

## **Sponsorship and Advertising Policy**

## **Corporate Relations**

V3 approved by the Board of Directors 9/2023

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- **1.0 Introduction.** BetterInvesting maintains a program of sponsorship and advertising. The program solicits several levels of corporate engagement including corporate membership; corporate sponsorship and participation in BetterInvesting national and regional events; advertising in *BetterInvesting Magazine*; product endorsement; and joint marketing or royalty agreements.
- **2.0 Purpose.** The purpose of the BetterInvesting sponsorship and advertising program is to create:
  - Opportunities for the community to learn about individually and publicly traded companies of all sizes.
  - Opportunities for publicly traded companies of all sizes to reach the community of retail investors.
  - Additional sources of revenue for the organization.
  - Expand educational opportunities for members to better understand all asset classes and company stages.

By leveraging BetterInvesting's unique ability to bring together individual investors and publicly traded companies in these forms of information exchange, this program is consistent with BetterInvesting's investor's education mission and brings value to corporate sponsors by enabling efficient access to a significant population of retail investors.

The sponsorship and advertising program helps diversify funding sources so that BetterInvesting is not dependent entirely on membership fees and product sales to cover the cost of operations. This program enables BetterInvesting to keep membership fees affordable.

The purpose of this policy is to assist and empower Home Office staff in their efforts to secure appropriate sponsors and advertisers, and to forward decisions regarding controversial sponsors and advertisers to the NAIC Officers, or a committee appointed by the Board of Directors (hereinafter referred to as the Sponsorship and Advertising Task Force).

- **3.0 Formal Evaluation** is split into three categories depending on the sponsor/advertiser:
- **3.1 Formal Evaluation Stock Investment.** As part of the corporate sales function, potential sponsors and advertisers, who have a desire to attract the interest in the purchase of their stock by BetterInvesting members, will be vetted prior to delivery of a final proposal to conduct business with BetterInvesting. This vetting process requires completion of an information sheet that confirms the following:
  - Sponsor/Advertiser is a publicly traded company
  - Sponsor/Advertiser is in good standing with BetterInvesting
  - The price per share to confirm the stock does not meet the SEC definition of a penny stock; penny stocks are prohibited from advertising with BetterInvesting
  - Has no known credit/payment issues
  - Sponsor/Advertiser is not under investigation by the SEC or other government agencies
  - Understands and has been advised that BetterInvesting members are committed to fundamental long-term equity investing

The Home Office will conduct a due diligence check on the company and its C-level officers. The information will be formally reviewed and a decision made regarding whether to accept or reject the prospective sponsor/advertiser.

**3.2 Formal Evaluation – Investing-Related Products and Services.** Potential advertisers, such as, but not limited to, mutual funds, ETFs, and financial advisors, who have a desire to market an investing-related product or service to BetterInvesting members, will be vetted prior to delivery of a final proposal to conduct business with BetterInvesting. This vetting process requires completion of an information sheet that confirms the following:

- Advertiser is a publicly traded company –or-
- Advertiser is privately held and has information that can be assessed by the BetterInvesting team
- Advertiser is in good standing with BetterInvesting
- Has advertised elsewhere
- Has no known credit/payment issues
- Advertiser is not under investigation by the SEC or other government agencies
- Understands and has been advised that BetterInvesting members are committed to fundamental long-term equity investing

Unacceptable products and services include, but are not limited to the following:

- A service or product which is in competition with the services or products being delivered, marketed, licensed or sold by NAIC (BetterInvesting and ICLUBcentral), including but not limited to subscription (monthly or annual) stock analysis tools including screening, club accounting software, or newsletters
- Products or services contradictory to BetterInvesting principles and methodology including, but not limited to, day trading, penny stocks and cryptocurrency

The Home Office will conduct a due diligence check on the company and its C-level officers. The information will be formally reviewed and a decision made regarding whether to accept or reject the prospective advertiser.

## **3.3** Formal Evaluation – Non-Investing Products, Services, and Offers. Potential advertisers, who have a desire to sell or market a non-investing-related product or service to BetterInvesting members, will be vetted prior to delivery of a final proposal to conduct business with BetterInvesting. This vetting process requires completion of an information sheet that confirms the following:

- Advertiser is in good standing with BetterInvesting
- Has advertised elsewhere
- Has no known credit/payment issues
- Description of product being advertised

Unacceptable products, services and offers include, but are not limited to the following:

- Adult/sexual dating services or "hook-up" sites
- Initial coin offerings
- Drug paraphernalia, or products to beat drug tests
- Illicit drugs
- Marijuana/ Cannabis (including brick and mortar shops). Until the use of marijuana is decriminalized at the federal level, BetterInvesting will not accept advertising for facilities that dispense marijuana and its component elements/parts even if they are

licensed by states or local entities. This prohibition includes products containing cannabis and cannabis-derived compounds, particularly CBD.

- Mail order brides
- Medical research solicitations
- Online casinos (includes all online gambling)
- Political party-related and/or issue-related messages
- Pornography, escort services, products claiming to enhance sex, and adult/sexual content
- o Premium pay-per-call services, such as 900 numbers
- Products, services, or technology that infringes on, or encourages, or enables the infringement on the intellectual property or personal rights of others
- Products, services, or technology that promotes any illegal or dangerous activity, including hacking or evading law enforcement
- o Psychics and related offers
- Religious or spiritual services
- Sexual wellness products
- Short-term, high-interest loans (e.g., "payday lenders")
- Weapons, firearms, ammunitions and related parts or accessories

The information will be formally reviewed and a decision made regarding whether to accept or reject the prospective advertiser.

- **4.0 Governance.** The initial evaluation will be completed by Home Office Vetting Committee consisting of the CEO, Director of Education and Chapter Relations, and Director of Shared Services (CFO Function). This group will review the information on the prospective sponsor/advertiser and determine whether to accept or reject the prospect. If the committee is uncertain whether a prospective sponsor/advertiser should be accepted, the decision will be escalated to the Sponsorship and Advertising Task Force of the Board of Directors. The Task Force will then make the final decision within 7 days.
- **5.0 Agreement.** Upon acceptance of the Vetting Committee or Task Force, the Director of Corporate Relations or other representative appointed by the CEO will negotiate an agreement, as appropriate, with the sponsor/advertiser. This agreement may take the form of corporate membership, sponsorship/participation in events such as BINC or a webinar, advertising in BetterInvesting Magazine, BetterInvesting website advertising, or BetterInvesting email campaigns. Standard BetterInvesting specifications and business practices will be followed regarding sponsorship/advertising delivery, acceptance, and billing for services rendered.

BetterInvesting retains editorial control of BetterInvesting Magazine. Advertorials will be clearly labeled 'advertisement'.

- 6.0 Endorsed Products. While implementation of this Sponsorship/Advertising Policy facilitates increased access to appropriate sponsors/advertisers as well as new (to the BetterInvesting community) publicly traded companies, it is not intended as an endorsement. Each investor is expected to conduct their own analysis before making an investment or purchase decision. BetterInvesting also offers a third-party product endorsement program. Policies associated with this program as described in the Product Endorsement Policy.
- **7.0 Other Products or Services.** From time to time, BetterInvesting will offer third party products and services for sale through its web store. These products and services may include such products/services as discounts, other financial services (e.g., credit cards), etc. These third-party products and services will also be vetted by the Vetting Committee. Offering such products and services does not represent endorsement by BetterInvesting.
- **8.0 BetterInvesting National Convention (BINC) and BetterInvesting Regional Conferences (BIRC).** When the Corporate Relations department secures sponsors for BINC, it will first request approval by the Chair of BINC and BIVAB. It will also follow the Sponsorship/Advertising Policy. Additionally, when requested the Corporate Relations department will prospect and secure sponsorships for BIRCs. When a prospective sponsor expresses interest in regional events, the sponsor will be referred to the local Chapter for approval and then secured by Home Office Corporate Relations.
- **9.0 Virtual Investors Conference (VIC).** Sponsors and advertisers to the Virtual Investors Conferences, which are produced by OTC Markets Group, Inc. are only vetted by the producer of the event. BetterInvesting has the ability to secure a presenter for the event and will be reimbursed at an amount determined by OTC Markets Group, Inc. The producer will work to ensure that each VIC is a quality event. While BetterInvesting will seek to apply the same criteria itemized in section 3.0 of this policy to VIC sponsors, the VIC vetting process is governed by the OTC Markets Group, Inc., and is outside the scope of this policy.
- **10.0 Third Party Literature.** Frequently, writers and publisher of books and newsletters about investing seek BetterInvesting endorsement of the publication, to advertise in BetterInvesting channels, or to sell it via the BetterInvesting web store. In these instances, the Vetting Committee will evaluate the sponsor/advertiser and forward its recommendation

regarding acceptance to the Task Force for final decision. Offering such products does not represent endorsement by BetterInvesting.

- opportunities to publicly traded companies, privately held companies and other organizations. To ensure that all sponsors and advertisers receive impartial and consistent terms associated with the consideration they give to BetterInvesting, coordination is essential. Chapters are expected to protect use of member information, BetterInvesting Assets and intellectual property as set out in this Sponsorship and Advertising Policy as well as other BetterInvesting policies as described in the Chapter Operations Manual. If a chapter wishes to solicit sponsorship and/or extend an advertising opportunity to a current Corporate Partner, they must first receive approval from the Director of Corporate Relations.
- **12.0** Advertising Content. As BetterInvesting is committed to providing the highest quality member experience, BetterInvesting may choose not to accept advertisements containing content which is deemed unacceptable. All advertising material presented to members/readers must conform to governmental laws and regulations.
- **13.0 Rejection**. BetterInvesting reserves the right to decline or reject any advertisement for any reason at any time without liability, even though previously acknowledged or accepted.