

PARTNER COMPLIANCE GUIDELINES for eToro USA: Phase I

Paid Marketing Affiliate 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.

- Affiliates are not permitted to mention specific ETFs or fund families within promotions of eToro USA Securities Inc.
- Affiliate marketing must be fair and balanced, and must provide a sound basis for evaluating the facts. Content cannot contain misleading statements. All material facts required to make an educated decision about whether to establish an eToro account must be included.
- Affiliates must not use small print to convey material facts. All substantive information must be clearly detailed in the body of the marketing material using standard size text.
- No marketing material may make any false, exaggerated, unwarranted, promissory or misleading statement or claim within the communication.
- No Affiliate may publish, circulate or distribute any communication that the Affiliate knows or has reason to know contains any untrue statement of a material fact or is otherwise false or misleading. In particular, an Affiliate may not tout their personal experience with a particular product or service if the Affiliate has never personally used such product or service.
- Affiliates must ensure that statements are clear and not misleading within the context in which they are made, and that they provide balanced treatment of risks and potential benefits.
- Affiliates may promote a valid eToro specific campaign or offer, but must confirm that the terms of the campaign or offer are valid and accurate prior to publishing content related to said promotion. Please review (<https://www.etoro.com/en-us/>) to confirm accuracy of material facts.
- Monetary promotions are not permitted under this Program (i.e. Get 5 free trades from eToro for opening an account).
- Affiliate communications may not predict or project performance, imply that past performance will recur or make any exaggerated or unwarranted claim, opinion or forecast.
- Affiliates shall not conduct one on one communications with, directly or indirectly, any eToro investors and/or potential eToro investors at any time. All communications with current or prospective eToro investors must be limited to the Affiliate marketing materials prepared and disseminated in accordance with these guidelines.
- Affiliates may not use misleading headlines or unfair comparisons.
- Affiliates are not permitted to promise profits or gains.
- Affiliates may only use an absolute statement if it can be substantiated by a source, and some statements are not capable of being substantiated and must not be used—*e.g.*, “eToro offers the best customer service of any digital broker-dealer in the U.S.” is an example of a statement that would generally be prohibited
- All sourcing information must be provided to eToro upon request.

- Affiliates are not permitted to include the name of any governing authority in such a way that would indicate approval, or suggest endorsement, by that authority of the products or services offered by eToro USA LLC.
- 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.
- Affiliates are not permitted to advertise “free” products or services provided by eToro. Relevant information about any charges, fees, or risks must be included if pricing is discussed.
- Disclosures on mobile devices will be placed on the same screen, link, or menu item.
- Affiliates should not disclose necessary information through the use of pop-ups that could be blocked by pop-up blocking software.

- Affiliate must not use hyperlinks for disclosures that are integral or inseparable from the claim.
- An Affiliate will prevent visual and written imagery that creates false impressions, not just prevent misleading spoken words.

- An Affiliate must not offer one transaction, and then switch the customer to something different (“Bait and Switch”). Affiliates are only permitted to publish marketing materials concerning eToro that strictly adhere to all requirements listed within this agreement.

- These guidelines are subject to change at any time, including due to regulatory changes and new applicable laws.

- **Examples of Misleading/Prohibited Statements**
- “1 click 60 seconds 85% profit”
- “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.”
- “Become a successful trader.”
- “You will make profits.”
- “Make money with the best traders.”
- “With eToro, trading is easy.”
- “Copy the best traders and you will make profits.”
- Do not recommend or encourage specific trades e.g. “Buy Apple before it’s too late”.
- Do not suggest the product is “Free.” Any reference to pricing or cost must include any fees associated with promoted products and services.

The foregoing rules and requirements apply regardless of whether an Affiliate is located in the U.S. Any communications that are intended to or could reach U.S. prospective or current investors are subject to U.S. rules and regulations.

All Affiliate communications must contain the following disclaimer:

“[Affiliate] is compensated if you access certain of the products or services offered by eToro USA LLC and/or eToro USA Securities Inc., as applicable. This compensation incentivizes [Affiliate] to describe those products and services in favorable terms. 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.”

YOUTUBE

While advertising on YouTube the following rules apply:

- At the beginning of the video, the #sponsored must appear for 10 seconds as per Google's Ad policies.
- Other options: #ad, #advertisement, Includes Paid promotion. Please note that the # 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.
- At the end of the video, a disclaimer should be added to mention additional disclosures that are required under applicable laws.

ADDITIONAL RESTRICTIONS

- **eToro USA LLC cannot be promoted among Binary Options or associated with Binary Options.**
- **Only target individuals over the age of 18**
- **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.

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.

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!