

Veloce Autos Ltd

Financial Promotions Policy

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Purpose

This policy applies to all Veloce Autos Ltd employees. All staff must follow this policy when dealing with Financial Promotions.

Our rules and responsibilities reflect FCA regulations (COBS 4, CONC 3), ASA/CAP requirements and internal company standards to ensure fair treatment of customers.

Definition

A Financial Promotion is defined as “ an invitation or inducement to engage in investment activity. ” Within our industry, this includes any communication relating to vehicle finance.

Staff will receive training to ensure they understand what constitutes a financial promotion.

Rules and Responsibilities

- No employee may post on social media or any marketing platform on behalf of the firm without written permission.
- All financial promotions must be reviewed for compliance.
- Promotions must be clear, fair and not misleading, and identifiable as financial promotions (COBS 4.3, CONC 3.3.1).
- Financial information must remain accurate, up to date, and include all required disclosures under CONC 3.
- Promotions will be reviewed quarterly.
- Representative APRs must be calculated using the 51% rule and displayed prominently (CONC 3.5.7).
- Representative examples must meet the requirements of CONC 3.5.5.
- Restricted expressions (CONC 3.5.12) must never be used.
- Systems will be kept secure to prevent infiltration.
- No staff member may share consumer or company information publicly.
- All promotions must clearly state that Veloce Autos Ltd acts as a broker, not a lender (COBS 4.5.2).
- All mandatory information must be prominent, clear and visible.

- Compliance partners may review promotions as required.

Documentation Requirements

- All non-real time financial promotions must be documented, including copies, dates and platforms used.
- All promotions will be stored within the Financial Promotions Register in the Compliance Monitoring Plan.
- Records are retained for reference and compliance purposes.

Real-Time Financial Promotions

Although real-time promotions are not anticipated due to structured call processes, all calls are recorded for training and monitoring and stored against customer applications.

Records

All financial promotions and related records will be documented in the Veloce Autos Financial Promotions Register within the Compliance Monitoring Plan.

Review and Approval

This policy is reviewed annually, version-controlled and approved by directors before implementation.

“ Gear up for Veloce. ”