



Social Media Policies and Procedures

The Leaders Group, Inc. welcomes the use of social media sites such as Facebook, Twitter and LinkedIn by its registered representatives as a means of contacting existing and prospective customers. The purpose of these policies and procedures is to detail how these sites can be used while remaining in compliance with all applicable rules and regulations.

Social media communications are subject to the same compliance standards as written communications. Specifically, they are subject to FINRA review, recordkeeping, and filing requirements. SEC Rule 17a-4 requires the firm to preserve copies of all such communication relating to the member's business for a minimum of three years.

FINRA Rule 2210 stipulates that all communications must be fair and balanced, with no misleading statements or omissions of material information. Further, any false, exaggerated, unwarranted, promissory claims or guarantees are prohibited.

All static content needs to be reviewed and approved by compliance prior to the initial use. Any new profile content must be approved prior to posting.

All LinkedIn individual pages are required to be archived. However, please note that company pages containing non-investment related content, such as items relating to fixed insurance, do not need to be archived. No solicitation of business is allowed on any social media site. Avoid making recommendations, endorsements and promotions of any specific products or services.

Finally, please keep your business page separate from your personal page. A profile or page created for professional use must be used only for professional activities. Personal profiles or pages must be used only for personal activities. Recognizing this difference will keep The Leaders Group from any intrusion into your personal life.

Cost of monitoring social media content

The Leaders Group, Inc. uses Global Relay as its third-party vendor to capture and archive social media content. All representatives who elect to use Twitter or LinkedIn individual pages for business purposes must sign up with Global Relay so that their content can be archived electronically. The cost for this service is included with the compliance and technology fees. The use of Facebook or LinkedIn company pages is not included and is subject to an additional fee of \$45.00 per quarter per page. Please reach out to the Compliance team, compliance@leadersgroup.net, to have this set up.

The Leaders Group will search for Social Media accounts periodically. If you are found to have a social media account containing securities keywords or a LinkedIn individual page, a link will be sent to your archived email address for you to immediately sign up through Global Relay or remove your securities-related content. Non-compliance with our social media policies is grounds for having your payment withheld, fines, and if chronically ignored, termination.



Required disclaimers:

The Leaders Group disclaimer must be included in one of these formats:

Securities offered through The Leaders Group, Inc., Member FINRA/SIPC, 26 W Dry Creek Circle, Suite 800, Littleton CO 80120, (303) 797-9080

On individual LinkedIn pages under Summary, Certifications or Education, it should say **Registered Representative of The Leaders Group, Inc. Member FINRA.**

If you are with TLG Advisors as well, this disclaimer must be used:

Securities and Investment Advisory Services offered through The Leaders Group, Inc. Securities Dealer, Member FINRA/SIPC; TLG Advisors, Inc. Registered Investment Advisor; 26 W Dry Creek Circle, Suite 800, Littleton CO 80120, (303) 797-9080

Please make sure to check regulations for any additional rules specific to your state

Legal or Tax Disclaimers

Make sure your pages contain the proper securities disclaimers. Any other discussions concerning tax or legal issues must also contain disclaimers about obtaining independent tax or legal advice. Contact The Leaders Group Compliance Department for further information about these disclaimers.

Sharing of Information

Personal, private, or confidential information about clients, carriers, fund companies, publicly-traded companies, or The Leaders Group or its affiliates may not be shared. Information must be accurate, authentic and factual.

Enforcement of policies

We will be reviewing all usage on a regular basis. Any deviations from accepted policies may result in disciplinary action, including warnings and leading up to other penalties such as fines or, in certain cases, termination for cause.

Procedures for getting started

For individual LinkedIn pages, a member of the compliance team will send you a request to archive your LinkedIn page to your archiving email address during your on boarding process. You will need to click on this link and login using your LinkedIn username and password. This will need to be renewed each calendar year after the archiving has been initiated.

For company Facebook and LinkedIn pages there is an authorization form on the Leaders Group website that will need to be filled out prior to the archiving being set up. Once this information has been received, Global Relay will reach out to the admin of the page to set up the archiving. Please follow their instructions for signing up for archiving for these pages.. You may **not** use your personal Facebook page for your investment related page, and we do not allow the use of individual Facebook pages. You will need to create a new business page if necessary. Once your page has been posted, contact the Compliance Department at (303) 797-9080 or



compliance@leadersgroup.net so that it can be reviewed. If it is deemed as being used for securities business, the site needs to get set up for archiving through Global Relay.

Appropriate usage

- Never represent yourself or The Leaders Group in a false or misleading way. All statements must be true and not misleading; all claims must be substantiated.
- Post meaningful, respectful comments — in other words, please, no spam and no remarks that are off-topic or offensive.
- Use common sense and common courtesy: for example, it's best to ask permission to publish or report on conversations that are meant to be private or internal. Make sure your efforts to be transparent don't violate privacy, confidentiality, and legal guidelines for external commercial speech.
- Stick to your area of expertise
- When disagreeing with others' opinions, keep it appropriate and polite.
- If you want to write about the competition, make sure you behave diplomatically, have the facts straight and that you have the appropriate permissions.
- Please never comment on anything related to legal matters, litigation.
- Be smart about protecting yourself, your privacy, and The Leaders Group confidential information. What you publish is widely accessible and will be around for a long time, so consider the content carefully.
- Respect copyright and plagiarism principles. Cite the sources you use and attribute quotes.
- Please be aware that anything you post or write, even private messages, is considered communications with the public and open to regulatory review.

Prohibited content

- Specific buy/sell recommendations.
- Referring to past investment recommendations.
- Promises about future performance.
- Discussion of specific investment-related questions on your Facebook or LinkedIn page. Call them back or use email.
- Publication of any client information, including addresses, phone numbers, account/policy numbers, social security numbers, passwords, PIN numbers, etc.
- Personal client information. Both Facebook and LinkedIn invite you to upload your email address books to their sites so that you can invite your contacts to be your “friends” or “connections.” However, if your account is hacked, then your customers’ information could be compromised.
- Recommendations from clients. These are considered testimonials, which are not permitted.
- If you are also with TLG Advisors: no recommendations/testimonials are allowed, regardless of who they are from.
- Any untrue, misleading, or exaggerated statements. Avoid terms like “always”, “never”, “the best”, “guaranteed”, etc.



Next steps

- Make sure the privacy settings on your business profile allow it to be seen by all. If people can't find you, the profile isn't doing any good.
- Take advantage of content sources; sites such as Emerald or Advisor Square offer FINRA-compliant content.
- News or magazine articles can generate interest, but make sure they aren't discussing a specific company or investment.
- Once you are posting content, keep track of the feedback you receive and adapt accordingly.

Above all, use common sense: your social media site reflects on you AND The Leaders Group. Don't post items of a political, religious or otherwise inappropriate nature.