

PARTNER COMPLIANCE GUIDELINES

for eToro Service ARSN 637 489 466 offered by Gleneagle Asset Management Limited Ltd AFSL 226199.

| All you need to know
in one place

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: **High risk to capital** under every CTA (Call to Action) when promoting CFDs.

- Always add the Risk Warning: **ARSN 637 489 466, promoted by eToro Australia Pty Ltd. CAR 001281634. Your capital is at risk** under every CTA (Call to Action) when promoting real stocks.
- Always add the Risk Warning: **ARSN 637 489 466, promoted by eToro Australia Pty Ltd. CAR 001281634. Your capital is at risk. Other fees may apply** 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 Limited ABN 29 103 162 278, AFSL 226199, and promoted by eToro Australia Pty Ltd. CAR 001281634.

3 Always be fair, clear and avoid misleading statements.

4 Always mention in your affiliate marketing channel which eToro entity you are promoting: eToro eToro AUS Capital Pty Ltd, ABN 66 612 791 803 AFSL 491139

OR

eToro Service ARSN 637 489 466, operated by Gleneagle Asset Management Limited ABN 29 103 162 278, AFSL 226199, and promoted by eToro Australia Pty Ltd. CAR 001281634.

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 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.

Examples of Misleading Statements

Do not use the statements below:

"1 click 60 seconds 85% profit"

"Trading has never been so easy"

"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

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

eToro AUS Capital Pty Ltd, ABN 66 612 791 803 AFSL 491139. Level 19, 9 Hunter Street, SYDNEY NSW 2000

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 Copyfund or Bonuses offerings need to be immediately removed.

How to display risk warning?

Whenever there is a Call to Action ('CTA') for CFDs, 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 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.

For the larger CTA, the disclaimer is:

For CFDs

CFDs are highly leveraged and risky, and may not be suitable for all investors. You may lose more than your initial investment. Trading CFDs does not result in ownership of the underlying assets. You should obtain your own advice and refer to our [FSG and PDS](#) before deciding whether to trade with us.

For Real Stocks

This content promotes stocks traded on US stock exchanges and is of a general nature only. Stocks are offered through eToro

Service (ARSN 637 489 466), operated by Gleneagle Asset Management Limited ABN 29 103 162 278, AFSL 226199, and promoted by eToro Australia Pty Ltd. CAR 001281634. All other stocks are offered as derivatives and bear commission.

This information has been prepared without taking your objectives, financial situation or needs into account. You should obtain advice independently in light of your own objectives, financial situation or needs and refer to our [FSG and PSD](#) before deciding whether to trade with us. Trading stocks may not be suitable for all investors. You may lose all of your capital. Your capital is at risk.

For Zero Commission

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whether to trade with us. Trading stocks may not be suitable for all investors. You may lose all of your capital. Your capital is at risk.

Zero commission does not apply to short or leveraged positions. Zero commission means that no broker fee will be charged when opening or closing the position on the US exchange. Other fees may apply. For additional information regarding fees, [click here](#).

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

CFDs are highly leveraged and risky, and may not be suitable for all investors. You may lose more than your initial investment. Trading CFDs does not result in ownership of the underlying assets. Copy-trading facilities cannot be construed as financial advice. Use

these facilities at your own risk and we are not liable for losses incurred. You should obtain your own advice and refer to our FSG and PDS before deciding whether to trade with us.

For Real Stocks

This content promotes copy trading and stocks traded on US stock exchanges, and is of a general nature only. Stocks are offered through eToro Service (ARSN 637 489 466), operated by Gleneagle Asset Management Ltd. ABN 29 103 162 278, AFSL 226199, and promoted by eToro Australia Pty Ltd. CAR 001281634. All other stocks are offered as derivatives and bear commission.

Copy trading is offered by eToro AUS Capital Pty Ltd. (AFSL 491139) and cannot be construed as financial advice. Use at your own risk and we are not liable for losses incurred. This information has been prepared without taking your objectives, financial situation or needs into account. You should obtain advice independently and refer to [FSG and PDS](#) before trading with us. Trading stocks may not be suitable for all investors. Your capital is at risk.

For Zero Commission

This content promotes copy trading and stocks traded on US stock exchanges, and is of a general nature only. Stocks are offered through eToro Service (ARSN 637 489 466), operated by Gleneagle Asset Management Ltd. ABN 29 103 162 278, AFSL 226199, and promoted by eToro Australia Pty Ltd. CAR 001281634. All other stocks are offered as derivatives and bear commission. Copy trading is offered by eToro AUS Capital Pty Ltd. (AFSL 491139) and cannot be construed as financial advice. Use at your own risk and we are not liable for losses incurred. This information has been prepared without taking your objectives, financial situation or needs into account. You should obtain advice independently and refer to FSG and PDS before trading with us. Trading stocks may not be suitable for all investors. Your capital is at risk.

Zero commission does not apply to short or leveraged positions and means that no broker fee has been charged when opening or closing positions. Other fees may apply. For additional information regarding fees, visit stocks.etoro.com

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&C, related to compliance. The entire T&C 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, 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!