

Type: Standard	
TITLE / NAME: Website Use Policy	
Entities: (check all that apply) <input checked="" type="checkbox"/> Penn Mutual <input checked="" type="checkbox"/> PIA <input type="checkbox"/> PIAre I <input checked="" type="checkbox"/> HTK <input type="checkbox"/> ICMI <input type="checkbox"/> Penn Series	Policy Number: N/A
	Guiding Principle: Representing Our Company
	Corporate Policy: <i>Acting on Behalf of Our Company</i>
	Primary Responsible Party (name and title): Dominic Russo, CCO
	Approver (name and title): Dominic Russo, CCO
Audience: (check all that apply) <input checked="" type="checkbox"/> Home Office <input checked="" type="checkbox"/> Field Offices	Original Effective Date: 3/20/2017
	Published Date: 3/20/17
	Minimum Review Cycle : Annual
	Third-Party Accessible: No

Description	<p>Website Use Policy</p> <p>Both State and Federal regulations, as well as FINRA rules 2210 and 3230, provide specific and detailed requirements for communication with the public. As a result, Penn Mutual and HTK have adopted policies and procedures that require pre-approval for any communication that is being published, distributed or made available to more than one client and with the intent to promote the products and services of Penn Mutual or Hornor, Townsend & Kent (HTK). This also applies to public websites.</p> <p>The use of websites by Registered Representatives is permitted by Penn Mutual & HTK. All websites require preapproval before being presented to the public. To obtain approval, website content is submitted to the Advertising Review Team of the Compliance Department.</p>
Responsibilities	<p>There are two paths Registered Representatives can take when using a website for business purposes. The first path is to use one of HTK's preselected vendors each of whom maintain a Compliance Workflow (Path 1). These website vendors are FMG Suite, Advisor Launchpad & Emerald. The second path is to use an outside vendor (Path 2). Please be aware that if the outside vendor is unable to comply with any aspects of this policy, they may not be used.</p> <p>Websites containing HTK or Penn Mutual related product or service information must not be made public until they are approved.</p> <p>New Domains, Switching of Vendors or Resubmission of Expired Websites Applicable to Path 1 & Path 2</p> <p>When creating a new website or switching website vendors, Registered Representatives must submit the proposed domain name & a copy of the non-public website (pdf or word preferred) into RegEd's AdTrax tool. The Advertising Review Team will review the content and either reject the submission, send back with changes or approve. If approved, the approval code must be added to the public website. Resubmission into AdTrax for only the addition of an approval code is not required.</p> <p>Only after approval may the site be made public. Approvals are generally valid for a 3 year period. Once approved, the Advertising Review Team will notify its archiving vendor Smarsh, to begin archival of the domain.</p>

Changes to Websites – This includes the addition, removal or altering of content.

Path 1

Changes may be made directly with the vendor. Each preselected vendor has a Compliance workflow that will prevent the publication of content until it is approved. No AdTrax submission is needed for changes if this path has been chosen.

Path 2

Any change to a website must be submitted through RegEd’s AdTrax tool prior to being made viewable to the public. Once approval is received from the Advertising Review Team, the changes may be made public. If you have daily rotating content on your site, this should be specifically pointed out on your submission.

Broker Check

FINRA Rule 2210 (Communications with the Public) requires each of a member firm’s websites to include a readily apparent reference and hyperlink to BrokerCheck on (1) the initial Web page that the firm intends to be viewed by retail investors, and (2) any other Web page that includes a professional profile of one or more registered persons who conduct business with retail investors.

For those Registered Representatives who are using a preselected vendor (Path 1), the site will automatically turn on the Broker Check link for you. For those Registered Representatives who are using an outside vendor (Path 2), you are required to comply with the Broker Check rules outlined above. Failure to do so will result in the rejection of the website in AdTrax. For more information, please visit FINRA’s website page, [“Complying With the BrokerCheck Link Requirements in Rule 2210”](#) or the Company’s Compliance Exchange Article, [“Notice To Members - BrokerCheck Link Now Required on Registered Representative Websites”](#).

“Terms of Use” for Websites:

- Any vendor that cannot comply with this policy may not be used.
- Any video being used on a website must comply with the “PML + HTK Video Use Policy”.
- Testimonials for Investment Advisory Services are not permitted to be displayed on websites.
- Registered Representatives must add their disclaimer to each page of a websites that discusses HTK Products, Services or Representatives. If the website contains a listing of Financial Professionals, an asterisk must be listed next to the HTK Disclosure and each of those Financial Professionals that are an HTK Registered Representative.
- Registered Representatives are responsible for not only the content, but also the vendor relationship when using websites.
- If using an outside vendor, Registered Representatives must maintain the ability to promptly disable the website. HTK may, at its discretion, instruct a Registered Representative to remove their website from public view.

Applicability

These Standards apply to all HTK Registered Representatives, Penn Mutual Producers, Field Office Associates, & Field Leaders.

Related Policies, Standards, and Procedures

- Penn Mutual Corporate Policies
- Penn Mutual Social Media Policies
- HTK Compliance & Supervision Manual

**Related Rules,
Regulations, and
Laws (as applicable)**

- PML + HTK Video Use Policy

This standard is designed to reasonably assure that the users of video adhere to applicable Company and regulatory requirements.

The rules, regulations and interpretations cover:

- FINRA Rule 2210
- FINRA Regulatory Notice 10-06 and Notice 11-39
- SEC, Guidance Update on the Testimonial Rule and Social Media, No. 2014-4 (March 2014)
- State Department of Insurance Rules

**Terms and
Definitions**