

## **FINANCIAL PROMOTIONS COURSE – two half-day with case studies**

### **1. Introduction**

What is a promotion and the extent to which it matters?

Financial Promotions Order

The regulatory framework for promotions: Principle 7, COBS 4, FOS and sanctions in FSMA for breaching the rules

Context of product development and governance and the responsibilities of providers and distributors (RPPD)

Scope of application of COBS 4 and Principle 7 beyond consumers

International dimension, IOSCO and rules around the world, MiFID and MiFID II

The effect of rule breaches - fines for firms and individuals, litigation, complaints

### **2. Clear, fair and not misleading**

Form of promotions

The difference between wholesale and retail promotions

Product development issues and retail compliance

Target audiences and the application of the rules to different types of customer

Internet issues and scrolling down

New media - twitter, texts and other forms

Internet transactions

The content of promotions

Identifying the communication as a promotion

Notions of balance, clarity and accuracy

Risk content, warnings and disclosures

Unfair comparisons

Product features

Past performance and things that look like it (such as performance awards)

Tax and foreign currency issues

### **3. Systems and Controls**

Approving promotions

Monitoring their impact & management information

Relying on others' approval

Case studies will be included throughout the programme to illustrate different features of promotions with a small number from outside the company.