

Social Media Policies & Guidelines

World Financial Group Insurance Agency, LLC

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A Transamerica Company



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Section I

Policies

Introduction

Licensed agents and unlicensed associates of World Financial Group Insurance Agency, LLC* (WFGIA) may choose to access social media services and social networking websites through third-party IT systems or via your own personal equipment. The social media policy described within this guide sets forth the rules governing the use of social media by you as a WFGIA agent in connection with your WFGIA business, or as an individual who is associated with WFGIA. Specifically, this policy documents a WFGIA agent's and associate's use of social media accounts when talking about and/or promoting WFGIA or your respective businesses.

NOTE: Agents who are also registered representatives (RRs) or Investment Advisor Representatives (IARs) of Transamerica Financial Advisors, Inc. (TFA) and intend to use social media to promote their TFA business must adhere to TFA's Social Media Guide. This includes submitting their social media profile(s) to Advertising Compliance for approval and connecting their social media account(s) to TFA's archiving tool. TFA RRs may only use LinkedIn, Facebook, or X (formerly Twitter).

Why This Policy Exists

Agents who use social media to promote their WFGIA business must do so in a professional, ethical and accurate manner. A false or misleading statement can generate complaints or damage WFGIA's, and thereby WFG's, reputation. There are also security and data protection issues to consider.

* This includes agents of World Financial Group Insurance Agency of Hawaii, Inc., World Financial Group Insurance Agency of Massachusetts, Inc., World Insurance Agency of Puerto Rico, Inc., and World Financial Insurance Agency, LLC, in California.



Policy

This policy applies to all business use of social media.

The current approved social media platforms for WFGIA agents are:

- Facebook but not Facebook Live
- Instagram but not Instagram Live
- LinkedIn
- X (formerly Twitter)

Use of social media platforms not on the approved list are prohibited, and include, but are not limited to:

- TikTok
- Snapchat
- Facebook Live
- Instagram Live
- WhatsApp
- WeChat

Please note that WFGIA Compliance will review and approve/disapprove the use of other social media sites on a case-by-case basis.

YouTube

In comparison to other social media, we consider YouTube to be a unique social site. Although it's not a prohibited social media channel, the use of it by agents is very restricted. When using YouTube, you:

- Cannot post any recordings taken during WFGIA or any of its company events, e.g., general sessions at convention.
- Cannot post any content related to securities.
- Can only share/post content from other sources if you receive permission from the source and it meets the two previous criteria.
- Must have Advertising Compliance approval prior to posting any content, including anything related to types of insurance products (e.g., term, whole life, IUL) and recruiting to WFGIA.



Content Standards

All content posted on social media must adhere to these content standards.

- Use fair and balanced language.
- False, misleading, promissory, exaggerated, or unwarranted statements or claims are prohibited.
- Do not omit material information.
- Do not misrepresent or oversimplify the income opportunity.
- Statements must be clear and provide a balanced treatment of risks and potential benefits.
- Communications must be appropriate for the audience.
- As an agent you are representing yourself, your business and WFGIA, and, as such, posts made under this policy must be respectful, professional and polite.

Regardless of the social network used, the following rules apply:

- All social media postings must conform to the site's terms and conditions and any other applicable rules established by the site.
- Posts that violate insurance laws, regulations, WFGIA policies, the agent's agreement with WFGIA, or that could lead to client confusion or complaints are prohibited.
- When using social media, be familiar with security threats and reasonably act to prevent such threats to WFGIA's information or clients. Be aware of social engineering and phishing attempts, and that social networks can also be used to distribute spam and malware.
- Do not speak on behalf of WFGIA or any of its affiliated companies.
- Do not make disparaging or defamatory statements about WFGIA, its employees, clients, customers, suppliers or competitors.
- Do not publish, post or release any company information that is considered confidential or non-public.
- Do not post about any investment-related topics.
 - Agents who are RRs or IARs of TFA must follow the broker-dealer's policies and procedures governing the use of social media for TFA business purposes.
- Do not post recruiting information as employment opportunities or job offers. The use of words such as "hire" or "employ" are not allowed as all WFGIA agents are independent contractors that are recruited into WFGIA. This prohibition includes not using the LinkedIn functionality to add "#hiring" to your profile picture.
- Do not publish or post statements that endorse or promote a specific product, service or product provider. This also includes statements about commissions, payouts, etc.
- Social networks are not the place to resolve complicated inquiries and client issues so, after a client makes contact, you should determine the appropriate channel to continue the discussion (e.g. email or telephone).
 - Client complaints of any kind must be reported to WFGIA Compliance.
 - If a client's message is hostile, offensive, etc., or it appears to be a complaint, do not attempt to resolve the matter yourself. Please escalate it to WFGIA Compliance.

Social Media Principles

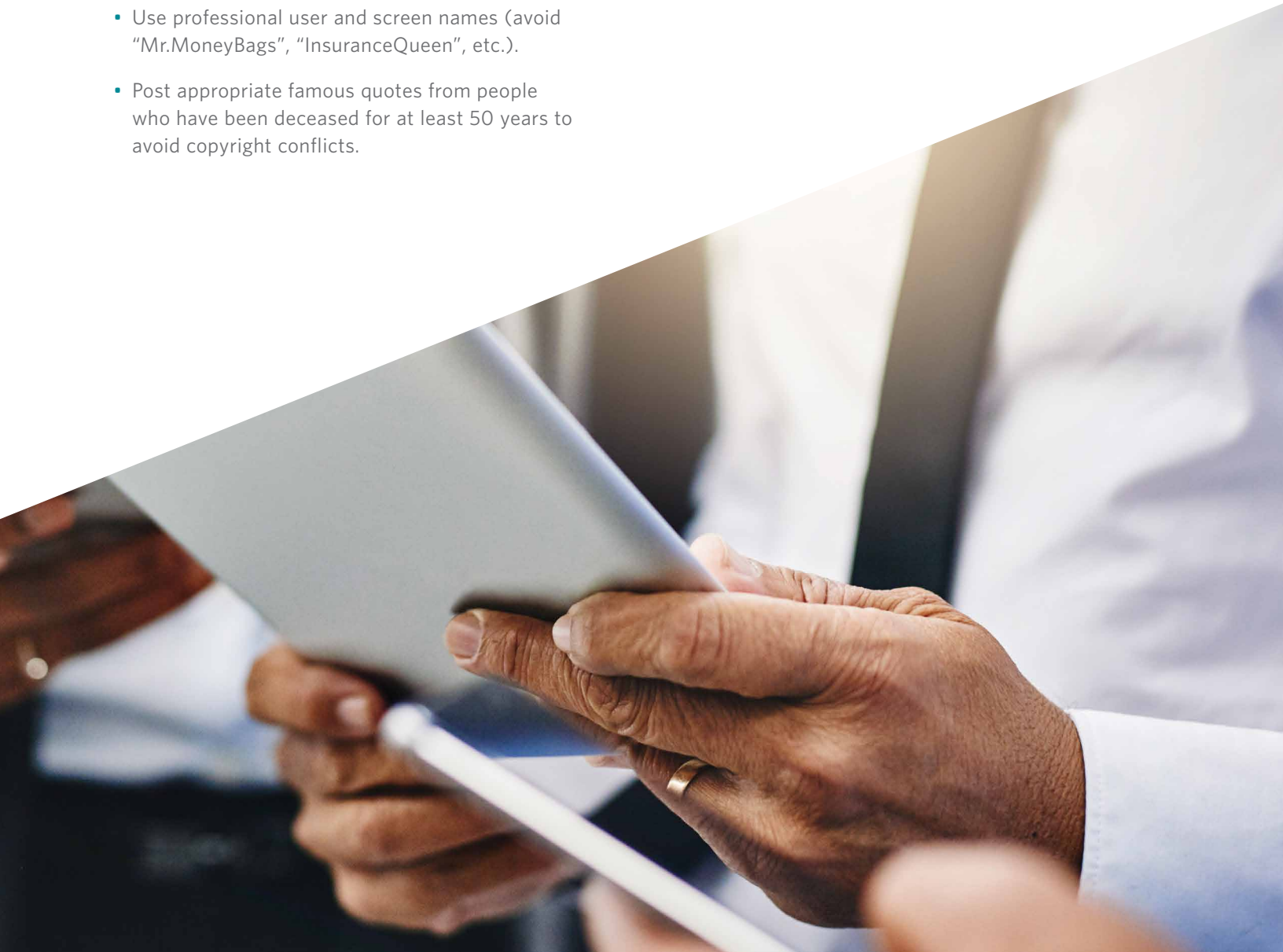
These principles apply to all WFGIA agents/associates who use social media.

- Be aware of the effect that your posts may have on your image as well as on the company's image. The information posted or published may be public for a long time.
- Use your best judgment in posting material that is appropriate and not harmful to WFGIA or its clients. Be aware that WFGIA Supervision will periodically observe content and information posted on social media, and will investigate and respond to violations of this policy and other related policies. Although not an exhaustive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are discriminatory, defamatory, pornographic, proprietary, harassing, intimidating, lewd, offensive, coercive, abusive, libelous, or are otherwise unprofessional.
- Obtaining permission to use a third-party's copyrights, copyrighted materials, trademarks, service marks, or other intellectual property is required.
- Keep business-related social media accounts separate from personal accounts.
- Do not publish, post or make comments about WFG/WFGIA, Transamerica or Aegon that imply that you are an employee of any of the companies.

Content Do's

Consider the following social media content strategies.

- Repost images and text posted by the company.
- Post content provided to you by Marketing. (<https://www.mywfg.com/social-media>)
- Post images of you with your team with their permission.
- Tag team members in your posts with their permission.
- Post images of business-related events.
- Use your WFG title (e.g., SMD, EMD, etc.) or simply Financial Professional.
- Use professional user and screen names (avoid "Mr.MoneyBags", "InsuranceQueen", etc.).
- Post appropriate famous quotes from people who have been deceased for at least 50 years to avoid copyright conflicts.
- Post messages of gratitude and appreciation.
- Offer sentiments of encouragement and recognition.
- Share appropriate photos of personal achievements and activities.
- Pay attention to what followers are commenting/saying about your posts.



Content Do Not's

Social media activities to avoid

- Do not include Financial Planning or Estate Planning in your profile, skills, or posts as WFGIA does not offer these services.
- Do not commingle any personal business (e.g., that you're a Realtor) with a social media account used for WFGIA business.
- Do not post financial advice.
- Do not post private/personal client information.
- Do not post personal contact information or details.
- Do not publish any unapproved branded material.
- Do not post images of corporate executives or staff members who did not give you permission to share them publicly. Do not tag corporate executives or staff members in your photos without their permission.
- Do not publish images that you didn't capture with your own mobile device or that you don't have permission to post.
- Do not use Team names in social media profiles or other public facing activity.
- Do not post images from Google or from other public sources.
- Do not post confidential material, checks, policies, client payouts, etc.
- Do not post images of clients without their permission.
- Do not post advertisements, invitations, programs, promotions, corporate branded imagery or event material that is not approved by Compliance.
- Do not address customer service issues publicly; refer these issues to WFGIA Compliance.
- Do not use promissory hashtags, e.g., #MillionairesClub, #AmazingIncome, etc.

Violations of Social Media Policy

Public social media postings can be viewed by anyone, including other agents, consumers, clients, regulators, and others associated with our company. WFGIA and its affiliated companies reserve the right to monitor and review comments or discussions about WFGIA and its affiliated companies, employees, other agents and associates, consumers, clients, and the industry, including competitors. WFGIA management will review the post to determine the severity of the policy violation and the appropriate level of corrective action to take.

Corrective action taken may include:

- Additional training
- Letter of caution
- Fines
- Suspension
- Heightened supervision
- Termination of WFGIA affiliation and Agent Agreement (or Affiliated Associate & Non-Disclosure Agreement for unlicensed individuals)



Section II

Best Practices

Social Media Services Delineations & Suggested Uses

Below are suggested uses for agent-approved social media channels.

LinkedIn

The primary professional social network for developing business connections and online forums. Consider using LinkedIn to:

- Develop business connections and communication.
- Discover professionals with whom you have similarities.
- Contribute appropriate value to various discussion groups.
- Foster new relationships through authentic engagement.

Caution: Any prospecting on LinkedIn should be truthful, transparent and professional. Avoid false, misleading, or inappropriate claims, promises or offers.

Instagram

A public forum for sharing photos, videos, stories, and comments. Suggestions for using a public account is to:

- Recognize business relationships.
- Share happenings at business-related events.
- Recognize your team/members of your team.
- Share appropriate personal imagery (family, friends, hobbies).
- Share content provided to you by Marketing.

Caution: Posts on Instagram should be images or video that you have captured on your own mobile device and have permission to upload, or approved corporate content that has been provided to you.

Facebook

This social platform's strength is building community and sharing information pertinent to a group. The recommended use of this social channel is for team communication and development in a *private* group. Use it to:

- Discuss team goals, news and recognition.
- Organize and plan team events.
- Provide mentorship and coaching from top leaders.
- Develop community and connections.

Caution: If you use a business Facebook page, your posts and comments should only contain factual information, updates for events and approved material relating to your business.

X (formerly Twitter)

A popular social channel best used to publish short, timely expressions to followers. Consider using this real-time communication outlet to post:

- Professional and business status updates.
- Appropriate team news, recognition and greetings.
- Business event details and happenings.
- Reposts of official WFG posts.
- Content provided to you by Marketing.

Caution: You are responsible for your own posts as well as posts you repost.

Benefits

There are a variety of advantages for using social media.

Social media can:

- Foster connections between leaders and team members.
- Develop community among your team members.
- Establish your leadership position among team members through encouragement, gratitude and recognition.
- Inform your team members about business-related matters and events.
- Create confidence with clients via approved, company-provided material.
- Promote a positive public perception of your professionalism and value proposition.
- Maintain a positive association between you and WFGIA's corporate brand and image.



Develop Your Strategy

Because social media activity reflects your professional image, keep these questions in mind before posting to any channel.

- Am I following the Social Media Policies & Guidelines?
- Could posting this image/graphic/information hurt the reputation of the WFGIA brand that I represent?
- Am I supporting the marketing efforts of WFGIA as a whole?
- Is this confidential information?
- Am I being fair, respectful and accurate?
- Do I have permission to post this item?

Shape your social media strategy by considering the following techniques and directions:

- Create separate accounts for each approved social media channel – one for personal use and one for professional use.
- Choose your social media channel based on your audience and objectives. You don't need to be present on all social media platforms.
- Develop a posting schedule that is frequent enough to keep followers engaged, but not so frequent that you spur unfollows or complaints.
- Be your best professional self rather than trying to copy the style/persona of other professionals or celebrities on social media.
- Avoid the temptation to use social media to sell.
- Measure success by how many of your team members and clients follow you and how many positive responses you receive, rather than your total number of followers and responses.
- Write down a description for the kind of reputation and community you want to develop before launching your social media strategy and let it act as a guide for future posts.
- If a social dialogue ever threatens to become hostile, it is recommended that you disengage in a polite manner.
- Incorporate variety by integrating compliance-approved corporate graphics with your own images and messages.

Resources

Be sure to read the policies in the FAQ sections of these social media channels.

Each of these sites have additional policies that WFGIA agents are expected to adhere to as users of these social media channels.

- Facebook
- Instagram
- LinkedIn
- X (formerly Twitter)

If you have any other questions, please contact WFG-TFAFieldAdvertising@transamerica.com.



World Financial Group Insurance Agency, LLC (In California, doing business as World Financial Insurance Agency, LLC), World Financial Group Insurance Agency of Hawaii, Inc., World Financial Group Insurance Agency of Massachusetts, Inc., and/or WFG Insurance Agency of Puerto Rico, Inc. (collective WFGIA), offer insurance products.

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