



Website guidelines

Websites are viewed by FINRA as advertisements, in that they are accessible to the general public. They also can serve as a communication medium and a "place" to conduct business. Prior to the establishment of a website separate and apart from the Firm, a detailed description, site map, and page layout must be submitted (via link or PDF) to the compliance department for approval. We prefer you use an approved provider for your website that will not publish without compliance approval. Contact the compliance department for approved providers.

The site must continually adhere to and contain all disclosures required under FINRA requiring a hyperlink to the FINRA website (www.finra.org). If the website requires a customer to enter any personal information, the site must be secure or provide clear notice that it is not secure.

As with other advertisements, the website is subject to the general and specific standards of communications with the public in FINRA Rule 2210:

- Fair and balanced content with no omission of material facts
- No false, exaggerated or misleading statements
- No guarantees, implications or predictions of performance of any security or investment product

Representatives also must retain and be able to reproduce all historical content within the site for a minimum of three years. Each page of the website should be saved as a PDF, kept on file, and provided to the Firm for retention purposes.

Whenever updates are made to a website, representatives are required to seek prior approval from the compliance department and save the new page(s) in their records. Representatives are responsible for all fees involved in the website review process. Use of hyperlinks will be reviewed on a case-by-case basis.

To have sites approved by Compliance, representatives should choose one of the following methods:

- Representatives with a current version of Adobe Acrobat can simply save the page as a PDF file. Either click the "Convert Web Page to PDF" icon on the Google toolbar or select Save As in the File drop-down menu and save the page as a PDF. Email all pages to Compliance for approval.
- Representatives who are unable to save the web pages to PDF can submit screen prints of the required pages. To do this, click the Alt-Print Screen buttons simultaneously – this will save a copy of the screen. Then, on a blank Word



document, right-click and select “paste.” Save the screen print the same as any other document. Email the documents to Compliance for approval.

- As a last resort, a representative may print the necessary pages, scan and email or fax directly to Compliance. Be sure to print the entire page.

If Compliance requires additional information, the representative is expected to comply.

Whenever updates are made to a site or page mentioning securities business, representatives must obtain prior approval from the compliance department and email the new page to the Firm after the update has been made.

Whenever a discussion of any investment product is made, appropriate disclaimers must be included.

Securities Disclaimer:

Securities offered through The Leaders Group, Inc. Member FINRA/SIPC, 475 Springfield Ave, Summit, NJ 07901. 303-797-9080.

Securities and Investment Advisory Disclaimer:

Securities and Investment Advisory Services offered through The Leaders Group, Inc. Securities Dealer, Member FINRA/SIPC; TLG Advisors, Inc. Registered Investment Advisor; 475 Springfield Ave, Summit, NJ 07901. 303-797-9080.

Insurance Disclaimer:

This is not an offer to sell or a solicitation to buy in any state the representative is not securities registered and insurance licensed in.

FINRA Guidance is available at

<http://www.finra.org/web/groups/industry/@ip/@reg/@notice/documents/notices/p120779.pdf>