

IDENTIFICATION AND PROMOTIONAL MATERIAL POLICY

Version 2.01

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AIM OF THIS POLICY

It is important that your clients clearly understand at all times what services you provide and who is responsible for those services. It is therefore important that the information contained in your identification and promotional material is clear, complete and consistent. The requirements outlined in this policy apply to all identification and promotional material unless stated otherwise.

This policy also addresses the requirements under the Anti-Hawking provisions to ensure clients are not subject to pressure selling.

WHO THIS POLICY APPLIES TO

This policy applies to all staff of Insight Investment Partners and referral partners.

WHAT THIS POLICY COVERS

This policy covers:

- What You Must Do
 - General Obligations
 - Websites, Mass Communications, Social Media & Media Communications
- What You Must Not Do
 - General Obligations
 - Websites, Mass Communications, Social Media & Media Communications
- Good Operating Practice
 - Websites, Mass Communications, Social Media & Media Communications
- FAQ

WHAT YOU MUST DO

GENERAL OBLIGATIONS

- Ensure that your clients/any relevant third parties, are aware of the distinction between those services offered under Insight Investment Partners and those not, particularly when making a referral or operating a non-financial planning practice in addition to your financial planning practice.
- Include the following in all identification and promotional material:
 - your representative status and financial adviser number (Authorised Representative or Corporate Authorised Representative);
 - the licensee's full name (subsequent references may be an abbreviated form);
 - the licensee's ABN; and
 - the licensee's AFSL (you are required to spell out the first reference to an Australian Financial Services Licence (AFSL) in a document; subsequent references may be shortened to AFSL).
- Ensure you have the legal right to use your business name and that it:
 - meets the promotional requirements outlined in this policy;
 - does not use/reference another licensee name;
- Include the general advice disclaimer as detailed in the General Advice & Personal Advice Policy where your material involves references to products, services, strategies, market

commentary, legislative changes, etc. This includes, but is not limited to, your website/web page/social media pages.

- Add the following statement to the general advice warning if the material includes reference to a specific product:

“To assist you in doing this, you should obtain a copy of and consider the Product Disclosure Statement for this product before making any decision.”

- If your material includes reference to third party information, source the information and include the following warning (in addition to any other warnings above):

“No representation is given, warranty made or responsibility taken about the accuracy, timeliness or completeness of information sourced from third parties. Because of this, we recommend you consider, with or without the assistance of a financial adviser, whether the information is appropriate in light of your particular needs and circumstances.”

- Provide an FSG with promotional material unless clients already have a current copy.
- Make your FSG available at public forums (e.g. seminars, workshops, etc.) if are providing general advice.
- If a client elects not to receive marketing material, make a record on your CRM (XPLAN) to ensure the client is not subject to marketing in any form. The client can then only be contacted where it is necessary to do so in relation to existing products and services.
- Adhere to the Anti-Hawking Provisions if you are contemplating making an unsolicited marketing call.

WEBSITES, MASS COMMUNICATIONS, SOCIAL MEDIA & MEDIA COMMUNICATIONS

- Ensure that the content of your website is generalised with no reference to product or specific strategy advice which could be perceived as influencing clients. Replacing words such as “will”, “must” and “guarantee” with “may”, “might” and “possible” assist in ensuring your content is generalised and not too specific.
- Link your facebook, LinkedIn and/or Twitter account to your website to provide access to all relevant disclaimers. You are not required to display the logo on your Facebook, LinkedIn and Twitter accounts.
- Ensure client testimonials are genuine and you have permission to post them. You are permitted to use anonymous testimonials upon client request.
- Include Insight Investment Partners AFSL/ABN number on your website and all social media pages where you own the content.
- Ensure you have permission to use photographs that appear on your website/social pages. If minors are involved, you will need to seek and retain written permission from their parents/legal guardians.
- Where you intend to send mass communications, ensure that clients or prospective clients have consented to receive these, whether by way of email or newsletters.
- When sending mass communications by email, ensure the email contains accurate information which identifies the sender of the message and a facility to enable recipients to opt out from receiving messages in the future (unsubscribe requests must be honoured within 5 business days).

WHAT YOU MUST NOT DO

GENERAL OBLIGATIONS

- Promote or hold out to provide services under Insight Investment Partners that you are not authorised to offer under our licence.
- Use the following terms in your financial planning promotional material:
 - General Insurance Broker
 - Accounting and Audit Services
 - Business Services
 - Tax/Tax Services/Tax Minimisation or similar wording; we consider these descriptions too broad. 'Tax Effective Strategies' is permitted.
 - Legal Services
 - Real Estate
 - Consulting Services
 - Administration and Compliance of SMSFs
 - Credit Advice/Assistance.
- Avoid the use of terms such as 'safe', 'secure' or 'guaranteed' where they may create expectations that cannot be met or indicate a certain level of security or protection that doesn't exist.
- Endorse third party advice (including that of a related business), in line with the Referral Arrangements Policy.
- Promote your financial planning practice as a 'fee model' where you receive commissions (including insurances) or volume rebates. Where you do not receive these payments, you may like to promote your fee structure as, "Insight Investment Partners operates on a fee-for-service basis, which means our clients pay us directly for the services we provide. Our advisers do not receive commissions when investment recommendations are provided to clients." Please refer to the FAQ below for examples of terminology where you are in receipt of the payments described above.
- Reproduce on your website, web page, social media pages sections or in your mass communications, whole articles or other material written or published by other sources, without the copyright owner's permission, as you will be infringing copyright laws. Small quotes of one or two lines (maximum) may be satisfactory, provided the information is properly attributed to the author.

WEBSITES, MASS COMMUNICATIONS, SOCIAL MEDIA & MEDIA COMMUNICATIONS

- Provide personal advice via a social media website, including private messaging, as this can be viewed by people other than those the advice is intended to be provided to.
- Provide general advice on Twitter, unless your profile states "general advice only".
- Issue any advertising, promotional or marketing material or make public statements of any kind about Insight Investment Partners, our services or business unless such material has first been approved by the Responsible Manager.
- Make any reference alluding to or referring to Insight Investment Partners in any radio or television broadcast without the prior written consent of the Responsible Manager.
- Send unsolicited mass communications to clients or prospective clients without their consent or if they have opted out.

GOOD OPERATING PRACTICE

GENERAL GUIDANCE

- The following is an overview of guidance from ASIC's Regulatory Guide 234 that should be considered when preparing promotional material:
- Advertisements about financial services should not create unrealistic expectations about what that service can achieve (for example, "We guarantee that you will meet your retirement goals").
- The inclusion of warnings or disclaimers within promotional or advertising material should be of sufficient prominence to adequately convey the information to the audience on first viewing the advertisement.
- Where a fee or cost is referred to in an advertisement, it should give a realistic impression of the overall level of fees and costs a person is likely to pay, including any indirect fees or costs.
- Any product comparisons made should only be between products that have sufficiently similar features or, where an advertisement compares different products, the differences should be made clear in the advertisement.
- Where past performance figures are stated, these should be accompanied by a warning that past performance is not indicative of future performance.
- Advertisements should be capable of being clearly understood by the audience that might reasonably be expected to see the advertisements, and should not state or imply that a product is suitable for particular types of consumers unless the promoter has assessed that the product is suitable for that class. Advertisements for complex products that are only appropriate for a limited group of people should not be targeted to a wider audience. Where the advertisement is targeted, the nature of the advertisement must be general. This is to avoid the perception that the targeted audience's personal objectives, financial situation or circumstances have been considered.

WEBSITES, MASS COMMUNICATIONS, SOCIAL MEDIA & MEDIA COMMUNICATIONS

- It is important to remember that anything you publish on a social media website can be forwarded and can also be extremely difficult to remove.

FAQ

Questions	Answers
My business doesn't qualify as a 'fee model', what terminology could I use to promote our financial planning advice fees?	<p>In this instance you may wish to promote your business in the following ways if you charge fees for particular services (examples only):</p> <p>Insight Investment Partners operates on an hourly fee-for-service basis for the initial advice and services provided to our clients.</p> <p>Insight Investment Partners offers flexible payment options for our advice and services. You may choose to pay via an hourly fee-for-service basis, pay via a commission or a combination of both. Our fees will be agreed with you before we proceed with your work.</p>