

Promotion Guidelines for Granite Powered by AAA products.

Introduction

This guide aims to help brokers understand the marketing and advertising requirements when promoting Granite Powered by AAA products and creating promotion material related to our products.

“Promotional material” may include:

- Advertising (newspapers, radio, television)
- Websites, including your own website or any other sites where you promote or discuss your services and products,
- Social Media (Facebook, Tiktok, Twitter, LinkedIn, YouTube, Instagram, etc),
- Online Directories (Yellow pages, TrueLocal, etc)
- Online Advertisements (Google Adwords, banner ads, etc),
- Printed Material (brochures, flyers, handouts, etc)
- and any other marketing by you that relates to your brokering activities, training or comments that you provide.

Core Advice for promotions

- You will need to white label / repackage the messaging we provide as your own branded material.
- Preferably, do not use Granite Powered by AAA name or logo in promotion of the products. We don't want clients calling direct.
- You can use our logo to represent that we are lender you are accredited with. See our strict terms of use.
- Do not repost or republish the material we provide for you, it is for Broker use only and not for distribution to clients.
- Maintain correct procedures, wording and information as per the rules and regulations that apply to you.

1. We'd prefer you don't mention "Granite Powered by AAA", "Granite Home Loans" or "AAA" in your promotions.

We want customers to go to you, the Broker, and not call us direct. In this same vein, we advise you not use the relevant logos of the above companies when promoting to your public audience.

2. Template promotional wording, phrases or messaging

The following phrases or any combination of them can be used to promote to the general public. It is your responsibility to make sure that the information you provide is up to date and representative of the products.

- "Loans for borrowers with overseas income"
- "Finance for Non-Residents and Expats"
- "Wide range of acceptable Countries and Visas"
- "Applicants living and working overseas, buying property in Australia"
- "Australian Citizens earning overseas income looking to buy property in Australia"
- "Permanent Resident Visa Holders earning overseas income looking to buy property in Australia"
- "Temporary Resident Visa Holders earning overseas income looking to buy property in Australia"
- "For owner occupied or investment property purchases"
- "Up to 85% LVR"
- "Up to \$2,500,000"
- "Construction loans available"
- "Includes 100% offset account"
- "Internet, app and phone banking included"
- "Free unlimited transactions on all accounts"
- "Redraw available"
- "No Early Repayment Penalties"

3. White label promotion only.

You must create your own material when publishing to the general public. You should present the material as your name or Brokerage firm, a white label or re-package of the information under your name.

As with all of your communication to the public, you must maintain correct procedures, wording and information as per your regulatory requirements when promoting or presenting Granite Powered by AAA products. We advise you to use the template / guidance messaging we have provided in section 2 of this document for your white label version.

4. Do not use material from Broker Resources for public marketing.

Material on <http://granite.aaafin.com.au/> is created with a broker audience in mind unless otherwise stated. This material is intended to inform a Broker audience only, and not for posting to the general public. **You must create your own material when publishing to the general public.** Do not use screenshots or segments of our material. You cannot use portions or sections of the Broker Resources we create in your promotional material. You can use the advised wording (section 2), but do not modify the messaging in any way that changes its content or meaning. Do not crop or delete any parts. You must recreate the messaging into white labeled material while adhering to the rules and regulations that apply to you.

5. Using our logo to show us as your Accredited Lender

You may use the 'Granite Powered by AAA' logo to represent a lender with which you are accredited. This is the only approved use context of the logo. You may only use this logo if you are accredited, and maintain your accreditation. By using our logo you are accepting the terms outlined in this document. You may only use the logo on your website or marketing materials. You cannot display the logo in any manner to suggest you are an employee of the company, or that our name is part of your company name. Your company name must appear clearly and prominently on any material where our logo is used. Our logo must not appear larger, more prominently or more frequently than your company name or logo on any material. You cannot combine our logo with any other subject, including, but not limited to your logo, other logos, icons, words, graphics, photos, slogans, numbers, design features or symbols. Except for size, our logo must not be altered in any manner whatsoever; including proportions, colours, elements, etc; or be animated, morphed, or otherwise distorted.

6. Obligation to not mislead.

It is the responsibility of you, the broker, to accurately and honestly convey details of the products in all of your marketing material and communications to your clients, regardless of the channel or method used. You must not be misleading or deceptive. In any form of communication, you must ensure that you do not engage in misleading conduct. Conduct will be misleading and deceptive if it could induce, or lead to a consumer making an error in understanding the true nature of a product or service. It does not matter if the promoter making the statement or representation intended to mislead/deceive or whether the consumer was actually deceived.

7. Your Regulatory Requirements:

When promoting Granite Powered by AAA products, messages should be clear, accurate and balanced; and adhere to the *ASIC Regulatory Guide 234: Advertising financial products and services (including credit): Good practice guidance*. Providing accurate information enables informed choices by clients.

Disclosures. For Australian Credit Licence (ACL) holders, at a minimum, the following identification statement must be included on all disclosure documents and promotional material:

[ACL holder's name] (Australian Credit Licence [ACL number]).

Comparison Rates. If you publish interest rates for products or indicate 'interest rates from...' you must include the comparison rate in a way that complies with *ASIC CP178 Advertising credit products and credit services: Additional good practice guidance*.