



# MARKETING GUIDELINE POLICY

VERSION 1.0

SPECTRA GLOBAL LTD

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

## 1. Introduction

Spectra Global Ltd ( the “Company”) incorporated in Mauritius under the Company number 198453 and FSC registration number GB22201302, and whose registered office is The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, Ebene.

“Advertisement” means commercial and promotional materials:

- i. Communicated through any medium and in any form, including:
  - a. Magazines and newspapers;
  - b. Radio and television;
  - c. Outdoor advertising, including billboards, window display and signs at venues;
  - d. The internet, including webpages, banner advertisement and social networking (e.g. Facebook and Twitter);
  - e. Product brochures and promotional fact sheets;
  - f. Direct mail (e.g. by post, facsimile, or email);
  - g. Telemarketing activities; and
  - h. Seminars and presentations to groups of people.
- ii. Used for the marketing or promotion of financial products to consumers and potential consumers in Mauritius; and
- iii. Which are distributed through any medium currently known or hereafter developed.

Spectra Global Ltd understand that the company is required to abide with the Advertising and Marketing provisions in line with the provisions of section 31 of the Financial Services Act and the Guidelines for Advertising and Marketing of Financial Products (the “ Guidelines”).

The Company shall submit a copy of the advertising and marketing materials to the Commission for assessment, at least 7 business days prior to presenting them to targeted consumers.

## 2. Contents

All company’s advertisements will contain information that is timely and consistent with any relevant prospectus, offer and/or contractual document. They will convey an equitable message in respect of the returns, benefits and risks associated with financial products. Benefits will not be given undue prominence compared to risks. The tone of the advertisement will not undermine the importance of the risks.

- i. Presentation, legibility and prominence
  - a. The company’s advertisements will not be false, biased, misleading or deceptive.
  - b. Assumptions on which statements are based in the Company’s advertisement will be stipulated.
  - c. The design and presentation of any advertisement will be easily and
  - d. The warning statement will be printed in type of at least the same size as the rest of the text in the advertisement or in a smaller where it is prominently outlined.

- e. The full name, license, authorisation or registration ( as applicable) details of the Company will be disclosed in the advertisement.

- ii. Target Audience

The company's advertisement will be written in clear and simple terms that can be easily understood by the intended audience.

The company will not state or suggest that a financial product is suitable for a particular class of consumers unless a suitability assessment has been conducted for that group. Furthermore, complex financial products that are appropriate only for a specific target audience will not be marketed or promoted to the broader public.

### 3. Words and Layout

Spectra Global will not use extensive use of technical, legal terminology or complex language and the inclusion of excessive details in an advertisement which may not convey a clear message to the consumers and potential consumers if the likely audience is unfamiliar with the concepts.

The Company will ensure that any reference to the Commission in an advertisement does not imply that the Commission has approved the content, endorsed the financial products, assessed their soundness, or verified the accuracy of any statements or opinions presented.

The logo of the Commission will not appear or be reproduced in an advertisement without the express authorization of the Commission.

- (i) Use of certain terms and phrases

1. The Company will only put opinion statements of financial products which are reasonable and verifiable. Phrases such as "best performing" or "first" will only be quoted if it is appropriately supported by an independent source available to the consumers for verification.
2. Company's advertisements will not include wordings (such as "safe", "secure", "riskfree", "protected", "warranty", "guarantee" or "promise") that may lead the consumers and potential consumers to believe that they cannot lose money or that capital is guaranteed. Where an advertisement guarantees or assures any minimum rate of return or yield, resources sufficient to support such a guarantee will be indicated.
3. Company's advertisements will not provide the impression to consumers that their savings or investments will invariably increase in value. The company will not use any language implying any urgency or emergency for making savings or investments, save and except, where regulatory deadlines apply. Words including but not limited to "get rich quick", "greater wealth awaits you", "you too can be rich", "invest now before it is too late" will not be used at all.
4. The Company's advertisements will not use unreasonably promising language as regards the potential return to be derived from financial products. Statements such

as “high rewards await you”, “you will reap high returns”, “you will be a winner” will not be used.

5. Company’s advertisements will not aim to undermine competitors in such a way as might jeopardize the reputation of the industry. They will be clear and in simple language and, where applicable, contain support graphics.
6. Company’s advertisements will not contain language and graphics which are inconsistent with its corresponding disclosure documents. For instance, where a prospectus, offer document or any other contractual document contains a special risk warning, it would be misleading if such advertisement suggests “low risk”.

**(ii) Fees and Costs**

i. Where the company’s fee or cost are referred to in an advertisement of a financial product, it will give a realistic impression of the overall level of fees and costs a consumer and potential consumer is likely to pay. When a claim about a fee or cost is used in the heading of an advertisement, any exclusions or qualifications shall also be contained within the heading or be clearly and prominently noted within the advertisement.

ii. Advertisement for a financial product will state clearly when certain benefits are mutually exclusive, that is, which cannot be simultaneously earned.

**(iii) Risks and Warning disclosures**

i. Company’s advertisements will adequately reflect and explain any special or unusual risks (for instance, interest rate fluctuation risks, country, and political risks, etc.) associated with a financial product.

ii. Where a financial product is denominated in a currency other than that of Mauritius, the consumer will be warned that changes to the rates of exchange may have an effect on the value, price, or income of his holding in that financial product.

**(iii) Miscellaneous**

i. Company’s advertisements will disclose adequate information concerning all applicable taxes and the impact of such taxes on consumers and potential consumers

ii. Where cancellation rights apply, this right will be adequately disclosed, along with the liabilities attached to the exercise of such right, to consumers and potential consumers in the advertisement or in the terms and conditions of the contract attached to the financial product or service.

**4. Performance Information**

Where performance information is presented in an advertisement, it must be based on a track record of at least six months. At a minimum, such information must include details of returns such as net asset value or price returns, where applicable. The advertisement must also clearly state that past performance is not indicative of future results.

## **5. Internet Advertisement**

With respect to internet advertisements, a hard copy of the relevant web pages must be submitted to the Commission for approval prior to being published or displayed online.

The principles and standards as set out hereunder will be followed:

- The company will ensure that copy of any electronic advertisements or constitutive documents of the financial products are identical to the most up-to-date paper versions, submitted to the Commission, where appropriate;
- There will be a prominent statement on the relevant web pages, which is capable of being seen or read with reasonable ease by the consumer accessing the electronic copies of such advertisements or constitutive documents, to the effect that printed copies of the same are also available, as well as where and how they can be obtained; and
- Any Company's advertisements or other documents on the relevant web pages will remain available for as long as it is necessary for the consumers of the financial products to have a reasonable opportunity to read or access them. Consumers will also be given the opportunity to retain the information through printing or downloading.

## **6. Non-Written and Direct Marketing (includes Cold Calls)**

When conducting non-written marketing communications with consumers, the Company will ensure that the person initiating the communication:

- i. does so only at a mutually convenient time;
- ii. clearly identifies themselves and states the purpose of the communication;
- iii. asks whether the consumer wishes to continue or end the communication, and immediately terminates it if requested;
- iv. provides the consumer with appropriate contact details.

## **7. Duties of the Company**

### **a) General Principles**

At all times, the Company will:

- i. Act responsibly, with honesty, fairness, integrity, and professionalism;
- ii. Avoid aggressive, misleading, or offensive sales practices;
- iii. Treat consumers and potential consumers with respect, ensuring adequate disclosure is provided to enable informed decision-making;
- iv. Preserve the confidentiality of consumer and potential consumer information and refrain from using such information for personal gain or the benefit of any third party, in accordance with applicable data protection laws in Mauritius.

### **b) Specific Conduct Obligations**

Where appropriate, the Company will:

- i. Clearly disclose its full and accurate identity when first engaging with consumers and potential consumers;
  - ii. Disclose, prior to entering into any contract for the purchase of a financial product, all applicable charges whether in the form of fees, commissions, dividends (direct or indirect), or any other cost arising from relationships or interests shared with third parties associated with the financial product;
  - iii. Only provide information within the scope of the Company's expertise, and where necessary, recommend that consumers or potential consumers seek additional specialist advice.
- c) The Company will utilise analytics software, CRM software and customer feedback to refine campaigns and ensure that such software maximize each campaign's potential.

## **8. Use of Third Parties Logos**

A logo or trademark refers to any image, word, or symbol used to identify a brand, service, or product. Logos are protected intellectual property, even if they are not formally registered. Therefore, using another party's logo without permission regardless of registration status may constitute an infringement of intellectual property rights.

However, the Company may use third-party logos without prior permission if the use qualifies as 'fair use', particularly when such usage is collateral for example, when promoting a financial product that is backed by or linked to an asset associated with that brand.

In such cases, where a third-party logo is featured in advertising materials, the Company must ensure the following:

- The most recent version of the logo is used;
- The logo is obtained from a public domain source and not from a private source that may be subject to copyright restrictions;
- The advertising material includes a clear disclaimer stating:  
"Any images or logos used are the property of their respective owners."

## **9. Planning, Preparation, Review and Approval of Marketing Campaigns and General Marketing Material**

The aim of this section of the policy is to provide a solid foundation and roadmap from planning to approval and the execution of marketing materials and marketing campaigns while making sure all policies and procedures have been duly respected in the mentioned stages. The Marketing Department of the Company would be responsible for the marketing of the Company's services to clients and/or potential clients and therefore the planning and preparation of marketing materials and marketing campaigns.

### **Stage 1 – Identifying the Target Audience**

The Company will first identify the specific target audience for each marketing material and/or campaign. This step is essential, as both the content and the delivery method (e.g., marketing channel) must be tailored to suit the characteristics, needs, and expectations of the intended audience.

## **Stage 2 – Selection of Marketing Channels**

Before developing any marketing material, the appropriate marketing channels must be identified. The relevant rules, legal requirements, and terms of use for each selected channel must be reviewed and fully understood to ensure compliance prior to their use in any campaign. The marketing channels for the company shall be through any medium including social media, digital marketing, paid advertising, content marketing, email marketing, through link-building, SEO techniques, offline events, developing business collaborations, partnering with influencers, and using referrals etc.

## **Stage 3 – Preparation of Marketing Materials**

The Marketing Department is responsible for preparing all marketing materials and campaigns intended for clients and potential clients. During this stage, the team will consider the objective of the material and determine the appropriate content, tone, and visual presentation.

The marketing content will be tailored to the identified target audience and delivery channel. Standard risk warnings, legal disclaimers, and any required regulatory disclosures will be included, as appropriate, to ensure clarity, transparency, and compliance.

When marketing material refers to a competition (e.g., a trading competition), it must clearly state that Terms and Conditions apply. A link or mechanism must be provided to allow clients and/or potential clients to easily access and review the applicable Terms and Conditions.

## **Stage 4 – Review of Marketing Materials**

All marketing materials prepared by the Marketing Department must be submitted to the Compliance Department for review and approval via the Company's designated ticketing system.

The purpose of this review is to ensure that all marketing content complies with internal policies, regulatory requirements, and marketing guidelines. The Compliance Department will assess the materials to confirm that the information presented is fair, clear, and not misleading.

## **Stage 5 – Compliance Comments and Feedback**

Following its review, the Compliance Department will determine whether the marketing material is to be approved, rejected, or amended prior to submission to the Commission and eventual distribution to the target audience.

If amendments are required, due to content that is unclear, unfair, misleading, or otherwise non-compliant, the Compliance Department will notify the Marketing Department of the necessary changes, along with the rationale for each. Where appropriate, the Compliance team may also suggest revisions.

The Marketing Department (or the responsible party) must implement the required changes in line with the Compliance Department's guidance. Once amended, the updated marketing material must be resubmitted to the Compliance Department for final review and approval.

The Compliance Department shall continue to review and provide feedback to the Marketing Department until the marketing material is finalized and receives formal approval.

Comprehensive records of all marketing materials will be maintained, including the name of the material, submission and approval/rejection dates, comments (if any), and all related correspondence regarding the review and approval or rejection process.

## Stage 6 – Final Approval and Distribution

Once the marketing material has completed the Compliance Department's review process and is confirmed to be fully compliant, it will receive final approval. Following this, the Marketing Department may proceed with distributing the approved material to clients and/or potential clients.

### Submission and Approval Timeframes

To ensure timely review and compliance, the following timelines apply:

- **Social Media Posts:**
  - Must be submitted to the Compliance Department **on the same day or at least 1 day in advance**
  - **Approval timeframe:** 1–2 hours
- **Banners, Emails, Landing Pages, Videos, Weekly Reports, Website Page Changes:**
  - Must be submitted **at least 2 days in advance**
  - **Approval timeframe:** Up to 48 hours (depending on the nature and complexity of the material)
- **Website Reviews, Expo Materials, Webinar Content, Educational Materials:**
  - Must be submitted **2–4 days in advance** (depending on the volume and complexity)
  - **Approval timeframe:** Up to 48 hours (subject to material size and scope)

**Note:** Time-sensitive materials will be prioritized and reviewed within the same business day, wherever possible.

## Appendix 1

The appendix 1 hereunder list out specific guidelines followed by the Company with respect to the advertising and marketing of financial products.

### Contents (Paragraph 2.0)

#### (i) Presentation, legibility, and prominence

- a) Advertisements will not be false, biased, misleading, or deceptive.
- b) Assumptions on which statements are based in an advertisement will be stipulated.
- c) The design and presentation of any advertisement will be easily and clearly understood.
- d) The warning statement shall be printed in type of at least the same size as the rest of the text in the advertisement or in smaller text where it is prominently outlined.
- e) The full name, licence, authorisation, or registration (as applicable) details of the Company will be disclosed in the advertisement.

#### (ii) Target Audience

- (a) The advertisement will be in plain language as to be capable of being clearly understood by the audience that might reasonably be expected to see it. The advertisement will not state or imply that a financial product is suitable for a particular class of consumers unless the Company has assessed that the financial product is suitable for that class of consumers. Advertisement



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for complex financial products that is only appropriate for a targeted group of persons will not be marketed or promoted to a wider audience.

### **Words and Layout (Paragraph 3.0)**

#### **(i) Use of certain terms and phrases**

(a) A statement of opinion regarding a financial product by the Company will be reasonable and verifiable. Phrases such as “best performing” or “first” will only be quoted if it is appropriately supported by an independent source available to the consumers for verification.

(b) An advertisement will not include wordings (such as “safe”, “secure”, “risk-free”, “protected”, “warranty”, “guarantee” or “promise”) that may lead the consumers and potential consumers to believe that they cannot lose money or that capital is guaranteed. Save and except, where an advertisement guarantees or assures any minimum rate of return or yield, resources sufficient to support such a guarantee may be indicated.

(c) An advertisement will not provide the impression to consumers that their savings or investments will invariably increase in value. The language used will avoid implying any urgency or emergency for making savings or investments, save and except, where regulatory deadlines apply. Words including but not limited to “get rich quick”, “greater wealth awaits you”, “you too can be rich”, “invest now before it is too late” will be avoided.

(d) An advertisement will not use unreasonably promising language as regards the potential return to be derived from financial products. Statements such as “high rewards await you”, “you will reap high returns”, “you will be a winner” shall not be allowed.

(e) An advertisement will not aim to undermine competitors in such a way as might jeopardise the reputation of the industry. The advertisement will be clear and in simple language and, where applicable, contain support graphics.

(f) An advertisement will not contain language and graphics which are inconsistent with its corresponding disclosure documents. For instance, where a prospectus, offer document or any other contractual document contains a special risk warning, it would be misleading if such advertisement suggests “low risk”.

#### **(ii) Fees and Costs**

Where a fee or cost is referred to in an advertisement of a financial product, it will give a realistic impression of the overall level of fees and costs a consumer and potential consumer is likely to pay. When a claim about a fee or cost is used in the heading of an advertisement, any exclusions or qualifications will also be contained within the heading or be clearly and prominently noted within the advertisement.

Where an advertisement for a financial product makes a claim about the fees or costs associated with advisory service, this will be clearly stated, and any qualification clearly and prominently noted in the advertisement. Where applicable, the disclaimer ‘terms and conditions apply’ may be included in the advertisement.

The advertisement will not suggest that the advisory service is ‘free’ or ‘low cost’ if, in fact, the consumer will pay for the service indirectly through the fees and costs of the financial product (for example, where commissions are derived from product fees and these are not related to the

consumer, or through administration fees, incorporating fees or costs incorporating fees or costs associated with the advisory service associated with the advisory service).

An advertisement for a financial product shall state clearly when certain benefits are mutually exclusive, that is, which cannot be simultaneously earned.

**(iii) Risks and Warning disclosures**

(a) An advertisement will adequately reflect and explain any special or unusual risks (for instance, interest rate fluctuation risks, country, and political risks, etc.) associated with a financial product.

(b) Where a financial product is denominated in a currency other than that of Mauritius, the consumer will be warned that changes to the rates of exchange may have an effect on the value, price or income of his holding in that financial product.

**(iv) Miscellaneous**

(a) An advertisement will disclose adequate information concerning all applicable taxes and the impact of such taxes on consumers and potential consumers.

(b) Where cancellation rights apply, this right will be adequately disclosed, along with the liabilities attached to the exercise of such right, to consumers and potential consumers in the advertisement or in the terms and conditions of the contract attached to the financial product or service.

**Performance Information (Paragraph 4.0)**

(a) An advertisement for a financial product will not contain any projection of performance returns based on borrowing plans. An advertisement which contains references to leverage financing will thus only contain factual information, without any persuasive element.

(b) If there has been, or will be, any change or restructure in relation to a financial product, the advertisement will state this fact and state also whether and/or describe to what extent any presentation of performance information therein, will be affected by these changes to ensure that the presentation is fair and not misleading.

(c) Where performance awards received are included in an advertisement for a financial product, the grantor of the award will be clearly identified, and the award explained. An advertisement will make it clear if an award is granted by a person related to the Promoter.

**Internet Advertisement (Paragraph 5.0)**

(a) Hyperlinks from an advertisement on the relevant web pages to other documents or web pages shall not be acceptable, unless the other documents and information on the other web pages have been forwarded to the Commission prior to the date of first issue or use of the said advertisement or promotional materials, where appropriate.

(b) Where special software is necessary for the viewing of an advertisement, the software will be provided for download, free of charge, before the consumers and potential consumers can gain access to the relevant web page



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**Non-Written and Direct Marketing (Paragraph 6.0)**

(b) The Company will not make a Cold Call unless:

(i) the recipient has an established existing client relationship, and the relationship is such that he has consented to respond to the Cold Call; or

(ii) the marketing communication is related to a generally marketable, low-volatility and low-risk financial product