SOCIAL MEDIA POLICY -LinkedIn

I. SOCIAL MEDIA POLICY

Effective January 1, 2012, Representatives will be able to begin using social media to help promote business, marketing and networking using **LinkedIn.com**. All references to KCD Financial, Inc. or DBA name will require the appropriate disclosures. Testimonials will not be allowed on the Linked-In Profile page. KCD Financial, Inc. will allow for Representatives to upload a business professional profile picture. It is company policy that *only email addresses approved through KCD Financial, Inc*. are to be used on the social networking site. Representatives also understand that it is their responsibility to monitor content on their specific Linked-In Profile page.

II. APPROVAL REQUEST SUBMISSION PROCEDURES

1. Complete the Linked-In Profile Request form.
2. Submit to KCD Financial Compliance via fax, email, or mail.
3. Create Linked-In Profile and notify KCD Compliance upon completion.
4. Any updates to Linked-In Profile must be submitted and approved by compliance prior to updating of the actual profile.

III. NON-ALLOWABLE FORMS OF SOCIAL MEDIA

KCD Financial, Inc. does not allow the use of INSTANT MESSAGING, CHAT ROOMS, FACEBOOK, TWITTER and BLOGS regarding securities or investment matters. TEXT MESSAGING is allowed with training and the use of an assigned text phone number that KCD will archive through our vendor.

IV. RECORDS RETENTION REQUIREMENTS

Representatives are required to keep records of communications and attachments sent via social media, they can be retained via hard copy, maintaining them on your computer, or backing up copies on non-alterable, non-deleting storage media such as a non-rewritable CD-ROM. Records must be available for review upon request by KCD or other securities examiners.

V. DISCOVERY OF NON-COMPLIANCE

Non-compliance with the above policy regarding the approval, submission and recordkeeping guidelines will result in disciplinary actions including heightened supervision, more stringent review procedures, fines, and termination if the situation warrants such action.

V. LinkedIn Disclosure

" KCD Financial Inc. (KCD), a member of SIPC (www.sipc.org), reserves the right to the extent permitted under applicable law, to retain and monitor all electronic communications. KCD will not accept purchase or sales orders via LinkedIn or its messaging systems. KCD is not responsible for content posted by third parties. KCD does not provide tax or legal services – please consult a tax advisor. Statements and messages are for US residents only. "