



Agent Advertising *guidelines*

This guide is designed to provide you with our specific Advertising Guidelines for Americo Financial Life and Annuity Insurance Company (Americo/AFL). As a licensed insurance agent, you are required by your Agent Agreement to comply with the insurance regulations of the states in which you do business. Please refer to your state insurance department’s website for specifics.

We urge you to carefully review this information and incorporate the appropriate regulations into your everyday business practices.

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If you have any questions or comments regarding the material contained in this guide, please contact Agent Services at 800.231.0801 or agent.services@americo.com.

Advertising Review Policy

Home Office approval is required for all advertising materials. This includes advertisements that may not specifically reference our companies or our products by name, but will be used for solicitation of our products.

According to your Agent Application and Agent Agreement, you must obtain written approval for any advertisement used to solicit Americo products before use. State insurance regulations require us to monitor all advertising. In addition, you must keep copies of all

materials, including any items that support the statements in your advertisements.

Due to the changing nature of regulations governing insurance advertisements, Home Office approval is valid for up to 12 months. This time period will be shorter if there are any product or rate changes. After 12 months, or after a change to a product, you must resubmit for approval if you intend to continue using the material.

Definition of Advertising

The National Association of Insurance Commissioners (NAIC) defines advertising as any communication “designed to create public interest in life insurance or annuities, or in an insurer, or in an insurance producer; or to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace, or retain a policy.” - NAIC, Advertisements of Life Insurance, Annuities and Medicare Supplement Model Regulation.

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

- Brochures, flyers, leaflets, prospecting letters, form letters, lead cards, outer envelopes, and mail stuffers
- Material used in direct mail, newspapers, magazines, billboards, and posters
- Internet websites, email and any form of ecommunications, and ecommerce
- Radio ads, television ads, telephone scripts, telemarketing scripts, and DVDs
- Seminars and seminar invitations
- Proposals and illustrations, including supplemental spreadsheets and pages
- Agent training and presentation material
- Agent recruiting materials and ads

Advertising Submission

Secure approval before investing money in development costs, ad space, or airtime. Submit proposed ads to the Marketing Support Department and allow approximately 5 business days for review. One-page ads may be approved in as little as three business days depending on the extent of the content. Multiple-page ads and training materials may take longer. Some states may require ad approval by the state Department of Insurance prior to use. Approval may take an additional 30 to 60 days, and is not guaranteed.

Review the advertising guidelines at the of this guide and mail your request for review to Marketing.Support@americo.com.

Be sure to include everything that will be used in the sale of an AFL or GSL product. This includes scripts for presentations or videos and outer envelopes for mailings.

General Guidelines

The following guidelines will be used in reviewing all advertising. Please review them prior to submitting material for review. Please note that these guidelines are not meant to be all inclusive and 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 Americo Compliance Manual (19-072-1) for information concerning prohibited sales practices and other information.

Accuracy and Truthfulness

- ▶ Ads may not describe provisions and benefits without fairly and accurately describing all limitations, exceptions, or reductions of benefits.
- ▶ Ads should use correct spelling, grammar, punctuation, style, and tone, as well as create an overall positive impression of the company and the product.

Agency Name

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 is an independent, authorized agent of Americo" must appear on the ad. The agency/agent name that is advertised must have an active contract with Americo.

Agent Name

All advertisements and promotional material must include the agent's name as well as a reference to "Independent Agent." Always indicate the licensed agent as the contact person. All consumer ads must have the name of the agent, agency (if applicable), and phone number.

Agent Use Only

If an ad is intended for agent use only, the following disclosure must be included in the bottom left corner of each page of the piece:

"For agent use only. Not for public use."

This disclaimer must be in a font size that has the equivalent readability of Arial 10 pt. type.

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 can 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 12 month period, the ad must be resubmitted for review prior to use.

Business Cards

Americo does not allow the use of business cards that have the Americo or GSL company name or logo on them.

Americo Agent ID cards issued to new agents when they become contracted are not business cards, and should not be used as such.

Company Name

The full name of the underwriting 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 name:

- ▶ Americo Financial Life and Annuity Insurance Company
- ▶ Americo / AFL

Designations

If you are licensed and acting in the capacity of a life insurance agent, do not describe yourself as a “financial consultant,” “advisor,” “counselor,” “planner,” or “benefit specialist” unless you are trained and have earned such a designation. Persons with special training and certification, such as a Chartered Financial Consultant (ChFC), generally can use such credentials in advertising, although several states have stringent rules governing such use.

In addition, the use of professional or senior designations in the sales process and in advertisements is an area of concern for many state insurance departments and regulatory agencies. The issue surrounds the use of senior designations by agents to give the appearance of special expertise, knowledge, or skill when dealing with the public, particularly seniors. Please be aware of the issues and your state’s regulations. Make sure that you understand and comply with the laws of the states in which you solicit business.

Final Copy

We must receive a final copy of all approved 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.

Form Number

We will assign the advertising piece a unique form number upon submission. This form number is used to track your materials so a history of any piece you submit can be maintained. This form number must be added to your piece in the bottom left corner of each page of the piece.

Government Sponsorship or Endorsement

Ads may not mention state guaranty associations or imply state or Federal government endorsements. Do not use emblems or symbols that imply state or Federal government endorsements.

Do not use terminology or symbols that might imply any government connection or endorsement. Ads that discuss government programs such as Social Security, Medicare, or veterans’ benefits, or that use symbols closely identified with the government, such as military insignias, stars and stripes, eagles, or pictures of Uncle Sam, are prohibited. Also, envelopes or packaging that imply a government affiliation are prohibited.

Indexed Product Ads

Advertising of indexed products is highly regulated. The regulations are lengthy and vary by state. Be sure to check your state’s regulations when developing your advertising for these products.

Intended Use

When submitting your ad, always include to whom (audience) and what state(s) the ad will be distributed in.

Internet Advertising

Insurance Department advertising regulations apply to all Internet advertising. You must submit any advertising you would like to post to the Internet, including websites, for written approval. We do not allow the use of specific websites (e.g., Craig’s List, Linked In) to market our products or recruit agents to sell our products. Social Media Guidelines can be found on page 8 of this guide.

Some additional requirements are unique to Internet advertising. Please take these guidelines into consideration before submitting your Internet advertising or website for review:

- ▶ The website or Internet advertisement must contain the name of the person or entity contracted to represent Americo, as well as a business address and phone number.
- ▶ If the website is intended for agents only, this should be clearly noted on each page.
- ▶ The website or Internet advertisement must disclose the states where the person or entity is (or is not) licensed and contracted to solicit insurance products. (Example: XYZ Agency is licensed in WA, CA, & OR).
- ▶ The website must include the agent’s license number in certain states.
- ▶ All product descriptions and information posted must be submitted for review.
- ▶ All product descriptions and information must be updated immediately upon notification of product or rate changes, availability, and other information as required.
- ▶ Any changes in website material must be documented before the website is updated. Screen prints or screen “shots” must be dated, printed, and kept in your own advertising compliance files.

Websites that provide time-sensitive information must have a revision or a “last changed” date.

Lead Letters and Postcards

Letters, postcards, and envelopes that are used to generate leads must be approved in writing and prior to use by Americo, even if the company name is not specifically mentioned. Several states have specific requirements regarding lead letters. For example, the inclusion of a lender name is prohibited in many states. Other states prohibit the lender name from appearing in the window of the envelope. The use of lead letters, even if they are coming from a lead generation company, should be monitored closely. Several states have imposed steep penalties on agents using unapproved or misleading letters. Monitor your state requirements closely and be sure to send all letters, postcards, and envelopes for prior approval.

Logo Usage

Agents who are contracted and in good standing with Americo may request to use an approved Company logo in their advertisement. Agents must follow the Logo Brand guidelines when using the logo. Send requests to Marketing.Support@americo.com.

To use the logo on a website, agents must fill out the linking agreement at www.americo.com/website-linking-agreement.

Opt Out of Email

When sending an email, recipients 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 ask to be removed.”

Pre-Approved Advertising

We provide pre-approved advertising for several of our core products. The pieces include Compliance-approved language and a design that is consistent with our marketing material brand. Utilizing these templates and/or the language provided will decrease the time required for Home Office approval. In most cases, the piece can be reviewed and approved in fewer than 3 business days.

This service is free for contracted Americo Agents. We will provide you with a Press-ready PDF that you can

take to any local print shop to have printed. We do not provide printing or mailing for customized advertising.

Preapproved advertisements can be found on our advertising website, www.Americo.com/ads.

Prior Approval

If an ad being submitted is 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.

Prohibited Terms:

While this list of prohibited terms is not all-inclusive, it provides an idea of what type of words are viewed as misleading or absolutes.

- ▶ “Deposits” or “contributions” when you mean premiums.
- ▶ “Savings,” “equity,” or “investment” when referring to policy descriptions or account features.
- ▶ Words that suggest absolutes, such as “least,” “most,” “best,” “finest,” “unique,” “lowest,” “highest,” “all,” “ideal,” “guaranteed,” “complete,” or “never” unless clearly described and substantiated.
- ▶ “Plans,” “investments,” “savings plans,” “retirement or pension plans,” or “college funding plans” when you are referring to life insurance policies or annuities

Product Clarification

This is the most important requirement for any ad. The type of product, such as term life insurance, Medicare Supplement, universal life insurance, or flexible premium deferred annuity, must be prominent. In ads with a large amount of content, we generally require a disclosure on the first page that explains the ad as it pertains to the product.

If the ad promotes a specific product or rider, the ad must include the product/rider’s formal name and the policy series number (usually in a footnote). See Product Disclosures for more information.

Product Comparisons

Ads may not compare life insurance and annuities to savings accounts, certificates of deposit, or any other financial instruments in such a way as to be misleading or deceptive. Any such comparisons must be complete and accurate.

Product Disclosures

The product(s) being advertised must clearly be identified (see Product Clarification). Any ad promoting any of our products must include a disclosure describing the policy type, form number and underwriting company. A typical product disclosure is as follows:

[Product Name (Policy Series XXX)] is underwritten by Americo Financial Life and Annuity Insurance Company (Americo), Kansas City, MO and may vary in accordance with state laws.

- ▶ All disclaimers and disclosures must be clear, conspicuous, and in a legible font.
- ▶ If promoting add-on benefits and riders, include a disclosure stating they are optional and available for an additional charge.
- ▶ Policies issued on a guaranteed basis or issued with a modified or graded death benefit often require state-specific disclosures. Contact Marketing Support for more information.
- ▶ If a non-guaranteed feature is mentioned, such as preferred loans or interest rates, you must disclose that it is not guaranteed and state how long non-guaranteed rates are available.
- ▶ Advertisements for use in multiple jurisdictions should note the product is not available in all states if that is the case. Avoid the impression that the agency or company is licensed to do business where it is not by indicating where you are licensed in ads that cover multiple jurisdictions.

Ratings and Statistics

Statistics and ratings must be factual, recent (within the past five years), relevant, and should show dates as well as sources. Our current financial information and ratings are updated and available on www.americo.com.

Social Media Guidelines

Americo allows social media advertising on Facebook and Instagram. We will require prior written approval of any social media advertising, including but not limited to status updates, posts, video, text, copy, audio clips, etc., if the intent is to solicit either directly or indirectly, the agents' clients or members of the general public to inquire about, purchase, or otherwise promote Americo, or any of its products and/or benefits. In addition, we will require all of its IMOs and agents to obtain written permission for any distribution to or solicitation or recruitment of agents or potential agents if there is any reference to Americo, its products or benefits or any comparison of Americo with any of its competitors. Americo reserves the right to monitor and control the unauthorized use of its name, mark, or the name or description of any of its products and to take steps to prevent any unauthorized or misleading use of the name, any associated marks, or products.

1. All current advertising policies apply online. All state advertising regulations and organizational branding standards must be adhered to when posting information to the Internet.
2. All content and material (status updates, posts, video, text, copy, audio clips, etc.) posted must be pre-approved.
3. All online advertising and sales material must be approved in writing by the Home Office before use. This includes any modification to approved materials, as well as new material created by an associate or another source such as a colleague or third party.
4. Be aware that when you publish information it will be public. Online activity is permanent. Protect the reputation and privacy of yourself, your clients, your company, and Americo.
5. All activity must be business-related on business-only accounts. Personal activity is encouraged but must be free from specifically mentioning Americo's name, associated products and specific advice.
6. Respect propriety information, content and confidentiality. When dealing with sensitive information use private means of communication. Do not send unsecured, confidential customer information through the Internet. Ask for permission to publish information that is meant to be private or internal to the company. Abide by all copyright, fair use and financial disclosure laws.

7. Keep posts broad in topic. If conversation moves to personal information or product specific requests, set up an offline follow-up meeting for further clarification.
8. Post appropriate disclaimers in designated, Home Office approved areas.

Preapproved social media advertisements are available at Americo.com/ads and Americo.Insuredrip.com

Tax Information

Ads should not unduly emphasize the tax advantages of life insurance products. Using qualifying language such as “in most cases,” “within certain guidelines,” and “our understanding of current tax law” may be helpful when discussing tax treatment. If an ad covers policy loans, withdrawals, or face changes, we typically require disclosures that these transactions may have tax consequences.

If tax issues are referenced in your ad, include the following disclosure: “Neither Americo Financial Life and Annuity Insurance Company nor any agent representing the company can give legal or tax advice. Please consult a tax advisor or financial planner regarding the information and concepts contained in this material.”

TCPA

When asking for a response to an advertisement, you must include TCPA language letting the person know that by filling out and returning the card or form, they will be contacted by an authorized insurance agent. Typical TCPA language is as follows:

“By completing this form, you authorize an insurance agent to contact you by phone, text or fax at the phone number listed to provide automated and/or pre-recorded advertisements. You are not required to sign this to purchase any product. This consent applies to all products currently or in the future marketed or sold by us. This authorization continues until it is revoked by you.”

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:

A.M. Best: “Rating for Americo Financial Life and Annuity Insurance Company (Americo), 2018. Americo Financial Life and Annuity Insurance Company has a financial strength rating of A (Excellent, 3th out of 15 rating categories.) A.M. Best’s rating is assigned after a comprehensive quantitative and qualitative evaluation of a company’s balance sheet strength, operating performance, and business profile. A.M. Best uses a scale of 15 ratings, ranging from “A++” to “F.””

Trademarks / Service Mark

All product and company names registered with a service mark or registered trademark should reflect the applicable symbol.

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Advertising Request Guidelines

To use pre-approved advertising in its existing format with none or minor text modifications, please follow these guidelines:

1. Locate the form number in the bottom left-hand corner of the piece.
2. Email Marketing.Support@americo.com a request to use the ad with the following required information:
 - ☐ Form number of the piece being requested
 - ☐ Contact person and phone number (person requesting the use of the ad)
 - ☐ Americo Agent ID number
 - ☐ State(s) the piece will be used in
 - ☐ Email
 - ☐ Mailing/Return Address (if applicable)
 - If using a Business Reply mailer, please provide the artwork for your business reply permit. If you do not have one, you can obtain one from your local post office. Otherwise, please provide a return address for the postcard.
 - ☐ Website (if applicable)
 - ☐ How the piece(s) will be used
 - ☐ Quantity printed/mailed
 - ☐ Special requests
 - Logo artwork – must be sent electronically in a high resolution .jpg or .eps format
 - New headline or changes to existing headline
 - Any **minor** deletions or additions to copy. Please note that any new text may delay review/approval time.
3. We will assign a new form number for tracking purposes, modify the piece based on the information submitted, and obtain approvals. We will send you an Advertising Approval notice by email with the ready-to-use PDF attached.

To create your own advertising piece utilizing the pre-approved language from a piece, please follow these guidelines:

1. Locate the form number in the bottom left-hand corner of the piece.
2. Email Marketing.Support@americo.com a request to use the ad with the following required information:
 - ☐ Form number of the piece the pre-approved language was taken from
 - ☐ Contact person and phone number (person requesting the use of the ad)
 - ☐ Americo Agent ID number
 - ☐ Contact email address – for Compliance/Approval correspondence
 - ☐ State(s) the piece will be used in
 - ☐ Website (if applicable)
 - ☐ How the piece(s) will be used
 - ☐ Quantity printed/mailed
 - ☐ Include a PDF attachment of the piece that needs to be reviewed by Compliance
 - Please note that new advertisements, although they may utilize pre-approved language, may delay review/approval time slightly depending on the extent of the variation from the original piece. To expedite the review process, please be sure to include all relevant disclosures, as provided in the pre-approved piece. Americo reserves the right to refuse the use of any advertisement or any specific content of an advertisement for any reason.
3. We will assign a new form number for tracking purposes.
4. We will send you an Advertising Approval notice by email.
 - a. If any changes/modifications are required by Compliance prior to use, please modify the piece appropriately and submit a final version to us at marketing.support@americo.com.

To use a piece that you have created, Americo Marketing will coordinate the Compliance Review and Approval process for you. Please follow these guidelines:

1. Email Marketing.Support@americo.com the piece to be reviewed with the following required information:
 - ☐ Contact person and phone number (person requesting the use of the ad)
 - ☐ Americo Agent ID number
 - ☐ State(s) the piece will be used in
 - ☐ Email
 - ☐ How the piece(s) will be used
 - ☐ Quantity printed/mailed
 - ☐ Include a PDF attachment of the piece that needs to be reviewed by Compliance
 - Please note that new advertisements, although they may utilize pre-approved language, may delay review/approval time slightly depending on the extent of the variation from the original piece. To expedite the review process, please be sure to include all relevant disclosures as provided in the pre-approved piece. Americo reserves the right to refuse the use of any advertisement or any specific content of an advertisement for any reason.
2. We will assign a new form number for tracking purposes.
3. We will send you an Advertising Approval notice by email.
 - ☐ If any changes/modifications are required by Compliance prior to use, please modify the piece appropriately and submit a final version to us at marketing.support@americo.com.

Advertising Reminder

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As per your Americo Agent Application and Agreement, you must obtain written approval for any advertisement before use. State insurance regulations require us to monitor all advertising. In addition, you must keep copies of all materials, including any items that support the statements in your advertising. Due to the changing nature of regulations governing insurance advertising, Home Office approval is valid for up to 12 months. This time period will be shorter if there are any product or rate changes. After 12 months, or after a product change is made, you must re-submit your advertisement for approval if you intend to continue using the material. For more information on advertising guidelines, see the Americo Doing the Right Thing Booklet.

If you have any questions or need assistance, please contact Americo Agent Services at 800.231.0801.

Questions and Concerns

For questions and concerns regarding ethical sales practices, compliance laws and regulations, please contact our Compliance Department at 800.231.0801 or regulatory.compliance@americo.com.

For questions regarding advertising reviews, contact Agent Services at 800.231.0801 or marketing.support@americo.com

Submit requests to marketing.support@americo.com for advertising reviews.



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