



THE UNIFI COMPANIES ANTI-SPAM POLICY

Effective as of January 1, 2010

Purpose and Scope. This Policy is intended to comply with state and federal anti-SPAM regulations. It applies to all of the UNIFI Companies except Acacia Federal Savings Bank and Calvert, who maintain their own compliance programs, and all of their internal and external marketing and sales associates, including but not limited to, producers, registered representatives, agents (both general or career), brokers, telemarketers and agencies.

PLEASE NOTE: Marketing, sales associates and producers should contact the UNIFI Companies Privacy Office for additional information or clarification regarding compliance with this Policy.

Definitions.

Business Relationship-Transactional E-mail. “Business Relationship-Transactional E-Mails” are e-mails that are non-soliciting in nature and are sent for one or more of the following purposes:

- To complete a business transaction or provide routine or updated business information to an applicant, client, account holder, or policyholder, with regard to a product or service they have purchased or are in the process of purchasing.
- To communicate business-related materials to a UNIFI appointed **producer**.

Marketing E-mail. “Marketing E-mail*” means an e-mail that is not a Business Relationship-Transactional E-Mail, that a receiver has not requested, nor consented to receive:

- the primary purpose of which is the commercial advertisement or promotion of any UNIFI Company or any of their products or services; and/or
- that contains a link or links directing the recipient to website(s) with information about any of the UNIFI Companies and/or any of their products or services.

**Please note: A business related e-mail sent to UNIFI appointed producer in order to provide information that assists them in selling a UNIFI product or service is considered a Business Relationship-Transactional E-mail under this policy, however, the same may become a Marketing E-mail when it is advertising in nature and is subsequently transmitted via e-mail by the producer to outside third-parties, including but not limited to, non-UNIFI appointed agents and/or customers.*

POLICY

1.0 All E-mails, sent by or on behalf of any UNIFI Company within the scope of this Policy, whether Business Relationship-Transactional or Marketing E-mails, must

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contain complete headers (the “To,” “From,” and “Subject” lines) that accurately depict the sender, the receiver and the subject of the e-mail.

2.0 All *Marketing E-mails* **must** comply with the following:

2.1 Be sent from an e-mail address that will receive reply e-mails at all times for a minimum of 30 days after the Marketing E-mail is sent.

2.2 Clearly and conspicuously identify the e-mail as an advertisement.

2.3 Clearly identify the line of business, division, or company on whose behalf the Marketing E-mail message was sent.

2.4 Contain an explanation of how the recipient can “opt-out” of receiving future Marketing E-mails from the line of business, division or company.

2.4.1 Each person sending Marketing E-mails on behalf of any UNIFI company, business line or division must ensure that the e-mail contains a fully-functional method for tracking opt-outs such as through manual tracking or the implementation of an unsubscribe link; and

2.4.2 Within 10 business days of the recipient’s request to “opt out”, the recipient’s e-mail address(es) must be removed from all Marketing E-mail lists. No further Marketing E-mails may be sent to the recipient’s e-mail address by or on behalf of the UNIFI company which received the “opt-out” request*.

**Please Note: In the event that cross-marketing is utilized by, or on behalf of a UNIFI company or business line via Marketing E-mail, each sending line of business, division and UNIFI company must first check all pertinent opt-out lists and remove any opted-out e-mail addresses.*

2.5 Contain the sender’s name and a valid physical postal address (not a post office box number).

3.0 The sender of any Marketing E-mail must ensure that:

3.1 Accurate information is used when registering a domain name and/or e-mail address.

3.2 The sender’s e-mail account does not contain any fraudulent or misleading information.

3.3 The “To”, “From”, and “Subject” lines of all e-mail are complete and are not deceptive or misleading.

3.4 Marketing E-mails are only sent from a mail server that does not have an open relay or otherwise allow others to send e-mail through the mail server without permission.

3.5 E-mail lists were not built using dictionary attacks, harvested e-mails, or randomly

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generated e-mail addresses.

4.0 State Law. Producers must familiarize themselves with e-mail communication laws for any and all states in which the producer transacts or attempts to transact marketing or other business communication by e-mail.

5.0 Broker-Dealer Registered Representatives. In addition to the Rules stated above for Business Relationship-Transactional E-Mails, Registered Representatives transacting securities business for Ameritas Investment Corp. (“AIC”) are also subject to guidelines set forth in the AIC Compliance Policies and Procedures Manual regarding the use of e-mail.

6.0 Penalties

Each marketing associate and producer who sends Marketing E-mails is responsible for ensuring compliance with this Policy. Discipline and sanctions, up to and including termination, may be imposed for non-compliance. Additionally, sending an e-mail that does not comply with the guidelines set-forth above can result in government imposed sanctions up to and including:

- 3 years in jail for first time offenders.
- 5 years in jail for repeat offenders who also commit a felony.
- Confiscation of proceeds, computers, software, technology or equipment connected to the non-compliant e-mail(s).
- State legal action resulting in a fine of \$250 per message, with no upper limit if fraudulent information is contained in the e-mail header(s).
- Civil legal action by the Internet Service Provider(s) adversely affected by the violation in the amount of \$25 per e-mail, or \$100 per e-mail with no upper limit if fraudulent information is contained in the e-mail header(s).

Please contact the Privacy Office for any questions or clarifications:

**UNIFI Companies
Privacy Office
P.O. Box 81889
Lincoln, NE 68501-1889
1-888-284-7844
privacy@ameritas.com**