



# Revol One Advertising Guidelines

## I. What is Advertising?

“Advertising” for purposes of these guidelines is any content created to generate public interest in Revol One Insurance Company (referred to herein by its marketing name, “Revol One Financial”), its products, and its appointed financial professionals, including content created to encourage purchase of Revol One Financial products. This may include but is not limited to: product brochures, product illustrations, training materials, websites, social media sites, video and audio recordings, seminar invitations and presentations, internet advertisements, radio and television commercials or shows, business cards and letterhead.

Even if you do not intend to create advertising, all content that references Revol One Financial or its products or describes Revol One Financial product features, must be submitted for review and be approved in writing by the Revol One Financial Compliance team prior to use. You should direct approval requests to [compliance-inbox@RevolOneFinancial.com](mailto:compliance-inbox@RevolOneFinancial.com) with the subject “Advertising Approval”. In addition, you should consider contacting the Revol One Financial Compliance team when creating content that can be reasonably expected to result in a sale or potential sale of Revol One Financial products, even if Revol One Financial is not mentioned.

## II. What is not Advertising?

At times, it can be difficult to differentiate between content that is “advertising” and other content. Here are two examples of content that is not advertising:

- Material created for customer service purposes relating to existing contract owners and that does not encourage the purchase of Revol One Financial products; and
- Internal communications from an agency or IMO to financial professionals that are not created to encourage public interest in Revol One Financial or its’ products.

If you have any questions regarding whether a document constitutes advertising or not, please contact the Revol One Financial Compliance Team at [compliance-inbox@RevolOneFinancial.com](mailto:compliance-inbox@RevolOneFinancial.com).

### **III. General Advertising Guidelines**

These guidelines were created to assist financial professionals in understanding important compliance issues, and to help you develop best practices in your business. To fairly conduct business with consumers, you should have a thorough knowledge and understanding of our guidelines, the laws and regulations of the states in which you conduct business, and where applicable, federal laws and regulations, such as from the Department of Labor. Know that we are here to help you with this information as needed. Please do not hesitate to contact the Revol One Financial Compliance team if you have any questions about these guidelines.

#### **A. Accuracy**

- The advertisement must not be untrue, deceptive, or misleading based upon the information included or omitted.
- Revol One Financial products must be described as annuities, and should not be falsely described in any manner to hide or disguise their true nature.
- Products must be approved in the state(s) in which the advertisement will be used, and/or it must be clearly stated that products may not be approved in all states.
- Advertisements may not use non-guaranteed elements in a misleading manner. There can be no suggestion or indication that non-guaranteed elements are guaranteed. All illustrations of non-guaranteed elements must clearly state that they are not guaranteed.
- If the advertisement contains illustrations or statements with non-guaranteed policy elements, it must include similar illustrations or statements with guaranteed elements.
- If crediting rates used are higher than those guaranteed, they cannot be higher than those currently being credited.
- References to projected values of Revol One Financial annuity products must indicate clearly any non-guaranteed elements that may affect such values, including, but not limited to, cap rates, participation rates, market value adjustments, etc.
- References to guaranteed elements or features (e.g. a Guaranteed Lifetime Withdrawal Benefit) must indicate whether the guarantee is subject to any requirements and conditions, and where contractual language regarding those requirements and conditions can be found.
- If the advertisement refers to a product, the product name and form number must be clearly identified.
- Advertising should never suggest that the sale is related to or endorsed by any governmental agency, if not accurate.
- Your relationship with the insurance companies you have contracted with, including Revol One Financial, must be clear.

- If you are conducting business as a “Doing Business As” (DBA), that relationship and the products and services that you are authorized to sell must be clear.
- Certain states have state-specific requirements. Financial professionals who conduct business in these states must familiarize themselves with these requirements. For example, California requires financial professionals selling insurance to include their California insurance license number in all consumer-facing communications such as business cards, letterhead and electronic correspondence (email).
- Material that is not intended for consumers should be labeled with “Financial Professional Use Only” and should not be used with consumers.
- If an agency or financial professional is located in a bank or other financial institution, it should be disclosed that annuities are insurance products, are not deposits in a bank and are not FDIC insured. It should also be disclosed that Revol One Financial is separate from and has no relationship to the bank or financial institution.

## **B. Use of Revol One Logo and Financial Condition**

- Any use of Revol One Financial’s logos must be sent to the Revol One Financial Compliance team for review and to obtain written approval ***prior to use***.
- Unauthorized use of Revol One Financial’s logo is not permitted.
- Information about Revol One Financial’s financial condition, ratings, asset amount, and asset portfolio must be accurate and up to date. Required disclosures as to the meaning of the rating or other information must be included in the advertising.

## **C. Disclosures**

- If disclosures are used, the disclosures must be in a font size sufficient to be easily readable and meet state compliance requirements, if applicable.

## **D. Tax Information**

- General information regarding taxation of Revol One Financial annuity products must state that the reference to tax treatment does not constitute tax, legal or accounting advice, and that the consumer should consult their own legal or tax counsel to confirm how the tax treatment may apply to them.

## **E. Rankings/Ratings, Statistics, Testimonials and Risk-Based Capital (RBC)**

The use of statistics, ratings, or rankings must be permitted by regulation, derived from reliable sources, current, and include all applicable components for consumers to understand. Methodology used in the creation of the ratings, rankings or statistics should be prominently displayed in the same location.

If permitted by regulation, testimonials may be used if they are fair, balanced, and complete, and if they do not exclude key information. Testimonials typically require disclosure that:

- The testimonial may not be representative of the experience of other customers;
- The testimonial is not a guarantee of future results; and
- Disclosure of whether the individual providing the testimonial was compensated for the testimonial.

The use of Risk Based Capital (RBC) is prohibited and may not be used to promote Revol One Financial products.

## **F. Prohibited Statements and Words**

The following are examples of statements and words that are not permitted in advertising of Revol One Financial products.

- Statements that are false or misleading
- Statements that describe annuity features or elements that do not exist.
- Statements that contain material omissions of information that are likely to cause confusion.
- Statements that make false, unfair, or incomplete comparisons to other financial products
- Statements that refer to Revol One Financial's "RBC" (Risk Based Capital) position.
- Statements that disparage competitors of Revol One Financial.
- The words "CD annuity", "certificate of annuity" or "risk free"
- Using the words "savings account", "savings plan", or "retirement plan", when referring to an annuity.
- Use of "no fee" if there is a surrender charge or if fees are otherwise built into the product design.

## **G. Use of Professional Designations**

Financial professionals selling Revol One Financial annuity products should not hide, disguise or otherwise misrepresent their intention to sell insurance products. Additionally, only professional designations that involve a rigorous curriculum and are recognized in the industry should be used by financial professionals. Financial professionals should never use a designation that may mislead a consumer. Certain states also may have prohibitions against the use of certain professional designations. Financial professionals should become familiar with any applicable state restrictions regarding professional designations. It is the financial professional's responsibility to ensure any professional designations or licenses remain in good standing.

## **H. Failure to Comply with Laws and Regulations**

Failure to comply with laws and regulations applicable to advertising of annuities can result in fines or other sanctions by regulators. Monetary fines may be assessed against a financial professional and/or a carrier. Also, the insurance license of a financial professional and/or carrier could be restricted, suspended, or in severe cases, revoked. Regulators may also require that all future advertising be submitted for their prior approval before use.

## **I. Maintenance of Advertising Files**

State laws may require that financial professionals keep final copies of all advertisements along with related materials for a period of time following the date of last use. Financial professionals must be familiar and comply with any such requirements.

Revol One Financial™ is the marketing name for Revol One Insurance Company. Revol One Insurance Company is responsible for its own financial and contractual obligations. Revol One Insurance Company is not authorized to conduct business in the state of New York.