

As your Principal we are responsible for ensuring that all your advertising & marketing communications are compliant with FCA rules. Advertising & marketing may take the form of investment pitches, emails, newsletters, blogs, Tweets, Facebook posts, emails, as well as more traditional forms of advertising such as newspaper ads. Communications may be made to both potential investors and existing clients.

Advertising & marketing communications can be categorised as

- **Financial Promotions: an invitation or inducement to invest**
- **Non Financial Promotions eg general information about your company or the industry in which you operate**

All advertising & marketing needs to be clear, fair and not misleading but additionally, a financial promotion is required to have a risk warning attached. The FCA's rules and guidance on these matters are set out in the Further Reading section below, and we do ask before you submit that you confirm the material meets the following minimum requirements:

- The overall presentation can be reasonably said to be **fair, clear and not misleading**
- **Risks** or drawbacks of investing are appropriate and are **given equal prominence to benefits**
- **Warnings** remind investors that their capital is at risk, that past performance is not indicative of future results, and that forecasted performance may fail to be realised
- All **claims are proportionate** and are adequately sourced
- Any **fees** are clearly stated and their effect on the investment is disclosed
- For online or social media, the chosen media is suitable, and the above criteria related to fair, clear and not misleading promotions are met, **irrespective of medium**

We use Trello – a project management app – to organise many of the things we do at ShareIn. We have created a Trello board for you specifically to control the approval process for all advertising & marketing communications that you make. You should have received an automated email inviting you to join.

Trello is intuitive and very easy to use. We think that you will quickly be up-&-running using the guidelines below but if you need any help there are loads of introductory videos on Trello <https://trello.com/guide>

- There are five lists on the board: Guidance, Compliance Enquiries, Financial Promotions For Review, Work in Progress, and Reviewed by ShareIn.
- Whenever you have any advertising & marketing material to be reviewed, add it as a card on the Financial Promotions For Review list and tag it @shareincompliance (in the Comments section of the card) so that the ShareIn compliance team is notified.
- You can also add the "Master Checklist" (found on this Trello card under the Guidance list: <https://trello.com/c/WR7v3CvR>) to any card you create by clicking on 'Checklist' in the right-hand panel on the card and then selecting 'Master Checklist' from the 'Copy Items From...' dropdown.
- General compliance enquiries can be added to the Compliance Enquiries list.

- Once we have begun the review, we will move the card over to the Work in Progress list.
- If any amendments are required, we will communicate these through the comments on the Trello card and mark the card with an **Amendments Required** label.
- Once we have approved the material we'll move it over to the Reviewed by ShareIn list, marking it either **Approved as an Financial Promotion** or **Approved as a non Financial Promotion**. At this stage, the materials can be published.

You can upload Word files, images, videos, anything to the For Review list and you will be alerted to any input from us via email (or you can set Trello to give you desktop notifications).

Our standard turnaround time for reviewing materials on Trello is 48 hours. We would encourage you to post copy to Trello as much in advance as you can.

If you have any questions or need more information please email compliance@sharein.com

Further reading

FCA Conduct of Business Sourcebook: COBS 4 Communicating with clients, including financial promotions: <https://www.handbook.fca.org.uk/handbook/COBS/4>

FCA Perimeter Guidance Manual: PERG 8 Financial promotion and related activities: <https://www.handbook.fca.org.uk/handbook/PERG/8>

FCA Finalised Guidance FG15/4: Social media and customer communications: <https://www.fca.org.uk/publication/finalised-guidance/fg15-04.pdf>