



Social Media Policy

Entity: Integrity Financial Planners Pty Ltd (**IFP**)

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AFSL: 225051

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1 Background and purpose of document

1.1 Background

Under s912A(1) of the Corporations Act (**Act**), an Australian Financial Services Licensee (**AFSL**) is required to (amongst other requirements):

- (a) do all things necessary to ensure that the financial services covered by the licence are provided efficiently, honestly and fairly;
- (b) have available adequate resources to provide the financial services covered by the licence and to carry out supervisory arrangements; and
- (c) comply with the conditions on the licence.
- (d) Reference to Group in this policy refers to the Licensee and or its representatives’.

1.2 Purpose and framework

- (a) This policy (**Policy**) is in conjunction with other policies and has been developed by IFP (**Licensee**) for the purposes of enabling the Licensee to meet its obligations under the Act and ASIC guidance.
- (b) This policy provides guidance for advisers and their employees in appropriate use of Social Media and ensuring appropriate disclosure is made where feasible.
- (c) The process for approval will require the Responsible Manager/s to give regard to the nature and use of social media forums such as, but not limited to, Instagram, LinkedIn, Twitter and Facebook.
- (d) This policy may be subject to change from time to time at the Group’s discretion. It does not form part of your Adviser Agreement or any industrial instrument that applies to you.

1.3 Responsibility

- (a) The Responsible Manager/s (or a delegate with appropriate experience and seniority) will be responsible for ensuring that the Licensee:
 - (i) meets the requirements of this Policy;
 - (ii) considers and assesses the risks faced by the Licensee when carrying on a financial services business, including the use of social media; and,
 - (iii) reviews this Policy on not less than an annual basis (unless more immediate updates are required due to legislative or regulatory change).

2 Role of IFP – Policy Approval

The Responsible Manager/s, will approve and implement the Social Media Policy.

The process for approval will require the Responsible Manager/s to give regard to the nature and use of social media forums such as, but not limited to, Instagram, LinkedIn, Twitter and Facebook.

Advisers must adopt IFP's Social Media policy and are required to follow these requirements. Adherence to and understanding of the Social Media policy will be confirmed in adviser reviews/audits.

The IFP Social Media Policy will be monitored and reviewed on a 12-monthly basis.

The review will be based on

- Information from adviser reviews
- Monitoring of any complaints in respect of social media issues.

Introduction

The rapid and dramatic rise in the use of social media within our community brings with it both challenges and opportunity.

Its public nature and global spread presents a range of challenges to IFP and its authorised representatives and their employees in safeguarding our commercial activities, our brand and reputation, our clients and more importantly the security and safety of our practices and employees. There are also tremendous opportunities for us to connect with our clients, and potential clients in new and exciting ways through social media.

Many of us appreciate the way social media can let us share information and gives us a voice to express our opinions. The challenge for us is that once information is shared or an opinion is expressed through social media channels, our thoughts and words can be permanently recorded and used in ways which we did not expect and can't always control.

Given these challenges, we want and expect our representatives and their staff to be careful online and not to display or post any information that may cause harm to Integrity or its practices.

As a representative of Integrity, you are expected to be careful and exercise common sense when using social media channels. We have created this policy as a reminder that the obligations you have as an Authorised Representative of Integrity Financial Planners (e.g. not to damage its business or reputation) also apply in the realm of social media.

What are social media channels

Social media channels include social networks, video/photo sharing sites, chat rooms, online forums and discussion groups, wikis, blogs, micro-blogging tools, and any other web sites that facilitate the publishing of user generated content (e.g. Instagram/LinkedIn/ Twitter/Facebook). These channels offer individuals the opportunity to connect with people, create and share information and ideas and develop relationships through online communities and networks.

Private use of social media channels

Please remember that you should not have any expectation of privacy when it comes to content and information stored or posted in the social media environment. Even if you intend to keep the information private, it may unintentionally enter the public domain. For example, online content may inadvertently be viewed or accessed by your colleagues, the media, or clients. Inappropriate content and information stored or posted in the social media environment, which is capable of being connected to Integrity, may adversely affect Integrity's brand/image and customer expectations as well as your own reputation.

As a rule, you should be guided by your common sense and not display or post any information that may damage yourself, your business, your clients or Integrity in any way. You also need to ensure that personal comments could not be taken as advice and lead or influence someone to act upon any information that you post.

In particular, you must not use social media channels to:

- post or disclose any information belonging or relating to any person/s or business/s which is not otherwise publicly available (eg client information; private documents etc);
- comment on, post or store any information in a way that may damage you, your practice or IFP; or
- disparage or speak adversely about IFP, other representatives, clients, employees or contractors (including supporting others who do this).

We also recommend that you remain aware of your personal online reputation, security and safety at all times. You should be aware that, even when not discussing Group related matters, if you engage in inappropriate conduct online (for example, by posting racist comments or offensive images) it may still have a serious impact on your reputation in real life, your relationships at work and even on your status within the Group.

Material posted by others

Inappropriate or disparaging content and information stored or posted by others in the social media environment may also damage the Group or its reputation.

If you become aware of any such material which may damage the Group or its reputation, it would assist us if you would immediately notify the Compliance Manager so that the issue can be addressed.

Using social media channels for Group business

IFP views social media channels as an increasingly important communication and engagement tool in our interactions with clients, stakeholders and online communities. Social media channels present the opportunity to enhance the Group's client relations capabilities and the chance to listen and where appropriate, engage in meaningful conversations with our clients and communities of interest.

You must not at any time purport to speak on behalf of IFP through social media channels without the express prior approval of the Director and/or a Responsible Manager

If you do identify yourself as an IFP adviser (or are identifiable as an IFP adviser) you must make it clear that you do not speak on behalf of IFP.

General Advice

Any commentary made via Social Media by its very nature will be either General Advice or factual information. No personal advice should **EVER** be provided or stated via social media.

As such, an appropriate disclaimer should be present within any post that discusses any strategy or product related commentary.

If you are sharing information or posts, ensure that the source of the information is clear or easily accessible. If this is not possible, do not share the information or post or add a comment / additional post to identify the source.

Examples

As an example, providing a link along with a comment regarding the Reserve Bank of Australia retaining or altering interest rates would **NOT** require a disclaimer.

Providing an article about the benefits of investing into a particular asset class **WOULD** require a general advice disclaimer such as the one below.

"This commentary is of a general nature and does not constitute advice to any individual. You should seek individual and specific advice before making any financial decision based on information contained in this article. Failure to seek advice may lead to financial decisions and consequences that are not appropriate to your needs and circumstances and financial loss may be incurred."

Breach

Failure to comply with this policy may result in disciplinary action being taken against the adviser, which, in serious cases, may include the termination of representative status.