

Conflicts of Interests Policy eToro (Europe) LTD

This Policy is issued in accordance with and reflects compliance with the EU directive 2004/39/EC on Markets in Financial Instruments (MiFID) and the implementation in Cyprus legislation on Investment Services and Activities and Regulated Markets Law of 2007 – Law 144(I)/2007 that apply to eToro (Europe) Ltd. This Policy is only for informational purposes and is not intended to, and does not create third party rights or duties that would not already exist if the Policy had not been made available. The Policy does not form part of any contract between eToro (Europe) Ltd. (or any of its affiliates) or any Client or prospective Client. This Policy demonstrates that eToro (Europe) Ltd. is taking all reasonable steps to identify and avoid conflicts of interest situations that may arise between eToro (Europe) Ltd. and its employees and its Clients or among its Clients during the course of the provision of investment services. It is the duty of the Compliance Officer to develop and maintain this Policy so as to prevent and resolve potential conflicts of interest. For the purposes of identifying the types of conflict of interest which may arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a Client, eToro (Europe) Ltd. need to take into account, by way of minimum criteria, the question of whether eToro (Europe) Ltd. or a relevant person, or a person directly or indirectly linked by control to eToro (Europe) Ltd., is in any of the following situations, whether as a result of providing investment or ancillary services or investment activities or otherwise:

- a) eToro (Europe) Ltd. or that person is likely to make a financial gain, or avoid a financial loss, at the expense of the Client
- b) eToro (Europe) Ltd. or that person has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome
- c) eToro (Europe) Ltd. or that person has a financial or other incentive to favour the interest of another Client or group of Clients over the interests of the Client
- d) eToro (Europe) Ltd. or that person carries on the same business as the Client
- e) eToro (Europe) Ltd. or that person receives or will receive from a person other than the Client an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard commission or fee for that service

eToro (Europe) Ltd. shall maintain policies, controls and procedures to manage the identified conflicts of interest. eToro (Europe) Ltd. shall undertake ongoing monitoring of business activities to ensure that internal controls are appropriate, some of which are detailed below:

- a) Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities that may cause a conflict of interest where the exchange of that information may harm the interests of clients.

b) The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of eToro (Europe) Ltd.

c) The removal of any direct link between the remuneration of relevant persons engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a conflict of interest may arise in relation to those activities.

d) Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment services or activities.

e) Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.

eToro (Europe) Ltd. shall also have in place Chinese Walls procedures: No communicating of information and data between the various business units of eToro (Europe) Ltd. and especially, whether eToro (Europe) Ltd.'s officers and employees have access to data in the possession of business units to which such access is not permitted, so that to prevent the flow of confidential information in a way that which adversely affect the interest of the Clients. Where a conflict of interest arises, eToro (Europe) Ltd. will, if made aware of it, disclose it to a client or potential client prior to undertaking investment business for that client. If eToro (Europe) Ltd. does not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict. eToro (Europe) Ltd. reserves the right to review and/or amend its Policy whenever if deems this necessary/appropriate.