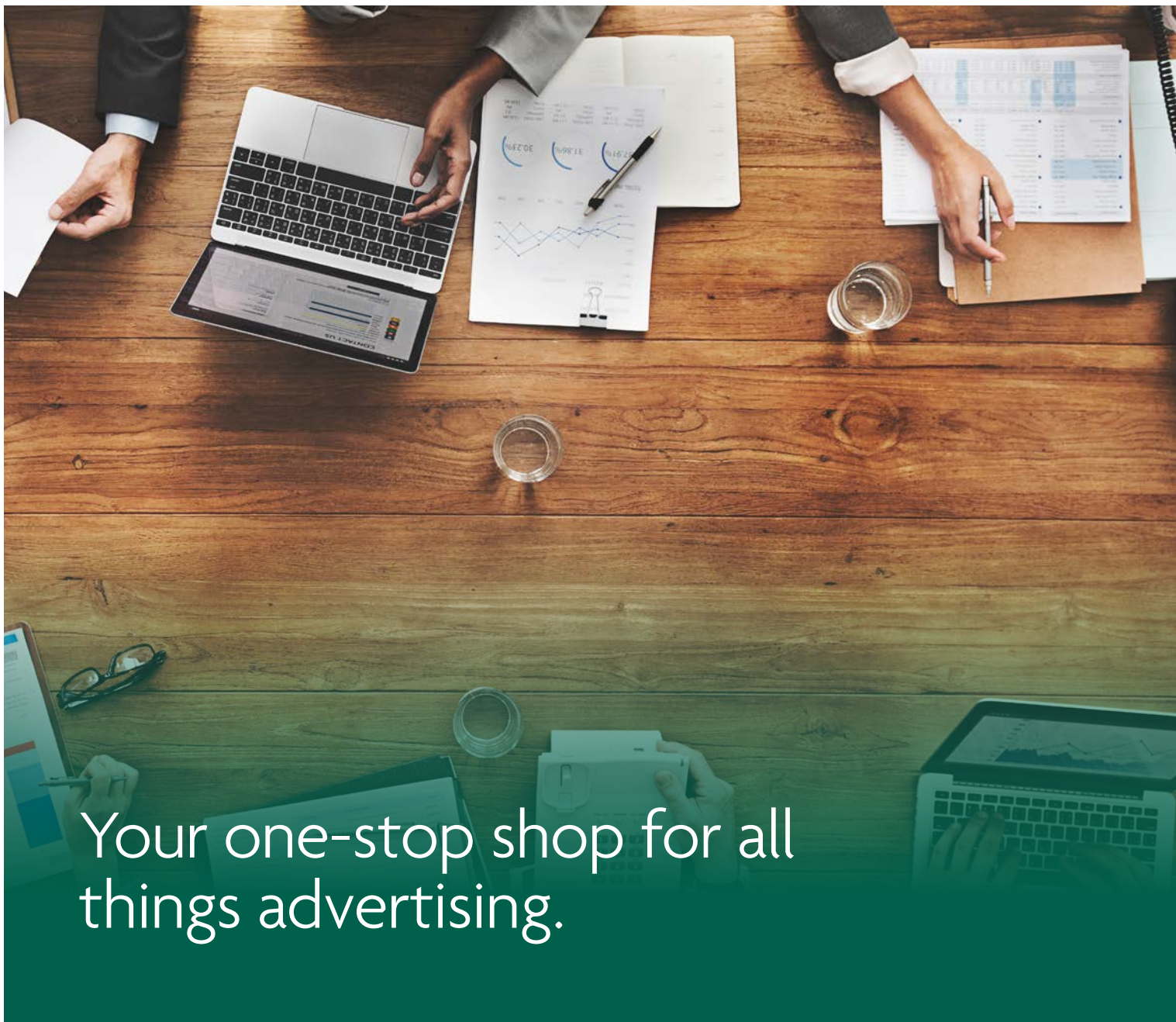


# Agent Advertising guidelines



Your one-stop shop for all  
things advertising.

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## Definition of Advertising

Advertising includes any material, written or electronic, with the intent to create interest in life or annuity insurance that is designed for distribution to the general public, agents or prospective agents, including but not limited to:

- Print, Radio, TV and any form of media advertising (newspaper, magazine, TV, radio, etc.) including 'pre- approved' ad slicks that have been personalized.
- Internet and Internet websites or home pages and any form of e-commerce referencing North American name, logo, description, products, services, rates, or features. These must be submitted with a link to the website or in printed format.
- Product brochures, circulars, pamphlets and published articles.
- Sales presentations, prepared sales talks, seminar presentations and handouts, telemarketing scripts and materials. This also includes guest presenter materials at sales or agent meetings or events.
- Newsletters, research reports and performance reports or summaries.
- Prospecting, target market and form letters.
- Emails as well as email signatures, referencing North American name, logo, description, products, services, rates or features.
- Lead cards and lead generating material.
- Business cards and letterhead.
- Agent biographies.
- Agent recruiting and training material.
- Sales illustrations.
- Third-party software.
- LinkedIn, Facebook, Twitter, Phonebook and Yellow Page listings
- Third-party websites that contain any North American material, name or logo.

Some states may have their own specific requirements about what they consider advertising (for example in California, worksheets and questionnaires or fact finders are included in their definition). If you are uncertain whether something falls within the definition of "advertising," please contact the applicable advertising review area defined on Page 2 for guidance. If you need assistance with branding, designing or completing an ad, please contact Marketing or Sales Support.

## Advertising Review Policy

Without exception, all consumer advertising and agent use only recruiting material or sales literature mentioning North American Company for Life and Health Insurance<sup>®</sup> (North American) or referencing any of our products or services are considered advertising and must be submitted for advertising review and approval **PRIOR TO USE. This includes products referenced by name, description, rate or features regardless of whether our company name is referenced.**

Generic ads that do not specifically reference North American or our products by name, feature, or description, are not required to be submitted. However, it is your responsibility to understand and apply all state advertising requirements for any material considered advertising under this policy. If you choose to submit generic ads, we will be happy to assist you by reviewing them for general information, accuracy and compliance with Company marketing standards and rules as set out in the North American Compliance Guide. We may also make suggestions to help you comply with state laws and regulations. While we may suggest revisions based on this review, we will not provide approval on generic ads.

Please review these guidelines prior to submitting your advertisements and sales materials. In return, we will work diligently with you to review your material fairly and responsively. The analyst will make every effort to provide you with initial comments within five business days of receipt.

However, depending on the complexity and length of the piece, and volume of advertising received, additional review time may be required. If the piece includes a website, the review time may take longer than the standard five business days. If we receive the advertising piece prior to 3:00 pm (CST) Monday through Thursday or 11:00 am (CST) Friday, that day is considered to be day one of the initial review period. If the piece is received after 3:00 pm (CST) Monday through Thursday or 11:00 am (CST) Friday, the following business day is considered day one.

## Advertising Submission and Contacts

Please submit your requests for advertising review via email using the following contact information. To ensure your materials are reviewed expeditiously, the following procedures should be taken into consideration. When submitting annuity advertising, be sure to complete the Annuity Advertising Submission Form 11490Z or when submitting life advertising, be sure to complete the Life Advertising Submission Form 11490Z-LIFE. Please use the contact information for questions or concerns about advertising reviews. **New advertising questions must be sent to the applicable email address shown below.**

Product Line	Contact / Extension	Email Address	Supervisor
Fixed Life and Annuity	Sara Dekker / 39374 Paula Kunkel-White / 87712 Stacey Roach / 33946 Janelle Peterson / 32079 Sue Travis / 33422	<a href="mailto:AdReview@sfgmembers.com">AdReview@sfgmembers.com</a>	Michal Schmidt

## General Guidelines

The following guidelines will be used in reviewing all advertising. Please familiarize yourself with them prior to submitting material for review. These guidelines are not meant to be all-inclusive, additional requirements may apply, and in some cases alternative disclosure language may be suggested depending on the content of the ad. In addition to these guidelines, please also see the North American Compliance Guide for information concerning ethical sales practices and complying with various laws, regulations and company policies.

### Accuracy and Truthfulness

Ads must be fair and balanced. No aspect of the ad can be considered untrue, misleading or deceptive and no material piece of information can be omitted. It cannot make exaggerated, unwarranted or misleading claims.

If the following terms are used, the party paying for the benefits must be disclosed and the terms must be true and verifiable: “free,” “no cost,” “without cost,” “no additional cost,” “at no extra cost,” “vanishing,” or similar words.

All comparisons, if allowed, of competitor’s policies, benefits, performance, or rates must be fair and complete. The ad cannot disparage other insurers, agents, products, selling methods, or the industry.

### Agency

Include your agency’s name as it appears on your agent’s license. For example, if an agent is licensed as “John Doe” but is doing business as “City Insurance Agency,” “John Doe, Independent Agent, Independent Insurance Agent”, or “Financial Professional” (depending on the content of the ad) must appear on the ad. The agency/agent name that is advertised must have an active contract with North American.

### Agent or Agency Name

Advertisements and promotional material must include the agent’s or an agency’s name as well as a reference to “Independent Insurance Agent” or “Independent Agency” (as applicable). Always indicate the licensed agent or agency as the contact person. Consumer ads must have the name of the agent, agency (if applicable), address and phone number.

### Agent Use Only

If an ad is intended for agent or financial professional use only, the following disclosure must be included on the bottom of each page of the piece: **“FOR AGENT (OR FINANCIAL PROFESSIONAL) USE ONLY. NOT TO BE USED FOR CONSUMER SOLICITATION PURPOSES.”** This disclaimer must be in a font size that has the equivalent readability of Arial 8pt. in bold and all caps.



### Approval Period

Due to the changing nature of regulations governing advertisements and sales materials, approval is valid for up to 12 months. This time period will be shortened to 3 months if interest rates are referenced in the ad. The time period may be shorter if company sponsored specials/promotions are referenced in the ad or a product is revised or discontinued. Upon expiration of the time period, you must resubmit the ad for approval if you intend to continue to use the ad. If revisions are made to an approved ad during the approval period, the ad must be resubmitted with a different form number or revision date for review prior to use.

### Blind/Generic Ads

Blind ads are generic ads in which our name, products, product features, rates, or anything that would be reasonably identifiable to our Company or our products are NOT mentioned. **Blind advertisements will not be approved.**

As with any ad you should always indicate that you are a licensed independent insurance agent and list the types of insurance you are licensed to sell. All consumer ads must include the name of the agent, agency (if applicable), address and phone number. If referencing a generic entity, like “one of the nation’s leading brokerage clearing institutions,” or “one of the largest privately owned companies” the name of the group, institution, or company must be identified.

### Business Cards and Letterhead

Agent business cards and letterhead must include the agent’s name followed by the term “Independent Agent or Independent Insurance Agent” (depending on the content) and, in states that require the agent’s license number be listed, (Arkansas, California and Texas) “Independent Agent [insert state] License #”. The agent’s address and phone number must appear on the card, as opposed to contact information for North American. For California specific print advertisements, the word “insurance” must have a readability of the larger of either twelve point font or the telephone number listed.

### Company Name

The full name of the issuing company must be used in the first reference to the Company. Thereafter, shortened versions of the company name can be used. Acceptable forms of company names:

- North American Company for Life and Health Insurance®
- North American
- North American Company®

### Designations

Professional designations must be reviewed and approved prior to use with the public. Senior targeted designations or any other designation that does not represent meaningful achievement or specialized experience and knowledge that would be considered valuable to a life insurance or annuity consumer will not be approved. You can find a current listing of approved and prohibited designations on our website: [NorthAmericanCompany.com](http://NorthAmericanCompany.com).

### Email Signatures

If your email signature includes our Company name, logo or refers to our products or services, the signature must be submitted for review prior to use.

### FDIC/NCUA

The following disclosure is required for all consumer advertising for life and annuity products sold through a banking institution, by an agent connected with a banking institution, or when comparing to a certificate of deposit:

“Insurance products are not bank deposits, and are not insured by the FDIC/NCUA or other regulatory agencies. They are not obligations of or guaranteed by the financial institution or other affiliated entities, and are not a condition of a loan.”

or –

- NOT FDIC/NCUA INSURED
- MAY LOSE VALUE INCLUDING LOSS OF PREMIUM
- NO BANK/CU GUARANTEE
- NOT A DEPOSIT
- NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY

This is required on all annuity consumer advertising pieces.

Advertisements that compare life insurance to a certificate of deposit will not be approved.

### Final Copy

We must receive a final copy of all ads. If revisions to your ad are necessary, you will be required to submit a final copy of the ad with the revisions before approval and before use.

### Fixed Index Annuities

When advertising a Fixed Index Annuity, include a footnote as follows: "Fixed Index Annuities are not a direct investment in the stock market. They are long term insurance products with guarantees backed by the issuing company. They provide the potential for interest to be credited based in part on the performance of specific indices, without the risk of loss of premium due to market downturns or fluctuation. Although Fixed Index Annuities guarantee no loss of premium due to market downturns, deductions from the Accumulation Value for optional benefit riders or strategy fees or charges associated with allocations to enhanced crediting methods could under certain scenarios exceed interest credited to the Accumulation Value, which would result in loss of premium. They may not be appropriate for all clients. Interest credits to a fixed index annuity will not mirror the actual performance of the relevant index."

### Font Size

The text in the body of the ad must be in a font size that has the equivalent readability of Arial 10pt. and all disclosures/footnotes must have the minimum equivalent readability of Arial 8pt. Some states have stricter font size requirements. It is your responsibility to comply with your state requirements.

### Form Number

All ads submitted for approval must have a form number in the bottom left-hand corner of each page. If you do not include a form number on the ad when submitted for review, a form number will be assigned and you will be notified to include it on your ad.

### Graphics/Images

When using our Company name, logo or products, use of misleading images such as dollar signs, money, golden eggs, money bags, coins, piggy banks, safes or similar images will not be permitted based on the content and context of the ad. These graphics can be misinterpreted to emphasize "return" or "investment" features or savings aspect of an insurance product. In general, we recommend caution on advertising, which does not reference our Company name, logo or products to avoid graphics or images that have the potential to mislead.

### Guaranty Association

There can be no reference to Guaranty Associations or any implication that premiums or principal are "insured."

### Guaranteed Lifetime Withdrawal Benefit

Marketing materials that discuss GLWB rider benefits should focus on the riders' ability to provide guaranteed payments for life and any other benefits provided by the rider. Such materials should not focus on the GLWB Value (or Benefit Base or other terms that refer to the rider value), other than to make clear it is used only to calculate lifetime payments (and death benefit where applicable) and is not available as a lump sum or death benefit at any time. Rider rollup rates should not be marketed as rates of return.

### Index Accounts

In most instances, the use of the term "uncapped" is not allowed when referring to Index Accounts on annuity products. States have issued many bulletins warning against the use of "uncapped". When this term is used to describe rates of return, without proper disclosures of limitations, such as index margins or participation rates, it may have the tendency to mislead consumers and their expectations of future performance of an annuity product. Consumers should be informed how the limitations of an "uncapped" strategy could lower future projected interest credits, since "uncapped" does not mean unlimited. With regard to promotion of the Volatility Control indices, care should be taken to disclose that because these indices are managed to a volatility target, the index performance will not match the underlying performance of the Volatility Index. Volatility Control references should consider the inherent control built into the index and since those indices are internally controlled interest credits may be more limited.

### Intended Use

When submitting an ad, always include to whom (audience) and where (states) the ad will be distributed.

### Interest Rate

If reference is made to specific interest rates, include the statement: "Current rate is effective as of publication date and is subject to change without notice."

**Annuities:** If reference is made to first-year yield, combining a premium bonus with the fixed account, include the following statements: "XX.XX% First-Year Yield reflects a XX% Premium Bonus plus a X.XX% Fixed Account Rate, and assumes no withdrawals. This yield applies only to premiums in the Fixed Account. The Fixed Account Interest Rate is based on current rates and subject to change at the Company's discretion."

### Lead Generating Material

The use of lead generating material continues to be under increased scrutiny by regulators. These activities are not prohibited, but as with any ad must disclose that a licensed insurance agent is involved and that insurance and annuity products may be discussed or offered for sale, then or at a later time. You may not use materials that contain exaggerated or misleading claims, or that are intended to pressure the consumer into making an immediate decision, by reference to the continued availability of certain product features. Any reference in any material that suggests the involvement of any regulatory or governmental agency, or any organization that focuses on seniors, such as AARP, is also prohibited. These guidelines also apply to lead cards you obtain from an outside vendor.

### Liquidity

The description of liquidity or ease of fund access must be equally balanced by clear language describing the negative consequences of early redemption/withdrawals.

The ad cannot imply or represent that life insurance is a "short-term" or "liquid" investment.

Terms such as "tax-free" cannot be used when referring to a life insurance death benefit paid to a named beneficiary. Depending on the content, "generally tax-free" may be acceptable.

If a reference is made to any withdrawal feature of a product, include the disclosure: "Withdrawals taken prior to age 59½ may be subject to IRS penalties. Withdrawals during the surrender charge period will be subject to surrender charges and possibly a Market Value Adjustment."

### Logo Usage

Indicate all product and company logos registered with a service mark or registered trademark as applicable. Please indicate if you have permission from the logo owner to reprint the logo in your materials and provide a copy of the approval.

North American advertising copy, photos and graphic elements are owned by the Company and duplication without authorization is considered a breach of copyright law. Agents who are contracted and in good standing may submit a request to use an approved Company logo in their advertisements as long as the ad includes the following: 1) Name of the agent and notation that the agent is an Independent Agent. 2) **Disclosure:** "This ad was developed by an Independent Agent and does not necessarily reflect the opinions or brand of the North American." Agents need to review the Logo/Branding standards for guidance on usage on [NorthAmericanCompany.com](http://NorthAmericanCompany.com).

### Market Value Adjustment (also known as Interest Adjustment)

**Annuities:** When referencing withdrawals, surrenders and/or Market Value Adjustments, include the following disclosure: "A Market Value Adjustment (also known as Interest Adjustment) is applied only during the surrender charge (or Market Value Adjustment) period to full surrenders and to any partial surrender in excess of the penalty-free amount. This adjustment may decrease or increase the Surrender Value depending on the change in interest rates since the annuity purchase date. Lower interest rates at time of issue may result in less opportunity for a positive Market Value Adjustment in future contract years. In certain rate scenarios at the time of issue, it may not be possible to experience a positive Market Value Adjustment. Market Value Adjustment may not be applicable in all states."

### **Mortgage Re-financing, Mortgage Acceleration, Reverse Mortgages, Home Equity Loans**

Use of any advertising, sales literature or seminar materials that in any way employs mortgage re-financing, reverse mortgages, or mortgage-acceleration strategies are prohibited. This prohibition is not limited to the point of sale or the sales process. No such advertising or sales materials may be used when promoting North American or our products or securing an appointment that may result in the sale of a North American product. In addition, sales material on a subject other than mortgage re-financing may not be used if the intention is to systematically promote mortgage re-financing to pay premiums at some later date. Inappropriate mortgage re-financing sales strategies include, but are not limited to:

- Use of home equity loans to pay premiums;
- Use of home equity loans to consolidate debt and lower monthly payment with the intention of using the increased cash flow to pay premiums;
- Diverting funds intended for mortgage payments to pay premiums;
- Re-financing mortgages to a lower interest with the intention of using the increased cash flow to pay premiums;
- Reducing the intended amount of a mortgage down payment to pay premiums.
- Encouraging or directing a client to take out a reverse mortgage or obtain home equity funds and use the money to buy a life insurance policy or annuity.

The traditional emphasis on the use of the death benefit protection or the potential cash value provided by life insurance to reduce or eliminate a mortgage balance when selling life insurance may be acceptable as long as the ad, in its entirety, is fair and balanced.

### **Numerical Hypothetical Examples**

Ads that include projections or hypothetical examples must be based on contractual guarantees or must disclose the assumptions and factors used. Non-guaranteed elements must be clearly noted as non-guaranteed, must be based on current product offerings, and must be accompanied by equally prominent disclosure of guaranteed elements.

### **Opt out of Email**

If you are sending an approved email to a client, the client must be allowed to opt out of receiving further emails from you. Please add the following, or similar language to any email sent to a client that is not a response to a question: "To stop receiving further email messages from me (or include your name), please reply back and request to be removed."

### **Premiums**

An ad for life insurance cannot contain a statement or representation that premiums paid for a life insurance policy can be withdrawn unless reference is made to a prepayment agreement or unconditional premium refund offer. Premium charges must be prominently described if the policy has non-level premiums.

There can be no representation that a pure endowment benefit is a "profit" or "return" on the premium paid rather than a policy benefit for which a premium is paid.

### **Premium Bonus**

For annuity products offering a premium bonus, if this feature is discussed, the following disclosure would be used: "Premium bonus may vary by annuity product, premium band and surrender charge period selected and may be subject to a premium bonus recapture. Products that have premium bonuses may offer lower credited interest rates, lower Index Cap Rates, lower Participation Rates and/or greater Index Margins than products that don't offer a premium bonus. Over time and under certain scenarios the amount of the premium bonus may be offset by the lower credited interest rates, lower Index Cap Rates, lower Participation Rates and/or greater Index Margins."

The disclosure language can be modified to match the product that is being advertised. For any product, if the bonus is conditionally guaranteed, then the conditions to get the bonus must be stated.

### **Prior Approval**

If an ad is being submitted based on a previously approved ad, please include the previously approved form/ad tracking number, and a description of the changes in your submission. This can help expedite the review.



## Product Comparisons

Comparisons, if allowed, must be clear and provide a fair and balanced presentation including material differences such as retirement objectives, sales and management fees, liquidity, types of guarantees or insurance, fluctuation of premium and/or return, tax features.

Comparison of life insurance to annuities, mutual funds or certificate of deposit (CD) are inappropriate since they are purchased for different reasons and fulfill different needs.

Comparison to “other taxable savings methods/vehicles” rather than a specific product is more acceptable when featuring the benefits of tax deferral as compared to a taxable financial product. See Tax Deferral Features for disclosure requirements.

Comparisons of fixed annuities to a CD may be inappropriate without specific disclosures and complete explanation. There can be no implication that fixed annuities are CDs or that they are similar in nature to a CD.

## Product Disclosure

The product being advertised must clearly be identified as a life insurance policy or an annuity contract. Products being advertised must be available for sale in states where the advertisement will be used or it must be stated that the product is not available in all states. Any ad promoting one of our products must include a footnote describing the policy type, form number and issuing company. A typical product disclosure is as follows:

**Annuities:** “Insurance products issued by North American Company for Life and Health Insurance®, West Des Moines, IA. Product and features/options may not be available in all states or appropriate for all clients. See product materials for further details, specific features/options, and limitations by product and state.” The [product name] is issued on form [form numbers].”

**Life Insurance:** “[Product Name] is issued on [form series XXXX], or state variation including all applicable endorsements and riders, by North American Life Insurance Company, West Des Moines, IA. Products, features, riders, endorsements, and issue ages may not be available in all jurisdictions. Limitations or restrictions may apply.”

## Product Features

Specific product or feature related disclosures may apply and will be provided by the analyst upon review if required.

## Product Type

The product being advertised must clearly be identified as a life insurance policy or an annuity contract. For example: indexed universal life insurance; fixed index annuity.

## Prohibited Terminology

The terms “safe money,” “no cost,” “disappearing” or “vanishing” may not be used in any advertising materials. The word “guarantee” may be allowed to describe certain fixed product features with adequate disclosure. If a guarantee is referenced, the type of guarantee must be specified, i.e. premium guarantee, death benefit guarantee, etc.

A life insurance policy cannot be billed as an “investment,” “investment plan,” “charter plan,” “savings plan,” “savings,” “private pension plan,” “financial planning,” “retirement plan,” or “retirement vehicle”.

Do not refer to premium payments as “deposits,” “contributions,” “investments,” “investment plan,” or “principal.” Absolute words such as “all,” “never,” and “shall” are not to be used.

Key words and phrases to avoid include “expert,” “specialist,” “advisor/adviser,” “promise,” “no risk” or “free”.

Advertising that implies or refers to North American annuities as appropriate products for “Medicaid friendly” annuity programs will not be approved.

## Promissory Language

Promises may be misconstrued as extra-contractual responsibilities or fiduciary duty and might increase the Company and/or agent risk and liabilities. Promissory language, whether to consumers or agents, is not allowed.

### Public Information

If public information, such as the name of a mortgage company and mortgage loan amount is used in advertising, such advertising must include the following disclosure: “[Information] was obtained from public records. [Agency Name] is an independent insurance organization not affiliated with any bank, mortgage company or other lender.”

### Quotes or Phrases

If a quote, phrase, image, picture or similar material is used in the ad, indicate whether the material is copyrighted and if the agent has permission to reprint the article, quote, and phrase or use the image or picture in the advertisement.

### Religion/Faith/Politics

Religious and political beliefs in the United States take many forms. Given the diversity of our agents and our contract/policy owners, we recommend that you refrain from using any reference to faith, religion or religious or political conviction in advertising, sales literature, seminars, contract/policy owner correspondence, or any other material used to promote our company and/or induce the sale of our products. Submitted materials with such themes will not be approved through our standard advertising approval process.

### Senior Market

Advertising that targets or focuses on the senior market is prohibited.

### Social Media

Please refer to the Addendum to Agent Advertising Guidelines: Agent/Producer Social Media Policy later in this guide.

### State Licenses

All consumer advertising must list the state(s) where insurance licenses are held. If the advertisement will be distributed in the state(s) of Arkansas, California, or Texas, depending on scope of use, you are required to include your state-issued license number on the advertising in the same size font as your contact information. For California specific print advertisements, the word “insurance” must have a readability of the larger of either 12-point font or the telephone number listed.

### Statistics

Any use of statistics, numerical data, or reference to third-party information must clearly identify the source of the information including the name and date of the report or publication.

Internal sourcing such as reports should also include the name of the report being referenced along with the date. The source data must be relevant to the material being advertised. The date of the statistical information must be current within 12 months of the date the ad is submitted. Any statistical data older than 12 months will not be allowed unless documentation is provided to verify that it is the most current data available.

### Surrender Charges

For products that contain surrender charges and are referenced in the ad, include the following disclosure:

**Annuities:** “A surrender during the surrender charge period could result in a loss of premium. Surrender charge structure may vary by state. Please consult your Disclosure Statement for details specific to your state.”

**Annuities-MYGA’s:** “A surrender during the surrender charge period could result in a loss of premium. The surrender charge and Interest Adjustment (also known as Market Value Adjustment) may reset with renewal. Surrender charge structures and guarantee periods may vary by state.”

**Life Insurance:** “Income and growth on accumulated cash values is generally taxable only upon withdrawal. Adverse tax consequences may result if withdrawals exceed premiums paid into the policy. Withdrawals or surrenders made during a Surrender Charge period will be subject to surrender charges and may reduce the ultimate death benefit and cash value. Surrender charges vary by product, issue age, sex, underwriting class and policy year.”

### Tax-Deferral Feature

When comparing the tax-deferral feature of our products to other qualified plans, the following disclosure must be included:

**For client ads used in the presentation at time of sale:** “The tax-deferred feature of the [policy][annuity] is not necessary for a tax-qualified plan. In such instances, you should consider whether other features, such as the death benefit and optional riders make the [policy][annuity] appropriate for your needs. Before purchasing this product, you should obtain competent tax advice both as to the tax treatment of the [policy][annuity] and the suitability of the purchase.”

**Annuities: For other client and agent pieces:** “Under current law, annuities grow tax deferred. An annuity is not required for tax deferral in qualified plans. Annuities may be subject to taxation during the income or withdrawal phase. Neither North American nor any agents acting on its behalf should be viewed as providing legal, tax or investment advice.”

If a client piece, add the following: “Consult with and rely on your own qualified adviser.”

**For agent use only, add:** “You should advise your clients to consult with and rely on their own qualified advisers before making a purchasing decision.”

Terms such as “tax-free” and “tax-free retirement” cannot be used.

### Tax/Legal Advice

Neither North American, nor its agents give tax or legal advice. Depending on the extent and focus of the information provided, material discussing tax or legal issues may not be approved.

### Testimonials

An advertisement cannot imply an endorsement or testimonial by a person or organization without their approval. Testimonials must be genuine, reflect the actual opinion of the author, be applicable to the product, and complete so as not to mislead. There must be disclosure if compensation is given for the endorsement or testimonial.

The ad cannot imply that the product or company has been approved or endorsed by a group, association, government entity or society, unless true.

When providing a testimonial, please add the following disclosure: “The opinions and ideas expressed by the individuals providing testimonials are their own. The testimonials are not indicative of future performance or success and may not be representative of the experience of other agents”.

### Third Party Rating Disclosures

Reference to any third party/commercial rating must incorporate the full description of the rating, including a statement about the number of categories that a rating service would use to rank a company and where a particular ranking would fall within the total number of categories. The following are examples of approved disclosures:

<b>A.M. Best</b>	A.M. Best is a large third-party independent reporting and rating company that rates an insurance company on the basis of the company’s financial strength, operating performance, and ability to meet its obligations to contract holders. A+ (Superior) is the second highest rating out of 15 rating categories and was affirmed on July 30, 2021 to North American, as part of the Sammons Financial Group. For the latest rating, access <a href="http://www.ambest.com">www.ambest.com</a> .
<b>S &amp; P Ratings</b>	Standard & Poor’s Corporation is an independent third-party rating firm that rates on the basis of financial strength. Standard and Poor’s awarded its “A+” (Strong) rating for insurer financial strength on February 26, 2009 and affirmed on June 2, 2021 to North American Life Insurance Company as part of the Sammons Financial Group. The “A+” (Strong) rating, which is the fifth highest out of 22 available ratings, reflects the financial strength of North American Life Insurance Company, an affiliate of Sammons Financial Group
<b>Fitch Ratings</b>	Fitch Ratings, a global leader in financial information services and credit ratings, on December 14, 2021, affirmed an Insurer Financial Strength rating of A+ Stable for North American. This rating is the fifth highest of 19 possible rating categories. The rating reflects the organization’s strong business profile, low financial leverage, very strong statutory capitalization and strong operating profitability supporting by strong investment performance. For more information access <a href="http://www.fitchratings.com">www.fitchratings.com</a>

## **Titles**

No insurance producer may use terms such as “financial planner,” “investment adviser,” “advisor/adviser,” “financial consultant,” or “financial counseling” in such a way to imply that he or she is generally engaged in an advisory business in which compensation is unrelated to sales unless that actually is the case. No insurance producer may charge an additional fee for services that are customarily associated with the solicitation, negotiation or servicing of policies.

## **Trademarks / Service Mark**

Sammons® Financial Group, Inc. (SFG), the insurance holding company for North American, is the owner of all common law and statutory trademark rights and accompanying goodwill of the names and marks associated with the life insurance and annuity products provided by North American. Agent may use the trademarks only for the purpose of promoting, advertising and selling the insurance, annuity and financial products and related services of North American for which the Agent is authorized. All of Agent’s use of the trademarks inures to the benefit of SFG, and Agent acquires no ownership rights by virtue of such use. Without exception, all consumer advertising (including websites) and agent-use only recruiting material or sales literature mentioning North American or any of North American’s products or using any of SFG’s trademarks must be submitted for advertising review and approval PRIOR TO USE. Agent must make any changes requested by North American related to Agent’s use of trademarks. Agent is prohibited from registering trademarks, domain names and trade names that consist of or contain any of SFG’s trademarks or any colorable imitation of any of SFG’s trademark names or marks.

## **Use of Illustrations for Annuity Products**

It is our general policy that no outside sales illustrations, proposals, projections, and/or software, be used during the application, sale, purchase, or any other aspect of marketing our fixed index annuity products, other than Company approved illustration software and approved calculators. This includes, but is not limited to, sales illustrations, proposals, projections, and/or software that provide hypothetical or past index performance to demonstrate or predict product returns.

## **Website Articles**

Please do not post entire articles from other sites. If you wish to draw attention to an article from another site, please provide a link and one or two sentences. Posting entire articles is almost always a copyright violation.

## **Website Links**

In order to avoid potential entanglement issues, we recommend that you add the following disclosure, or provide a pop-up notice: “You are now leaving [agent or agency name] website. [Agent or agency name] was not involved in the preparation of the information you are about to view. The opinions and ideas expressed in the following pages are those of the author(s) and are not promoted or endorsed by [agent or agency name]. You should always seek professional advice before making an insurance purchase or investment decision.”

## **White/Yellow Page Ads**

Agents and agencies can list in a local or online telephone directory as North American Company for Life and Health Insurance as long as there is a subheading that notes the agency or agent’s name followed by “Independent Agent”.

North American Company for Life and Health Insurance OR  
ABC Agency, Independent Agency  
123 Any Street,  
Any Town, ST 555-5555

North American Company for Life and Health Insurance  
John Doe, Independent Agent  
123 Any Street  
Any Town, ST 555-5555

## **Withdrawal Feature**

If a reference is made to any withdrawal feature of a product, include the disclosure: “Withdrawals taken prior to age 59½ may be subject to IRS penalties. Withdrawals during the surrender charge period will be subject to surrender charges.” If referring to annuities add: “and possible Market Value Adjustment”.

## Indexed Universal Life and Index Annuities Do's and Don'ts

Indexed Universal Life	Index Annuities
<p><b>Marketing/advertising materials for Indexed Universal Life product(s) should DO the following:</b></p> <ul style="list-style-type: none"> <li>• Be clear that it is a life insurance product and is designed to provide life insurance death benefit protection;</li> <li>• State the type of guarantees, including protection of premium and the guaranteed interest rates;</li> <li>• Refer to the applicable index only as a factor that in part determines the interest to be credited at the end of an index period, and not as a vehicle for participation in stock market gain or returns;</li> <li>• Emphasize that the insurance company credits interest, and not that purchasers get “market gain” or “market growth;”</li> <li>• Clearly state that the product is not an investment in the “market” or in the applicable index;</li> <li>• Be clear that the participation rate and/or cap rate, and any other non-guaranteed components of the index in formula may change at the Company’s discretion and may be different in the future;</li> <li>• Be clear that the insurance company is the entity backing the guarantees provided by the product;</li> <li>• Disclose that the index interest could be less than with a traditional product, and could be zero (if applicable);</li> <li>• Include the index service mark or registered trademark as applicable along with index name disclosure for any listed index;</li> <li>• Disclose indexed universal life insurance products are subject to all policy fees and charges normally associated with most universal life insurance.</li> </ul> <p><b>Marketing/advertising materials for Indexed Universal Life should NOT DO the following:</b></p> <ul style="list-style-type: none"> <li>• Place undue emphasis on the index;</li> <li>• Ignore Death Benefit protection need.</li> <li>• Use investment terms such as “investment performance,” “trading day,” “investment returns,” “maximizing returns,” “Wall Street,” or the “stock market,” except with extreme care (and appropriate caveats);</li> <li>• Describe the product’s indexing feature or formula as a means of “participation” in the “stock markets,” or the “equity markets” although indexing may be appropriately described as providing the potential for higher excess interest rates over the long term;</li> <li>• Provide a partial or complete list of the stocks or the companies that comprise the index (such a list might suggest that the owner is indirectly investing in those stocks); or,</li> <li>• Emphasize similarities to variable annuities, mutual funds, or other investment vehicles;</li> <li>• Describe the product as like or similar to a variable annuity or variable life with a guaranteed floor or premium or principal protection, as opposed to simply emphasizing the premium protection feature.</li> </ul>	<p><b>Marketing/advertising materials for Fixed Index Annuity product(s) should DO the following:</b></p> <ul style="list-style-type: none"> <li>• Emphasize the guarantees, including protection of premium and the guaranteed interest rates;</li> <li>• Refer to the applicable index only as a factor that in part determines the interest to be credited at the end of an index period, and not as a vehicle for participation in stock market gain or returns;</li> <li>• Emphasize that the insurance company credits interest, and not that purchasers get “market gains” or “market growth;”</li> <li>• Clearly state that the product is not an investment in the “market” or in the applicable index;</li> <li>• Be clear that the participation rate, cap rate and/or index margin and any other non-guaranteed components of the indexing formula may change at the Company’s discretion and may be different in the future;</li> <li>• Be clear that the insurance company is the entity backing the guarantees provided by the product;</li> <li>• Disclose that the index interest credit could be less than with a traditional product, and could be zero (if applicable);</li> <li>• Include the index service mark or registered trademark as applicable along with index name disclosure for any listed index.</li> </ul> <p><b>Marketing/advertising materials for Fixed Index Annuity product(s) should NOT DO the following:</b></p> <ul style="list-style-type: none"> <li>• Place undue emphasis on the index;</li> <li>• Use investment terms such as “investment performance,” “trading day,” “investment returns,” “maximizing returns,” “Wall Street,” or the “stock market,” except with extreme care (and appropriate caveats);</li> <li>• Describe the product’s indexing feature or formula as a means of “participation” in the “stock markets,” or the “equity markets” although indexing may be appropriately described as providing the potential for higher excess interest rates over the long term;</li> <li>• Provide a partial or complete list of the stocks or the companies that comprise the index (such a list might suggest that the owner is indirectly investing in those stocks); or,</li> <li>• Emphasize similarities to variable annuities, mutual funds, or other investment vehicles;</li> <li>• Imply that the product is insured by the FDIC/NCUA;</li> <li>• Describe the product as being suitable for all investors;</li> <li>• Describe the product as like or similar to a variable annuity or variable life with a guaranteed floor or premium or principal protection, as opposed to simply emphasizing the premium protection feature.</li> </ul>

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## Internet Advertising Guidelines

Internet advertising includes home pages and all related pages in a website. To submit your site and/or pages for review, submit copies of all relevant web pages, including all links and instructions for accessing the site online in printed format. **Our review must be completed PRIOR TO any new website or new webpage “going live.”** These reviews may take longer than five business days. Regulations that apply to print advertising also apply to Internet advertising. Since a website is accessible to all consumers and agents regardless of where they live, internet advertising must comply with advertising requirements in all states.

**NOTE: Advertising materials that list a website may prompt a website review that must be completed PRIOR TO the requested materials being reviewed.**

Many websites, including those that market insurance products, may be identified by a marketing name that is different from the name shown on the “official” license for the agency or agent. Please note that a marketing name can easily be construed as a DBA (doing business as) and as such, could require that the name be filed with the respective secretary of state offices and/or state insurance departments.

**Your independent website should link to our Company websites.** There are several reasons that this is the best strategy: It shows the original source and drives viewers to our Company site. Information is presented in whole, including appropriate disclosures. Since Company web pages are updated continually, it ensures the most current information and form versions are available and being used which can help avoid delays in processing applications or policy requests. Since information contained on a website can be viewed by virtually anyone, include where you are licensed to do business and that you are a domestic US agent/agency.

Please note that material approved for Financial Professional Use Only cannot be posted on a public website unless it is accessible only through a secure agent logon.

**When including product information that is for Agent Use Only, please provide the Internet address, User ID and password.** Agents who are contracted and in good standing may submit a request to use an approved North American logo in their advertisements as long as the advertisement also includes the name of the agent and notation that the agent is an Independent Agent. The ad must also include a **disclosure** stating that the advertisement does not necessarily reflect the opinions or brand of North American.

Agents need to review the Logo/Branding standards for guidance if using North American logo's on their individual websites. The standards can be found on [NorthAmericanCompany.com](http://NorthAmericanCompany.com).

### Seminars

Seminar selling, complimentary lunch or dinner offers and the use of lead generating material continues to be under increased scrutiny by regulators. All such promotions must disclose that a licensed insurance agent or registered representative is involved and that insurance and annuity products may be discussed or offered for sale, then or at a later time. You may not use materials that contain exaggerated or misleading claims, or that are intended to pressure the consumer into making an immediate decision.

Any reference in any material that suggests the involvement of any regulatory or governmental agency, or any organization that focuses on seniors is prohibited.

Seminars are defined very broadly to include any public speaking appearance in which you are involved as either (1) a speaker at the event or (2) an organizer or facilitator of the event (including client appreciation events). Any event in which a presentation is given to more than one client or prospect is considered a seminar. All seminar materials that reference North American or our products must be submitted for advertising review and approval **PRIOR TO USE**.

Advertisements or mailers that invite consumers to attend a seminar that promotes North American or our products, must be submitted for advertising review, along with the content, presentation materials (PowerPoint files, slides, overheads, etc.) and any other handouts that will be distributed to consumers **PRIOR TO OFFERING THESE SEMINARS TO THE PUBLIC**.

**NOTE: North American Contracted Agents are required to meet the Corporate Guidelines for Seminar Selling and required to use disclosure slides and acknowledgment form. Generic seminar materials that do not promote North American or our products by name, feature, or description, are not required to be submitted. However, it is your responsibility to understand and apply all state advertising requirements for any material considered advertising. See page 2 for Generic Advertising for more details.**

## Corporate Guidelines for Seminar Selling

### Use of Seminar Materials

All seminar materials that reference our Company or our products must be submitted for review prior to use as required by our Agent Advertising Guidelines. This would include:

Seminar Invitations	Advertisements promoting seminar	All seminar presentation slides	Outline/talking points/ speaker notes
Mailers	All handout material	Seminar Script	

If you revise any approved seminar material, the revised pieces will need to be submitted for review and approval prior to use. All approvals are effective for 12 months. If you want to continue using the seminar material after approval has expired, you must resubmit the material for a current review.

### Seminar Presentations

All seminar presentations must begin with the required introductory slides (example attached) to identify the presenter as an agent. Avoid using the following terms in seminar material when referring to yourself:

Expert	Investment	Adviser/Advisor*	Specialist	Planner
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Avoid using the following terms in seminar material when referring to a life insurance or annuity product:

Investment or Investment Plan	Retirement Plan	Deposit	Profit
Principal	Free	Interest	Savings or Savings Plan
Private Pension Plan	Profit Sharing	Contribution	

### File Retention

A file should be maintained in your office for each calendar year and must be retained by you for a minimum of six years. This file should include:

- A copy of the seminar and all materials noted above along with documentation of North American ad review approval.
- The dates, times and locations for each seminar
- A list of the names and addresses of all attendees

## Agent Acknowledgment

When you submit a seminar for review, please sign below and submit this page to acknowledge your agreement to abide by these guidelines. Please send it to the advertising email address on page 3.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Agent Name: \_\_\_\_\_ Agent Number: \_\_\_\_\_

\*Please refer to Titles section on Page 10

## Examples of Introductory Disclosure Slides To Be Included In Consumer/Client Seminar Presentations

<b>Example: Disclosure Slide #1</b>	<ul style="list-style-type: none"> <li>Licensed insurance agent in the state(s) of [list of state(s) where license(s) are held]</li> <li>Licensed to sell [insurance, annuities, etc.]</li> </ul>
<b>Example: Disclosure Slide #2</b>	<ul style="list-style-type: none"> <li>This is not intended to be a sales seminar. The purpose of this seminar is to provide you with general information on [subject of seminar]</li> <li>There will be an opportunity to schedule an appointment for an individual consultation at the end of this seminar, which may result in a recommendation of specific financial products that may help you achieve your financial goals.</li> <li>There is no obligation to schedule an appointment or purchase a product.</li> </ul>
<b>Include the text on the slide below if the seminar could ultimately result in the sale or solicitation of the products indicated:</b>	
<b>Example: Additional Information</b>	<ul style="list-style-type: none"> <li>During the course of this presentation or in follow-up appointments, you may hear more about the following types of products. If so, please keep in mind:</li> <li><b>Qualified and non-qualified annuities:</b> Owners of non-qualified annuities are not required to take mandatory distributions due to age. Owners of qualified annuities are subject to the minimum required distributions.</li> <li><b>Fixed Index Annuities:</b> Only guarantee premium against market downturns since a customer can lose premium due to the fees and charges of the product itself, particularly if they surrender in the early years.</li> <li><b>Life Insurance:</b> In exchange for the death-benefit coverage provided, all life insurance products include various costs, such as the cost of insurance, surrender charges, monthly expense charges and premium loads (where applicable). Costs vary according to the product selected.</li> </ul>

## Addendum to Agent Advertising Guidelines Agent/Producer Social Media Policy

### Scope

This Policy is intended as an addendum to the Agent Advertising Guidelines and applies to all insurance producers and agents appointed with North American Company for Life and Health Insurance (the "Company") who wish to use social media in any capacity including sales, marketing and recruiting. Under these guidelines, any promotion of the Company or its products through social media may be deemed advertising, and if so must comply with the Advertising Guidelines and this Policy.

### Purpose

The purpose of this Policy is to provide North American producers, and their employees (i.e. assistants) with requirements and restrictions for advertising via Company sponsored social media or via social media that is supported by the Company, in which a producer affiliation with North American is acknowledged, recognized, or assumed.

### Definition of Social Media

While there are several ways to define social media, the Company defines social media as the participation and dissemination of information through the social interaction of various interconnected websites, whereby communications will be presented, viewed and reacted to in an open public domain.

Social media offers multiple ways to communicate with existing and potential clients via blogging, status updates, and discussion boards, instant, direct, or private messaging. Some of the most frequently used social media sites today are Facebook, LinkedIn, and Twitter, although these are not the only social media websites. Any website that invites users to interact with the site and with other users falls under the definition of social media.

### Types of Content

Social media can be either static or interactive.

**Static content** remains posted and is visible until changed or updated. It is generally accessible to all visitors. The Company views static content similarly to traditional forms of advertising such as print or television. Use of static social media that mentions the company name or specific product(s), must be submitted for approval prior to use and otherwise fully comply with the Advertising Guidelines.

**Interactive social media content** is “real time” content that may involve multiple parties and as such cannot be considered private. Interactive social media may be conversational and responsive to other people. Interactive social media will be treated and viewed as a public appearance. We will not require prior approval of interactive social media unless the Company name or specific product(s) are mentioned. A general posting that references industry news or other useful information, or identifies the agent, as a producer offering insurance products as financial solutions may be acceptable.

As mentioned, while it is acceptable for producers to provide general business information, such as “Independent Insurance Agent Offering Life Insurance and Annuities,” a specific mention of the Company name or specific product names in interactive social media could subject that posting or reference to review under the Advertising Guidelines. Using the Company name for a business purpose requires advertising review and pre-approval. The same process applies to static social media content that mentions the Company name or products. Using the Company name or product names in interactive social media does not discharge the responsibility that you must get prior approval for such usage. All other interactive social media usage will be deemed public appearance and will be reviewed post-use or upon our request.

Anytime an interactive conversation crosses into a request for specific product information or recommendations, it should be immediately taken offline and discussed privately with a potential or current client.

### Recordkeeping

Treat social media as any other form of advertising. It is important that you keep records and documentation that can easily demonstrate compliance with state insurance advertising laws and regulations and Company policy.

### Registered Representatives and Social Media

Registered Representatives are required to comply with the policies and procedures established by his or her broker-dealer regarding the use of social networking sites, which may be more restrictive than the guidelines we have established here.

The use of social networking sites (Facebook, LinkedIn, Twitter, etc) bulletin boards, websites, message boards, or other electronic communication systems on the internet for the purposes of advertising, soliciting business or in any way **communicating about Sammons Financial Network LLC business is prohibited unless specifically approved by the Compliance Department.** As a securities licensed producer, you are responsible for maintaining your records in accordance with Rules 17a-3 and 17a-4 under Securities and Exchange Act of 1934 and FINRA Rule 4510, and any other updates or applicable securities regulations.

### Social Media Personal Use vs. Business Use

Social media use that is personal in nature is outside the scope of this policy. This would include a personal Facebook page or other social media profile that is not used to develop or grow your business.

### General Guidelines for Business Use

The following guidelines will be used in reviewing social media content. Please review them prior to posting or blogging on social media sites. Please note that these guidelines are not meant to be inclusive and additional requirements may apply.

- Current advertising guidelines and policies apply to content and material (status, updates, posts, video, text, audio clips, etc.) posted online. All state advertising regulations and standards must be adhered to when posting information to the Internet.
- All online advertising and sales material that specifically promotes the Company or Company products must be approved prior to use by the appropriate Advertising review teams as outlined in the current Agent Advertising Guidelines. When submitting content for review, please include which social media site will be used, the intended target audience and the intended date of posting said content. As a reminder, content should remain generic in nature. Producers are responsible for the content published on the Internet, including but not limited to blogs, wikis or any other user-generated media. Once material is published it is public and permanent.
- Follow applicable privacy laws and treat sensitive confidential information as such. Do not send confidential unsecured customer information through the Internet. Printing internal company information or confidential information requires permission. Respect and follow copyright laws.
- Be sure to read and comply with Terms of Conditions of all social media sites used.
- Keep the information broad in topic. If a customer desires to discuss the information in more detail, set up an offline meeting or follow up call. Do not make offers for an insurance product or recommendations via a social media platform.

### Best Practices

The keys to success in social media are being honest and being thoughtful before posting, and respecting the purpose of the social media community.

**Be Transparent** – An authorized independent producer for a company should identify him or herself clearly. Never hide an identity for the purpose of promoting a company through social media. Use of social media should focus on a brand as a resource on issues relating to insurance or retirement planning products.

**Be Thoughtful** – Remember that this is a public forum; please do not communicate anything that should not be public knowledge.

**Be Respectful** – As with all forms of communications producers must be professional and respectful in online communications. It is critical to treat the Company, employees, producers, customers and competitors with respect. Do not post any material that is obscene, offensive, profane, defamatory, threatening, harassing, abusive, hateful, or embarrassing to another person or entity. Disparaging remarks and disrespectful communications may result in your Company or producer appointment being terminated.

**Be Accurate** – Be truthful in all marketing. Verify all the facts before disseminating any information. Online reputations are better served by verifying and sourcing the correct information the first time rather than having to post a correction or retraction. Specifically cite sources when possible. If an error is made, correct it quickly and visibly.

**Think Before Posting** – There's no such thing as a "private" social media site. Search engines can turn up posts years after the publication date. Comments can be forwarded or copied. Archival systems maintain information even if a post has been deleted. Ask "How will this look if everyone views it?" before posting.

**Maintain Confidentiality** – Do not post confidential or proprietary information about North American or its employees. Do not use or disclose any policyholder/ annuitant identifiable information of any type on any social media.

Even if an individual is not identified by name within the information, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of law and Company policy.

**Follow Fair Use and Copyright Laws** – Linking to or citing another's work is the best blogging policy. It is essential to respect copyrighted material and to source materials as appropriate. This includes copyright laws for text as well as images, videos, and music.

**Be Responsible** – Agents and their employees are personally responsible for posts, blogs, wikis, or other forms of online communication. Keep in mind that anything written online will remain online for a long period of time.



One of our Company's core values is integrity and the Company expects agents to use personal responsibility whenever participating in online communication in any social media format. This includes breaching the trust of those with whom the agent is communicating. Conduct any advertising or promotion via social media with the same responsibility as is required with written material.

**Uses of Logos, Service, or Trade Marks** – Do Not Use the Company's logo or service mark unless approved to do so by the Company. Any material that may be personally identifiable to the Company must go through the formal ad review process prior to use.

**Do Not Be Confrontational** – If misrepresentations about the Company are identified in the media by analysts or other online communicators, please notify the Company's appropriate representatives. Do not engage in an interactive dialogue with the individual over social media.

### Restrictions of Usage

Disparaging comments about our competitors and sending any material that would be considered offensive or inappropriate is strictly prohibited.

### Monitoring

The Company conducts periodic reviews (including: audits, compliance examinations, risk management assessments) which will include the following subject matter related to social media use: The Company monitors social media outlets and websites for use of Company and product names. If North American discovers its name or the name of its products is being promoted via social media, a review of records for prior approval will be required. Violation of the Social Media policy or Agent Advertising Guidelines could result in the termination of a contract and appointment.

### Failure to Comply

If the Company determines that a representative has violated the obligations under this Policy, the Company reserves the right to take action which may include, among other actions, termination of the contract and appointment. It is important to follow the Social Media Policy and Agent Advertising Guidelines.

### Social Media Content Requiring Pre-Approval

#### Static Content

All content that remains "static" or unchanged on your social media profile page or Company page. This is everything from the photo or graphics used in addition to the descriptions about yourself or your company. Interactive content, also called "posts", "tweets", "pins", or "status updates", depending on the social media site being used, may also be subject to pre-approval.

**NOTE: If you are a Registered Representative, you must comply with your Broker/Dealer's policy, which may include adding particular information and disclosures directly onto your profile, or may entirely prohibit the use of certain social media platforms.** Be sure to review your Broker/Dealer's social media policy for this information.

Regarding LinkedIn Endorsements and Recommendations: it is required that these functions of LinkedIn profiles be turned off for Registered Representatives, and that "Skills and Expertise" keywords be listed as skills in the "Summary" portion of your profile rather than the "Skills and Expertise" section. SEC Rule 206(4)-1 of the 1940 Act (the "Testimonial Rule") prohibits an IAR from utilizing testimonials; given that a recommendation or endorsement on a social media site is considered to be a testimonial. In addition, FINRA Rule 2210 requires that client testimonials be prominently noted as such with specific wording that cannot be adequately added to these sections.

Likewise, the use of "like" or "share" buttons on particular content could be construed as a testimonial or a recommendation. It is advised that agents do not "like", "share", or "comment" on content that would require pre-approval, specifically promoting a company or its products and services. Again, Registered Representatives must consult the social media policy of their Broker/Dealer for specific information about using social media, or any of its features.

## All Promotional Marketing or Advertising

Any content that falls into the category of “advertising” will be subject to the same rules as advertising through any other medium (e.g. print, web, email, video, etc.). Social media is simply a new channel through which content can be communicated. Therefore, if that content is advertising the Company or its products in the following ways, it must be submitted for preapproval before posting, even though it is in the interactive section of the social media site. Such types of posts include, but are not limited to:

- Videos about Products or Sales Concepts
- Marketing Materials (e.g. brochures, post cards, promotional emails, landing pages, Website content, and social media posts) or Any Other Repurposed Content Related To:
  - Products
  - Sales Concepts
  - Company Programs
  - Incentives, Rewards, Bonuses
  - Conferences & Company Events

Social media posts made by North American which promote Company products, services, or sales concepts have been approved for corporate social media use only. If an independent agent or agency wishes to “like”, “share”, or otherwise redistribute social media content or company approved marketing materials that fall under the above categories of “advertising”, they must submit the social media post for approval prior to posting.

While North American encourages our social media community to share our content, it’s important to remember that as a licensed agent, you must abide by the regulations set forth by the entity which governs your license. Therefore, please consider the nature of the content and whether it requires pre-approval thoroughly before sharing it with your own social media network.

Be sure to thoroughly review the entire Agent Advertising Guidelines to make sure your social media content – both static and interactive – adhere to the guidelines for your protection.

## Social Media Content Requiring Archiving for Post-Review

Certain interactive content does not require approval before you post it. However, you must retain records of your content in the event that a post-review is necessary.

### Record Retention

In accordance with the North American Compliance Guide, it is important to maintain, and make available upon request to North American, the insurance department/ division of your state, on any other regulatory agency with jurisdiction, a record of client information collected, whether or not the client elected to purchase a policy. Certain documents should always be maintained. These include:

- Original sales proposals;
- A copy of any needs analysis completed during the solicitation. North American makes a fact finding form available for use by its agents through its Website;
- A copy of any sales material and advertisements used during the sales process, including social media posts and correspondences made through social media platforms via email messaging features (e.g. “InMail” on LinkedIn) or interactive communications (e.g. comments on posts, chat transcripts, etc.);
- Any written correspondence to or from the policy owner regarding the solicitation, issuance of the policy, or subsequent service of the contract;
- Documentation of phone calls to or from the policy owner addressing the above issues;
- Notes from meetings with the policy owner; and
- A copy of the policy owner’s signed delivery receipt, if applicable.

State regulations vary regarding the length of time that client files are to be maintained. However, a general rule of thumb is to maintain all active client files indefinitely and all inactive files for seven years. Visit the Training Center section of [NorthAmericanCompany.com](http://NorthAmericanCompany.com) to view the complete North American Life Compliance Guide for more information.

### Curated Articles from Sources with “Share” buttons

Curating social media content is a best practice for social media content marketing. Curating content means to share articles or other content that may be of value to your particular audience. If articles are open to the public (meaning no subscription is required), and contain social media sharing icons, they are ideal for sharing on social media sites. If the content is general in nature, and does not make recommendations for specific products or investments or promote a specific sales strategy, it is permissible to use curated articles that contain sharing icons. Topics include but are not limited to:

- Healthy Living (fitness, diet, etc.)
- Money Saving (retirement, daily expenses, etc.)
- Stress Reduction & Mental Wellness
- Business Building Tips (e.g. “Why Your Business Must Have A Website”)
- Social Media Tips (e.g. how to use it for business, job searching, recruiting, etc.)
- Other Human Interest Stories (e.g. “Woman Leaves Fortune To Cat” or “Man Saves Child From Burning Building”, etc.)
- Professional Development Tips, Articles, Etc.
- Work/Life Balance Articles
- Other Articles Related To Target Audience (e.g. if you work with professional athletes perhaps you would share content more related to their line of work or interests.)

### Charitable Activities & Community Involvement

If you are involved in any volunteer or charitable activities, sharing those activities on social media is a great way to build your personal brand and to show that you are an active member of your community. From sponsoring little league teams to volunteering a food drives, this type of content would be permissible and require archival for post-review when necessary. If using photos of participants (especially of children), be sure to get their written permission (or the written permission of their parent or guardian) before posting.

### Topical Stock Photos

Stock photos can be purchased on Websites like istockphoto.com for a very low cost, and come with the right to use the photos for things like promotional materials including posts on social media sites. A common practice on social media is to ask a question, and post a stock image associated with that topic, for example:

- Generic Seasonal or Holiday Messaging (e.g. “Happy Independence Day!” with fireworks photo)
- Questions to Prompt Engagement (e.g. “Fill in the blank: I want to retire at age,” with a photo of individuals having fun)

A best practice of social media marketing is to avoid making sales pitches. Instead, use social media to engage with clients or potential clients and show your personality by sharing the types of posts listed in this section. Useful articles, information about community involvement and posting stock photos with questions are generally better received by the social media community.

Posts that promote products and sales concepts can turn an audience off, and they require more planning time because of the pre-approval required. When planning your social media calendar, a good rule of thumb would be to spend at least 90% of your time posting from within this category of content requiring archival only, with only 10% at most falling into the category requiring pre-approval.

Sammons Financial® is the marketing name for Sammons® Financial Group, Inc.’s member companies, including North American Company for Life and Health Insurance®. Annuities and life insurance are issued by, and product guarantees are solely the responsibility of, North American Company for Life and Health Insurance.

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