

Lombard 180 Visa card

ADVERTISING GUIDELINES



CONTENTS

Please read before you proceed to create any materials. This guide is designed to assist you in ensuring that the advertisements and other materials that you develop, promoting the Lombard 180 Visa card, are compliant. By adhering to these guidelines, you will minimize the changes required upon submission of your advertisement for signoff, thereby saving time in the turnaround process and any adverse regulatory action.

Any advertising that you conduct that promotes the Lombard 180 Visa card **MUST** be signed off by Lombard Finance's Marketing and Legal teams prior to production or publication.

Please allow up to 5 business days for any advertising materials to be reviewed and signed off by Lombard Finance. More complex requests may take longer and will be advised accordingly.

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1. INTRODUCTION

This document sets out the legal requirements for all advertising in relation to the Lombard 180 Visa card of Lombard Finance Pty Limited ABN 31 099 651 877 Australian Credit Licence 247415 (Lombard Finance).

The *National Credit Code NCC* (“the Code”) regulates credit advertising and failure to comply can result in significant financial penalties (for example, up to \$11,000 for each advertisement contrary to the Code or fines of \$220,000 for individuals and \$1.1 million for companies for conduct contrary to the *Australian Securities and Investment Act*), as well as significant damage to reputation and significant legal costs. Under the Code, the advertiser of retail finance (i.e. you) and the retail finance provider (i.e. Lombard Finance) can both be liable for the breach of any legislative requirement. As such, you must comply with the requirements set out in this document and our approval process as outlined.

The *Competition and Consumer Act (2010)* requires that all information presented to customers about the product be factual, accurate and not misleading. Misleading information or advice can result in penalties for both stores and Lombard Finance. Something can be misleading by providing inaccurate, false or incomplete information. It makes no difference whether you intend to mislead or deceive or not – it is how your conduct affected the customer’s thoughts and beliefs that matter.

Further, you should ensure that you seek approval from Lombard Finance should you wish to use our trademarks. You are restricted from displaying logos associated with our product in advertisements mentioning us or our facility, such as the Visa logo.

The following information is provided to assist you in developing advertisements compliant with the Code. For clarity, we have divided advertisements into:

- Print
- Website
- Radio
- Television

While all care has been taken in the preparation of this guide, it is not to be taken as legal advice and neither Lombard Finance nor its associated entities make any warranty in relation to the accuracy of this guide and do not accept any liability for any loss arising from use or reliance on this guide.



2. ADVERTISING APPROVAL PROCESS

The following process should be used to seek approval for advertising, where the Lombard 180 Visa card is mentioned within the copy.

STEP 1: Contact your Account Manager to discuss and agree on the retail promotional offer you're wishing to advertise as soon as possible in the concept phase. Provide details of the proposed promotional offer, including the following:

- Proposed term and offer e.g. 6 Months Interest Free
- Start date and end date of promotion
- Advertising mediums to be used (e.g. Print, Radio, TV, web)
- If a deposit is required from the customer
- Any exclusions to the offer
- Disclaimers
- Any other information that may be relevant

STEP 2: Provide your Account Manager with the copy and creative of the advertisement at least five (5) business days prior to the advertising deadline. More complex requests may take longer and will be advised accordingly.

STEP 3: Your Account Manager will manage the initial compliance review of your materials. They will liaise with you regarding any feedback or changes where necessary.

STEP 4: When finalised, artwork is sent through to Lombard Finance Marketing and Legal teams for sign off.

STEP 5: You will be advised by your Account Manager when your materials are approved and you are able to print or publish them.

2.1 Lead times

Lombard Finance will aim to provide sign off of materials within 5 business days of receiving the final advertising creative artwork (including copy).



3. DISCLAIMERS

Any mention of the Lombard 180 Visa card or finance in any medium of advertising requires a disclaimer.

Disclaimers must be:

- Precise
- Referenced by a symbol (i.e. asterisks) next to the copy to which the statement applies

Disclaimers must not be:

- Placed in an obscure location
- Too small
- Text that appears on the screen without satisfactory time to read it
- Contained within voiceovers that are too quick or too quiet.

A disclaimer cannot simply be used where the strong impression created by the main selling point cannot be effectively dispelled by any amount of 'fine print'. The overall impression of the advertisement must not mislead the audience. For example, if an asterisk appears near the word 'free', the copywriter may be attempting to trade on positive reactions to the selling point, while trying to comply with the law by placing the conditions in the fine print.

This may not protect your business and Lombard Finance from breaching the relevant legislation, as the additional facts may not be balanced with the offer in the headline.

3.1 THE MINIMUM FINANCE AMOUNT

Depending on the advertising medium used, the minimum finance amount may need to be specified in the disclaimer. The minimum finance amount required is based on the promotional term offered.

If for example, you are advertising '*12 months Interest Free*', you will need to specify in the disclaimer '*Minimum finance amount is \$400*'. Please note, you can choose to have a minimum finance amount that is greater than what we recommend.

If your advertisement does not promote a specific promotional term, rather something generic like 'Interest Free finance available', then you do not need to specify the minimum finance amount. Instead, the disclaimer must include the following line: '*Minimum finance amount applies and is based on the promotional term*'.

To find out the minimum finance amount for different promotional terms, speak to your Account Manager.



4. PRINT ADVERTISING

Print media includes the following:

- Newspapers, magazines, catalogues
- Billboards, posters
- Letters, flyers, emails
- Counter displays

Print advertisements used to promote finance usually include:

- A headline which incorporates the finance offer
- A disclaimer at the bottom of the advertisement

NOTE: All relevant disclaimer text must be a minimum of 10 point font wherever possible and no smaller than 8 point font for an A4 size advertisement. The text may be required to be larger, depending on the size and positioning of the layout. The size and type of font must render copy clearly legible.

Full disclaimers are always required for print advertising. Examples have been provided below.

4.1 DISCLAIMER EXAMPLES

Product:	Interest Free
Promotional term:	12 Months Interest Free
Example headline:	Get it now on 12 months Interest Free*

* Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Minimum finance amount \$X. Interest, currently 22.99% p.a., is payable on any balance outstanding after the Interest Free period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®



4. PRINT ADVERTISING CONT...

Product: Interest Free with Payment Deferred
Promotional term: 12 months Interest Free with 12 months deferred payments
Example headline: **NO interest, NO repayments for 12 months***

**Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Minimum finance amount \$X. Interest, currently 22.99% p.a., is payable on any balance outstanding after the Interest Free period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

Product: Low Rate Start Up
Promotional term: Promotional term: 11.99% p.a. for 12 months
Example headline: **Example headline: 11.99% p.a. low rate start up for the first 12 months***

**Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Minimum finance amount \$X. Interest, at the low rate, is charged from the date of advance. The low rate will revert to the Standard Variable Rate of 22.99% p.a. and is payable on any balance outstanding after the promotional period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*



4. PRINT ADVERTISING CONT...

These disclaimers are the minimum requirements when advertising finance in print. However, if you have additional terms and conditions in order for your customers to get finance as a payment option, these MUST also be disclosed in the disclaimer.

Additional terms and conditions may be:

- A deposit
- An offer end date i.e. if the promotional offer is available for a certain period of time.
- Exclusions - advertisements must not be misleading in relation to the products being covered by finance. It must be clear from the advertisement which products are available on the promotion. Where there is a reference to a type of product and some items are excluded, this must be included in the disclaimer.
- Geographical restrictions – e.g. where a dealer has multiple stores – if the Finance promotion is not available across the entire business or in every store, then this must be disclosed in the disclaimer e.g. ‘Offer available at participating dealers only.’

Product: Interest Free
Promotional term: 12 months Interest Free
Example headline: **Finance is available at select stores. A 20% deposit is required. Offer excludes clearance items and ends on 31 / 12/ 2015**

Approved applicants only on a Lombard 180 Visa card. **20% deposit required. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Minimum finance amount **\$300.** Interest, currently 22.99% p.a., is payable on any balance outstanding after the <X> month Interest Free period. Ask in store for details **at participating dealers only.** Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*



4. PRINT ADVERTISING CONT...

4.2 COMPONENT PRICING

Component pricing is where a business represents the cost of a product or service in its component parts, rather than as a single or total figure. Component pricing can create an impression that the product is on sale or being offered at a lower price.

The Australian Consumer Law (ACL) requires, under section 48, and the ASIC Act under Section 12DD, that if component pricing is stated in an advertisement, the total price must also be stated in a prominent way and be at least as prominent as the main component price.

Component pricing requirements do not directly relate to finance, but the requirements may indirectly link to advertisements where the product or service (along with the finance), has been broken down into smaller parts, such as \$ per day, \$ per week and \$ per month advertising.

Product:	Interest Free
Promotional term:	12 months Interest Free
Example headline:	Get it now from just \$20 per week over 12 months Interest Free*

**Approved applicants only on a Lombard 180 Visa card. The indicative weekly repayment is inclusive of a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date, over a promotional term of 12 months based on the <product name> priced at \$<RRP>. To pay this out within the promotional term, the indicative weekly repayment figure translates to <\$X> per month or <\$X> in total. All repayments assume no additional purchases, cash advances or any other fees and charges. Interest, currently 22.99% p.a., is payable on any balance outstanding after the Interest Free period. Terms, conditions, fees and charges apply. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

NOTE: If component pricing is chosen for an advertisement, the price must relate to one product, as per the example above. Component pricing should not be used for a range of products as the disclaimer becomes very complex, long and is unattractive in advertisements.

Due to the Introduction of Component Pricing legislation by the ACCC, advertising daily, weekly or monthly repayments is not recommended due to the complexity, size of disclaimer required and the need to include the RRP of the item being advertised.



5. WEBSITE ADVERTISING

We recommend that you use your website to advertise the Lombard 180 Visa Card.

Place a banner on your home page, which redirects to a finance landing page, where customers can find out more about the Lombard 180 Visa card.

If you are promoting a specific promotional offer i.e. 12 months Interest Free, you can use the exact same disclaimers as those listed in the Print advertising section.

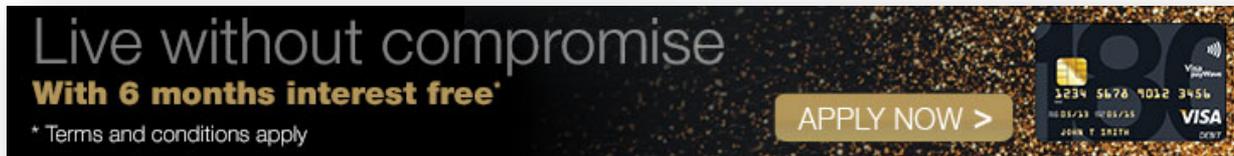
However, if you offer a range of promotional terms, we recommend you keep the website advertising generic.

Product:	Interest Free or Interest Free with Payment Deferred
Promotional term:	3, 6, 9, 12, 24 and 36 months Interest Free available
Example headline:	Up to 24 months Interest Free* or Interest Free finance available*

**Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Minimum finance amount applies and is based on the promotional term. Interest, currently 22.99% p.a., is payable on any balance outstanding after the Interest Free period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

5.1 WEBSITE BANNERS

We have a range of website banners that you can use on your website. See example below.



Contact your Account Manager to request a web-ready version in your preferred size.



5. WEBSITE ADVERTISING CONT...

5.2 DESIGN YOUR OWN WEBSITE BANNER

If you would like to design your own website banner, that's no problem. However, your banner must include the following:

- Asterisks after the headline
- Short form disclaimer - **Terms and conditions apply.*

If the website banner **does not redirect** customers to a finance landing page, the full disclaimer needs to be placed at the **bottom of any web page where the banner advertisement appears.**

If the website banner **redirects** customers to a finance landing page, the full disclaimer must be placed at the bottom of the finance landing page.



5. WEBSITE ADVERTISING CONT...

5.3 FINANCE LANDING PAGE

We encourage dealers to develop a finance landing web page, giving customers more information about the finance payment option. The copy for the finance landing page can be prepared by you. Below is an example of generic copy that we recommend you include.

Heading:

**Live without compromise
With 180 days Interest Free finance***

Body:

Finance your purchase with the Lombard 180 Visa card and pay no interest over the current promotional term. Plus get the added flexibility of 0% p.a. interest for 6 months on any future card purchases of \$250 or more* - everywhere Visa is accepted!

Enjoy the benefits of:

- 0% p.a. interest for 6 months on any card purchases of \$250 or more
- 0% p.a. interest for up to 55 days on any card purchases under \$250
- The ability to borrow up to \$20,000
- Easy online application with a quick response
- 24/7 online access to your account

Apply NOW at lombardfinance.com.au/180visacard or contact us on **<dealer number>**

Disclaimer:

**Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and annually on the anniversary of the account open date. Up to 55 days Interest Free is available on all card purchases (excluding cash withdrawals), when you pay, by the payment due date, the amount identified in your statement as the 'optional repayment to qualify for up to 55 days Interest Free on purchases'. 6 months Interest Free is available on all card purchases of \$250 or more made in one transaction. Interest, currently 22.99% p.a., is payable on balance outstanding after any Interest Free period. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

NOTE: On request, we can provide you with an image of the Lombard 180 Visa card to incorporate in your finance landing page.

lombardfinance.com.au/180visacard

Finance provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence 247415. Lombard® is brought to you by FlexiGroup®



5. WEBSITE ADVERTISING CONT...

5.4 PRE-APPROVED FINANCE

Pre-Approved finance enables applicants to get pre-approved for a Lombard 180 Visa card via your website before they shop. **This reduces the amount of paper work required.** To allow for pre-approvals online, you will need to develop your website to include the following:

- A banner on the home page** – you can use one of our website banners to promote pre-approved finance or design your own.
- Finance landing page** - The banner on the home page needs to redirect customers to a finance landing page.
- Embed the URL link in the apply now buttons** – your Account Manager will provide you with the URL links, once the website copy is approved.

Pre-approved finance landing page copy:

Live without compromise

With 180 days Interest Free finance*

Finance your purchase with the Lombard 180 Visa card and pay no interest over the current promotional term. Plus get the added flexibility of 0% p.a. interest for 6 months on any future card purchases of \$250 or more* - everywhere Visa is accepted!

Enjoy the benefits of:

- 0% p.a. interest for 6 months on any card purchases of \$250 or more
- 0% p.a. interest for up to 55 days on any card purchases under \$250
- The ability to borrow up to \$20,000
- Easy online application with a quick response
- 24/7 online access to your account

[Click here to view the Key Facts Sheet](#)

Get pre-approved now before you shop! Simply:

1. Apply online in minutes – choose “single” or “joint” application (You will be redirected to Lombard Finance to complete your application)
2. Receive the decision via email within seconds
3. If approved, you will receive a “welcome confirmation” email
4. Then visit **<dealer name>**. Please ensure you bring along the “welcome confirmation” email, and a form of identification e.g. your current driver’s licence, to complete your purchase.

SINGLE

Apply Now

JOINT

Apply Now

**Approved applicants only on a Lombard 180 Visa card. Terms, conditions, fees and charges apply including a \$99 Annual Fee charged on the account open date and subsequently on the anniversary of the account open date. Up to 55 days Interest Free is available on all card purchases (excluding cash withdrawals), when you pay, by the payment due date, the amount identified in your statement as the ‘optional repayment to qualify for up to 55 days Interest Free on purchases’. 6 months Interest Free is available on all card purchases of \$250 or more made in one transaction. Interest, currently 22.99% p.a., is payable on balance outstanding after any Interest Free period. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

lombardfinance.com.au/180visacard

Finance provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence 247415. Lombard® is brought to you by FlexiGroup®



6. RADIO ADVERTISING

If you want to promote finance during a radio advertisement, we suggest that you firstly send through a proposed radio advertisement script to your Account Manager for us to review prior to recording. This way, we can best recommend how to mention finance in your radio advertisement.

In the interest of saving time and money, we strongly recommend you DO NOT record any radio advertisement until the copy regarding finance has been approved by Lombard Finance. This will help minimise changes you might need to make to the recorded radio advertisement.

The length of the finance terms and conditions in a radio advertisement will differ depending on the length of the radio advertisement.

15-second (or less) radio advertisement

Product: Interest free
Promotional term: 12 months Interest Free
Example headline: “...12 months Interest Free* this weekend only...”

**Terms, conditions, fees, charges and lending criteria apply. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. For more details go to <URL>.*

30- second radio advertisement

Product: Interest free
Promotional term: 12 months Interest Free
Example headline: “...12 months Interest Free* this weekend only...”

**Terms, conditions, fees, charges and lending criteria apply. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. For more details go to <URL>.*

NOTE: If the Lombard 180 Visa card is not promoted on your website, then the call to action can also be “Ask in store for details”.

A copy of the actual radio advertisement must be sent through to Lombard Finance for signoff prior to running the radio commercial.



7. TV ADVERTISING

Like all other forms of advertising, disclaimers are required in TV advertisements where finance is mentioned and should be thought about at the briefing stage of a TV advertisement.

15-second or 30-second radio advertisement

Product:	Interest free
Promotional term:	12 months Interest Free
Example headline:	"...12 months Interest Free* this weekend only..."

**Terms, conditions, fees, charges and lending criteria apply. Interest is payable on any balance outstanding after the Interest Free period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Lombard® is brought to you by FlexiGroup®*

If the promotion advertised in the TVC has a **minimum purchase amount** and/or **offer end date** then this must be included at the end of the disclaimer as per below:

**Terms, conditions, fees, charges and lending criteria apply. Interest is payable on any balance outstanding after the Interest Free period. Ask in store for details. Credit provided by Lombard Finance Pty Limited ABN 31 099 651 877, Australian Credit Licence number 247415. Minimum purchase <\$X>. Offer ends DD/MM/YYYY.*

NOTE: For other products and promotional terms, refer to the disclaimers under the Print Advertising section.

In TV advertisements the disclaimers can be incorporated as:

1. Supers at the base of each frame; or
2. A block super in the last frame.

You can only start referencing terms and conditions at the first mention of the finance facility, either by way of voice over or on screen. If finance is not mentioned until the middle or end of the advertisement, the legal disclaimer should be broken into blocks of supers and superimposed on the bottom of each of the final screens. Alternatively, the full disclaimer is to be shown at the bottom of the screen as soon as finance is mentioned and should remain for the duration that finance is mentioned or shown on the screen.



7. TV ADVERTISING

7.1 CAD GUIDELINES

The following is an extract from the CAD website and sets out the requirements for disclaimers on TV ads. Your advertising or TVC production agency will be aware of this.

Disclaimers & Other On-Screen Text

Disclaimers must be clearly legible, easily comprehensible and held on screen long enough for all text on screen, not just the disclaimers, to be read by the average viewer to avoid rendering a commercial potentially misleading under the *Competition and Consumer Act 2010 - Schedule to the Australian Consumer Law*.

Disclaimers are generally used to expand or clarify an advertised offer or to make minor qualifications and should, where possible, be introduced at the same time as the representations they qualify. Disclaimers should simply explain the representation in further detail and should not be used in an attempt to correct a misleading impression created by the advertisement as a whole. Disclaimers should not be used to conceal important information.

A disclaimer must be effective – this means it must be:

- able to be readily identified by a consumer;
- placed close to the main representation; and
- clear in meaning.

Disclaimers should appear for sufficient time on screen for them to be noticed, read and understood by the audience. Important disclaimers should be reinforced by voice-overs.



7. TV ADVERTISING CONT...

To assist in making the process easier for producers when submitting final commercials for CAD classification, CAD makes the following recommendations:

- 1. Duration on Screen** - CAD recommends allowing a minimum of 0.2 seconds per word or 2 seconds minimum duration if less than 5 words, taking into account all text on screen at the same time as any disclaimer. Registered trademark legal lines need not be included in the calculation of duration on screen for other text.
- 2. Text Size** - Taking into account the duration of on-screen text and the additional factors below, the size of text and choice of font should allow any disclaimer to be easily read.
- 3. Additional Factors** - Some other factors to be taken into account when producing a commercial to ensure all on-screen text is clearly legible include:
 - the contrast between text and its background must allow for the text to be clearly legible
 - if the background is moving, on-screen text may need to be placed in a single-coloured box
 - certain colour combinations; for example: white on yellow or red may increase the difficulty of reading any on-screen text
 - fading text in and out of vision is not recommended, unless the text is held to allow for the fact that at some points the text will be less visible

Like radio advertising, we would suggest you send through your proposed TVC script to your Lombard Account Manager to us for review, prior to recording.

This will help minimise changes you might need to make to the recorded commercial and prevent any additional costs.

Please note that a copy of the actual TVC must be sent through to Lombard Finance for signoff prior to running the TVC.



CONTACT US

Please initially contact your **Account Manager**;
or **Email:** advertapproval.cards@flexigroup.com.au

