

# **VPR Safe Financial Group Ltd**

*Regulated by the  
Cyprus Securities & Exchange Commission (CySec)  
CIF license number 236/14 and company registration number HE 322134*

## **Marketing Policy**

**September 2017**

# VPR Safe Financial Group Ltd - Marketing Policy

## 1. Marketing communications

### 1.1.General

VPR Safe Financial Group Ltd (hereinafter the “**Company**”) may launch from time to time promotions via various advertising material such as videos, banners, text/wordings and any other promotional material that may appear on the internet or on traditional media such as printed press, television, radio, etc.

The design and or script of the material shall be undertaken either in-house by the Company or assigned to an external party such as an advertising agency or an outsourced party (in this section “the **Designers**”).

### 1.2.Procedure

The Company shall instigate the creation of the material depending on its marketing needs and shall instruct the Designers for its creation. The Compliance Officer in coordination with the Marketing Advertising Department, upon the instructions of the Company’s management, shall liaise with the Designers on the specific features of the material and the material shall always adhere to all of the following conditions:

- (a) the material shall always disclose the identity of the Company and/or its trade/brand names;
- (b) the material shall not contain any absolute statements such as e.g. “Trade with the Biggest Company in terms of volume”, unless such statements can be verified with tangible evidence that must be also presented in the material to an extent appropriate to the medium;
- (c) Alternatively, the material shall contain an annotation or a hyperlink (where such material is a web banner) leading to a dedicated webpage on the Company’s domain/domains where the evidence backing up the statement shall be thoroughly and clearly presented as per the conditions set in point (i) below;
- (d) the material shall be at all times fair clear and not misleading;
- (e) the material shall be accurate and will not emphasize any potential benefits without also giving a fair and prominent warning of all relevant risks to an extent proportional to the material’s medium;
- (f) The material if in the form of a banner where it contains an invitation/solicitation to trade in the Company’s offerings in financial instruments such as open an account, trade, invest, receive bonus, etc. shall contain at all times a prominent risk warning that will indicate “Trading is risky and you may lose all of your invested capital”;
- (g) The material if in the form of a banner where it contains an invitation/solicitation to trade in leveraged products (i.e. Contracts for Difference) such as open an account, trade, invest, receive bonus, etc. shall contain at all times a prominent risk warning that will indicate “Trading is risky and you may lose your capital”;

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- (h) The material shall be sufficient for and presented in a way that is likely to be understood by the average consumer to whom it is addressed, or by the average consumer it is likely to be received;
- (i) The material shall not contain economic jargon if such economic jargon deceives or is likely to deceive the average consumer about the risks and drawbacks of the investment services and or financial instrument promoted by the material;
- (j) Where the material compares investment or ancillary services, financial instruments, or persons providing investment or ancillary services the following conditions will always apply:
  - The comparison shall be meaningful and presented in a fair and balanced way,
  - The sources of information for the comparison must be identified,
  - Key facts and assumptions used to make the comparison must be included;
- (k) Where the material includes an indication of past performance of a financial instrument or an investment service the following conditions will always apply:
  - The indication shall not be the most prominent feature in the material,
  - The information accompanying the indication must include performance indication which covers the immediately preceding 5 years or the whole period for which the financial instrument/investment service has been provided or if the financial instrument/investment service has been offered for less than five years the whole period for which the financial instrument/investment service has been provided and in any case that performance indication must be based on complete 12 month periods,
  - The reference period and the source of information must be clearly stated,
  - The indication must contain a prominent warning that “The figures refer to the past and past performance is not an indication for future gains”,
  - Where the comparison relies on figures denominated in a currency other than that of the European Economic Area Member State in which the Client or potential Client resides, the currency must be clearly stated along with a warning that returns may increase or decrease due to currency fluctuations,
  - Where the comparison is based on gross performance the effects of commission, fees or any other charges must be disclosed.

### **1.3.Approval of the material and Controls Procedure.**

Upon completing the design of the material, the Head of the Marketing Advertising Department shall send the material via email to the Company’s Compliance Officer who, if in his/her own absolute judgement decides that the material does not satisfy any of the conditions set out in points (a) through (k), shall reject the material and request from the Designers to effect the appropriate changes.

If the Compliance Officer in his/her own absolute judgement is satisfied with the material, he/she shall forward the material to the Company’s Managing Director via email for final approval.

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If the Company's Managing Director is not satisfied that the material meets all of the conditions in points (a) through (k), they shall revert to Head of the Marketing Advertising Department via email stating the reasons why the material is not up to the appropriate standards requesting also the appropriate changes.

In case where the Company's Managing Director is satisfied that the material meets all of the conditions in points (a) through (k) they shall inform the Head of the Marketing Advertising Department via email. In this respect, the Head of the Marketing Advertising Department will proceed with registering the material onto a spreadsheet (in this Section "**the Registry**") that will include the following information:

- A unique identification number for each material registered;
- The name and a description of the material and the promotion for which the material was created for (email/banner/video/landing page);
- The name of the Head of Marketing Advertising Department who provided the initial approval of the material;
- Date of initial approval by the Head of Marketing Advertising Department;
- The name of the Compliance officer who approved the material;
- Date of approval by the Compliance Officer;
- The list of web domains to which this material is going to be distributed.

Upon registering the material to the Registry, the Head of the Marketing Advertising Department shall upload the material onto a web based application. This web based application shall be restricted from editing to all persons in the Company and to any affiliates/outsourced parties to the Company with the exception of the Company's Compliance Function.

The Head of the Marketing Advertising Department shall then grant access to the Head of IT Department of the above material for the uploading process onto the Company's webpage.

The Head of IT Department shall examine the technicalities for uploading the said material to the Company's web page and if he/she is satisfied from a technical point of view, shall proceed to upload the said material onto the Company's webpage.

Following the publication of the said material, the Company shall continue the on-going monitoring of the said material.

An officer of the Compliance department shall conduct regular reviews of the Company's and affiliates parties' webpages in order to ensure that the approved material was not altered in any way that impairs or jeopardises compliance with points (a) through (k). In case where such cases are identified, the Compliance Officer shall alert via email the Company's Managing Director and Senior Management who shall proceed with issuing a cease and desist warning to the party responsible for the material's alteration. If the aforementioned party fails to immediately restore the material to its original approved state, the Company's Senior Management shall consider punitive actions against said party.

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The Company has in place the “Affiliates and IB Review Policy” and strives to maintain and operate effective organisational and administrative arrangements in order to ensure that any creative text content sent out to perspective Clients adhere to the respective regulations.

In that respect the Company shall follow certain guidelines according to the Affiliates and IB Review Policy when conducting website reviews, landing pages and other types of marketing material by performing a checklist regards to the content and the information available to clients, language and wording, banners etc.

This part of the manual covers but does not exhaust the provisions of the “Affiliates and Review Policy” and the Company must and shall confirm to both the Marketing Manual and the Affiliates Review Policy established by the Company. The Compliance Officer shall document his sample checks in a document titled “Website Inspections” that will contain the following information:

- Identity of the website inspected;
- External Domains using material name;
- Material identification number;
- Date of Inspection;
- Deficiencies identified;
- Actions taken if applicable.

The Company shall perform sample checks, on a quarterly basis, of the material uploaded in the web-based application in order to ensure compliance with points (a) through (k) and if necessary shall remove any material from the relevant web-based application while the Head of the Marketing Advertising Department shall update the Registry indicating the date of review and the rejection of the material. Conversely if the Company is satisfied that the material is compliant with points (a) through (k) the Head of the Marketing Advertising Department to update the Registry indicating the date of review and the approval of the material.

The registry, the marketing material stored in the web-based application, the document titled “Website Inspections” as well as all emails of the persons described above shall be kept for a period of at least five years.

The Company shall make available the Registry, the marketing material as well as any emails of the persons described above to its Internal Auditor and CySEC upon request.

The Policies and procedures described herein shall apply irrespective of whether the functions have been outsourced to third parties.