

# **PARTNER COMPLIANCE GUIDELINES** **for eToro USA (LLC)**

| All you need to know  
in one place

## Below is a checklist of the main rules that should be followed in any financial promotion on your affiliate marketing channel:

- 1** Always add the USA LLC Risk Warning: eToro USA LLC; Virtual currencies are highly volatile. Your capital is at risk.
- 2** Remember that Etoro offers only real crypto in the USA and no CFDs
- 3** Always be fair, clear and avoid misleading statements.
- 4** Always mention in your affiliate marketing channel which eToro entity you are promoting: eToro USA LLC is a registered money services business with FinCEN.
- 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 <https://www.etoro.com/en-us/>
  - a.** Popular Investors
  - b.** Our Story (history of eToro)
  - c.** Team and Investors
  - d.** eToro Copy Systems explanation
  - e.** eToro CopyPortfolios
  - f.** Withdrawal
  - g.** FAQ
  - h.** Regulation and License
  - i.** Customer Service
  - j.** General Risk Disclosure 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 <https://www.etoro.com/en-us/>
- 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.

## Leading Compliance Principles

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**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 source as to where the information is taken from.

**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, copy fund, OpenBook, high leverage and bonuses/promotions). Please note that all content and marketing materials that include BONUS offerings need

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

**BE CLEAR** - about any charges, fees or risks.

## Examples of Misleading Statements

- a. "1 click 60 seconds 85% profit"
- b. "Gain up to 85% return every 60 seconds"
- c. "Start your career as a trader right now"
- d. "Suggestions are great – it is hard not to win"
- e. "95% return in a few minutes"
- f. "Our Pro signals have been tested to have over 65% daily success rates"
- g. "What can you do in 60 seconds? Copy\* and earn extra money."
- h. "Learn how to turn market opportunities into profit"
- i. "\$10,000 – Get your bonus now."
- j. "Free"
- k. "Investment", "investing"

**Do not** incite specific trades eg "Buy bitcoin before it's too late".

**Do not** use the word "invest".

**Do not** suggest the product is "Free"

**Use risk warnings** where appropriate.

For example, Cryptocurrencies are highly volatile, be aware of the risks when trading them.

## Do not make any false promises

## 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 Please note that all content and marketing materials that include BONUS offerings need to be immediately removed.

**Always disclose** the sponsorship depending on if you are an influencer or an affiliate.

If posting from abroad, U.S law applies if it's reasonably foreseeable that the post will affect US consumers. Foreign laws might also apply.

## How to display risk warning?

Whenever there is a Call to Action ('CTA') for Cryptos (i.e., Join now, Trade 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 is:

eToro USA LLC; Virtual currencies are highly volatile. Your capital is at risk. (always in bold).

For the influencer promoting real crypto, the disclaimer under CTA is:

eToro USA LLC. This ad promotes copy. Your capital is at risk.

For mix content ( partner promoting different eToro entities) the disclaimer should appear under the US content:

eToro USA LLC does not offer CFDs and makes no representation and assumes no liability as to the accuracy or completeness of the content of this publication, which has been prepared by our partner utilizing publicly available non-entity specific information about eToro. Your capital is at risk

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

## A few examples of CTA:

- Trade now
- Sign up
- Join now
- Buy and Sell
- Register Now

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

## Influencer VS Affiliate

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### Influencer

**Definition** - Partner with influencers on social media who promotes eToro USA LLC

**Purpose** - Brand awareness

**Promoting Platforms** - Social media platforms such as Facebook, Youtube, Instagram and more

**Who are they?** - Celebrities, Bloggers, Media Personalities, Industry Leaders

**Cost** - Influencers are generally compensated with a flat fee (media deal).

**ROI (\*return on investment)** - Number of new followers, social media engagement, Website Traffic, lead generation

## YOUTUBE

While advertising on youtube the following rules should apply:

1. At the beginning of the video, the #sponsored needs to appear 10 sec as per Google's Ad policies

Other options: **#ad, #advertisement, Includes Paid promotion**

**Please note that the # can be removed**

2. If the video is less than or equal to 30 sec, the appropriate time will be 5 seconds at the beginning and 5 seconds in the end.

3. At the end of the video, a disclaimer should be added in order to mention additional disclosures that are required under applicable laws.

## Affiliate

**Definition** - Business that promote the brand/content on their Marketing Channel and receive a commission when leads invest in the product/service

**Purpose** - Lead generation and revenue growth

**Promoting Platforms** - Affiliates generally own websites. They usually operate in the same industry where the audience spends time online

**Who are they?** - Companies, Publishers or Blog

**Cost** - The standard payment is CPA / Revshare

**ROI (\*return on investment)** - Average order value, Sales volume, Site traffic

## YOUTUBE

**While advertising on youtube the following rules should apply:**

1. At the beginning of the video, the **#eToropartner** or **#eToroambassador** needs to appear 10 sec as per Google's Ad policies.

**Please note that the # can be removed**

2. If the video is less or equal to 30 sec, the appropriate time will be 5 seconds in the beginning and 5 seconds in the end.

3. At the end of the video, a disclaimer should be added in order to mention additional disclosures that are required under applicable laws.

## **ADDITIONAL RESTRICTIONS**

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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.

NO BONUSES AND/OR ANY TRADING BENEFIT IS ALLOWED - as eToro USA LLC is regulated by FinCEN and cannot offer bonuses whatsoever

Only target individuals over the age of 18

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.

eToro USA LLC cannot be promoted among Binary Options or associated with Binary Options.

## **Partner Up!**

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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!