

Social Media Policy

We use social media channels such as <u>Twitter</u>, Facebook, and <u>LinkedIn</u> and on our website Blog to promote the views and opinions of Collins Sarri Statham Investments (CSSI) and those of our Analyst in regard to economic and political or social events which may have an impact, either positively or negatively on financial markets. These views may change, and may be promoted but not endorsed by all CSS Investments employees and are expressed for both marketing and educational purposes only. They should not be taken as advice or as a recommendation to make an investment decision.

Whilst we monitor our social media channels retweets, "likes" or other onwards sharing of our content are not endorsements.

Where permitted, we may moderate comments and posts made on our social media channels to ensure discussions are open and civil. Whilst we want to encourage conversations and debate we reserve the right to block comments where appropriate.

The main types of content that will be removed are comments that include:- offensive language, personal abuse; put us in legal jeopardy; include racist, sexist or homophobic comments and any that may give rise to concerns in respect to market abuse within financial markets.

We do not give investment, tax or any other professional advice via social media sites. Clients and prospective clients should always seek independent advice before making financial decisions.

Social media is becoming increasingly used in the working environment and many of our staff are likely to have a presence on social media sites. CSSI is committed to utilising social media to enhance its profile and reputation and encourages employees to support our activities through their personal social networking channels.

Use of social media can pose risks to our confidential and proprietary information, our reputation and can jeopardise our compliance with legal obligations. At all times and on all devices staff (permanent and temporary) are to exercise sound judgement and common sense in their use.

CSSI's official account (venue, name, etc.) will be maintained by either Director and any activity by a member of staff requires prior approval from them. As any post may be construed as a financial promotion approval from the compliance officer will be required.

No financial advice is to be provided via personal accounts – any item referring to CSSI, its services or the financial services industry generally will require approval from the compliance officer prior to posting. Caution should be exercised when commenting on 'blogs': it is for a Director to comment on behalf of the company, your comments should be clearly your personal view.

Access to social media for personal use during work time is permitted so long as it does not interfere with your responsibilities or productivity or contain inappropriate material. The company reserves the right to monitor staff activities using our IT resources and communications systems and where inappropriate use is discovered take the necessary action to prevent further abuses of this privilege.