



## INTRODUCER BROKER MARKETING GUIDELINE

SPECTRA GLOBAL LTD

AN INVESTMENT DEALER (FULL-SERVICE DEALER EXCLUDING UNDERWRITING) LICENCE AND  
GLOBAL BUSINESS COMPANY LICENSED BY THE FSC



## **1. Purpose**

The purpose of this document is to define the marketing guidelines for Introducing Brokers (“IBs”) working with Spectra Global Ltd (“the Company”). Spectra Global Ltd, a licensed Investment dealer under the FSC in Mauritius, operates in accordance with strict regulatory and ethical standards. These guidelines are designed to ensure that all marketing activities carried out through Introducing Brokers comply with Mauritian laws, safeguard client interests, and uphold Spectra Global’s brand integrity and regulatory compliance.

## **2. Legal & Regulatory Framework**

These guidelines are designed to comply with:

- The Financial Services Act 2007
- The Securities Act 2005
- FSC Guidelines on Advertisement and Conduct
- The Data Protection Act 2017 (DPA)
- Anti-Money Laundering and Combatting the Financing of Terrorism (AML/CFT) standards

## **3. IB’s Role and Relationship**

An Introducing Broker serves strictly as a third-party referrer of clients to Spectra Global Ltd and is not authorised to act as an agent, employee, or licensed representative of the company. IBs are prohibited from offering investment advice, executing trades on behalf of clients, or misrepresenting their affiliation with the company. IB’s role must be transparently presented in all marketing communications.

## **4. Permissible Marketing Activities**

IBs may market Spectra’s services using company-approved materials such as brochures, digital banners, social media assets, or explainer presentations. All self-created materials, including website content or social media posts, must be submitted to Spectra’s Compliance Department for review and written approval prior to publication. Email marketing is permitted only with the recipient’s prior consent and must always include an unsubscribed mechanism. Mass unsolicited communications, cold calling, or bulk SMS campaigns are strictly prohibited unless explicitly approved and conducted in accordance with Mauritian law.

## **5. Branding and Content Guidelines**

All marketing materials must include a clear risk warning stating that trading in financial instruments involves significant risk and may not be suitable for all investors. IBs must not promise returns or make any claims regarding guaranteed profits. The use of Spectra’s logo, trademark, copyright, or license number is prohibited unless prior written authorisation is granted. All content must accurately reflect Spectra’s services and licensing status as an Investment Dealer under the Financial Services Commission of Mauritius.

## **6. Required Disclosures and Disclaimers**

Every marketing communication must identify the IB as an independent referrer and clearly state that they are not an authorised representative or advisor of Spectra. IBs are required to disclose that they receive a commission for client referrals. Additionally, all communications should encourage potential clients to perform their own due diligence before engaging in any trading or investment activities.



## **7. Review and Approval Process**

IBs must submit all proposed marketing materials to Spectra's Compliance Department for written review and approval. Spectra reserves the right to amend or reject any material that does not comply with its brand guidelines or regulatory requirements. IBs may not publish or circulate any content that has not been formally approved.

## **8. Monitoring and Enforcement**

Spectra Global Ltd will monitor IB activity on an ongoing basis to ensure compliance with these guidelines. Any breach may result in a warning, suspension, or immediate termination of the IB agreement. In cases of serious non-compliance, such as regulatory breaches or reputational damage to Spectra, the company reserves the right to report the incident to relevant authorities and pursue legal action where necessary.

## **9. Contact**

For questions or to submit marketing materials for approval, please contact Spectra's Compliance Department at [Compliance@sgfx.com](mailto:Compliance@sgfx.com).