



**SALES ROAD MAPS**

**ONLINE<sup>®</sup>**

*Transforming Marketing Compliance<sup>®</sup>*



**2020**

# Mission Statement

## Our Experience

Sales Road Maps Online® is the financial services industry's unique online **marketing compliance tool** developed from bespoke compliance advisory experience of Global Sales Compliance Ltd.® since 2006.

We have developed SRMO as a non-bespoke **compliance “self-help tool”** based on our advisory experience in private placement regulations, licensing rules & fund registration in **70+ countries**.

Each country SRMO Sales Road Map® content is confirmed by a network of leading legal counsels in 70+ countries with whom we have **over 2 decades of working experience**.

Our goal is to provide clients with HIGH-QUALITY, VALUE-ADDED marketing compliance SOLUTIONS, not “teaser-products”.

See SRMO website for further details: [www.salesroadmapsonline.com](http://www.salesroadmapsonline.com)



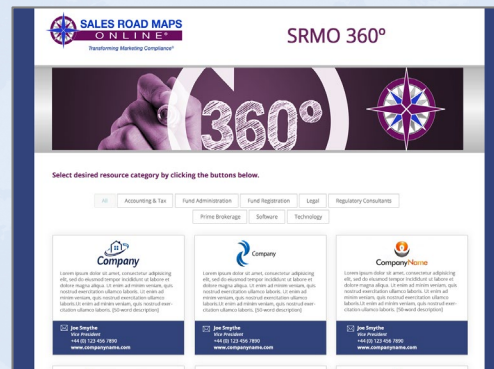
# What do you get with Sales Road Maps Online®?

Sales Road Maps Online® is a web-based tool for marketing compliance guidance on local regulations for AIF marketing in 50+ jurisdictions.

SRMO provides a range of online services about fund marketing compliance including:



**Free LIBRARY:** Valuable legal articles, client alerts, and bulletins related to AIF marketing overseas.



**Free SRMO 360°:** A network of third party service providers relevant to the needs of AIFMs and Asset Managers.



**Sales Road Maps®:** Compliance guidance (marketing do's & don'ts) for marketing AIFs overseas.

*Coming soon*  
**Compliance training videos**

# What is an SRMO Sales Road Map<sup>®</sup>?

## The CHALLENGE

When marketing AIFs in overseas jurisdictions, it is **time-consuming and costly** to research marketing restrictions in each country.

Marketers and CCOs **need key, targeted guidance** at their fingertips (online, mobile) to answer **2 key questions**:

- 1 What are the local rules for marketing AIFs?**
- 2 How to comply with local rules for marketing AIFs?**

## The SOLUTION

**SRMO Sales Road Maps<sup>®</sup>** provide Users the “Rules of the Road” (what you need to know) when marketing AIFs in 50+ countries.

SRMO Sales Road Maps<sup>®</sup> USPs:

- Each country’s Sales Road Map<sup>®</sup> content is confirmed by local Counsel.** If Users need bespoke advice, legal counsel contacts are provided.
- Helps fine-tune AIF overseas distribution strategy** to focus on “low hanging fruit” countries (feasible regulations) vs. countries with restrictive regulations.
- 4-5 pages** of easy to follow guidance vs. confusing legalese.

# Benefits of SRMO Sales Road Maps<sup>©</sup>

**High Quality Content:** 10 key issues per Sales Road Map<sup>©</sup> including country disclaimers

**Product Differentiation:** Summary of local laws AND how to comply (Marketing DO's & DON'TS)

**Legal Counsel Reference:** In most cases, local Counsel contacts are provided for Subscribers to obtain bespoke legal advice

**Latest Technology:** Accessible via PC, tablet & mobile phone

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



# 10 Key Issues

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 1. Business Model

- ✓ Cross-border & offshore marketing vs. onshore private placement
- ✓ Marketing by AIFM (EU/EEA) or local licensed distributor
- ✓ Compliance with AIFMD (Full-Scope AIFM)



# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 2. Product Offering (non-bespoke guidance)

- ✓ Alternative Investment Funds (AIFs) of any domicile
- ✓ AIFs: Private Equity, Real Estate, Hedge Funds, other asset classes
- ✓ Corporate form funds, Trusts & Limited Partnerships
- ✓ Region EU/EEA: EU/EEA AIFM managed EU/EEA AIFs & non-EU/EEA AIFMs managed non-EU/EEA AIFs



# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 3. Private Placement Exemptions & AIF Distribution Rules

- ✓ Private Placement & Private Offering rules (non-public offering)
- ✓ AIFMD distribution rules (Passporting & NPPR)
- ✓ Where private placement exemptions aren't available, marketing guidance to mitigate risk of triggering prospectus registration

# SRMO Sales Road Map<sup>©</sup> Content

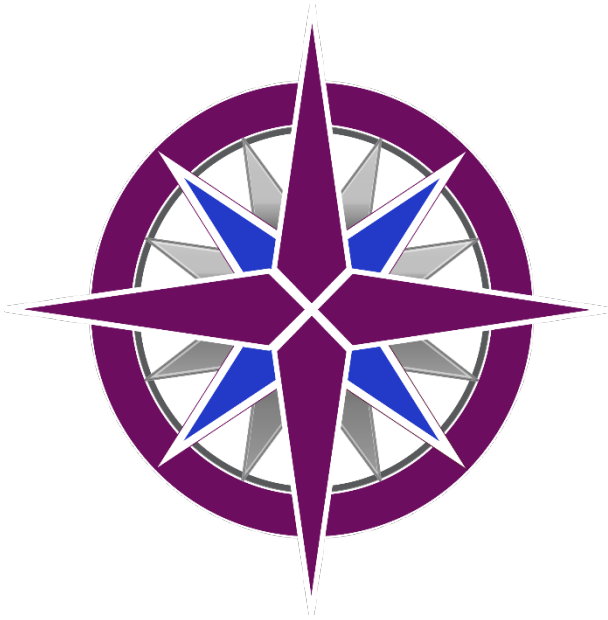
## Module #1: Alternative Investment Fund (AIF) Marketing



- ### 4. Product (AIF) Registration Rules
- ✓ AIF registration/notification requirements
  - ✓ AIF filing requirements as part of distribution

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 5. Country Disclaimer Language (Legend)

- ✓ Country specific disclaimer language relevant to the business model
- ✓ Subscriber can download (non-bespoke) country disclaimer text



# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 6. Investor Qualification Criteria

- ✓ To whom can I market my AIF?
- ✓ Target investor definitions based on business model
- ✓ Target investor definitions based on AIF registration/notifications

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing

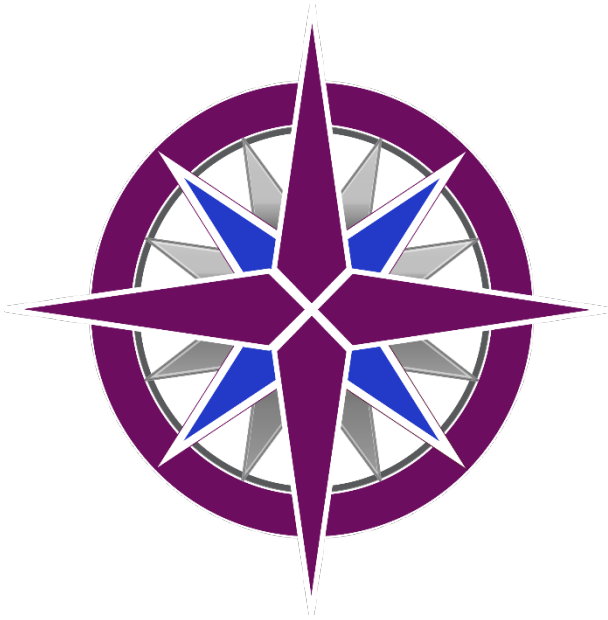


### 7. Offeree Number Limits

- ✓ Must we count “offers” of AIFs?
- ✓ What constitutes an “offer” (marketing materials, etc.)?
- ✓ Periodicity & application

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 8. Marketing DO's & DON'TS

- ✓ High level guidance on how to comply with local regulations on marketing AIFs
- ✓ Prohibited Marketing Techniques
- ✓ Cold Marketing Techniques
- ✓ Offshore Marketing Guidelines
- ✓ Offshore DRE Guidelines ("documented reverse enquiry")



# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 9. Licensing

- ✓ Can we market AIFs cross-border/from offshore without a license?
- ✓ Must we use a locally licensed vehicle as AIF distributor?
- ✓ MiFID II passport

# SRMO Sales Road Map<sup>©</sup> Content

## Module #1: Alternative Investment Fund (AIF) Marketing



### 10. Sanctions

- ✓ Penalties for breaches of local laws on prospectus registration (AIFMD requirements)
- ✓ Penalties for breaches of local licensing regulations
- ✓ Penalties specific to the country (cold-calling, etc.)

# What is not provided in SRMO Sales Road Maps<sup>©</sup>?

- **Legal advice or compliance guidance customised to the subscriber's AIF structure, business model & licensing status**
- **Decision-Trees**
- **High level "legalese": Non-substantive content**
- **Marketing to retail investors**
- **"Reverse Solicitation" or "Pre-Marketing": Region EU/EEA**
- **How to avoid triggering EU Directives (AIFMD, MiFID II): Operating "below the radar"**
- **Theoretical Marketing Scenarios**



# SRMO Sales Road Map<sup>©</sup> Features

Features	SRMO Sales Road Map <sup>©</sup> Subscriptions
<b>Content</b>	In-depth value-added COMPLIANCE content based on over 2 decades of client input and feedback. High Content-Value proposition.
<b>Minimum (Time) Subscription</b>	1-year (12 months)
<b>Minimum Purchase</b>	Minimum Purchase = blocks of 10 SRMO Sales Road Maps <sup>©</sup>
<b>Choice</b>	Yes. Subscriber can “pick and mix” the SRMO Sales Road Maps <sup>©</sup> and countries in any region. Some countries have 2 Sales Road Maps <sup>©</sup> based on different business models.
<b>Frequency of Updates</b>	Updates several times per year. In some cases, updates will occur more frequently based on major regulatory overhaul/change.
<b>Renewals</b>	Subscriber will be contacted 30 days in advance of the expiry of their subscription to confirm renewal for another 12 months.
<b>Self-Help Tools</b>	User can benefit from free service provider listing (SRMO 360 <sup>°</sup> ) and Free LIBRARY to complement their SRMO Sales Road Map <sup>©</sup> subscription. SRMO “compliance training videos” coming soon.
<b>Future Sales Road Map<sup>©</sup> Modules:</b>	Segregated Managed Accounts (SMAs) & UCITS

# SRMO Sales Road Maps<sup>®</sup> Country Capability

50+

## Europe

1. Austria
2. Belgium
3. Denmark
4. Finland
5. France
6. Germany
7. Greece
8. Iceland
9. Ireland
10. Italy
11. Luxembourg
12. The Netherlands
13. Monaco
14. Norway
15. Poland
16. Portugal
17. Spain
18. Sweden
19. Switzerland
20. United Kingdom

## Middle East & Africa

21. Bahrain
22. Israel
23. Kuwait
24. Lebanon
25. Oman
26. Qatar
27. Saudi Arabia
28. United Arab Emirates (2 SRMs:  
Offshore Marketing & Private Placement)

## Asia

29. Azerbaijan
30. Japan (2 SRMs: Offshore Marketing  
& Private Placement)
31. Mainland China
32. Hong Kong (2 SRMs: Offshore  
Marketing & Private Placement)
33. Singapore (2 SRMs: Offshore  
Marketing & Private Placement)
34. South Korea
35. Thailand
36. Kazakhstan
37. Taiwan (2 SRMs: Non-SIF Placement  
& Offshore DRE)

38. Australia
39. New Zealand
40. Malaysia
41. Brunei

## W. Hemisphere

42. USA
43. Canada (4 provinces)
  - Alberta
  - British Columbia
  - Ontario
  - Québec

## Latin America & Caribbean

44. Brazil
45. Mexico
46. Colombia
47. Chile
48. Peru
49. Uruguay
50. Panama
51. Bermuda

# For More Information, Contact Us



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# Disclaimer

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