



DO NOT CALL POLICY AND PROCEDURE

General statement of policy

All employees, independent contractors, vendors, and any persons or entities purporting to act on behalf of Premier Circulation Services (PCS) are strictly forbidden from making any telemarketing calls without first consulting with the Corporate Compliance department on appropriate procedures adhering to the TCPA, TSR, and applicable state laws.

Agents and brokers conducting telemarketing in reference to a product or marketing initiative of PCS or any PCS affiliate or subsidiary shall fully adhere to the TCPA, TSR, and any related federal laws, regulations and rules, and all applicable state laws ("Telemarketing Laws").

There are strict penalties for noncompliance with Telemarketing Laws. Violators may be subject to legal penalties, and, as applicable, may result in contract termination, employment termination or other disciplinary measures by PCS.

To learn more about the TCPA or TSR you can visit the websites listed below.

FCC web page: <https://www.fcc.gov/sites/default/files/tcpa-rules.pdf>

FTC web page: <https://www.ftc.gov/business-guidance/resources/complying-telemarketing-sales-rule>

PCS Do Not Call Policy

What is the National Do Not Call Registry?

In 2003, a National Do Not Call Registry was established through the efforts of the Federal Trade Commission (FTC) and the Federal Communication (FCC). The registry is a list of telephone numbers (residential and cell) from consumers who do not want to receive telephone solicitation calls to the registered telephone number. A telephone number registered on the National Do Not Call Registry must not be called for telemarketing purposes unless the caller has an existing business relationship with the individual being called or the individual being called has given the caller express consent to be called.

This policy applies to all PCS associates and its third-party contractors, including producers, registered representatives, agents and brokers, telemarketers and agencies to the extent that they provide services on behalf of the Company.

Practices and Procedures

PCS is committed to complying with applicable Do Not Call laws and shall maintain an internal Do Not Call list ("Internal DNC List") which will be readily available for viewing on premiercircservices.com. If any person under the scope of these policies and procedures receives a notification, whether oral or written, from a client or prospective client, that they wish to be placed on the PCS Internal DNC List, such person shall notify the Compliance Dept. within one (1) business day of receiving the request. The Compliance Dept. shall be responsible for updating and maintaining the Internal DNC List. The Internal DNC List shall be updated no later than 30 days after the receipt of a new number, but immediately under ideal circumstances.

- Telephone solicitations shall not be placed to any telephone number that is maintained on the Internal DNC List (located on the dialer).
- Telephone solicitations shall not be placed to any telephone number that is maintained on any applicable State Do Not Call Registry unless the entity or individual making the call complies with the relevant requirements of that state regarding such call.
- Telephone solicitations shall not be placed to any telephone number that is maintained on the National Do Not Call Registry unless:
 - Within the preceding eighteen (18) months, the subject of the telephone solicitation has had an established business relationship with the Company. The term established business relationship means a prior or existing relationship formed by a voluntary two-way communication between a person or entity and a residential subscriber with or without an exchange of consideration, on the basis of the subscriber's purchase or transaction with the entity within the eighteen (18) months immediately preceding the date of the telephone call or on the basis of the subscriber's inquiry or application regarding products or services offered by the entity within the three months immediately preceding the date of the call, which relationship has not been previously terminated by either party. The subscriber's seller-specific do-not-call request, terminates an established business relationship for purposes of telemarketing and telephone solicitation even if the subscriber continues to do business with the seller. The subscriber's established business relationship with a business entity does not extend to affiliated entities unless the subscriber would reasonably expect them to be included given the nature and type of goods or services offered by the affiliate and the identity of the affiliate.

Within the preceding three (3) months, the subject of the telephone solicitation has given express permission to the Company;

The subject of the telephone solicitation has a personal relationship with the caller.

- Telephone solicitations may not be placed before 8:00 a.m. or after 9:00 p.m. in the local time of the subject of the telephone solicitation without prior express permission.
- Upon making a telephone solicitation, the caller must provide the recipient of the call the following information:
- Caller's name;
- Name and address or telephone number of the Company, or the representative to which the caller is affiliated. A toll-free number may be used but is not required. A 900 number is strictly prohibited; and
- A statement that informs the subject that the purpose of the call is to solicit the purchase of products and services.

Individuals who violate these policies and procedures must be reported to the Compliance Dept. promptly.

Any complaint regarding the violations of these policies and procedures should be referred to the Compliance Dept. for coordination and handling.

We respect the privacy of all our customers, and we strive to provide the best possible customer service. If you feel that you have been contacted in violation of this policy or applicable Federal or State law, then please contact us immediately.

Contact:

Compliance Department

P.O. Box 2073

Absecon, NJ 08201

1-888-229-3191

compliance@premiercircservices.com