

eToro AUS Capital Ltd. & Gleneagle Asset Management Ltd. Guideline

PARTNER COMPLIANCE GUIDELINES for eToro AUS Capital Ltd – AFSL 491139 and eToro Service ARSN 637 489 466 offered by Gleneagle Asset Management Limited Ltd AFSL 226199.

All you need to know in one place

Marketing Affiliate Rules

Below is a checklist of the main rules that should be followed when promoting eToro AUS on your affiliate marketing channel:

- 1 Always add the Risk Warning:
 - eToro AUS Capital Ltd ACN 612 791 803 AFSL 491139. OTC Derivatives are speculative and leveraged. Capital is at risk. See PDS under every CTA (Call to Action) when promoting CFDs.
 - eToro Service ARSN 637 489 466 promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Capital at risk. Other fees apply. See PDS under every CTA (Call to Action) when promoting real stocks
 - **eToro Service ARSN 637 489 466 promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Capital at risk. See PDS. Zero commission does not apply to short or leveraged positions. Zero commission means that no broker fee has been charged when opening or closing the position. Limited stock exchanges only.** under every CTA (Call to Action) when promoting Zero Commission

- 2 Remember that **CFD assets are offered through eToro AUS**.

- Real Stocks are offered through eToro Service ARSN 637 489 466 operated by Gleneagle Asset Management ACN 103 162 278 AFSL 226199 and promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139.

- 3 Always be fair, clear and avoid misleading statements.

- 4 Always mention in your affiliate marketing channel which eToro entity you are promoting: eToro AUS Capital Limited ACN 612 791 803 AFSL 491139

OR

eToro Service ARSN 637 489 466 promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Capital at risk. Other fees apply. See PDS

- 5** Use only correct information in your reviews/articles and always keep them updated as per the list below (not exhaustive) - more information can be found at www.eto.com
- a.** Current CFD leverage limits
 - b.** Popular Investors
 - c.** Our Story (history of eToro)
 - d.** Team and Investors
 - e.** eToro Copy Systems explanation
 - f.** eToro CopyPortfolios
 - g.** Deposits FAQ
 - h.** Withdrawal FAQ
 - i.** Regulation and License
 - j.** Customer Service
 - k.** Invite your friends (“Refer a friend” (RAF) program)
 - l.** General Risk Disclosure

6 Affiliates are only permitted to use eToro’s official marketing materials which can be found in the affiliate marketing tools.

7 Any educational materials and/or marketing materials and/or related materials created by the affiliate to be provided to clients (i.e. banners, videos, newsletters, any significant changes to the communication channels of the affiliate etc.), through all of the communication channels, should be reviewed and approved by the Compliance Function/Department of eToro, prior to dissemination to clients. Any related requests to this matter should be forwarded to your affiliate account manager.

8 Any new communication channels and any relevant requests should be immediately communicated to the Affiliate Account Manager and should be pre-approved by the Compliance Function/Department of eToro.

9 Affiliates are not allowed to promote eToro via sources other than the ones disclosed and approved by the Compliance Function/Department of eToro.

10 Affiliates shall not approach, directly or indirectly, any traders and/or potential traders other than promoting eToro as detailed in these partner guidelines.

11 Do NOT use fake celebrity endorsement in order to promote eToro

Leading Compliance Principles :

BE FAIR - do not use misleading headlines and unfair comparisons. Partners should not hide important information by using small print. Always make sure that you display risk warnings in a clear and visible way. Never promise profits or gains.

Do not use any unqualified or absolute statements unless they can be proved by including a source as to where the information is taken from.

BE CLEAR - about any charges, fees or risks.

AVOID MISLEADING - ensure that all statements are balanced. Partners can not place too much emphasis on the benefits associated with a product without also highlighting the relevant risks. Always look for complete, relevant data and add proper warnings when using data (see section “How to display risk warnings”)

UNREALISTIC EXPECTATIONS - the information shall not include the name of any competent authority in such a way that would indicate or suggest endorsement or approval by that authority of the products or services offered by eToro entities.

KEEP THE TERMINOLOGY AND CONTENT UP TO DATE - all the irrelevant information or old terms need to be replaced and updated (i.e., words like: “Guru, copyfund, OpenBook and high leverage) Bonuses are subject to changes.

RESTRICTED WORDS - Ensure you not use the following expressions:

- “stockbroker” or “sharebroker”;
- “futures broker”;

Ensure you do not use the following expressions / words:

- “independent”;
- “impartial”;
- “unbiased”; or
- similar expressions.

Checklist of things to consider:

Confirm each sentence in the advert is factually correct.

Confirm information presented is relevant.

Confirm information presented is clear, concise and effective.

Confirm important information is aimed at catching the readers attention (e.g. disclaimers).

Confirm information is in a format that makes it easy for consumers to compare financial products and services.

Make it clear that past performance (results achieved) is not necessarily indicative of future results. Furthermore, no representation is made that profits will be achieved or losses avoided in the future.

Confirm that there is NO use of “non actual” information e.g. “modelled results”, “averages”, “simulated” etc.

Any comparisons used are current, complete and accurate i.e. compared with a benchmark or the average for a class of similar products or service.

Confirm that the advertisement was truthful and precise (i.e. the advertisement can not be misleading and/or deceptive or likely to mislead and/or deceive).

Confirm that the advertisement is suitable for the full range of its audience i.e. apply the “lowest common denominator” test.

Examples of Misleading Statements

Do not use the statements below:

“1 click 60 seconds 85% profit”
“Trading has never been so easy”

Please note that all content and marketing materials that include Copyfund or Bonuses offerings need to be immediately removed.

“Gain up to 85% return every 60 seconds”

“Start your career as a trader right now”

“Suggestions are great – it is hard not to win”

“95% return in a few minutes”

Our Pro signals have been tested to have over 65% daily success rates”

“What can you do in 60 seconds? Copy and earn extra money.”

“Learn how to turn market opportunities into profit”

“\$10,000 – Get your bonus now..”

“Make/earn money”

“Risk-free”

“low risk”

“No 1”

“Secure”

“Safe”

Avoid Jargons in general

Do not use the statements below:

- a. Become a successful trader!
- b. You will make profits!
- c. Make money with the best trader
- d. With eToro, trading is easy
- e. Copy the best traders and you will make profits

Do not make any false promises

How to display risk warning?

Whenever there is a Call to Action ('CTA') for CFDs, Real Stocks, Cryptos or any kind of instrument (i.e., Join now, Trade now, Invest now, Register, Open account, Verify etc), a RISK WARNING IS REQUIRED.

The disclaimer should be under/next to View Website the button (CTA). It should always be in the language of the website, visible and added to EVERY (CTA).

For the small CTA, the disclaimer should always be bold.

Real Stock:

Zero stock commission:

eToro Service ARSN 637 489 466 promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Capital at risk. See PDS. Zero commission does not apply to short or leveraged positions. Zero commission means that no broker fee has been charged when opening or closing the position. Limited stock exchanges only.

CFD:

eToro AUS Capital Ltd ACN 612 791 803 AFSL 491139. OTC Derivatives are speculative and leveraged. Not suitable for all investors. Capital at risk. See PDS

Real Crypto Assets:

Crypto assets are unregulated & highly speculative. No consumer protection. Capital at risk.

Real + CFD Crypto or Ambiguous

eToro AUS Capital Ltd ACN 612 791 803 AFSL 491139. eToro offers both real crypto assets as well as crypto assets as OTC Derivatives.

Real crypto assets are unregulated & highly speculative. Being unregulated, there is no consumer protection. Your capital is at risk.

Leveraged positions are OTC Derivatives, which are regulated financial products. OTC Derivatives are considered risky financial products, speculative, and include leverage. Not suitable for all investors. Capital at risk. See PDS

For the larger CTA, the disclaimer is:

For CFDs

eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. OTC Derivatives are leveraged financial products and considered speculative. OTC Derivatives may not be suitable for all investors. Trading OTC Derivatives does not result in ownership of the underlying assets. You risk losing all of your investment. This information is general only and has been prepared without taking your objectives, financial situation or needs into account. Consider our Product Disclosure Statement (PDS).

For Real Stocks

This content promotes stocks and is of a general nature only. Stocks are offered through eToro Service ARSN 637 489 466 operated by Gleneagle Asset Management ACN 103 162 278 AFSL 226199 and promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Investing in shares via a managed investment scheme does not result in direct ownership of the underlying assets. The scheme has legal ownership, the investor has beneficial ownership i.e. the shares are held on your behalf. As the scheme has legal ownership, you have no rights in the securities, including voting rights.

Shares are non transferable. Your capital is at risk. Refer to the Product Disclosure Statement (PDS) before transacting.

For Zero Commission

This content promotes stocks and is of a general nature only. Stocks are offered through eToro Service ARSN 637 489 466 operated by Gleneagle Asset Management ACN 103 162 278 AFSL 226199 and promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Investing in shares via a managed investment scheme does not result in direct ownership of the underlying assets. The shares are held on your behalf. Non-transferable. Your capital is at risk. Other fees may apply. For additional information regarding fees, [click here](#).

Zero commission is only available on limited stock exchanges. All other shares are offered as OTC Derivatives, and include commission. This information is general only and has been prepared without taking your objectives, financial situation or needs into account. You should obtain independent advice and consider our Product Disclosure Statement (PDS) before transacting. See full disclaimer.

If a CTA is at the end of the review, website, blog or article, **ALWAYS** use the long version noted above.

If a CTA is at the end of the review, website, blog or article, and the content mention “copy-trading” **ALWAYS** use the appropriate long version:

For CFDs

Copytrading is offered by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Social trading. eToro does not approve or endorse any of the trading accounts customers may choose to copy. All instructions and actions related to copied trades will automatically be replicated in your account. When you select to copy a particular trading account you will copy all of their future trades, and you may select also to follow their existing trades. Past performance of an eToro Community Member is not a reliable indicator of their future performance.

OTC Derivatives are offered by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. OTC Derivatives are leveraged financial products and considered speculative. OTC Derivatives may not be suitable for all investors. Trading OTC Derivatives does not result in ownership of the underlying assets. You risk losing all of your investment. This information is general only and has been prepared without taking your objectives, financial situation or needs into account. Consider our Product Disclosure Statement (PDS).

For Real Stocks

Copy trading is offered by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Social trading. eToro does not approve or endorse any of the trading accounts customers may choose to copy. All instructions and actions related to copied trades will automatically be replicated in your account. When you select to copy a particular trading account you will copy all of their future trades, and you may select also to follow their existing trades. Past performance of an eToro Community Member is not a reliable indicator of their future performance.

Stocks are offered through eToro Service ARSN 637 489 466 operated by Gleneagle Asset Management ACN 103 162 278 AFSL 226199 and promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Investing in shares via a managed investment scheme does not result in direct ownership of the underlying assets. The scheme has legal ownership, the investor has beneficial ownership i.e. the shares are held on your behalf. As the scheme has legal ownership, you have no rights in the securities, including voting rights. Shares are non transferable. Your capital is at risk. Refer to the Product Disclosure Statement (PDS) before transacting.

For Zero Commission

Copy trading is offered by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Social trading. eToro does not approve or endorse any of the trading accounts customers may choose to copy. All instructions and actions related to copied trades will automatically be replicated in your account. When you select to copy a particular trading account you will copy all of their future trades, and you may select also to follow their existing trades. Past performance of an eToro Community Member is not a reliable indicator of their future performance.

Stocks are offered through eToro Service ARSN 637 489 466 operated by Gleneagle Asset Management ACN 103 162 278 AFSL 226199 and promoted by eToro AUS Capital Limited ACN 612 791 803 AFSL 491139. Investing in shares via a managed investment scheme does not result in direct ownership of the underlying assets. The scheme has legal ownership, the investor has beneficial ownership i.e. the shares are held on your behalf. As the scheme has legal ownership, you have no rights in the securities, including voting rights. Shares are non transferable. Your capital is at risk. Refer to the Product Disclosure Statement (PDS) before transacting.

Zero commission is only available on limited stock exchanges. All other shares are offered as OTC Derivatives, and include commission. This information is general only and has been prepared without taking your objectives, financial situation or needs into account. You should obtain independent advice and consider our Product Disclosure Statement (PDS) before transacting.

A few examples of CTA:

- Trade now
- Sign up
- Join now
- Invest now
- Buy and Sell
- Register Now
- View Website

WARNING: it should be visible and in the language of the website.

NOTE: The disclaimers must appear at all times separate from other risk warnings.

Remember you can use the short version at the beginning of the article, reviews, blog, website, but you always need to use the long version at the end.

Remember that it is your obligations and responsibilities to check and comply with our guidelines as well as our T&Cs.

We would like to draw your attention to the following chapter from our T&Cs, related to compliance. The entire T&Cs can be found [HERE](#)

Section 2.3 “The Affiliate acknowledges and agrees that:

- a.** it will use the eToro Brands only as permitted Hereunder;
- b.** it will use the eToro Brands in a lawful manner and in strict compliance with all format(s), guidelines, standards and other requirements prescribed by eToro;
- c.** the eToro Brands are and shall remain the sole property of eToro;
- d.** nothing in this Agreement shall confer in the Affiliate any right of ownership in the eToro Brands and all use thereof by the Affiliate shall inure to the benefit of eToro;
And
- e.** the Affiliate shall not, now or in the future, attempt to register any eToro Brand and/or domain name and/or contest the validity of any eToro Brands or use any term or mark confusingly similar to any eToro Brands.”

Section 3.1.6.

The Affiliate’s fulfilment of its responsibilities under this Agreement shall be in strict compliance with the terms and conditions set forth herein;

Section 4.2

The Affiliate shall not publish any material which refers to the Trading Platform, eToro Brands or any other name or mark owned by eToro unless such publication is in compliance with eToro’s guidelines. Upon request by eToro, Upon request by eToro, the Affiliate shall immediately remove any publication referring to the Trading Platform, eToro Brands or any other name or mark owned by eToro.

Section 4.3

The Affiliate shall not copy any content from eToro’s Websites and/or publications and shall not post in any website and/or elsewhere, any material published in eToro’s Websites and/or publications. The Affiliate shall not copy any content from any other Affiliate’s websites.

ADDITIONAL RESTRICTIONS

Please note that if an affiliate cannot amend any of the promotional content of its website in accordance with the above rule, the content shall be required to be removed.

- Only target individuals over the age of 18
- Regulatory demands can change often and with no prior notice. When this occurs, all promotional material needs to be updated immediately.

If you want to make any changes to eToro promotional materials on your site, you must let us know via the customer service portal by opening a ticket or contacting your affiliate account manager.

Restricted Countries - please contact our Customer Service

Note that this document may be amended from time to time to include/reflect new operational and/ or new/ amended regulatory requirements.

Partner Up!

In case you need further assistance, do not hesitate to contact your direct affiliate manager and we will be pleased to assist you.

We would like to thank you for your collaboration and hope to deliver the best possible experience for all of our Partners!