

**Guarantee Trust Life Insurance Company**  
**ADVERTISING POLICY**

As part of our continuing efforts to ensure that all advertisements, sales materials, and illustrations promoting Guarantee Trust Life Insurance Company's products are unambiguous, honest and fair, we require all of our licensed distributors to be familiar with, and adhere to the following rules. Lack of compliance may be grounds for termination of appointment or contract.

- I. Distributors cannot generate or use any advertising or sales material which bears the name or logo of GTL and/or promotes any of our specific policies without securing GTL's Compliance Department's prior written approval of content, form, and method of dissemination.**
  
- II.** Advertisements and sales materials include, but are not limited to:
  - A. Printed and published material, sales aids, leaflets, booklets, brochures, audio visual material and descriptive literature used in direct mail, newspapers, magazines, radio and television scripts, telephone scripts, presentation summaries, projections, billboards and similar displays intended to promote the purchase, modification, or reinstatement of a policy.
  
  - B. Material used for the recruitment, training, and education of distributors.
  
- III.** Advertisements and sales materials must be truthful. Content must be sufficiently clear so as not to mislead or deceive.
  - A. The use of statistics, illustrations and statements which may be factually correct are not acceptable if their impact misleads or deceives.
  
  - B. Information required to be disclosed must not be minimized, rendered obscure, presented in an ambiguous manner, or intermingled with text so as to be confusing or misleading.
  
  - C. The tendency to mislead or deceive will be determined by the overall impression the advertisement or sales material creates on a person with little knowledge of insurance matters.
  
- IV.** The accompanying Advertising Submission Form must be used prior to submitting advertising or sales material to GTL for approval.
  
- V.** Illustration software provided by GTL must not be altered in any manner, except under written instruction.

**Please review this policy carefully. You must adhere to it at all times.**

**GUARANTEE TRUST LIFE INSURANCE COMPANY**  
1275 Milwaukee Avenue, Glenview, IL 60025

**ADVERTISING SUBMISSION FORM**

TO: \_\_\_\_\_ DATE: \_\_\_\_\_  
Line of Business Manager

FROM: \_\_\_\_\_  
Name Agency

**REVIEW CHECKLIST for ADVERTISING and ADVERTISING POLICY BEFORE  
SUBMITTING to GTL.**

This form must accompany every advertisement submitted to GTL for approval as required by General Agent Agreement.

---

Intended Use of Advertising:

Product Name and Form/Plan Number: \_\_\_\_\_

- Print Media Ad                       Sales Presentation                       Broadcast Media  
 Telemarketing                       Contact Letters                       Other

STATES WHERE ADVERTISEMENT WILL BE USED: \_\_\_\_\_

\_\_\_\_\_

DATE ADVERTISEMENT WILL START TO BE USED: \_\_\_\_\_

AGE OF INTENDED MARKET: \_\_\_\_\_

---

Home Office Use:

	INITIALS	APPROVED	DISAPPROVED (EDITS SHOWN)	DATE
LOB/Marketing:	_____	_____	_____	_____
Regulatory Compliance:	_____	_____	_____	_____

## Checklist For Advertising Material

This Checklist is for your use as a worksheet in preparing advertisements for Home Office approval. Items on the Checklist are based on the most commonly applicable state laws and rules governing the advertising of insurance products. Compare your advertising with the sections on this worksheet applicable to your piece. Check "Yes," "No" or "NA" (not applicable). Make changes to statements marked "No" before sending the advertisement to the Home Office for approval.

### Corporate Identity and Logo

Yes   No   NA

\_\_\_   \_\_\_   \_\_\_   Our full name, *Guarantee Trust Life Insurance Company*, is used in the first reference.

\_\_\_   \_\_\_   \_\_\_   Initials are used only in the place of the Company name if mentioned parenthetically in the first reference.

### Accuracy and Truthfulness

Yes   No   NA

\_\_\_   \_\_\_   \_\_\_   No aspect of this piece could be considered untrue, deceptive, or misleading based on the information included *or* omitted.

\_\_\_   \_\_\_   \_\_\_   This piece, when examined as a whole, cannot lead a person of **average** intelligence to any false conclusions. This conclusion is based on the literal meaning of the words, impressions from nonverbal portions of the piece, and from materials and descriptions omitted from the advertising piece.

\_\_\_   \_\_\_   \_\_\_   All important or required information appears in a type size that is easy to read and is not mixed in with information that could confuse the reader.

\_\_\_   \_\_\_   \_\_\_   Absolute words such as "all," "will" and "shall" are not used.

\_\_\_   \_\_\_   \_\_\_   Words such as "free," "no cost" and "no extra cost" are not used unless actually true and then only if explained.

**Comparisons, Ratings and Competition References**

Yes   No   NA

- Specific commercial ratings are not the focus of this piece.
- Any reference to a commercial rating is clear in describing the scope and extent of the rating (A.M. Best, B++, Very Good must all be used together).
- All statistical information is recent, relevant, and the source and date are identified.
- References to the competition are factual and not disparaging.

**Testimonials, Endorsements, Analyses and Illustrating**

Yes   No   NA

- There is no use or implication of an endorsement or testimonial by a person or organization without their approval.

**Identity of Insurer and Product**

Yes   No   NA

- The name of the insurer is clearly identified.
- The policy type and name are clearly and accurately identified including form number.
- No combination of words is used which could mislead prospective insureds into believing the solicitation is connected with a governmental agency or program unless true and supportable.

**HOME OFFICE USE**

- The piece is identified with a unique form number assigned by Guarantee Trust Life Insurance Company.