

1. Introduction

This Standard Operating Procedure document is an extension from Group Marketing and Social Media Materials Standards by Singlife Ltd and it applies specifically for Financial Adviser Representatives (FARs) from PIAS. This document is established to ensure that all marketing and promotional materials (collectively known as “marketing materials”) adhere to the PIAS internal processes and standards.

2. PIAS Marketing Review Committee

The PIAS Marketing Review Committee is responsible for reviewing and approving all marketing materials (including but not limited to those mentioned in section 3 of this Standard Operating Procedure for Marketing Activities and **section 2.1 of the Group Marketing and Social Media Materials Standards**).

The Marketing Review Committee comprises of the following departments

1. Marketing & Corporate Communication
2. Partnership Management
3. Risk Management & Compliance
4. Business Development (On a discretionary basis)

PIAS Marketing Review Committee will only review and approve marketing materials when the PIAS Marketing Material Application Form is submitted by the representative in softcopy to pias.marketingreview@singlife.com

The form is available for download from PIAS Docushare:

[Home](#) > [PIAS Resource Library](#) > [Guides & Manuals](#) > [Marketing Review Committee Guidelines](#) > [PIAS Marketing Materials Application Form](#)

3. Definition of Terminologies

Marketing Material or Advertisement means any dissemination or conveyance of information in connection with a promotion of, or an invitation or a solicitation in respect of, any product or service, by any means or in any form, including by means of

- a) publication in newspapers, magazines, journals or other periodicals;
- b) display of posters or notices;
- c) circulars, handbills, brochures, pamphlets, books or other documents;
- d) letters addressed to individuals or bodies;
- e) photographs or cinematograph films; or
- f) sound broadcasts, television, the Internet or other media;
- g) social media sites or online sites;

“**Product advertisement**” means an advertisement in respect of any investment product.

“**Non-product advertisement**” means an advertisement, other than a product advertisement, that is in respect of the provision of any product or service regulated by the Financial Advisers Act 2001. For avoidance of doubt, this includes and is not limited to the marketing of your financial advisory services as a PIAS Financial Adviser Representative on your personal social media pages.

Non-product advertisement also includes **recruitment advertisement** which refers to an advertisement that encourages members of the public to consider a career path with you or your branch as future representatives.

4. Regulatory Requirements

4.1 Product Advertisements

For product advertisements, the requirements are —

- a) the product advertisement is not false or misleading;
- b) the product advertisement provides a fair and balanced view of the investment product to which it relates;
- c) the product advertisement presents information in a clear manner, regardless of whether such information is in text or otherwise;
- d) where the product advertisement appears in any medium of communication in visual form, the product advertisement is clearly legible;
- e) where the product advertisement appears in any electronic mail or website —
 - i. the product advertisement is in a font size of at least 10-point Times New Roman or any other standard font type that is visually equivalent to that font size; and
 - ii. any footnote in the product advertisement is not smaller than —
 - where the font size of the word or statement to which the footnote relates is or is smaller than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size — 10-point Times New Roman or any other standard font type that is visually equivalent to that font size;
 - where the font size of the word or statement to which the footnote relates is larger than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size but smaller than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size—half the font size of that word or statement; or
 - where the font size of the word or statement to which the footnote relates is or is larger than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size — 14-point Times New Roman or any other standard font type that is visually equivalent to that font size;
- f) the product advertisement **must** contain the following statement: “This advertisement has not been reviewed by the Monetary Authority of Singapore.”;

4.2 Non-Product Advertisements

For non-product advertisements, the requirements are:

- a) the non-product advertisement is not false or misleading;
- b) the non-product advertisement does not contain any statement to the effect that any report, analysis or other service will be furnished free or without charge, unless such report, analysis or service is in fact or will in fact be furnished in its entirety without any condition or obligation; and
- c) the non-product advertisement does not contain any exaggerated statement which exploits an individual's lack of experience and knowledge.

4.3 Advertisements Prepared by Other Person

In the context of PIAS, other person refers to product providers who have business relations with PIAS. All advertisements prepared by others, and made publicly available, are to satisfy the above requirements as stated in Section 4.1 and 4.2 for product and non-product advertisements respectively.

5. Internal Minimum Standards

Please adhere to the following minimum standards:

5.1 Use of PIAS logos

Representatives must follow the logo usage guidelines as stated in the PIAS logos usage guidelines. The PIAS logos and usage guidelines are available for download from the PIAS Docushare:

[Home > PIAS Resource Library > Corporate Branding > Corporate Logos and Templates > Logos](#)

5.2 Representative Number (MAS RNF No.)

It is a good practice to include the MAS issued Representative Number (MAS RNF No.) in full on marketing materials with the name of the representative. This is to enable recipients of the materials to verify the identity of the representative in the MAS Public Register of Representatives.

5.3 Representation Clause

A Representative should introduce himself/herself as a Financial Adviser Representative representing PIAS. Representatives are not permitted to call themselves "Financial Advisers" as this term refers to the entity. Neither should they give the impression that they are Financial Advisers. Please include the representation clauses below in your material:

For marketing materials made for individuals:

I am an authorised Financial Adviser Representative from [*Branch Name*], an authorised group of Financial Adviser Representatives from Professional Investment Advisory Services Pte Ltd.

MAS RNF No.: [_____]

For marketing materials made for branches:

[Branch Name] is an authorised group of Financial Adviser representatives from Professional Investment Advisory Services Pte Ltd.

5.4 Use of Corporate Email

Where the Representative includes an email address in the marketing materials as a point of contact for the recipient, the email shall bear the registered domain name given by the Company. The use of any other email address e.g. Branch's own corporate email is strictly prohibited.

5.5 Mandatory Disclaimer for Presentation slide

It is mandatory that all PIAS presentations include a disclaimer at the end or at the beginning of the presentation. The PIAS disclaimer and presentation slide templates are available for download from PIAS Docushare:

[Home](#) > [PIAS Resource Library](#) > [Corporate Branding](#) > [Corporate Logos and Templates](#) > [Templates](#)

5.6 Use of Image(s) of Individuals and Display of Prominent Notice in Seminar Events

Under the PDPA, an image of an identifiable individual captured in a photograph is personal data about that individual and consent must be obtained from the individual for its use. Please refer to Singlife's **Group Marketing and Social Media Materials Standards** (available in PIAS Docushare) for the measures to be taken to ensure that attendees are aware of the purpose for which their photographs are collected, used and disclosed.

As a good practice, you should obtain consent in writing or recorded in a manner that is accessible for future reference, for example, if the organization is required to prove that it had obtained consent when a complaint arises in the future. Below are the measures you could take:

- i. Incorporate the relevant consent clause, "I understand, acknowledge and consent to PIAS using photos taken at this event which may reflect my identity for publication in PIAS collateral and/or publicity purposes." into your own form, if any; and
- ii. Use the standard PIAS Event Evaluation Form available in PIAS Docushare.

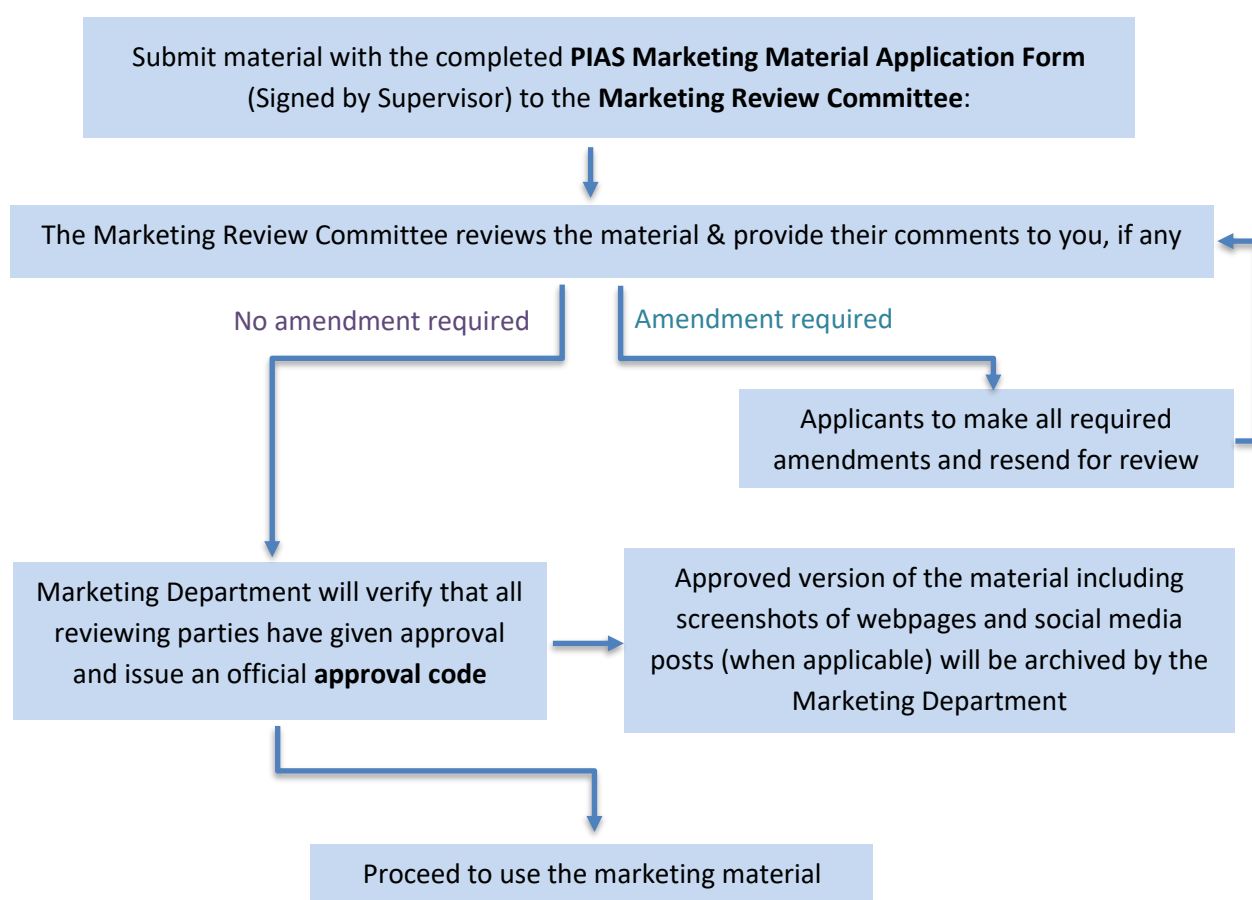
5.7 Other Standards (where applicable)

Following are some other standards to consider:

- Set out clearly both the potential upside and downside of the investment.
- Ensure that all marketing materials are free from grammatical, linguistic and/ or spelling errors.

- Ensure the information in the marketing materials does not constitute any copyright infringement.
- Ensure materials that are not in the English language are accurately translated and submitted in English for review.
- Avoid using superlative words such as “the best available product”, “will ensure it will meet your needs”, “number 1 in the market”, “we have the best products”.

6. Review and Approval Process



Please allow 7 business days for marketing materials to be reviewed

Note 1

Marketing Department: Review of materials conducted from a corporate image and branding perspective.

Partnership Management Department: Review of materials conducted on life insurance and investment product perspective and to provide unbiased and professional views with regards to the macroeconomic environments.

Risk Management & Compliance Department: Review of materials conducted solely from a regulatory perspective and to uphold the 3 principles (i) clear (ii) unambiguous (iii) not false or misleading.

Business Development: Ensures the information such as credentials, professional titles, achievements etc relating to Representatives and/or Branches are accurate, if such information is presented in the marketing materials.

7. Use of Social Media

The same regulations and requirements from section 4 to 6 apply for marketing activities done in any Social Media Platform (Facebook, Instagram, TikTok, YouTube, chat apps etc).



Facebook

Branch Page

- Branch profile pages must be public business pages, and everything posted must be open to public viewing access. There should not be any viewing restrictions on the branch page or any post (including country viewing or display limitations).
- Description / "About" section has to include PIAS representation clause:
"[Branch Name] is an authorised group of Financial Adviser representatives from Professional Investment Advisory Services Pte Ltd."
- You are required to send in the final URL of the branch page for approval. If you change the page name or post marketing materials, you must inform the PIAS Marketing Review Committee.

Individual Adviser's Business Page

- If you wish to create a platform to share information on financial planning or your business with your customers / prospects, you are required to create a personal business page instead of posting on your personal profile. If you are not familiar on the creation of business page, you may refer to this guide: <https://blog.hootsuite.com/steps-to-create-a-facebook-business-page/>
- Adviser business pages must be public business pages and everything posted must be open to public viewing access. There must not be any viewing restrictions on the page or on any post (including country viewing or display limitations).
- Include your name as the name of the business page. i.e. "John Tan Financial Planning", etc. Avoid using words such as: guru, master, expert and the likes in the name of your business page. If you would like to add your specialty, you may add in your page description "I specialize more in _____"
- Description / "About" section has to include PIAS Representation Clause in full.
I am an authorised Financial Adviser Representative from [Branch Name], an authorised group of Financial Adviser Representatives from Professional Investment Advisory Services Pte Ltd.
MAS RNF No.: [_____]
- You are required to send in the final URL of your personal profile page or personal business page for approval, if you change the page name or post marketing materials, you must inform PIAS Marketing Review Committee to get the individual items approved.



Instagram

- Branch and individual profiles must be professional/business pages and be open to public viewing and access.
- Each post and caption must have the #PIAS_SG regardless of whether the individual post needs to be reviewed and approved by the PIAS Marketing Review Committee.
- If requested for, you must be able to produce the material from your Instagram story archive. You should not tamper with or delete any Instagram Stories posted from your branch and personal social media pages from your archive.
- Your Instagram Bio must include a PIAS Representation Clause. Due to character limit for Instagram Bio, you may use the following versions:
 - Branch page:
"A group of financial adviser reps from PIAS."
 - Individual page:
"From [Branch Name], a group of financial adviser reps from PIAS"
- You are required to send in the final URL for approval. If you change the page name or post marketing materials, you must inform PIAS Marketing Review Committee to get the individual items approved.



LinkedIn

- Description / "About Us" section must include PIAS Representation Clause in.
 - Branch page:
"[Branch Name] is an authorised group of Financial Adviser representatives from Professional Investment Advisory Services Pte Ltd."
 - Individual page:
"I am an authorised Financial Adviser Representative from [Branch Name], an authorised group of Financial Adviser Representatives from Professional Investment Advisory Services Pte Ltd. MAS RNF No.: [_____]"
- You are required to send in the final URL for approval. If you change the page name or post marketing materials, you must inform PIAS Marketing Review Committee to get the individual items approved.



YouTube

- The YouTube channel's description and in the description of every uploaded video must include the PIAS representation clause in full.
 - Branch page: "[Branch Name] is an authorised group of Financial Adviser representatives from Professional Investment Advisory Services Pte Ltd."
 - Individual page: I am an authorised Financial Adviser Representative from [Branch Name], an authorised group of Financial Adviser Representatives from Professional Investment Advisory Services Pte Ltd. MAS RNF No.: [_____]
- The video can only be kept unlisted if the file cannot be sent via Email or Cloud for the PIAS marketing review team to review. After the approval code is issued, the video's viewing restrictions should be removed and set to be publicly viewable.
- You are required to send in the final URL for approval. If you change the channel name or post marketing materials, you must inform PIAS Marketing Review Committee to get the individual items approved.

The above guides for each social media platform are non-exhaustive.

The over-riding principle is that the social media page(s) and all its contents must not cast negative impressions to PIAS directly or indirectly.

This is to be adhered in tandem with the Group Marketing and Social Media Materials Standards which is available in Docushare. In the event of a dispute, the decision of PIAS Management is final.

8. Use of Third Party Trademarks & Contact Details in Representatives' Marketing Materials

PIAS representatives who intend to use third party trademarks and contact details in self-created marketing materials must seek approval from the third party before use. Third party trademarks and contact details include distribution partners' names, logos or service marks, addresses, telephone number or any other information or materials relating to third parties, whether in any printed matter, circulars, leaflets, directories, posters or banners or on the internet or by any other means of communication. For use of partner related trademarks and contacts, you can reach out to the BDM partners found in Docushare. <https://docushare.proinvest.com.sg/docushare/dsweb/View/Collection-82058>

9. Related Documents

- Marketing Materials Application Form [Appendix 1.0]
- Standard Operating Procedure for Marketing Activities Checklist [Appendix 2.0] – *Checklist to help you ensure that your marketing materials are adhered to the guidelines*

10. Some Useful References

- MAS FAA-N03 Notice on Information to Clients and Product Information Disclosure
- MAS FAA-G11 Guidelines on Fair Dealing
- MAS & LIA Code of Best Practices in Advertising Collective Investment Schemes & Investment- Linked Life Insurance Policies
- MAS FAA-G05 Guidelines on the Use of the Term “Independent” by Financial Advisers
- Spam Control Act 2007
- Copyright Act 2021
- Personal Data Protection Act 2012
- Group Privacy Policy
- Group Privacy Standard
- Group Data Management Policy
- PIAS Data Risk Governance Framework
- PIAS Data Incident and Breach Management Standard which includes “Advisory Guidelines on Key Concepts in the PDPA” and “PDPC Template for Notification of Data Breach Incident”
- PIAS Do Not Call Policy
- PIAS Personal Data Protection Manual
- Financial Advisers Act 2001
- Financial Advisers Regulations
 - Section 22 Product Advertisements
 - Section 22A Approval of Product Advertisement
 - Section 22D Advertisement other than Product Advertisement
- MAS Notice 120 Disclosure and Advisory Process Requirements for Accident and Health Insurance Products

Appendix 1.0 | Marketing Materials Review Form

Please refer to the PIAS Marketing Materials Application Process prior to submitting your marketing materials for vetting. Submit the completed form and material to pias.marketingreview@singlife.com.

Please allow 5-7 business days for marketing materials to be reviewed. Any amendments made to the marketing materials after the approval code is issued will void the approval code. The amended material must be resubmitted to the Reviewing Parties for another review and approval.

Name of Campaign / Document	
Date of Marketing Review Application	
Branch Name	
Type of Marketing Material (e.g. newsletter, Facebook, advertisement, EDM) For EDM, please indicate if there are any slides to be reviewed	
Approved Event Code (if any)	

Target Recipient(s) (e.g. existing clients, prospects)	Expected Date of Dissemination	Mode of Dissemination (e.g. email, hardcopy, newspaper)

I declare and undertake that my marketing material is compliant with Singlife Group Marketing and Social Media Materials Standards and PIAS Standard Operating Procedure for Marketing Activities.

Name and Signature of Financial Adviser Representative

Name and Signature of Supervisor

FOR INTERNAL USE ONLY			
	Name	Signature	Code Issuance Date
Issued by:			
Marketing Approval Code:			

Appendix 2.0 | Marketing Materials Checklist

2.1 PRODUCT ADVERTISEMENT GUIDELINES

PM: Partnership Management; RM&C: Risk Management & Compliance, BD: Business Development

1) The product advertisement is not false or misleading. <i>Each of the following product advertisements is false or misleading when:</i>		
S/N	Guidelines	Reviewer
a.	a product advertisement that omits any material information and as a result of which, the product advertisement or any part of the product advertisement is false or misleading	PM
b.	a product advertisement that contains a false or misleading statement	PM RM&C BD
c.	a product advertisement that contains information that cannot be justified based on the facts known to the person who disseminated or published the product advertisement, or caused the product advertisement to be disseminated or published	PM RM&C BD
d.	a product advertisement that contains any information, in text or otherwise, that is inaccurate or inconsistent with the nature or risks of the investment product to which it relates	PM
e.	a product advertisement that contains any exaggerated statement which is calculated to exploit an individual's lack of experience and knowledge	RM&C
f.	a product advertisement that contains information which is inconsistent with any information provided by the issuer of the investment product (to which the product advertisement relates) to the person who disseminated or published the product advertisement, or caused the product advertisement to be disseminated or published	PM
g.	a product advertisement that contains or refers to any graph, chart, formula or other device and represents directly or indirectly, that — (i) the graph, chart, formula or device (as the case may be) can, in and of itself, be used to determine which investment product to buy or sell, or when to buy or sell the investment product; or (ii) the graph, chart, formula or device (as the case may be) will assist any person in deciding which investment product to buy or sell, or when to buy or sell the investment product, but does not prominently disclose the limitations, and difficulties in respect of the use, of the graph, chart, formula or device, as the case may be	RM&C
h.	a product advertisement that contains any statement to the effect that any report, analysis or other service will be furnished free or without charge, and such report, analysis or service is not in fact or will not in fact be furnished in its entirety without any condition or obligation	RM&C

2) The product advertisement provides a fair and balanced view of the investment product to which it relates.

Each of the following product advertisements does not provide a fair and balanced view of the investment product to which it relates when:

S/N	Guidelines	Reviewer
a.	a product advertisement that contains a statement on any return of the principal sum invested in the investment product to which the product advertisement relates, or benefit of holding that investment product, but — (i) does not provide an unbiased description of risks associated with the investment product; or (ii) does not give a proportionate level of prominence to any warning, disclaimer or qualification which is disclosed in relation to that statement	PM
b.	an advertisement that is in respect of an investment product that is structured with the objective of returning the full principal sum invested in the investment product to a holder of the investment product upon the maturity of the investment product, but where the return of the full principal sum invested in the investment product at maturity is not unconditionally guaranteed, and the product advertisement does not contain a statement which clearly highlights the fact that the return of the full principal sum invested in the investment product at maturity is not unconditionally guaranteed	PM
c.	a product advertisement that contains a representation that the return of all or a part of the principal sum invested in the investment product to which the product advertisement relates, or the rate of return on the investment product is guaranteed, but — (i) does not state the name of the guarantor; or (ii) does not contain a statement that clearly highlights that while there is a guarantor who guarantees the return of all or a part of the principal sum invested in the investment product, or the rate of return on the investment product, there is no assurance that the guarantor will be able to fulfil its obligations under such guarantee	PM
d.	a product advertisement that contains historical information on the investment product to which the product advertisement relates, but does not contain a statement that the information presented is historical information and that the past performance of the investment product is not indicative of its future performance	PM
e.	a product advertisement that gives the impression that an investor can profit from investing in the investment product without any risk	RM&C
f.	a product advertisement that suggests that the nature of the investment product is, or is comparable to, a deposit	RM&C
g.	an advertisement that is in respect of an investment product of which the return of the principal sum invested in the investment product or the rate of return on the investment product is not guaranteed, but suggests that any of the following risks is low or nil: (i) the risk of the holder of the investment product losing the holder's principal sum invested; (ii) the risk of the holder of the investment product not achieving the stated, targeted or expected rate of return of the holder's principal sum invested	PM

3) The product advertisement presents information in a clear manner, regardless of whether such information is in text or otherwise.

Each of the following product advertisements does not present information in a clear manner when:

S/N	Guidelines	Reviewer
a.	<p>a product advertisement that presents information (including information in footnotes) in a manner that is not easily understood by —</p> <ul style="list-style-type: none"> (i) in a case where the product advertisement states the class of persons for whom the product advertisement is intended, a reasonable person belonging to that class of persons; and (ii) in any other case, a reasonable person who may rely on the product advertisement 	RM&C
b.	<p>a product advertisement that contains any jargon or technical term, but does not define or explain such jargon or term in a manner that is easily understood by —</p> <ul style="list-style-type: none"> (i) in a case where the product advertisement states the class of persons for whom the product advertisement is intended, a reasonable person belonging to that class of persons; and (ii) in any other case, a reasonable person who may rely on the product advertisement 	RM&C

4) Where the product advertisement appears in any medium of communication in visual form, the product advertisement is clearly legible.

Each of the following product advertisements is not clearly legible when:

S/N	Guidelines	Reviewer
a.	<p>a product advertisement that appears in any document in written or printed form, including any newspaper, periodical, magazine or letter, which —</p> <ul style="list-style-type: none"> (i) presents information in a font size that is smaller than 10-point Times New Roman, or any other standard font type that is visually equivalent to that font size; or (ii) presents information in any footnote in a font size that is smaller than — <ul style="list-style-type: none"> (A) where the font size of the word or statement to which the footnote relates is or is smaller than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size — 10-point Times New Roman or any other standard font type that is visually equivalent to that font size; (B) where the font size of the word or statement to which the footnote relates is larger than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size but smaller than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size — half the font size of that word or statement; or (C) where the font size of the word or statement to which the footnote relates is or is larger than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size — 14-point Times New Roman or any other standard font type that is visually equivalent to that font size; 	Marketing

b.	a product advertisement that appears in a form, other than a document mentioned in sub-paragraph (a), which presents information in any footnote in a font size that is smaller than half the font size of the word or statement to which the footnote relates	Marketing
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5) Where the product advertisement appears in any electronic mail or website —

S/N	Guidelines	Reviewer
a.	<p>(i) the product advertisement is in a font size of at least 10-point Times New Roman or any other standard font type that is visually equivalent to that font size; and</p> <p>(ii) any footnote in the product advertisement is not smaller than —</p> <p>(A) where the font size of the word or statement to which the footnote relates is or is smaller than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size — 10-point Times New Roman or any other standard font type that is visually equivalent to that font size; or</p> <p>(B) where the font size of the word or statement to which the footnote relates is larger than 20-point Times New Roman or any other standard font type that is visually equivalent to that font size but smaller than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size—half the font size of that word or statement; or</p> <p>(C) where the font size of the word or statement to which the footnote relates is or is larger than 29-point Times New Roman or any other standard font type that is visually equivalent to that font size — 14-point Times New Roman or any other standard font type that is visually equivalent to that font size</p>	Marketing

6) Inclusion of clause —

S/N	Guidelines	Reviewer
a.	the product advertisement contains the following statement: “This advertisement has not been reviewed by the Monetary Authority of Singapore.”	RM&C

2.2 NON-PRODUCT ADVERTISEMENT GUIDELINES

1) For the purposes of paragraph (1), the requirements are —

S/N	Guidelines	Reviewer
a.	the non-product advertisement is not false or misleading;	RM&C BD
b.	the non-product advertisement does not contain any statement to the effect that any report, analysis or other service will be furnished free or without charge, unless such report, analysis or service is in fact or will in fact be furnished in its entirety without any condition or obligation; and	RM&C
c.	the non-product advertisement does not contain any exaggerated statement which exploits an individual’s lack of experience and knowledge.	RM&C