

EquitySmart

HOME LOANS

Global Marketing and Advertising Policy
Last Updated: July 2025

I. General Policy Summary

This Marketing and Advertising Policy establishes the following:

- A Mortgage Loan Originator (MLO) may not at any time engage in marketing the Company, use the Company's name, or a facsimile of it in any marketing, or advertise a product sold by the Company without the Company's prior express permission through the review and acknowledgment of the parameters as set forth in this document.
- MLOs may not make any representations as a Mortgage Loan Originator on any social networking, blog, or internet site concerning the Company or its products and services without the prior express permission of the Company through the review and acknowledgment of the parameters as set forth in this addendum.
- MLOs will reference the [Equity Smart Home Loans Brand Guidebook](#) to ensure uniformity in branding and marketing collateral, including fonts, colors, and logos. The Guidebook can be found in the Marketing Hub on your Loan Officer Portal.

It is the responsibility of all individuals that do business with Equity Smart and who are engaged in facilitating the completion of the mortgage loan process to be aware of this policy. Any activity that is reported to Equity Smart's Management and may potentially be in breach of this policy will result in an investigation and possible disciplinary action.

II. Code of Conduct in Marketing

Equity Smart Home Loans holds all Mortgage Loan Originators and affiliated personnel to the highest standard of ethical and professional behavior in all marketing and advertising practices. Marketing is not only a reflection of individual loan officers, but of the company's overall integrity and reputation. As such, the following code of conduct must be upheld at all times:

A. Professional Representation

All marketing materials and communication must reflect professionalism, accuracy, and respect for the consumer. Messaging should be free from slang, sensationalism, or language that could diminish the credibility of the individual or the Company.

B. Respectful and Inclusive Language

Content—whether in public posts, comments, advertising, or private communications (e.g., direct messages, emails)—must never include inflammatory, harassing, racist, sexist, discriminatory, or otherwise inappropriate language or imagery. Equity Smart maintains a **zero-tolerance policy** for discriminatory or hateful content.

C. No Offensive or Inflammatory Behavior in Private Messages

Unsolicited messages (DMs, emails, texts, or otherwise) sent to consumers, colleagues, or the general public that are deemed inappropriate, aggressive, unprofessional, or offensive will be treated with the same seriousness as public violations. Such conduct may result in disciplinary action, up to and including termination.

D. Compliance with Advertising Standards

All marketing must comply with state and federal regulations and internal company policy. This includes accurate representation of products, truthful disclosures, and the appropriate use of licensing and identifying information.

E. Representation of Affiliation

All marketing must clearly show that you are operating as an individual Mortgage Loan Originator or team under the Equity Smart Home Loans brand—not as the corporate entity itself. Misrepresentation of affiliation, headquarters status, or implied corporate authority is strictly prohibited.

F. Responsibility for Conduct and Content

Loan Officers are personally responsible for the content they publish or share, even on personal accounts, when it relates to mortgage business or carries the appearance of a professional role. This includes resharing or reposting third-party content that does not align with company values or policy.

Violations of this code of conduct will be subject to immediate review by Equity Smart Home Loans Compliance and Management teams. Formal requests for removal or correction of any flagged content will be expected to be fulfilled within 24 hours. Ongoing or serious breaches may result in

disciplinary action, including suspension or termination of employment or association with the company.

III. Scope of Application

This policy applies to all MLOs operating in any of the nine states where **Equity Smart Home Loans** is licensed. These states include:

California	Arizona	Washington	Oregon	New Mexico
Tennessee	Florida	Colorado	Texas	

This policy covers all forms of marketing, advertising, and solicitation materials, including print, digital, and social media.

IV. Marketing and Advertising Policy Description

It is the policy of ESHL to monitor all marketing and advertising activities to ensure state and federal compliance. The following actions are required when representing yourself as a Mortgage Loan Originator:

1. License Identification Disclosure

Anyone with a license needs to disclose on all marketing materials advertising consumer mortgages:

- Whether they are a broker or salesperson.
- When advertising a consumer mortgage, their NMLS ID needs to be present. The NMLS information provided may be no smaller than the smallest typeface on the marketing and solicitation materials in the Advertisement.
- Mortgage advertisement materials subject to the NMLS identification disclosure include:
 - Printed advertisements
 - Radio and television advertisements

- Electronic advertisements, including websites and emails
- Advertisements of mortgage products intended to solicit borrowers need to include the employing broker's NMLS identification number.

2. First-Point-of-Contact Information Rules

Materials used to solicit or create a client relationship with prospective mortgage borrowers are known as solicitation materials, or first-point-of-contact materials. These advertising materials for marketing your mortgage practice include:

- Business cards
- Stationery
- Emails
- Websites controlled by the licensee

3. Prohibition of Misleading Terms

Mortgage advertisements a licensee generates may not include false or misleading terms or representations which mislead a borrower into believing the mortgage offered is something it is not. All interest rates, fees, costs, taxes, insurance, prepayment penalties, and other special aspects of a mortgage presented in a mortgage advertisement need to be truthful.

- This prohibition applies to all mortgage advertisements, including labels, packages, radio, television, cable television, newspapers, magazines, brochures, pamphlets, circulars, billboards, point of purchase displays, audio programs, and the internet.
- Any disclosure about terms made in a consumer mortgage advertisement is to be clear in its wording and conspicuous to those solicited.

4. Availability of Advertised Mortgages

If a mortgage advertisement provides specific mortgage terms, the licensee must actually have a product available with the advertised terms. Further, advertisements misrepresenting the likelihood a consumer will be approved for the advertised mortgage violates Regulation N.

5. Interest Rates

An advertisement offering a consumer mortgage which states a simple interest rate also needs to state the annual percentage rate (APR) with at least equal prominence to the rate stated.

6. Fixed vs. Adjustable

To use the word “fixed” when advertising a consumer mortgage that is an adjustable-rate mortgage (ARM), the phrase “Adjustable-Rate Mortgage,” “Variable-Rate Mortgage,” or “ARM” needs to appear first in the advertisement before any use of the word “fixed” and be at least as conspicuous in the advertisement as any use of the word “fixed.”

7. Costs and Fees

Advertisements using terms such as “no costs” or “no fees” are deemed misleading by Regulation N. All costs and fees, whether they are paid upfront by the borrower or added to the mortgage amount, must be disclosed truthfully.

8. Triggering Terms

The use of some words or phrases in consumer mortgage advertisements triggers the need to include additional disclosures in the advertisement. These include the amount or percentage of any down payment, the number of payments, and the amount of any payment, finance charge, or balloon payment.

Any of the following terms in an advertisement require additional information:

If it contains:	Then include:
1. The amount of the down payment, expressed either as a percentage or as a dollar amount. 2. The amount of any payment expressed either as a percentage or as a dollar amount. 3. The number of payments. 4. The period of repayment (the total time required to repay). 5. The amount of any finance charge.	(i) The amount or percentage of the down payment. (ii) The terms of repayment, which reflect the repayment obligations over the full term of the loan, including any balloon payment. (iii) The “annual percentage rate,” using that term, and, if the rate may be increased after consummation, that fact.

9. ESHL Disclaimer for Print Advertising

Visit equitysmartloans.com. Rates, Fees and Programs are subject to change without notice. This is not a guarantee or a commitment to lend. Some products may not be available in all states. Not all applicants qualify for financing, subject to review of credit/collateral. Equity Smart Home Loans NMLS#: 856170 DRE#: 01906808 Headquarters: 1499 Huntington Dr Suite 500, South Pasadena, CA 91030, (323) 258-4317

NOTE: Disclaimer must also include the [Equal Housing Lender logo](#).

V. Prohibited Advertising

The following practices are prohibited under both state and federal mortgage laws:

- False lender identification
 - False government identification
 - Simulated checks
 - Discriminatory content
 - Repurposing competitor marketing material by branding as Equity Smart Home Loans
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VI. Company Email Accounts

- Mass emails or emails which have a high likelihood of being reported as SPAM are not permitted when sending from company email accounts.
 - Company email accounts are to be used for acceptable business purposes only, and not for personal use.
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VII. Social Media & Google Business

- No Loan Officer is to claim or use Equity Smart Home Loans corporate as their social media handles or Google Business title, or headquarters address. These handles are for corporate use only.
- All social media profile information and posts must follow all rules set forth in the Marketing & Advertising Policies.

- Posts, profile information, or unsolicited direct messages (DMs) that are inappropriate, inflammatory, discriminatory, racist, or otherwise violate professional standards of conduct will be flagged internally or when brought to our attention. A formal request for removal or correction will be issued, with the expectation that the content be addressed within 24 hours. Such conduct, whether public or private, may be grounds for disciplinary action, up to and including termination.
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VIII. Team Name Usage for Advertising

1. Team Name Requirements

When advertising as part of a team or group, the following rules apply across all states where ESHL is licensed:

- **Inclusion of Team Member's Name:** A team name must include the surname of at least one member of the team.
- **Permitted Identifiers:** Team names may include words such as "Team," "Group," or "Associates."
- **No Implied Separate Entity:** Team names must not imply that the team is a separate entity, distinct from Equity Smart Home Loans. For example, the name should not suggest that the team is a separate mortgage or real estate brokerage.
- **Broker Information:** All advertising featuring a team name must include the **broker's name** (Equity Smart Home Loans) and the **broker's license number** as required by the state. Ex:
 - **Correct:** Smith Home Loans Team of Equity Smart Home Loans – Cal DRE #01234567
 - **Prohibited:** California Mortgage Experts, Inc." (suggests a separate entity)

2. Registration of Team Names

- All team names must be registered with ESHL's Compliance or Human Resources Department before they are used in any marketing or advertising materials.
 - Team names must comply with both federal and state regulations regarding corporate or business naming conventions, including but not limited to the DRE, DFPI, and NMLS requirements.
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IX. Review and Approval Process

All targeted marketing should be submitted to [ESHL Marketing Compliance](#) for approval prior to use when there is a question of its legality. This includes but is not limited to:

- Print advertisements, mailers, and flyers
 - Email campaigns
 - Web pages and social media content
 - Radio/TV ads or scripts
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X. Appropriate Use of Equity Smart Home Loans Branding

Equity Smart Home Loans encourages consistent brand representation and allows Loan Officers to use the company's logo, colors, and approved branding elements in their marketing materials — provided they do so in a way that **clearly distinguishes their identity as individual MLOs or teams, and not as the corporate entity itself.**

Any marketing, solicitation, or first point of contact material issued under Equity Smart Home Loans branding may not display, reference, or otherwise promote a separate, unaffiliated brokerage name or branding, unless there is a formal and disclosed business relationship approved by Compliance.

Dual-licensed individuals must maintain separate marketing for each licensed activity in compliance with both DFPI/NMLS and DRE rules.

However, the following are **strictly prohibited**:

- **Misleading Corporate Representation:** Marketing materials, websites, or public-facing content that imply the Loan Officer *is* Equity Smart Home Loans (e.g., stating or implying they are the company headquarters, corporate brand, or national branch).
- **Mimicked or Confusing Domains:** Creating website domains or social media handles that closely mimic or embed the company's official domain name or identity in a way that could mislead consumers or create brand confusion (e.g., [equitysmartAZloans.com](#), [equitysmartfunding.net](#), etc.).
- **Corporate Likeness in Team Names or Handles:** Using "Equity Smart" or variations thereof in a way that implies corporate endorsement or origin beyond standard affiliation (e.g., [@equitysmartcorporate](#), Equity Smart HQ, etc.).

 **Acceptable Examples:**

- Branding your marketing as *"John Smith, Mortgage Loan Originator, Equity Smart Home Loans"*
- Using approved logos and templates provided by Equity Smart Home Loans

 Not Acceptable:

- Claiming to *be* Equity Smart Home Loans
- Registering domains such as equitysmartazloans.com
- Creating social handles like @equitysmart_official or @equitysmarthq

All marketing must clearly show that you are an **individual or team operating under the Equity Smart Home Loans brand**, not Equity Smart Home Loans as a corporation.

If there is any uncertainty about compliance, materials must be submitted through the **Marketing Submission Portal** prior to use.

Violations of this policy will result in immediate removal requests, potential loss of marketing privileges, and disciplinary action if not corrected.