



COLLINS SARRI STATHAM INVESTMENTS

Social Media Policy

Purpose

This policy governs the use of social media by Collins Sarri Statham Investments Limited (CSSI), a UK FCA-regulated stockbroker, and its employees, contractors, and affiliates. It aims to balance the benefits of social media engagement — such as sharing market insight and enhancing the firm's profile — with the need to protect confidential information, maintain a professional online presence, deliver good client outcomes under the Consumer Duty (PS22/9), and comply with Financial Conduct Authority (FCA) requirements.

Scope

This policy applies to all employees (permanent and temporary), contractors, and affiliates of CSSI. It covers both professional use (on CSSI's official accounts) and personal use of social media where it may affect CSSI or the financial services industry. Social media includes all public and private platforms, such as X, LinkedIn, Facebook, Instagram, WhatsApp, YouTube, and blogs, and any comparable platform that may emerge.

Definitions

- **Professional Use:** social media activity conducted on CSSI's official accounts or on behalf of the firm.
- **Personal Use:** activity on personal social media accounts that may reference CSSI, its services, or financial markets.
- **Financial Promotion:** an invitation or inducement to engage in investment activity, which on social media includes posts, reposts/shares, images, videos, and interactions that promote a controlled investment.

Policy Guidelines

1. Compliance with FCA Requirements

- All social media communications that constitute financial promotions must be fair, clear, and not misleading, in accordance with COBS 4.2 and the FCA's finalised guidance on financial promotions on social media (FG24/1).
- A financial promotion on social media must be standalone compliant — it must carry the required risk warnings in its own right and must not rely on other posts, links, or a viewer scrolling further for balance.
- Promotional content must include appropriate risk warnings (for example, "The value of investments can fall as well as rise and you may get back less than you invested; your capital is at risk") and must be approved by a competent person authorised to sign off financial promotions before it is published.

- Financial promotions and investment advice must not be shared on social media unless the content has been approved through the firm's financial promotions sign-off process.
- Client confidentiality must be maintained at all times; no client details, holdings, or dealings may be discussed on any social media platform.
- Firms must act to deliver good outcomes for retail customers under the Consumer Duty (PS22/9); social media content must support customer understanding and must not exploit behavioural biases or create unrealistic expectations.
- Records of professional social media communications, including financial promotions and their approval, must be retained for a minimum of five years in line with the firm's Record Keeping Policy and SYSC record-keeping requirements. Retention periods are minimums, not deletion deadlines.

2. Professional Use of Social Media

- Only individuals expressly authorised by the firm, with financial promotions sign-off from a competent person, may post on CSSI's official accounts (for example X, LinkedIn, Facebook, Instagram, and the firm's website blog).
- Posts may share insight on economic, political, or social developments affecting markets, reflecting CSSI's role as an informed commentator, but must not be presented as, or capable of being read as, personal recommendations or financial advice.
- Content must align with CSSI's values of professionalism, integrity, and client focus.
- Prohibited content includes:
 - speculative or unverified market predictions;
 - offensive, discriminatory, or abusive material;
 - anything that could amount to, or encourage, market abuse; and
 - statements that create a legal, regulatory, or reputational risk for the firm.
- Moderation: CSSI reserves the right to remove or hide comments on its official channels that are offensive, abusive, discriminatory, or that pose a legal or regulatory risk, and to block persistent offenders.

3. Personal Use of Social Media

- Employees are encouraged to support CSSI's social media activity (for example, by sharing approved posts) but must not imply that they speak for the firm unless authorised to do so.
- Personal profiles that discuss finance or reference CSSI should include a disclaimer, for example: "Views are my own and not those of Collins Sarri Statham Investments."
- Employees must not:
 - provide financial advice or promote CSSI's services without financial promotions approval;
 - share confidential information about CSSI, its clients, or its strategies;
 - engage in online discussion about specific investments in a way that could be read as a personal recommendation; or
 - re-share or endorse a third party's financial promotion, as doing so may itself be a financial promotion.
- Reasonable personal use during work hours is permitted provided it does not interfere with responsibilities or involve inappropriate content.
- Employees must report any negative comment, complaint, or apparent breach concerning CSSI to the Compliance Officer promptly.

4. Monitoring and Record-Keeping

- CSSI monitors its official social media accounts. Employee activity on firm devices and systems may be monitored where necessary and proportionate for regulatory and security purposes; any such monitoring is carried out in accordance with the firm's data protection obligations and Privacy Notice.

- Professional social media communications and financial promotion approvals are retained for a minimum of five years to meet regulatory record-keeping requirements.
- Employees must report unauthorised, suspicious, or compromised activity affecting CSSI's accounts to the Compliance Officer immediately.

5. Training and Awareness

- All employees receive periodic training on this policy and on the FCA's expectations for financial promotions and social media.
- New joiners must review and acknowledge this policy during onboarding.

6. Consequences of Non-Compliance

- Breaches may result in disciplinary action, up to and including termination, depending on severity.
- Non-compliance with FCA requirements may lead to regulatory action against CSSI and, where relevant, against individuals under the Conduct Rules (SM&CR).
- Inappropriate use of social media on firm devices may lead to restrictions on access.

Responsibilities

- **Compliance Officer & Luca Sarri** oversees enforcement of this policy, investigates breaches, and coordinates financial promotions sign-off.
- **Authorised Poster(s)**: manage the firm's official accounts and prepare content for approval.
- **Financial Promotions Sign-off (competent person)**: approves social media content that constitutes a financial promotion before publication.
- **All Employees**: adhere to this policy and exercise sound judgement in all social media use.