

AFFILIATE POLICY

1. Introduction

This Policy establishes the framework under which all Affiliate marketing activity conducted on behalf of the Company must be monitored, controlled, and approved. As a Cyprus Investment Firm (CIF) regulated by the Cyprus Securities and Exchange Commission (CySEC), the Company is fully responsible for the content published by its Affiliates or any third party acting on its behalf. The purpose of this Policy is to ensure that all Affiliate-related content complies with applicable laws, CySEC requirements, MiFID II, ESMA guidelines, and the Company's internal standards.

2. Scope

This Policy applies to all Affiliates, partners, influencers, introducing brokers, and any third party engaged in promotional activities or marketing content related to the Company's services, platforms, and products. It applies to all communication channels including, but not limited to, social media, websites, blogs, emails, videos, and offline promotional events.

3. General Principles

All Affiliate marketing communications must adhere to the following general principles as per ESMA and CySEC guidelines:

- Be fair, clear, and not misleading.
- Ensure consistency with the Company's legal and regulatory documents.
- Provide accurate, transparent, and balanced information, including both risks and rewards.
- Avoid exaggerated or unverifiable claims.
- Ensure that all content is suitable for the target audience.
- Present costs, fees, and charges clearly.
- Prominently display appropriate risk warnings and disclaimers.
- Ensure sustainability-related statements are consistent with official documents.

4. Practical Do's and Don'ts

Affiliates must observe the following rules:

4.1 Do's

- ✓ Be transparent about the risks associated with trading.
- ✓ Always include at least one clear and visible risk warning/disclaimer.

AFFILIATE POLICY

- ✓ Use up-to-date, factually accurate information.
- ✓ Make fair and balanced comparisons.
- ✓ Clearly disclose the commercial nature of Affiliate promotions.
- ✓ Ensure that all marketing content is clearly identified as marketing.

4.2 Don'ts

- ✗ Do not guarantee profits, returns, or financial success.
- ✗ Do not use aggressive, manipulative, or high-pressure tactics.
- ✗ Do not use misleading visuals such as cash, luxury items, or lifestyle imagery suggesting wealth.
- ✗ Do not make unverified claims or use absolute terms such as 'the best' or 'guaranteed'.
- ✗ Do not use CySEC or other regulatory logos in any content.
- ✗ Do not provide investment advice, signals, or auto-trading claims.
- ✗ Do not compare the Company with banks or licensed credit institutions.
- ✗ Do not use forbidden phrases such as 'Easy profits', 'Double your money instantly', or 'Financial freedom'.

5. Forbidden Techniques and Practices

The following practices are strictly prohibited:

- ❖ Spamming through unsolicited bulk emails or messages.
- ❖ Cold calling or unsolicited private messages.
- ❖ Use of unapproved or high-risk traffic sources.
- ❖ Aggressive or high-pressure marketing tactics.
- ❖ Concealing or omitting costs and charges.
- ❖ Offering inappropriate bonuses to inexperienced retail clients.
- ❖ Use close groups to solicit clients.

6. Approval and Monitoring

- All Affiliate marketing content must be submitted in advance for review and approval by the Compliance Department at least 3-5 business days prior to posting it.
- Content means all elements, like text, images, videos, music or other characteristics that will accompany the posts.
- Affiliates must NOT publish or distribute content without prior written approval from the Company.

AFFILIATE POLICY

- The Compliance Department will continuously monitor published Affiliate content to ensure adherence to regulatory and Company standards.
- Any breach of this Policy may result in termination of the Affiliate agreement and reporting to CySEC if required.

7. Responsibilities

- Compliance Department: Responsible for approving, monitoring, and auditing Affiliate marketing content.
- Marketing Department: Responsible for training Affiliates and ensuring alignment with Company branding.
- Affiliates: Fully responsible for complying with this Policy and ensuring that their communications reflect the Company's standards and regulatory obligations.

8. Record Keeping

The Company will maintain a full archive of all Affiliate marketing content, including approvals, risk warnings, and disclaimers, for at least five (5) years in line with MiFID II requirements.

9. Enforcement

Breaches of this Policy will be treated as serious misconduct. Disciplinary actions may include termination of the Affiliate contract, withholding payments, and reporting to regulatory authorities where applicable.

Version 01 last reviewed in August 2025.

APPENDIX

AFFILIATE POLICY

APPENDIX A: Affiliate Compliance Checklist

<div><div><u>General Compliance</u></div><div><ul style="list-style-type: none">■ Fair, clear, and not misleading.■ Consistent with Company’s legal/regulatory documents.■ Accurate, transparent, and up to date.■ Risks and rewards presented fairly.■ Costs, fees, and charges disclosed.■ Language appropriate for retail clients.</div></div>	
<div><div><u>Risk Warnings</u></div><div><ul style="list-style-type: none">■ At least one clear, visible disclaimer.■ Same font size as other content.■ Specific to the product’s risk level.</div></div>	<div><div><u>Don'ts</u></div><div><ul style="list-style-type: none">■ No promises, guarantees, or exaggerated claims.■ No financial freedom or easy profit statements.■ No misleading visuals (cash, luxury goods, lifestyle).■ No forbidden phrases (e.g., 'Double your money instantly').■ No investment advice, signals, or auto-trading claims.■ No comparisons with banks or licensed credit institutions.</div></div>
<div><div><u>Do's</u></div><div><ul style="list-style-type: none">■ Disclose the commercial nature of content.■ Use fair comparisons backed by evidence.■ Clearly identified as marketing material.</div></div>	<div><div><u>Prohibited Practices</u></div><div><ul style="list-style-type: none">■ No spam, cold calling, or private DMs.■ Only pre-approved traffic sources used.■ No aggressive, manipulative, or high-pressure tactics.■ No inappropriate targeting of inexperienced clients.■ No use of closed groups.</div></div>
<div><div><u>Approval</u></div><div><ul style="list-style-type: none">■ Content submitted to Compliance Department (3-5 business days).■ Written approval received before publishing.</div></div>	