

eToro USA PARTNER PROGRAM COMPLIANCE GUIDELINES

Paid Marketing Partner Rules

Below is a checklist of the critical rules that must be adhered to when promoting **eToro USA LLC** or **eToro USA Securities Inc.** on your affiliate marketing channel(s). Questions concerning these rules can be sent to https://www.etoro.com/customer-service/?deepLink=type/programs/programs_subtype/partners_program/. Violating any of the below guidelines may result in termination of the partnership. 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. Regulatory demands can change often and with no prior notice. When this occurs, all promotional materials need to be updated immediately. If you want to make any changes to eToro promotional materials on your site, you must let us know by contacting your affiliate account manager.

All Partners must reside in a location in which eToro USA Securities Inc. is registered to conduct securities business and should, whenever possible, limit their marketing to customers in these same locations. Any communications that are intended to or could reach U.S. prospective or current investors are subject to U.S. rules and regulations.

All eToro Advertising Placements must include a disclosure in the footer:

US Crypto Trading is offered via eToro USA. US Securities trading is offered via eToro USA Securities, Inc. ("The BD"), a broker dealer registered with the Securities and Exchange Commission (SEC). The US Broker Dealer is a member of the Financial Industry Regulatory Authority (FINRA) and Securities Investor Protection Corporation (SIPC). eToro USA (NMLS ID: 1769299) is not a registered broker-dealer or FINRA member and your cryptocurrency holdings are not FDIC or SIPC insured. [Affiliate] is not an affiliate of eToro USA Securities, Inc. or eToro USA LLC. [Affiliate] is compensated if you access certain of the products or services offered by eToro USA LLC and/or eToro USA Securities Inc. Any testimonials contained in this communication may not be representative of the experience of other eToro customers and such testimonials are not guarantees of future performance or success.

NOTE: Disclosures on mobile devices should be placed on the same screen, link, or menu item. If the content includes multiple jurisdictions this disclaimer should be placed near the first US Sign-up link on the page. Video placements should include this disclosure during the last

An eToro Advertising Placement should:

- Provide a sound basis for evaluating the claims made by providing all material facts required to make an educated decision.
- Use reasonably sized and legible fonts.
- Discuss associated risks whenever potential benefits are discussed.
- Outside promotions (not managed by eToro) are not permitted.

- Communicate with prospective or current eToro account holders must be limited to the marketing materials prepared and disseminated in accordance with these guidelines.
- Affiliates may not make unfair comparisons and if comparisons include asset types the differences between these asset types must be fully explained.
- Include source citation for any statistics or data referenced.
- Affiliates are required to ensure that all information is kept updated and current, and that stale or irrelevant information is removed to mitigate the risk of confusing or misleading end investors.
- Include information about any charges or fees if pricing is discussed.
- An Affiliate will prevent visual and written imagery that creates false impressions, not just prevent misleading spoken words.
- These guidelines are subject to change at any time, including due to regulatory changes and new applicable laws.
- At the beginning of any video, the **#sponsored, #ad, #advertisement, or #Includes paid promotion** must appear for 10 seconds as per Google's Ad policies.

NOTE: The “#” is recommended but not required and can be removed. If the video is less than or equal to 30 sec, the appropriate time will be 5 seconds at the beginning and 5 seconds at the end.

An eToro Advertising Placement should not appear alongside (same webpage, audio, or video):

Products, services, or incentives not available in the US (Options / CFDs / Copytrader for stocks / etc.). As described above, this list may change over time and you will need to revise accordingly. The availability of incentives, products, services, or fees referenced should be easily confirmed on the US website (<https://www.etoro.com/en-us/>)

NOTE: for content including multiple eToro jurisdictions, any statements not relevant to the US audience must be accompanied by a disclaimer in close proximity or at the top of the page. This disclaimer should name the product or service and describe any limitation for US customers. (“not available in the US” “only available for crypto” etc.)

- Products or services restricted from advertising in the US: Individual Mutual Funds or ETFs or their distributing “fund family”. This would not restrict the use of the general term “ETFs” in a list of products or services but would preclude specific discussion of the various types and advantages/disadvantages of fund investing.

NOTE: because each advertisement naming the above assets requires pre-approval by FINRA, these assets may be available in the US but cannot appear on the same page as an eToro US link and cannot be disclaimed in multi-jurisdiction content.

- Get-rich-quick claims (“earn \$X per day/week/month” “become a millionaire” “get rich”, etc.)

- Statements that are misleading, exaggerated, or cannot be backed up with supporting evidence. —e.g., “eToro offers the best customer service of any broker-dealer.”
- Mention of, or advice regarding, specific assets or investment strategies
- Affiliates are not permitted to advertise “free” products or services provided by eToro.
- For nonwritten advertisements (audio and/or video) you must include the above disclaimer in the description and mention eToro as the “sponsor” or “partner” immediately before the advertising content.
- Forward looking statement that cannot be guaranteed; claims of future investment performance, “profits”, “gains”, or suggestion that past performance will continue or reoccur.
- Calls to Action that create a heightened sense of urgency i.e. a missed opportunity or suggests an artificial timeframe.
- Affiliates should not disclose necessary information through the use of pop-ups that could be blocked by pop-up blocking software.
- Promissory images such as a dollar signs, chart pointing upwards, money bags, gold coins, etc.
- Suggestion or implication that you are regulated or endorsed in any way by US regulators or eToro USA Securities. Regulators should not be mentioned beyond the statement in the required disclosure.
- Affiliate must not use hyperlinks for disclosures that are integral or inseparable from the claim.
- Positive descriptions of their personal experience with a particular product or service if the Affiliate has never personally used such product or service.
- NO BONUSES AND/OR ANY TRADING BENEFIT IS ALLOWED - as eToro USA LLC is regulated by FinCEN and cannot offer bonuses whatsoever.

Examples of Acceptable “Calls to Action”

“Learn more”

“Get informed”

“Get a free virtual account”

“Discover People”

“Explore Cryptocurrency Smartportfolios”

“Explore Cryptocurrencies”

“Join now”

“Start Today”

“Download the App”

“Sign-up”

“Sign in”

“Create an Account”

“Get started”

“Register Now”

“Join the Program”

Examples of Unacceptable “Calls to Action”

“Trade Now”

“Invest Now”

“Start Trading”

“Invest In stocks”

“Buy Cryptocurrencies”

“Join the party”

“Join the wave”

Variation of "the moon"

“Join the game”

Examples of Prohibited Investment Advice

Buy, Sell, or Hold recommendations

“Shares look particularly cheap”

“Your account is overweight equities”

“It looks to me like a head-and-shoulders formation is forming”

“Looks like we could be approaching an area of resistance”

Suggestion to invest X (\$,%) of your available equity

X “is currently up”

X “is trading near the high of its range”

Mention price target or entry or sale price of an asset

“Seeing good two-way flow in” X

X% “of eToro's clients are holding long positions in” X

Examples of Permitted Educational Content

“The benefits of portfolio diversification are as follows.....” (ie: risk should also be mentioned; fees/charges)

“Successful investors tend not to allocate their entire capital to one asset” (depends on the context. should be balanced and or a source)

“Non-farm payroll figures are expected at 12:30 today. The general consensus (as reported by Bloomberg) is for an increase of 225,000” (the source should be added + disclaimer about the forecast).”

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!