



## **Marketing, Promotions and Advertisements Procedure**

### **Requirement:**

The Marketing Department (“Marketing”) will intake, review and respond to all requests made for marketing or promotional materials (the “advertisement”). Marketing will provide Compliance and Legal Departments with completed products that adhere to Citadel Servicing Corporation (“CSC”) Marketing Policy and Procedures for final review before releasing any advertisement. Marketing will store produced advertisements in their original formats in central system.

### **Initial Request:**

Upon receiving a Marketing Material Request Form from a CSC employee, Marketing will conduct an initial review of the request to ensure that all required fields are filled. Marketing will then develop the requested advertisement in accordance with the CSC Marketing Policy and Procedures.

### **The Advertisement**

The marketing team has complete creative control in developing the advertisement. However, the advertisement should be reviewed prior to submission to Legal and Compliance, for all, but not limited to, the following:

- Advertisement is clear, concise and conspicuous
- Statements of fact are substantiated
- identify on the advertisement the duration and expiration of the advertisement
- All applicable and appropriate disclaimers are used
- All licensing information is displayed legibly and is easily discernable
- The HUD logo or legend is included (printed-advertisements)
- Trigger terms are properly explained
- Any claimed promotions or benefits are properly explained
- If the advertising is being sent via email, an opt out notice will be required.

The Marketing team will strive to complete an advertisement within ten (10) to twelve (12) business days of receipt of a request and provide three (3) business day for Legal and Compliance review and approval.



## **Submission and Processing**

Once the advertisement is prepared for review by Legal and Compliance, a marketing team member will submit the advertisement into the “Submitted for Review” folder, located within the “Compliance Review Process” folder, which is housed in the Marketing Drive.

The marketing team member will then send out an email to: [marketingcompliance@citadelservicing.com](mailto:marketingcompliance@citadelservicing.com). The email will inform Legal and Compliance that there is marketing material awaiting their review.

**If approved**, a Legal or Compliance team member will place the advertisement within the “Reviewed Approved” folder, located adjacent to the submission folder and respond to the initial email informing all members that the advertisement is compliant.

**If revisions are needed**, the advertisement will be placed within the “Reviewed Updates Required” folder, located adjacent to the submission folder. The Legal or Compliance member will respond to the initial email informing the Marketing team member that revisions are required and provide specific instructions on how to make the advertisement compliant.

When required changes have been made, the Marketing team member will place the material into the “Submitted for Review” folder with an ascending version number to denote that this is a follow up review. The above process will continue until the material is found to be compliant with the Marketing Compliance Policy.

When no further revisions are needed, a Legal or Compliance team member will place the advertisement within the “Reviewed Approved” folder and respond to the initial email informing all members that the advertisement is compliant.

Once Legal and Compliance review is complete, the Marketing department will note on the advertisement, the appropriate Compliance and Legal approval date alongside the advertising naming convention. Once all the final updates have been completed, the advertisement may be distributed in accordance to the dates of circulation listed on the advertisement.

## **Storage**

The Marketing Department will track ongoing advertisements for pending expirations and develop a central storage system for them. Furthermore, the Marketing Department **MUST** maintain all produced advertisements in their original formats for a minimum of five (5) years after their date of final use.

## **Opt-Out Management**

Advertising sent via email will require an “Opt-Out” feature that will allow consumers to opt-out from receiving further marketing material. The Marketing Department will be required to manage a “No Email Marketing List” to ensure compliance when the opt-out function is communicated.