



Policies Manual

Title: Advertising Policy

Operational Policy

Policy No: XXXX

Purpose

The purpose of this policy is to provide staff with the guidelines necessary to ensure advertising is compliant and follows a designated approval process.

Policy Statement

At CommonWealth One, we embrace opportunities to increase brand awareness, attract new members, and deepen relationships with existing members through advertising. As such, we must adhere to legislation and an internal approval process for all advertising materials.

GUIDELINES

Intent

CommonWealth One will utilize advertising to promote our products and services, brand, organization, and events.

What Defines Advertising

This policy will apply to all types of media, including, but not limited to, newspapers, magazines, newsletters and programs, radio, television, social media, digital content, and various types of signage.

Centralizing the Advertising Function

The development of advertising and marketing concepts will be handled by designated Marketing Department employees knowledgeable and experienced in credit union advertising and marketing. Marketing will coordinate compliance review of all advertising materials through internal compliance or a third-party vendor as designated by internal compliance.

Approval of advertisements will be conducted by the CEO, Chief or VP of impacted business unit, and VP of Marketing.

Compliance with Regulatory Requirements

CommonWealth One management and marketing staff will be diligent in staying updated on current advertising and marketing legislation and in adhering to all laws and governing these activities. Management and staff will strive to ensure no advertisements or other marketing efforts are misleading or inaccurate, or in any way misrepresent the Credit Union's products, services, or terms of doing business.

To ensure compliance with laws and regulations, the Credit Union will provide opportunities for employees involved with advertising to get necessary training. Required and appropriate disclosures will be provided to members and/or the public.

Advertising will include appropriate logos depending on ad type (e.g., generic ads will include both NCUA and Equal Housing logos or text lines); however, depending on the applicable media, different requirements may apply.

Effective Date July 25, 2024	Last Revision July 27, 2023	Enacted Date July 20, 2016
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Employees and Members in Advertising

CommonWealthOne reserves the right to take photos, video, and audio recordings in the workplace and at sponsored events. These images and recordings may be used in advertising on channels including our websites, social media channels (Facebook, Instagram, Twitter, Linked In, Glassdoor, Indeed, etc.), and in print and digital collateral pieces.

Advertising Review Regarding Markets

The Credit Union’s advertising goals, ad locations, and ad types will be periodically reviewed to ensure that target markets are not selected using a prohibitive basis: race, color, religion, national origin, marital status, age, handicap, familiar status, receipt of public assistance income, or because an applicant has in good faith exercised any rights under the Consumer Credit Protection Act. The Credit Union will work to include all of its field of membership in its overall marketing plan as far as feasible based on products and services being offered.

Record Retention

Copies of ads or other marketing and decision approvals shall be retained for 25 months. The marketing staff will be appointed to maintain advertising documentation.

Advertising and Marketing on Social Media

All content posted on the Credit Union’s official social media accounts or written as COFCU must be approved by the Marketing Department. All regulations related to product and service advertising apply to content posted on social media. Only employees designated by the VP of Marketing can post on social media on the Credit Union’s behalf, as detailed in the Credit Union’s Social Media Policy.

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