友邦香港
香港北角電氣道 183 號
友邦廣場 12 樓

AIA Hong Kong
12/F, AIA Tower
183 Electric Road
North Point
Hong Kong

Memo

Attn:	All EDD & Honourable Advisors / EDDs / PSDDs / SDDs / DDs / MICs / Agency Leaders / Financial Planners (Hong Kong)	From:	Victor Man
Copy:	Mr. Alger Fung / Ms. Amelie Shen / Ms. Amy Chan / Mr. Louie Ho / All Department Heads / ABDD Executives / CSBD Executives / IVS Executives	Dept:	Corporate Solutions
Date:	16 October 2026	Total pages:	2

Subject: **(A261065) 有關強積金市場推廣及宣傳活動的合規提醒**
Reminder on MPF Marketing and Promotional Activities

為確保強積金（MPF）業務推廣及客戶溝通符合監管要求，現提醒各註冊強積金中介人在進行市場推廣、客戶招攬及介紹強積金計劃或成分基金時，必須遵守相關法規及操守要求。請特別留意以下事項：

1. 行事須誠實、公平、符合客戶的最佳利益及持正	不得對自己、公司、其他註冊強積金中介人、與註冊計劃及／或成分基金的營運或分銷有關連的任何人士、任何註冊計劃或成分基金，作出失實或具誤導成分的陳述，不論該等失實或具誤導性的陳述是否明知或罔顧後果地作出。
2. 向客戶披露所需資料	須將客戶為了作出任何關鍵決定而有需要充分掌握的資料，向該客戶披露，關鍵決定包括是否將累算權益從某註冊計劃轉移至另一個註冊計劃，或何時轉移該累算權益，或將會從某註冊計劃轉移至另一個註冊計劃的累算權益的款額。 在邀請或誘使客戶考慮轉移至另一註冊計劃或投資於另一成分基金的過程中，或就此提供意見時，聲稱所推銷的註冊計劃／成分基金較客戶所參加的計劃或投資的基金為佳，須解釋： (a) 所推銷計劃／基金與客戶所參加計劃／投資的基金的特點（例如費用及收費水平、計劃下的基金選擇，基金的投資政策）的差別；及 (b) 進行轉移的好處或潛在好處。 確保任何比較性質的推廣內容（如計劃質素、表現、費用或服務）均有充分解釋並以事實支持，且不會過度強調單一特點，以免扭曲客戶對強積金計劃／成分基金整體特徵、風險及成本的理解。 避免提供偏頗引述以誘使公眾加入或轉入特定強積金計劃。例如，強調為特定僱主（如香港特區政府）的強積金服務提供者，可能無法讓潛在客戶看到客觀的事實，且在選擇強積金計劃營辦人時，若未考慮營辦人的資料及情況，可能會造成誤導。
3. 確保資料真實、準確及不具誤導性	所有向客戶提供的資料，包括宣傳品、簡報、社交媒體內容、電郵、通訊軟件訊息及口頭陳述，均必須： • 真實、準確及有事實根據；及 • 不得包含虛假、誤導或具欺騙性的內容。
4. 使用公司批准的市場推廣資料	請確保所有對外發布或使用的強積金宣傳資料均已獲公司批准。未經批准，不得自行製作、修改或發布任何涉及強積金產品、基金表現、收費比較或相關推廣內容的宣傳材料。

所有註冊強積金中介人均須以誠實、公平及符合客戶最佳利益的原則執行業務，並確保客戶獲得充分及準確的資訊，以作出知情決定。

如有任何查詢，歡迎與負責 貴區之企業業務營業拓展部同事聯絡。

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To ensure that MPF business promotion and client communications comply with regulatory requirements, we would like to remind all registered MPF intermediaries to adhere to the relevant regulations and conduct requirements when conducting marketing activities, soliciting business, or introducing MPF schemes and constituent funds to clients. Please pay particular attention to the following:

1. Acting Honestly, Fairly, in the Best Interests of the Client and with Integrity	Should not make inaccurate or misleading statements about yourself, Company, other registered MPF intermediaries, any other party connected with the operation or distribution of registered schemes and/or constituent funds, any registered scheme or constituent fund, whether knowingly or recklessly.
2. Disclosure of necessary Information to the Client	Disclosure of information to the client as is necessary for the client to be sufficiently informed for the purpose of making any material decision, including decisions on whether or when to transfer MPF benefits from an MPF scheme to another and the amount of MPF benefits to be transferred. If in the process of inviting, inducing or advising a client to consider transferring to another MPF scheme or investing in another constituent fund, claims that the promoted MPF scheme/constituent fund is to be preferred over the scheme/fund participated in/invested in by the client, should explain: (a) the differences in relation to the key features (e.g. level of fees and charges, fund choices available, investment policies of constituent funds, etc.) between the promoted scheme/fund and the scheme/fund participated in/invested in by the client; and (b) the benefits, or potential benefits, of conducting the transfer. Ensure that any promotional claims of a comparative nature (such as scheme quality, performance, fees or services) are adequately explained and supported by facts, and do not unduly emphasis a single attribute in a way that may distort clients' understanding of the overall features, risks and costs of an MPF scheme/a constituent fund. Refrain from making biased quotes to induce members of the public to join or transfer benefits to specific MPF schemes. As an example, emphasis on being an MPF service provider to a particular employer (e.g. the HKSAR Government) may not present a balanced picture for potential clients and could be misleading in regard to the choice of scheme provider without considering their profiles and circumstances.
3. Ensure the information is accurate, factual, and not misleading	All information provided to clients, including promotional materials, presentations, social media content, emails, instant messaging communications and verbal representations, must: • Be accurate, factual and supported by appropriate evidence; and • Not contain any false, misleading or deceptive information.
4. Use Only Company-Approved Marketing Materials	Please ensure that all MPF promotional and marketing materials used or distributed externally have obtained the necessary company approval. Without prior approval, registered MPF intermediaries must not independently create, modify or distribute any marketing materials relating to MPF products, fund performance, fee comparisons or promotional campaigns.

All registered MPF intermediaries are expected to conduct business honestly, fairly, with integrity and in the best interests of clients. Intermediaries should ensure that clients receive sufficient, accurate and balanced information to enable them to make informed decisions.

If you have any enquiries, please contact your designated CSBD Agency Executives.

Yours faithfully,



Victor Man
Head of CS Business Development
Agency Distribution, Corporate Solutions

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