

Online Review Pre-Publication Checklist:

Use this template as a foundation to create your own online review pre-publication checklist in coordination with your compliance team.

These resources are for informational purposes only with hopes of making your life a little easier as you prepare to get started with online reviews to grow your business. We encourage you to speak with your compliance team and legal counsel prior to using or customizing any of these resources.

Prefer this template in Microsoft Word format? Send an email to yourfriends@wealhtender.com, and we'll send it right over.

Wealhtender is the first financial advisor online review platform designed to be fully compliant with the SEC Marketing rule.

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Online Review Pre-Publication Checklist:

Use this pre-publication checklist to ensure no prohibitions exist and proper disclosures are added to online reviews you will promote as advertisements (testimonials & endorsements).

Review for a) Prohibited Content & b) Unsubstantiated Material Statements of Fact

- Does the review include a material statement of fact we don't have a reasonable basis for believing we will be able to substantiate upon demand by the SEC?
- Does the review include any untrue statement of a material fact, or omit to state a material fact necessary in order to make the statement made (in light of circumstances) not misleading?
- Does the review include information that would reasonably be likely to cause an untrue or misleading implication or inference to be drawn concerning a material fact relating to us?
- Does the review discuss any potential benefits to clients or investors connected with or resulting from our services or methods of operation without providing fair and balanced treatment of any material risks or material limitations associated with the potential benefits?
- Does the review include a reference to specific investment advice provided by us where such investment advice is not presented in a manner that is fair and balanced?
- Does the review include or exclude performance results, or present performance time periods, in a manner that is not fair and balanced?
- Could the review otherwise be considered materially misleading?
- Does the review contain an unsubstantiated material statement of fact that we should substantiate in the Additional Disclosures section?

Our Disclosures Include a) *Clear and Prominent* Section & b) Access to Additional Disclosures:

- Yes, *Clear and Prominent* Section is Included
- Clear and Prominent* Section is Adjacent to Body of Review and Visible at All Times
- Clear and Prominent* Section Font is Same Size and Weight as Body of Review
- Additional disclosures are accessible via link or other method (expand to view, QR code, etc.)

Our *Clear and Prominent* Disclosures Include:

- Client Status: Current Client, Non-Client
- Compensation: Paid (Cash, Non-Cash), Unpaid
 - If Compensated: Is the Reviewer a Bad Actor? If over \$1,000, is written agreement in place?
- Conflicts of Interest: Material Conflict(s) Succinctly Described

Our Additional Disclosures Include:

- Compensation: Material terms including a description, compensation value, time period, etc.
- Conflicts of Interest: Detailed explanation of material conflicts of interest based on relationship and/or compensation arrangement; Disclosure includes explicit statement 'reviewer has an incentive to recommend based on [compensation / other]'

- If reviewer wishes to remain anonymous publicly, are we honoring their request appropriately?