



FAIS ADVERTISING POLICY

VERSION 1.01

THE PRIME FINANCIAL SERVICES GROUP

28 PETER PLACE
LYME PARK
SANDTON
2060



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1. APPLICATION OF THE POLICY

- 1.1. This policy is applicable to the legal entities of the Prime Financial Services Group (hereinafter referred to as “the Group”), as shown on the Group’s corporate organogram and amended from time to time (excluding Automated Outsourcing Services (Pty) Ltd).

2. PURPOSE OF THE POLICY

- 2.1. The policy document shall outline the Group’s commitment and measures to ensure that the information provided in advertisements are consistent with the requirements as set out in the General Code of Conduct.

3. DEFINITIONS

- 3.1. **Advertisement:** With reference to the definitions contained in the applicable legislation, “advertisement” as used in this policy refers to any communication published through any medium and in any form, by itself or together with any other communication, which is intended to create public interest in the business, financial services, financial products or related services of a provider, or to persuade the public (or a part thereof) to transact in respect of a financial product, financial service or related service of the provider in an manner, but which does not purport to provide detailed information to or for a specific client regarding a specific financial product, financial service or related service. For definition purposes, the expression “advertising” has a corresponding meaning.
- 3.2. **Comparative:** Refers to a direct or indirect comparison between providers or between financial products, financial services or related services of one or more provider or product supplier;
- 3.3. **Endorsements:** Refer to public statements declaring the virtues of a financial product, financial service or related service of a provider or recommending the entering into of a financial product, financial service or related service;
- 3.4. **FAIS:** Financial Advisory and Intermediary Services Act 37 of 2002 .
- 3.5. **FSCA:** Financial Sector Conduct Authority
- 3.6. **FSP:** Financial Services Provider
- 3.7. **General Code of Conduct:** The General Code of Conduct for Authorised Financial Services Providers and Representatives as published in Board Notice 80 of 2003.
- 3.8. **Key Person:** (a) a member of the governing body of the FSP;
(b) the chief executive officer or other person in charge of the FSP;
(c) a person other than a member of the governing body of the FSP who makes or participates in making decisions that: affect the whole or a substantial part of the business of the FSP; or have the capacity to affect significantly the financial standing of the FSP;
- 3.9. **Loyalty Benefit:** Any benefit (including a so-called cash- or premium-back bonus) that is directly or indirectly provided or made available to a client by a provider or a product supplier or an associate of the provider or product supplier, which benefit is wholly or partially contingent upon-
(a) the financial product with that provider or product supplier remaining in place;

- (b) the client continuing to utilise a financial service of that provider or product supplier;
 - (c) the client increasing any benefit to be provided under a financial product; or
 - (d) the client entering into any other financial product or benefit or utilising any related services offered by that provider, product supplier or their associates;
- 3.10. **Marketing Material:** Marketing material includes brochures, prospectuses and websites.
- 3.11. **No-claim Bonus:** Any benefit that is directly or indirectly provided or made available to a client by a product supplier in the event that the client does not claim or does not make a certain claim under a financial product within a specified period of time
- 3.12. **Puffery** Any value judgments or subjective assessments of quality based solely on the opinion of the evaluator and where there is no pre-established measure or standard

4. ADVERTISING REQUIREMENTS AS PER THE GENERAL CODE OF CONDUCT

- 4.1. The FSP shall, prior to publishing an advertisement, take reasonable measures to ensure that the FSP's advertisements are clear, fair and not misleading and that the information provided in the advertisement is consistent with section 14 of the General Code of Conduct.
- 4.2. The FSPs within the Group have implemented [Annexure 1](#) and [Annexure 2](#) which serves as a guideline that assists the FSPs with identifying which advertising requirements are applicable to the form of advertising that the FSP is considering.
- 4.3. The FSP will, prior to publishing an advertisement, ensure that the advertisement adheres to the requirements as listed and that the advertisement has been signed off / approved by a key person (via completion of [Annexure 3](#)) whereby it is indicated that there is no non-compliance with Section 14 of the General Code of Conduct.
- 4.4. At this time, the Group does not advertise via public radio services or telephone.
- 4.5. All advertisements will be kept on record for a period of at least 5 years after publication.

5. NON-COMPLIANCE WITH SECTION 14 OF THE GENERAL CODE OF CONDUCT

- 5.1. Where the FSP becomes aware that an advertisement that relates to the FSP's business, financial services or related services, whether published by the FSP or by any other person, is not consistent with section 14 of the General Code of Conduct, the FSP will:
 - 5.1.1. As soon as reasonably practicable, correct or withdraw the advertisement; or
 - 5.1.2. Take reasonable steps to ensure that it is corrected or withdrawn; and
 - 5.1.3. Notify any persons who the FSP knows to have relied on the advertisement

ANNEXURE 1: STANDARDS AND BEST PRACTICE PRINCIPLES

GENERAL PRINCIPLES		
1.	Advertisements must-	<input type="checkbox"/>
1.1.	be factually correct	<input type="checkbox"/>
1.2.	provide a balanced presentation of key information; and	<input type="checkbox"/>
1.3.	not be misleading.	<input type="checkbox"/>
REFERENCES IN ADVERTISEMENTS		
2.	An advertisement that references statistics, performance data, achievements or awards must disclose-	<input type="checkbox"/>
2.1.	the source and the date thereof; and	<input type="checkbox"/>
2.2.	the identity of the grantor of an award and must make it clear if the award is granted by an associate of the provider or product supplier.	<input type="checkbox"/>
3.	An advertisement that refers to premiums or other periodic investment amounts must-	<input type="checkbox"/>
3.1.	in the case where the premium or periodic investment amount will escalate automatically, indicate the escalation rate or basis; and	<input type="checkbox"/>
3.2.	where the premium, in the case of an insurance policy, (with or without automatic escalations) may change at a future date, indicate the period for which the premium is guaranteed.	<input type="checkbox"/>
DESCRIPTIONS IN ADVERTISEMENTS		
4.	Descriptions in an advertisement must not-	<input type="checkbox"/>
4.1.	give benefits or returns undue prominence compared with risks; and	<input type="checkbox"/>
4.2.	exaggerate benefits or returns or create expectations regarding financial product or financial service performance or the performance of related services that the provider does not reasonably expect to achieve.	<input type="checkbox"/>
5.	Descriptions in an advertisement, in respect of a specific financial product, financial service or related service, must include key limitations, exclusions, risks and charges, which must be clearly explained and must not be worded positively to imply a benefit.	<input type="checkbox"/>
6.	References to a fee or cost must give a realistic impression of the overall level of fees or costs a person is likely to pay, including any indirect fees or costs.	<input type="checkbox"/>
7.	Where a provider can demonstrate that, due to the nature of the medium used for the advertisement, it is not reasonably practicable for the information required to be fully included in the advertisement itself, the advertisement must indicate	<input type="checkbox"/>
7.1.	that additional information on key limitations, exclusions, risks and charges related to the financial product, financial service or related service being advertised is available;	<input type="checkbox"/>
7.2.	and where and how the additional information may be accessed.	<input type="checkbox"/>
8.	The information referred to in paragraph 7 above must be publicly available and readily accessible to the average client targeted by the advertisement.	<input type="checkbox"/>
THE ADVERTISEMENT AS A WHOLE		
9.	An advertisement, when examined as a whole, must not be constructed in such a way as to lead the average targeted client to any false conclusions he or she might reasonably rely upon.	<input type="checkbox"/>
10.	An advertisement must not obscure information. In this regard, a provider must, when constructing an advertisement, consider the conclusion likely to be made by clients that are subject to the advertisement, and in doing so have regard to-	<input type="checkbox"/>
10.1.	the literal meaning of the words;	<input type="checkbox"/>
10.2.	impressions from nonverbal portions of the advertisement; and	<input type="checkbox"/>
10.3.	materials and descriptions omitted from the advertisement	<input type="checkbox"/>
11.	An advertisement relating to a financial product that is targeted at a particular type or group of client must make this clear	<input type="checkbox"/>
12.	Each piece of information in an advertisement must be prominent ¹ enough and proximate enough to other information so as not to mislead the average targeted client.	<input type="checkbox"/>

¹ In determining prominence, consideration must be given to: the target audience of the advertisement; the likely information needs of the average targeted client; prominence in the context of the advertisement as a whole; positioning of the text and audibility and speed of speech; the duration of displays of key information; background; colour; and font size. A statement or information in an advertisement is

13.	An advertisement must not be designed to exaggerate the need for urgency which could encourage the average targeted client to make unduly hasty decisions.	<input type="checkbox"/>
WARNINGS, DISCLAIMERS AND QUALIFICATIONS		
14.	Warnings, disclaimers and qualifications contained in an advertisement must-	<input type="checkbox"/>
14.1.	not be inconsistent with other content in the advertisement; and	<input type="checkbox"/>
14.2.	have sufficient prominence to effectively convey key information.	<input type="checkbox"/>
MISLEADING IMPRESSIONS		
15.	An advertisement relating to a financial service must-	<input type="checkbox"/>
15.1.	disclose any relevant limitations on the extent of the financial service and the range of financial products on which the financial service is based;	<input type="checkbox"/>
15.2.	not create a misleading impression about the nature and extent of a provider's skills, experience, knowledge and expertise insofar it relates to the financial service; and	<input type="checkbox"/>
15.3.	not create a misleading impression about the cost of a financial service including that it is 'free' if the service is in fact paid for by the client directly or indirectly through other costs or charges.	<input type="checkbox"/>
16.	An advertisement must not disparage or make inaccurate, unfair or unsubstantiated criticisms about any financial product, financial service, product supplier or provider.	<input type="checkbox"/>
IDENTIFICATION OF PRODUCT SUPPLIER OR FSP		
17.	An advertisement relating to a financial product or financial service must clearly and prominently identify the product supplier or provider or both, as applicable.	<input type="checkbox"/>
18.	An advertisement must not use the group or parent company name or the name of any other associate of a product supplier or provider, or the name of another person, to-	<input type="checkbox"/>
18.1.	create the impression that any person other than the product supplier or provider, as the case may be, is financially or otherwise liable in relation to a financial product or financial service;	<input type="checkbox"/>
18.2.	mislead or deceive as to the true identity of the provider or product supplier.	<input type="checkbox"/>
19.	An advertisement relating to a financial product that is subject to a white labelling arrangement must clearly and prominently identify the product supplier.	<input type="checkbox"/>
APPROPRIATE LANGUAGE AND MEDIUM		
20.	An advertisement must use plain language.	<input type="checkbox"/>
21.	Terms must be defined or explained if the average targeted client could not reasonably be expected to understand them.	<input type="checkbox"/>
22.	A provider must consider the appropriateness of the medium to be used to publish any advertisement in relation to the complexity of the features of the financial product or financial service or other information being communicated.	<input type="checkbox"/>
NEGATIVE OPTION MARKETING		
23.	A provider or any person acting on its behalf may not offer to enter into any agreement in respect of a financial product or financial service on the basis that the agreement will automatically come into existence unless the client explicitly declines the provider's offer to enter into agreement	<input type="checkbox"/>
UNWANTED DIRECT ADVERTISING		
24.	Where a provider or any person acting on its behalf uses a telephone or mobile phone call, voice or text message or other electronic communication for an advertisement, it must allow the client during that call or within a reasonable time after receiving the message, the opportunity to demand that the provider or other person does not publish any further advertisements to the client through any of these mediums. In this regard, no fee may be charged to a client for making such a demand.	<input type="checkbox"/>
COMPARATIVE MARKETING		
25.	Where a survey or other financial product or financial service comparison informs a comparative advertisement, the survey or other product or service comparison-	<input type="checkbox"/>
25.1.	must be undertaken by an independent person or, if it is not reasonably practicable that it is undertaken by an independent person, the advertisement must be so qualified;	<input type="checkbox"/>
25.2.	must be conducted at regular intervals if relied on or referenced on an on-going basis;	<input type="checkbox"/>

not regarded as being prominent if, amongst other things, the statement or information is: obscured through the close proximity of promotional illustrations and/or additional text; difficult to read due to the use of small font sizes, unclear type styles or the duration for which it is displayed; likely to be overlooked due to its position; superimposed across a coloured or patterned background which lessens its visual impact; or difficult to hear or understand due to the volume or speed at which speech is delivered.

25.3.	must ensure that financial products, financial services or related services being compared have the same or similar characteristics;	<input type="checkbox"/>
25.4.	must take account of comparable features across the financial product, financial service or related service offerings included in the sample to ensure that not only the price (e.g. the Rand value of premiums or investments) is being compared, but also the benefits provided under the financial products, financial services or related services concerned;	<input type="checkbox"/>
25.5.	in particular, in the case of comparisons between financial products that are insurance policies, must ensure that price comparisons are based on policies with equivalent terms and conditions, including insured events, cover levels, exclusions, waiting periods and other key features;	<input type="checkbox"/>
25.6.	may not focus on the price of a financial product, financial service or related service to the exclusion of the suitability of the financial product, financial service or related services or its delivery on client expectations; and	<input type="checkbox"/>
25.7.	must ensure that the information used in comparisons is current, complete and accurate.	<input type="checkbox"/>
25.8.	The survey or other comparison source and date thereof must be referenced in the advertisement and the methodology applied must be publicly available and readily accessible to the public in an easily understandable format.	<input type="checkbox"/>
PUFFERY		
26.	Advertisements that include puffery must be consistent with the provisions relating to puffery in the Code of Advertising Practice Issued by the Advertising Regulatory Board as amended from time to time.	<input type="checkbox"/>
ENDORSEMENTS		
27.	Testimonials and third person endorsements used in an advertisement-	<input type="checkbox"/>
27.1.	must be the genuine opinion and actual experience of the person making the testimonial or endorsement and be properly attributed to such person;	<input type="checkbox"/>
27.2.	must be based upon actual statements made for testimonial or endorsement purposes; and	<input type="checkbox"/>
27.3.	may use a pseudonym instead of the real name of the person making the testimonial or endorsement, provided this is stated in the advertisement concerned.	<input type="checkbox"/>
28.	If the person making the testimonial or endorsement, or their employer or principal or any associate, has any financial interest or relationship to the-	<input type="checkbox"/>
28.1.	provider or any associate of the provider or person acting on behalf of the provider; or	<input type="checkbox"/>
28.2.	product supplier or any associate of the product supplier or person acting on behalf of the product supplier where the advertisement relates to a financial product,	<input type="checkbox"/>
28.3.	or will or has been compensated for the endorsement by any person (other than through reimbursement of actual costs incurred by the person making the endorsement), this must be disclosed in the advertisement.	<input type="checkbox"/>
29.	Any endorsement in an advertisement must clearly and prominently state that the endorsement does not constitute financial advice.	<input type="checkbox"/>
LOYALTY BENEFITS OR BONUSES		
30.	An advertisement that references a loyalty benefit or no-claim bonus must not create the impression that such benefit or bonus is free and must adequately-	<input type="checkbox"/>
30.1.	indicate if the loyalty benefit or no-claim bonus is optional or not; and	<input type="checkbox"/>
30.2.	regardless of whether or not the loyalty benefit or no-claim bonus is optional, express the cost of the benefit or bonus including, where applicable, the impact that such cost has on the premium or investment amount, unless the impact is negligible ² ; and	<input type="checkbox"/>
30.3.	identify the grantor of the benefit or bonus.	<input type="checkbox"/>
31.	Where an advertisement highlights a loyalty benefit or no-claims bonus as a significant feature of a financial product or financial service and makes reference to a projected loyalty benefit value or no-claim bonus value that is payable on the expiry of a period in the future, it must also express	<input type="checkbox"/>

² the impact is deemed to be negligible if the cost of the loyalty benefit or no-claim bonus comprises less than 10% of the total premium or investment amount payable under a financial product; where the impact of a loyalty benefit or no-claim bonus is not negligible and where the advertisement refers to the actual premium or investment amount payable- the cost of the benefit or bonus must be shown as a percentage of that premium or investment amount; and the provider must be able to demonstrate that the premium or investment amount and benefit cost used in the advertisement presents a true reflection of the cost impact for the average targeted client; and where the impact of a loyalty benefit or no-claim bonus is not negligible and where the advertisement does not refer to the actual premium or investment amount payable, the average cost of the benefit or bonus as a percentage of premium or investment amount must be provided.

	the value of the projected benefit or bonus in present value terms, using reasonable assumptions about inflation.	
32.	An advertisement must clearly state whether the availability or extent of a loyalty benefit or no claims bonus is contingent on future actions of the client or any factors not within the client's control.	<input type="checkbox"/>
33.	An advertisement may not create the impression that the bonus or benefit is guaranteed or more likely to materialise than the provider or product supplier reasonably expects for the average targeted client.	<input type="checkbox"/>
FORECASTS, ILLUSTRATIONS, HYPOTHETICAL DATA, PROJECTED BENEFITS AND PAST PERFORMANCE DATA		
34.	No projected benefits (including but not limited to future investment values and, in the case of insurance policies, maturity, income, death, disability or full or partial surrender benefits) may be included in advertisements, if the benefits depend on future unknown investment performance, unless used to demonstrate the benefits of savings generally.	<input type="checkbox"/>
35.	Any reference to projected benefits, investment performance or returns must clearly reflect the effect that fees and costs may have on actual returns or benefits.	<input type="checkbox"/>
36.	When past investment performance is provided for or referred to in an advertisement-	<input type="checkbox"/>
36.1.	all information must be accurate and must be provided in the correct context, and the provider must be able to substantiate all claims made; and	<input type="checkbox"/>
36.2.	a statement must be included that past performance cannot be extrapolated into the future and is not an indication of future performance.	<input type="checkbox"/>
37.	If tax advantages are referenced in an advertisement such advantages must be explained, and any key restrictions, penalties, and mitigating circumstances must be disclosed.	<input type="checkbox"/>
38.	Any reference to guaranteed elements or features must indicate whether the guarantee is subject to any requirements and conditions and where disclosure of those requirements and conditions can be found.	<input type="checkbox"/>

ANNEXURE 2: ADVERTISING CHECKLIST

Stationary: Letterhead	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Company Registration Number	<input type="checkbox"/>
Contact Details (i.e. telephone number and fax number)	<input type="checkbox"/>
Postal Address	<input type="checkbox"/>
Registered Address	<input type="checkbox"/>
Website address	<input type="checkbox"/>

Stationary: Business Cards	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Name and Surname	<input type="checkbox"/>
Title	<input type="checkbox"/>
Contact Details (i.e. telephone number and fax number)	<input type="checkbox"/>
E-mail Address	<input type="checkbox"/>
Registered Address	<input type="checkbox"/>
Website address	<input type="checkbox"/>

Stationary: Folders	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Contact Details (i.e. telephone number and fax number)	<input type="checkbox"/>
Registered Address	<input type="checkbox"/>
Website address	<input type="checkbox"/>

Stationary: All Business-Related Forms	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Website address	<input type="checkbox"/>

Advertising Material: Banners	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Name of Insurer (Where Specific Product is Advertised)	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>

Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Advertising Material: Billboards	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Name of Insurer (Where Specific Product is Advertised)	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Advertising Material: Television	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Advertising Material: Radio	
Description	Included
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>

Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>
Advertising Material: Product Brochures	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Contact number or toll-free number	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Name of Insurer (Where Specific Product is Advertised)	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Appropriate Language / Medium	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Loyalty Benefit / Bonuses Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Advertising Material: Web Banners	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Name of Insurer (Where Specific Product is Advertised)	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Appropriate Language / Medium	<input type="checkbox"/>
Loyalty Benefit / Bonuses Requirements	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Advertising Material: Newspapers/Magazines, etc.	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>

Contact number	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Name of Insurer (Where Specific Product is Advertised)	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Appropriate Language / Medium	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Loyalty Benefit / Bonuses Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Electronic Branding: E-mail Signatures	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Name and Surname	<input type="checkbox"/>
Company Registration Number	<input type="checkbox"/>
Title	<input type="checkbox"/>
Disclaimer to appear below e-mail signature	<input type="checkbox"/>
Contact Details (i.e. telephone number and fax number)	<input type="checkbox"/>
Full email disclaimer accessed via the website link	<input type="checkbox"/>
Representative / Under supervision (if relevant)	<input type="checkbox"/>
Website address	<input type="checkbox"/>

Electronic Branding: Presentation Templates (PowerPoint)	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Appropriate Language / Medium	<input type="checkbox"/>
Direct Advertising Requirements	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Loyalty Benefit/Bonuses Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Electronic Branding: Electronic Newsletters	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Warnings, Disclaimers & Notification Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Appropriate Language / Medium	<input type="checkbox"/>
Direct Advertising Requirements	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Loyalty Benefit/Bonuses Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>

Electronic Branding: Electronic Invitations	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>

Electronic Branding: Website	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Conflict of Interest Management Policy	<input type="checkbox"/>
Compliance Officer contact details	<input type="checkbox"/>
Complaints Policy	<input type="checkbox"/>
FSP Licence number	<input type="checkbox"/>
Direct Advertising Requirements	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Loyalty Benefit / Bonuses Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>
Promotion of Access to Information Manual	<input type="checkbox"/>
Privacy Policy (only applies to outsourcing arrangements)	<input type="checkbox"/>
Binder Disclosures	<input type="checkbox"/>
Website disclaimer	<input type="checkbox"/>
List of authorised financial product sub -categories	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>
Advertisement Descriptions requirements	<input type="checkbox"/>
Warnings, disclaimers & notifications requirements	<input type="checkbox"/>
Identity of product supplier / FSP requirements	<input type="checkbox"/>

Appropriate Language / Medium	<input type="checkbox"/>
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Ad Hoc Branding: Signage - Building	
Description	Included
Logo	<input type="checkbox"/>
Advertisement Descriptions Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Appropriate Language / Medium Requirements	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Loyalty Benefit/Bonuses Requirements	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Forecasts, Illustrations, Hypothetical Data, Projected Benefits and Past Performance Data Requirements	<input type="checkbox"/>
Comparative Marketing Requirements	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>

Ad Hoc Branding: Signage - Vehicles	
Description	Included
Logo	<input type="checkbox"/>
Words – “Authorised Financial Services Provider”	<input type="checkbox"/>
Advertisement Description Requirements	<input type="checkbox"/>
Identity of Product Supplier and / or FSP	<input type="checkbox"/>
Appropriate Language / Medium Requirements	<input type="checkbox"/>
Endorsement Requirements	<input type="checkbox"/>
Contact Details (i.e. telephone number and fax number)	<input type="checkbox"/>
Puffery Requirements	<input type="checkbox"/>
Prominence Requirements	<input type="checkbox"/>
Website address	<input type="checkbox"/>
Statistics, Performance Data, Achievements, Awards, Premiums and Periodic Investment Amount Requirements	<input type="checkbox"/>

ANNEXURE 3: SIGN OFF / APPROVAL

Date:	
FSP Name:	
Advertisement Reference / Name:	
Proposed Publishing Date:	
Has the advertisement been reviewed before?	
If Yes, has the advertisement been remedied?	
Compliance with Section 14 of the General Code of Conduct?	
Date of referral for remedial action:	

**(Delete if not applicable)*

***If Yes:**

- I confirm that advertisement [redacted] **complies** with the requirements as stipulated in the Advertisement Checklist above, as well as section 14 of the General Code of Conduct.
- I confirm that the advertisement is clear, fair and not misleading.
- There are no further comments and / or remedies which must be implemented with reference to the abovementioned advertisement.
- The FSP may proceed to publish this advertisement.

Key Person/ Delegate Signature

Key Person/Delegate Name and Surname

**(Delete if not applicable)*

***If No:**

- I confirm that advertisement [redacted] does **not comply** with the requirements as stipulated in the Checklist above, as well as section 14 of the General Code of Conduct.
- The FSP / Product Supplier may not proceed to publish the advertisement prior to the content thereof being remedied in accordance with the recommendations below.

The advertisement does not comply with the following requirements:
 The advertisement must be remedied in the following manner:

Key Person/ Delegate Signature

Key Person/ Delegate Full Name and Surname:

ANNEXURE 4: OWNERSHIP, APPROVAL & REVISION HISTORY

POLICY OWNER

The FAIS Advertising Policy is owned by the Corporate Governance Department who maintains the document through consultation with and the assistance of the Compliance Department.

POLICY APPROVAL

The policy document was reviewed and approved by means of a round-robin resolution passed on the 26th of February 2025 by the Board of Prime Financial Services (Pty) Ltd, the holding company of the Prime Investments Group, for distribution and implementation within the Group.

POLICY REVISION

Detailed below is a list of policy versions and the changes/amendments/additions made to the policy with each new version:

DATE	VERSION	CHANGES
May 2023	1.0	- FAIS Advertising policy established.
Feb 2025	1.1	- General formatting amendments