

## **Why is this policy important?**

The Financial Markets Conduct Act 2013 (FMC Act) sets out responsibilities for companies offering financial products and financial services, related to their conduct and advertising practices. The law makes it an offence to engage in misleading or deceptive conduct in relation to financial products or to make false, misleading or unsubstantiated representations about financial products.

The Financial Services Legislation Amendment Act (FSLAA) also prohibits persons making false and misleading statements and omissions.

This policy sets out our approach to ensuring adherence to these requirements.

## **Our policy**

We do this:

- Ensure our advertising and communications are factual, and convey an accurate impression of our products and services.
- Review and approve all client communications and advertisements prior to issue to ensure their compliance with required standards.
- Hold evidence to substantiate any claims made in our advertising.
- Immediately rectify any material errors or omissions in our published advertising materials, including removing or amending the material concerned and contacting any clients who may have acted on that information.
- Regularly review our advertising material to ensure it remains current and remove any that are out of date.

We don't do this:

- Distribute client communications or advertisements that could be misleading or deceptive.
- Distribute client communications or advertisements without prior approval via our internal sign-off process.
- Make representations to clients, verbal or in writing, or conduct ourselves in a manner that could be misleading or deceptive.
- Make unsubstantiated representations to existing or prospective clients.

## **Implementation**

All brokers and employees receive induction and annual retraining on the contents of this policy.

## **Ensuring compliance**

Senior management maintains full visibility and oversight of all advertising and marketing initiatives, including supporting communications and broker activities.

## **Date**

01/03/ 2021