

Financial promotion · pre-publication check

PACK ID	FIN-PROM-4471
ARTEFACT	promotion_draft_v3.pdf · sha256:41c9...08d2
RULEBOOK	UK · FCA · v2026.07 · modules COBS 4, CONC 3
MODE	pre_publication · deterministic · engine v0.9

CHECKS EXECUTED

CHECK	BINDING RULE	RESULT
Risk warning present and prominent	COBS 4.2.1R	PASS
Balanced view of benefits and risks	COBS 4.2.1R · 4.5.2R	PASS
No implied guarantee of returns	COBS 4.5.2R	PASS
Past performance disclaimer where required	COBS 4.6.2R	PASS
Fees and charges stated without omission	CONC 3.3.1R	PASS
Target-audience appropriateness	COBS 4.7.1R	PASS



All executed checks passed against binding rules. Grounding sufficient: 2 binding rules matched with confidence above threshold. This artefact may be published; this pack constitutes the pre-publication compliance record.

SEALED RECEIPT · SHA-256 · CHAINED TO PRIOR PACK

9f2c41d8a1c33be07d5e12aa04b6c9e1f8837a02d41c55b6e90f3ac217d8a41e → prev: b31e07c4...52aa · seal: valid

Crypto promotion · breach identified

PACK ID	FIN-PROM-4482
ARTEFACT	crypto_promo_v1.html · sha256:77b0...3c1f
RULEBOOK	UK · FCA · v2026.07 · module COBS 4.12A (cryptoasset marketing)
MODE	pre_publication · deterministic · engine v0.9

CHECKS EXECUTED

CHECK	BINDING RULE	RESULT
Prescribed risk summary present	COBS 4.12A.36R	PASS
24-hour cooling-off communicated	COBS 4.12A.40R	PASS
No incentives to invest offered	COBS 4.12A.34R	FAIL
Fair, clear, not misleading overall	COBS 4.2.1R	FAIL · dependent



Breach identified: the artefact offers a referral bonus, which constitutes an incentive to invest under the cryptoasset marketing rules. Returned to author with the exact clause and remediation note. Not publishable in current form.

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c81f30aa92d4e17b6c05f9ae21d83b47e5590cc1a2f4d8be07316a9d420577c2 → prev: 9f2c41d8...a41e · seal: valid

Pension transfer advert · escalated to human

PACK ID	FIN-PROM-4490
ARTEFACT	pension_transfer_advert.docx · sha256:ab52...9e04
RULEBOOK	UK · FCA · v2026.07 · modules COBS 4, COBS 19
MODE	pre_publication · deterministic · engine v0.9

CHECKS EXECUTED

CHECK	BINDING RULE	RESULT
Risk warning present	COBS 4.2.1R	PASS
Product structure classification	COBS 19 (scope)	NOVEL
Rule grounding for verdict	n/a	INSUFFICIENT



No binding rule matched the novel product structure with confidence above threshold. Velkron does not guess on compliance: the case is escalated to a named compliance officer with the partial analysis attached. The refusal itself is recorded and sealed.

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2e5db04c61f98a3d17ee40b2ca9f5d8631a07c44f2b9e01d5c8837aa164fb910 → prev: c81f30aa...77c2 · seal: valid