ADVERTISING GUIDELINES

Advertising and training materials are available from LifeSecure for use in the solicitation of LifeSecure product(s). Any advertising or training material created by the Producer, general agent or managing general agent must be submitted to the Company for approval prior to use.

"Advertising" includes any material, written or electronic, that is designed for distribution to the general public, including but not limited to:

- Print, radio, TV and any form of media advertising (newspaper, magazine).
- Product brochures, circulars, pamphlets and published articles.
- Posters and counter-cards.
- Sales presentations, prepared sales talks, seminar texts, telemarketing scripts and materials.
- Newsletters, research and performance reports or summaries.
- Business cards and letterhead.
- Producer recruiting material.
- Third party software.
- Internet and internet websites or home pages and any other forms of e-commerce including e-mails used for solicitation.
- Letters or post cards use for solicitation or leads.

If a Producer is uncertain whether or not something falls within the definition of "advertising", please contact the Compliance Department for guidance. Without exception, all consumer advertising mentioning LifeSecure by name or referencing any of our products and services, must be approved by Compliance prior to use. This includes products identified by name, description, rate or features.

To ensure the advertising materials are reviewed expeditiously, the following procedures should be taken into consideration. We suggest Producers review the following guidelines prior to submitting any piece of advertising for approval:

- Advertisements may need to be filed with state insurance departments, which will add to the approval turnaround time. The Producer will be notified once the material is approved.
- Due to the changing nature of regulations governing advertisements and sales materials, compliance approval is valid for up to 24 months. This time period may be shorter, if regulations are passed or revised that affect the previously approved material. Upon expiration, the material must be resubmitted for approval if its use is to be continued.
- If revisions to an advertisement are required, Producers must submit a final copy of the advertisement with the revisions to Compliance for final approval and filing.
- A form number will be assigned to all advertisements once the final copy is approved. This form number is to be printed in the lower left hand corner of the ad and is required by state insurance departments for tracking.
- Include the Producer or agency's name as it appears on the agent license. For example, if a Producer is licensed as "John Doe" but is doing business as "City Insurance Club", "John Doe" must appear in the advertisement.
- Always indicate the licensed Producer as the contact person. All consumer advertisements must have the name of the Producer, address and phone number. If the advertisement will be distributed in the state of California, Producers are also required to include their state license number.
- All advertisements must clearly identify the type of insurance being offered (i.e. LTC, Hospital Recovery, etc).
- Do not refer to premium payments as "deposits", "funds" or other banking terms.

- Indicate all product or feature names registered with a service mark or registered trademark, as applicable.
- If an advertisement or training material is intended for Producer use only, be sure to indicate "For Producer Use Only. Not Intended for Solicitation Purposes."
- Any advertisement promoting our product(s) must describe the policy type and form number. A typical disclosure is as follows: "Policy Series XXXX. Insurance is underwritten by LifeSecure Insurance Company, Brighton MI. This product, its features and riders may not be available in all states. Policies have exclusions and limitations. This is an insurance solicitation. A licensed LifeSecure Producer may be contacting you."
- Regulations require that the name of the insurance company must be clearly identified. The insurance company's full name (LifeSecure Insurance Company) and location, as well as logo must be displayed in equal or greater prominence and in close proximity of any other logo or identification.
- Any use of statistics or references to any information from an outside source must clearly identify the source of the information including the name and date of the report or publication. Source information must be current (within 3-5 years).

INTERNET ADVERTISING

Internet advertising includes home pages and all related pages in a Producer website. To submit site and/or page(s) for approval, complete and submit copies of all relevant web pages including all links and instruction for accessing the site online. Note that approval must be received prior to any website "going live". Regulations that apply to print advertising also apply to internet advertising. Since a website is accessible to all consumers, regardless of where they live, internet advertising must comply with the advertising requirements of all states.

- Many websites, including those that market insurance products, may be identified by a marketing
 name that is different than the name shown on the "official" license for the Producer or agency.
 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 office(s) and/or
 state insurance department(s).
- Since information contained on a website can be viewed by virtually anyone, anywhere in the world, include where you are licensed to do business and that you are a domestic U.S. Producer or agency. For example: "John Smith, DBA XYZ CO Insurance Agency, Inc., a domestic U.S. insurance agency licensed to do business in (states)," or "licensed to do business in all states except (states)".
- When including product information that is for Producer/agency use only, please provide the internet address, user ID and password.