

TRADING 212 CFD

Marketing Guidelines

These marketing guidelines comprise an indicative list of mandatory requirements, related to the marketing of CFD products, pursuant to the CFD Affiliates Terms and the Affiliate relationship. All defined terms, which are used herein, unless defined in these Guidelines, shall have the meaning prescribed to them within the CFD Affiliates Terms.

Please note that these Guidelines may be amended by us at any time, upon our sole discretion and without prior written notice. Therefore, whenever you are undertaking any campaign, please make sure that you have reviewed these Guidelines.

1. Always put the risk warning, when marketing CFD products.

The warning should state the following:

“CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 83% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money”.

The risk warning must be displayed in the language of the medium used to market the CFDs and must appear at all times, separate from any other risk warnings.

You should also be mindful of the percentage of retail investor accounts that lose money when trading CFDs on the Trading 212 platform, as it may change

from time to time. If you are not sure you are stating the correct percentage, it is advisable that you inquire from Trading 212 whether the risk warning needs to be updated.

- 2. No reference to any bonus/bonuses should be made at all.**
- 3. Only target individuals over 18 years of age.**
- 4. Always mention in your marketing material which Trading 212 entity you are promoting.** If you are unsure of which entity you should refer to, you should always ask Trading 212. The text in the marketing material can, for example, look like this when promoting Trading 212's services:

For Trading 212 UK Ltd.:

Trading 212 UK Ltd. is registered in England and Wales (Company number 8590005), with a registered address 107 Cheapside, London EC2V 6DN. Trading 212 UK Ltd. is authorised and regulated by the Financial Conduct Authority (Firm reference number 609146).

For Trading 212 Markets Ltd.:

Trading 212 Markets Ltd. is registered in Cyprus (Company number HE 409763), with a registered address 1, Agias Fylaxeos str., 2nd floor, Office 1, 3025, Limassol, Cyprus. Trading 212 Markets Ltd. is authorised and regulated by the Cyprus Securities and Exchange Commission (licence number 398/21).

5. General considerations

You shall ensure that all of your communication, promotion and marketing in relation to the services provided by Trading 212 is **fair, clear and not misleading**.

You must ensure that each communication and each promotion of Trading 212:

- a. is clearly identifiable as such;
- b. is accurate;
- c. is balanced and, in particular, does not emphasise any potential benefits of a product or service without also giving a fair and prominent indication of any relevant risks;
- d. is sufficient for, and presented in a way that is likely to be understood by the average member of the group to which it is directed, or by which it is likely to be received;
- e. does not disguise, omit, diminish or obscure important information, statements or warnings; and
- f. where a communication or a promotion of Trading 212 CFD services contains a comparison or contrast, the comparison or contrast is presented in a fair and balanced way and is meaningful (as per the criteria set out herein).

You must ensure that a communication or promotion of Trading 212's CFD services:

- a. uses plain and intelligible language; and
- b. is easily legible (or, in the case of any information given orally, clearly audible);

5.1. Do's and Don'ts:

You should be mindful of the following rules:

- a. Don't hide important information by using small print;**
- b. Don't promise profits or gains-** When marketing CFDs, don't start with their performance. When mentioning performance, you should always put the relevant risk warning in a clear and visible manner near it. If you mention past performance, your data should cover at least 5 years of the CFD's performance. If the CFD was created under than 5 years, your data should cover its performance from its inception;
- c. Don't omit costs-** You need to be clear about any charges, costs, fees or risks that may occur. Ensure that the marketing is balanced- avoid only mentioning the positives, without stating the risks, costs and charges;
- d. Don't set unrealistic expectations-** do not promise guarantees of success or security. Do not entangle a competent authority and use its name in a manner that alludes to endorsement or its approval of the products and services of Trading 212;
- e. Don't use outdated information-** all relevant information, warnings or terms should be updated regularly;

Present opportunities and risks in a balanced manner.	
The below are for illustrative purposes only and not a comprehensive list	
Do not use:	Use:
'easy' or 'simple' in relation to trading.	'Easy' in relation to the features and tools of the Trading 212 platform.
Do not use:	Use:
'secure trading', or 'trader's profits are guaranteed'.	'Security' if you refer to the IT security of Trading 212's platform.
Do not use:	Use:
'Riskless trading', 'guaranteed profit', 'use your free time to become a profitable trader', 'profit anytime and anywhere'.	'Risk-free' if you refer to the demo account only.
Do not use:	Use:
'The best', 'the most profitable', 'the greatest'	When referring to Trading 212 'One of the best', 'one of the safest'
Do not use:	Use:
The stock of Company X is guaranteed to bring profits!	There are no guarantees as to the performance of any company, so do research and assess the potential risks and rewards before investing in any stocks. Always consider taking independent financial advice.

Do not use:	Use:
I suggest you sell the stock of Company X as the company is failing.	Stock prices can go up as well as down, so conduct your own research, consult with a qualified professional, and make investment decisions based on your unique financial goals and risk tolerance, before performing any actions on the market.

When marketing CFDs, always make sure to highlight that the potential clients will trade CFDs and not the related underlying financial instruments and that at no time shall any delivery of or transfer of the title of the underlying financial instrument be made to the potential clients:

Differentiating CFD from their underlying instruments	
Do not use:	Use:
Trade forex, shares, crypto, indices and commodities with Trading 212.	Trading 212 offers trading of CFDs on forex, shares, crypto, indices and commodities.

6. Always provide fair, clear and not misleading communication

6.1. Fair Communication

A communication or a promotion of Trading 212's CFD services should not describe a feature of a product or service as "guaranteed", "protected" or "secure", or use a similar term unless:

- a. that term is capable of being a fair, clear and not misleading description of it; and
- b. You communicate all of the information necessary and present that information with sufficient clarity and prominence, to make the use of that term fair, clear and not misleading.

Affiliates are only permitted to promote Trading 212 via websites or other sources which have been prior reviewed and approved by Trading 212.

All traffic to Trading 212 from unapproved Affiliate websites, and from all other sources, will be blocked.

Marketing (information) **is not fair** in the following cases when the communicating party is:

- a. using misleading headlines;
- b. making unfair comparisons;
- c. displaying important information only in small print; or
- d. not displaying the risks of a product or service prominently enough.

You should not make any assertions or suggestions about the safety, security and reliability of Trading 212's CFD services as a guarantee by the relevant regulators, supervising Trading 212. You should also not mention the regulators' names as a sign of the reputability or safety of Trading 212.

In principle, assertions and suggestions about the safety, security, and lack of risk in relation to Trading 212's CFD Services, or the CFD products themselves, are restricted.

In general, you must make sure that the receiver of communications related to Trading 212's CFD Services, has an appreciation and understanding not only of the potential benefits but also of any relevant risks.

6.2. Clear Communication

Marketing (information) is clear, when it may be unambiguously understood by any potential client to the extent an average client would understand, in relation to the nature of the service that the firm provides.

Remember that: people have different levels of understanding about financial products, and many usually won't understand the financial industry's jargon or technical terms.

Marketing (information) is, for example, **not clear**, when:

- a. You don't provide enough or the right type of information; and/or
- b. it is insufficient or is provided (whether in text or as an image) or it may be ambiguously interpreted so that any potential client may not be aware of any:
 - i. Charges;
 - ii. Penalties (e. g. if someone withdraws money early from an investment);
 - iii. Risks (e. g. if someone could get back less money from an investment than the amount they paid in);
 - iv. Key conditions associated with an offer (e. g. if someone has to pay a certain monthly amount into their bank account to qualify for a benefit).

6.3. Advice and Recommendations

Trading 212 is an execution-only broker, and as such, it can neither directly nor indirectly provide or be associated with the provision of any investment advice to its clients.

You should not provide any investment advice in a form that could in any way directly or indirectly imply that advice is given on behalf or to the benefit of Trading 212.

For the avoidance of doubt, investment advice shall mean any recommendation or guidance that attempts to educate, inform, or guide an investor regarding a particular investment product or series of products. This means that you should not mention any single stock, advise people to buy or sell it, or suggest whether investors should buy, sell or hold a particular stock. Doing so may violate the applicable laws and regulations and expose you and our company to legal risks and penalties.

7. Approach towards vulnerable clients

You should consider the extent to which vulnerable clients might access a financial promotion especially when displayed on any type of social media. A vulnerable client is someone, who, due to their personal circumstances, is especially susceptible to harm.

You should not sway your promotion in such a way, that a vulnerable customer may be left with the impression that, for example, an investment may reduce their debt, or imply guaranteed success and profitability.

8. Providing appropriate Call-to-Action disclaimers

When you market or promote Trading 212, if or whenever a direct link or button provides the possibility of creating an account with Trading 212 (such as “Sign up” or “Register” etc. buttons), the relevant risk warning disclaimers should be visible around any such button(s) or link(s). This is called a Call-to-Action (CTA), and it represents an invitation or inducement to clients to enter into a business relationship with Trading 212.

The disclaimer should be under/next to the CTA button. It should always be in the language of the website, visible, and added to every Call-to-Action. It

should also be added, if the call to action is displayed in a video, stated orally in a video or is in the video description.

Depending on the size of the CTA, a different disclaimer should be used.

For small CTA, the disclaimer is: **“83% of retail CFD accounts lose money”** (always in bold).

For bigger CTA, the disclaimer is: **“CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 83% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money”**

If a CTA is at the end of a review, video, website, blog, or an article, always use the long version.

9. Monitoring

- a. Trading 212 will be monitoring your marketing communication on an ongoing basis to ensure compliance with these guidelines. You may therefore be contacted at any time by Trading 212 to amend and or remove marketing material we may deem inappropriate;
- b. Regulatory demands can change often and with no prior notice. When this occurs, all promotional materials need to change immediately. If you want to make any changes to Trading 212 promotional materials on your site, you must let us know;
- c. Keep in mind that if there are regular compliance issues, Trading 212 may need to reconsider the Affiliate relationship as a whole.

10. Transparency

- a. Do not use false personal information that could mislead clients and/or potential clients, such as false names, postal and email addresses;

- b. Do not contact the same client using different email addresses or phone numbers;
- c. Ensure you have clients' prior consent when sending marketing communication concerning Trading 212's CFD Products and Services.

You should under no circumstances present yourself as being a representative, agent or employee of Trading 212. You shall not use Trading 212's name in a way as to give to the public or any regulator the impression of the above. You shall refrain from using Trading 212's name in communication with potential clients such as in email communication in a way that it appears that the communication is being sent by or on behalf of Trading 212.

11. Useful Links about Trading 212

Who regulates Trading 212?

<https://helpcentre.trading212.com/hc/en-us/articles/360007315078-Who-regulates-Trading-212->

How is my money safety guaranteed?

<https://helpcentre.trading212.com/hc/en-us/articles/360007315158-How-is-my-money-safety-guaranteed->

In more detail:

<https://www.trading212.com/money-protection>

These CFD Marketing Guidelines were last updated and published on **31.03.2023**. A copy of the most up to date version of these Terms is available on our website.