

**RESPONSIBLE MARKETING
COMMUNICATIONS &
ADVERTISING POLICY**

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1. INTRODUCTION

TTCM Traders Trust Capital Markets Ltd, a limited liability entity registered in Cyprus, operates under Sections 14 and 6/132C(1) of the Companies Act 1981. The company is officially listed with the Registrar of Companies under Company Number 250591, with its headquarters located at: 3 Thalias Str., 3rd Floor, Offices 310-318, 3011 Limassol, Cyprus.

The company is committed to promoting and advertising its products and services ethically, ensuring that all marketing efforts remain lawful, fair, honest, and transparent. These efforts must align with the company's business objectives, serve its stakeholders positively, and protect the interests of its clients globally, across all advertising channels and product lines.

To uphold these standards, the company has established this Responsible Marketing Communications and Advertising Policy (hereinafter referred to as "the Policy"). This document provides guidance for all personnel, management, executive staff, and contract workers, ensuring they adhere to responsible marketing principles. It outlines key considerations, best practices, and risk mitigation strategies to safeguard the company's reputation and enhance stakeholder confidence while maintaining compliance with legal and ethical advertising standards worldwide.

2. SCOPE

The Policy applies to all individuals associated with the company, including employees, executives, management, and contractual staff. It extends across all marketing channels and advertising media, covering all company products and services, irrespective of geographical location or platform used.

This Policy is primarily directed at consumer-focused marketing and advertising but also applies to business-to-business marketing, with exceptions where specified.

3. DEFINITION OF RESPONSIBLE MARKETING

Responsible marketing ensures that promotional activities accurately represent the company's products and services while being transparent, fair, and aligned with stakeholders' interests. It aims to address market concerns, uphold ethical standards, and foster trust among consumers.

Conversely, marketing is deemed irresponsible if it involves false, misleading, or exaggerated claims about the company's offerings, which can damage credibility and consumer trust.

4. BUSINESS RISKS ASSOCIATED WITH MARKETING AND ADVERTISING

Failure to uphold responsible marketing practices can expose the company to several risks, including:

- **Regulatory Scrutiny:** Heightened oversight from regulatory bodies due to non-compliance.
- **Legal Consequences:** Potential lawsuits or enforcement actions arising from deceptive claims.
- **Reputation Damage:** Negative media coverage that tarnishes the company's image.
- **Client Distrust:** Increased skepticism and dissatisfaction among consumers and stakeholders.
- **Market Perception Issues:** Negative public perception leading to a decline in customer engagement.
- **Financial Impact:** Potential loss of investments or business opportunities.

- **Employee Disengagement:** Reduced morale and employee retention due to unethical marketing practices.
- **Lack of Strategic Oversight:** Absence of proper consultation with internal experts before launching marketing campaigns, leading to ineffective strategies or misaligned messaging.

By adhering to this Policy, the company aims to mitigate these risks, enhance its brand integrity, and maintain consumer trust through responsible marketing communications and advertising.

5. BUSINESS OPPORTUNITIES THROUGH RESPONSIBLE MARKETING AND ADVERTISING

There are several business opportunities associated with adopting "responsible" marketing and advertising practices. These include:

- Investment Growth:** Attracting potential investments that could increase the Company's share value.
- Client Acquisition:** The ability to appeal to potential clients, encouraging them to choose the Company's products and services, which can drive business expansion.
- Market Expansion:** The opportunity to explore new markets and strengthen the Company's brand image, particularly through product innovation and by offering sustainable products and services through supplier collaborations.
- Client Engagement:** Encouraging positive client behavior through transparent communication of the Company's business model, supported by a portfolio of sustainable products aimed at helping clients achieve their goals.
- Reputation Enhancement:** Strengthening the Company's reputation by gaining favorable attention from the media, clients, external partners, and stakeholders.
- Maximizing Opportunities:** Aligning marketing strategies with the Company's Corporate Responsibility initiatives to fully capitalize on opportunities.
- Employee Development:** Promoting internal cooperation, which can lead to skill development and increased potential for employees.

6. GUIDELINES FOR RESPONSIBLE MARKETING ACTIVITIES

To ensure that all personnel, management, executive staff, and contracted individuals adhere to the Company's Responsible Marketing Standards, the following guidelines should be followed for marketing and advertising activities:

A. ACCURACY AND INTEGRITY IN MARKETING COMMUNICATIONS AND ADVERTISEMENTS

Any marketing or advertisement related to the Company's investment or non-core services must be truthful and clearly present the relevant products and services to avoid misleading clients or potential clients.

Specifically, marketing communications and advertisements must adhere to these criteria:

- Clarity:** Marketing materials must avoid misleading statements and be easily understood by the target audience, ensuring the intended message is clear.

b. **Accuracy:** All marketing communications must undergo thorough internal reviews to ensure compliance with accuracy standards. Claims about the benefits of services or products should be balanced with clear communication of any associated risks.

c. **Transparency:** All communications must properly highlight risks, providing fair and comprehensive information about any potential hazards linked to the Company's products and services, in line with industry standards and regulatory requirements.

d. **Consistency:** Information provided should be consistent across all platforms, including media, social media, communications with clients, and formal correspondence.

e. **Ethics:** The Company's marketing practices must reflect ethical business standards, ensuring transparent and responsible conduct.

B. MINIMUM CONTENT REQUIREMENTS FOR MARKETING COMMUNICATIONS AND ADVERTISEMENTS

When the marketing or advertising medium allows, any communication or advertisement promoting the Company's investment or non-core services—particularly those aimed at non-professional investors—must include the following, where applicable:

a. **Key Features:** A description of the core features of the investment services or financial products being promoted in the communication or advertisement.

b. **Risk Level:** An indication of the investment risk level related to the advertised product or service.

c. **Investor Commitment:** Information about the extent and nature of the commitment an investor must undertake when participating in the advertised investment.

d. **Return Expectations:** A description of the kind and potential return from the investment referred to in the communication or advertisement.

e. **Right to Rescind or Terminate:** Details on the investor's rights to cancel or terminate any contract referenced in the marketing communication or advertisement.

f. **Market Information:** Information regarding the market where the trading of the financial instruments discussed in the advertisement takes place.

g. **Clarification of Information:** A clear statement that the provided information in the marketing or advertisement is not exhaustive, and for comprehensive details, the client or potential client should contact the Company directly.

C. INFORMATION ABOUT PRODUCTS AND SERVICES

The Company must offer clients or potential clients a general overview of the financial instruments available, including the associated risks, with consideration of the client's classification (either retail or professional). This information must be detailed enough to allow clients to make well-informed investment decisions.

The risk explanation should include the following, depending on the specific financial instrument and the client's knowledge level:

a. **Instrument Risks:** A description of the risks linked to the financial instrument, including an explanation of leverage and its potential impact, as well as the risk of losing the entire investment.

b. **Price Volatility:** An outline of the price volatility for the specific instrument and any restrictions in the market for such an instrument.

c. **Additional Financial Commitments:** A reminder that investing in such instruments may incur financial obligations beyond the cost of acquisition, including contingent liabilities.

d. **Margin and Similar Obligations:** Information on any margin requirements or similar obligations that apply to the instrument.

If the Company offers a retail client information about a financial instrument that is part of a public offer with an available prospectus, the Company must provide information about where the prospectus can be accessed publicly.

Additionally, when the risks associated with a financial instrument composed of multiple components are higher than the risks of the individual components, the Company must adequately describe the components and how their interaction increases the risk.

D. GUARANTEED INVESTMENTS

The term "guaranteed" in any marketing communication or advertisement can only be used under the following conditions:

a. A legally enforceable guarantee has been provided by a financially stable third-party, clearly identified in the marketing material as the guarantor, to cover the investment risks.

b. The investor has the right to directly enforce the guarantee with the third-party guarantor.

When the financial instruments feature a third-party guarantee, the details regarding the guarantor and the guarantee itself must be sufficiently disclosed, allowing retail clients or potential clients to assess the fairness and reliability of the guarantee.

E. MANDATORY INFORMATION ABOUT THE COMPANY IN MARKETING COMMUNICATIONS AND ADVERTISEMENTS

All marketing communications or advertisements related to the Company's investment or non-core services must include the following information to identify the Company:

a. The official corporate name of the Company.

b. The registered office and the addresses of any branch offices, along with the Company's contact telephone number(s).

c. The Company's Securities Dealer authorization number, as well as the regulatory authority that issued it.

d. The name of the Company's regulatory body.

e. The Company's official website address.

F. CONTENT OF MARKETING COMMUNICATIONS AND ADVERTISEMENTS VIA AUDIO-VISUAL MEDIA OR PRINT MEDIA

For marketing communications or advertisements through radio-visual media or newspapers related to the Company's investment and non-core services, the following details must be included:

a. A description of the key characteristics of the investment or non-core services offered and the financial product being promoted.

b. An indication of the investment risk level related to the financial product or service being advertised.

- c. Information on the nature and extent of the investor's commitment involved in making the investment.
- d. A clear statement that the information provided in the communication or advertisement is not complete, and to get full details, the client or potential client should contact the Company directly.
- e. If an investment is marketed as "guaranteed," the communication must state that a legally binding guarantee has been provided by a solvent third party, which is identified in the advertisement, covering the investment risks.
- f. If the investment is marketed as "guaranteed," the advertisement must specify that the investor can directly enforce the rights under the guarantee against the guarantor.

G. CONTENT OF MARKETING COMMUNICATIONS AND ADVERTISEMENTS IN CASES OF COOPERATION WITH OTHER PARTIES

If the Company's services are offered in collaboration with another person or legal entity, the marketing communication or advertisement must include the name and necessary details to identify that person or entity, clearly specifying their role or capacity in the partnership.

H. MARKETING COMMUNICATIONS AND ADVERTISEMENTS REGARDING SPECIAL OFFERS

Marketing communications or advertisements related to special offers must, depending on the situation, clearly specify either the start or end date of the offer submission period, or indicate that the special offer is subject to the availability of the financial instruments.

I. MARKETING COMMUNICATIONS AND ADVERTISEMENTS REGARDING PORTFOLIO MANAGEMENT

When the Company proposes to offer portfolio management services to retail clients or potential retail clients, it must provide, in addition to other required information, the following details as applicable:

- a. Information about how and how often the financial instruments in the client's portfolio will be valued.
- b. Details regarding any delegation of the discretionary management of all or part of the client's financial instruments or funds.
- c. A clear specification of any benchmark used to compare the performance of the client's portfolio.
- d. A description of the types of financial instruments that may be included in the client's portfolio, including any potential limits on the transactions to be conducted with those instruments.
- e. Information about the management objectives, the level of risk to be considered in the manager's discretion, and any specific restrictions or guidelines regarding that discretion.

J. COMPANY'S OBLIGATIONS IN CASE OF COMPARATIVE MARKETING COMMUNICATIONS OR ADVERTISEMENTS

If a marketing communication or advertisement refers directly to or implies the identity of a specific competitor, or describes competitive products and/or services, it must:

- a. Provide a comparison based on objective, fundamental, and verifiable characteristics of the competing products and/or services.

- b. Ensure that the compared services are either identical or sufficiently similar and serve the same objectives.
- c. Avoid exploiting the reputation or distinctive features of the competitor's products and/or services for unfair gain.
- d. Prevent market confusion between the advertiser and any competitor, or between the trademarks, distinctive marks, products, or services of the advertiser and those of competitors.
- e. Not include negative or defamatory statements regarding the competitor's products, trademarks, distinctive features, services, or business activities.
- f. Be substantiated by reliable and verified information, with the Company being able to provide proof of the details at any time.

For comparisons involving investment or ancillary services, financial instruments, or the service providers, the following criteria must be met:

- a. The comparison must be clear, fair, and balanced.
- b. The sources used to compile the comparison must be identified.
- c. Key facts and assumptions behind the comparison should be disclosed.

K. USE OF HISTORICAL FACTS IN MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS

References to historical facts in marketing communications and/or advertisements are permitted only when the following conditions are met:

- a. The historical facts contribute to clarifying the content and help the investing public form an objective, complete, and accurate opinion regarding the services or transactions being marketed.
- b. They do not create confusion among the investment public.
- c. They are not misleading.

It is crucial that the historical nature of the facts is clearly stated, and investors are informed that these facts do not guarantee or predict future returns on the investments involved in the marketing communication and/or advertisement.

The chosen period for referencing historical facts must be carefully selected to avoid giving misleading impressions. Specifically, if past performance is mentioned regarding a financial instrument, index, or investment service, the following requirements must be fulfilled:

- a. Past performance must not be the most prominent feature in the communication.
- b. The performance information must cover the last five (5) years, or the full period for which the instrument or service has been offered, if shorter than five years, or any longer period determined by the Company. This data must be based on complete 12-month periods.
- c. The reference period and source of the information must be clearly disclosed.
- d. A prominent warning must be included that past performance does not guarantee future results.
- e. If the performance figures are in a currency different from the client's home country, the currency must be clearly specified, along with a warning about the potential effects of currency fluctuations.

f. If the data relies on gross performance figures, the impact of fees, commissions, or charges must be disclosed.

In cases where simulated past performance is used, it must be based on actual past performance data of the same or similar financial instruments or indices. The following conditions must apply:

- a. The simulation must be based on genuine past performance of identical or comparable financial instruments or indices.
- b. A clear warning must be included that the figures represent simulated past performance and that past performance is not indicative of future results.

L. USE OF FUTURE PERFORMANCE PROJECTIONS IN MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS

When future performance is referenced in marketing communications and/or advertisements, the following criteria must be satisfied:

- a. The information should not rely on or refer to simulated past performance.
- b. The information must be grounded in reasonable assumptions, supported by objective data.
- c. If the information is based on gross performance, the impact of fees, commissions, or other charges must be clearly disclosed.
- d. A clear warning must be included that forecasts or projections are not reliable indicators of future performance.

M. MENTIONING TAX LIABILITIES OF INVESTORS IN MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS

Marketing communications and/or advertisements that discuss the impact of investments on an investor's tax situation must explicitly mention the possibility of future changes to tax laws. Furthermore, when tax treatment is mentioned, it should be prominently stated that the tax implications depend on the individual circumstances of each investor and may change in the future.

N. CONSISTENCY OF INFORMATION PROVIDED TO THE PUBLIC AND CLIENTS

The Company must ensure that the information presented to the public aligns with the information provided to its clients in relation to the investment or non-core services offered.

O. MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS CONTAINING PREDICTIONS, FORECASTS, SPECULATIONS, OR PROMISES

If a marketing communication or advertisement includes predictions, forecasts, speculations, or promises, it must clearly and accurately explain the assumptions upon which these are based.

P. PRIOR APPROVAL OF MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS BY THE COMPANY'S COMPLIANCE OFFICER

Any marketing communication and/or advertisement related to the Company's investment or non-core services, including all associated activities such as global marketing, advertising, and communication through various media channels and for all the Company's products and services, must be reviewed and

approved by the Company's Compliance Officer before being distributed or made available to clients, potential clients, or the public.

7. MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS THROUGH A WEBSITE

When the Company shares information with clients via its website(s), and that information is not personally directed at the client, the Company must ensure the following conditions are met:

- a. The method of providing that information is appropriate to the context of the business relationship between the Company and the client.
- b. The client must provide explicit consent to receive the information through this medium.
- c. The client must be notified electronically about the website address and the specific location on the website where the information can be accessed.
- d. The information provided must be up to date.
- e. The information must be continuously accessible on the website for as long as the client reasonably needs to review it.

For this purpose, providing information electronically is considered suitable to the business context if there is proof that the client has regular internet access. A client's provision of an email address for the business relationship is considered sufficient evidence of this.

8. WITHDRAWAL OF MARKETING COMMUNICATION AND/OR ADVERTISEMENT

If at any time the Company discovers that a marketing communication and/or advertisement does not comply with the Responsible Marketing Communications and Advertising Policy or applicable laws, it must take immediate action to withdraw the communication and/or advertisement. The Company will inform the intended recipients accordingly and correct the situation if necessary.

9. RECORDKEEPING OF MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS

The Company shall maintain a record of all marketing communications and/or advertisements for a period specified by applicable laws, and at a minimum, for no less than seven (7) years from the time they were made. These records must be organized in a way that allows them to be easily reviewed by the relevant supervisory authority. The records should, at a minimum, contain the details supporting the reliability of the facts stated in the communications and/or advertisements.

10. VERIFYING THE RELIABILITY OF FACTS IN MARKETING COMMUNICATIONS AND/OR ADVERTISEMENTS

The Company must always be able to substantiate the reliability of any facts presented in its marketing communications and/or advertisements.

11. COLD CALLING

11.1. Cold calling refers to the marketing practice of contacting potential or existing clients, typically by phone, email, or social media, without prior expectation from the recipient.

11.2. The term ‘cold’ signifies that the individual receiving the contact was not expecting to be approached and has not explicitly requested such contact. A cold call often marks the beginning of a sales process, commonly referred to as telemarketing.

A. CONSENT OF NON-PROFESSIONAL INVESTORS FOR COLD CALLING

Marketing communications and/or advertisements directed at non-professional investors through direct means, such as phone calls, home visits, faxes, automated calls, etc. (cold calling), are prohibited without obtaining the client’s explicit consent.

In cases where a non-professional investor or potential investor has agreed to receive cold calls, the Company is required to take the necessary steps to ensure that the person contacting the investor or potential investor on behalf of the Company:

a. Clearly, truthfully, and accurately presents the content of the marketing communication and/or advertisement, ensuring no risk of misleading impressions being created.

b. Clearly states the purpose of the advertisement from the outset of the communication.

c. Provides the following identifying information about themselves and the Company:

(i) The Company’s legal name; (ii) The address of the Company’s registered office and any other head offices, along with the Company’s contact phone number(s); (iii) The Company’s Securities Dealer authorization number and the regulatory body that issued it; (iv) The name of the Company’s supervising authority; (v) The Company’s website(s).

B. ADDITIONAL REQUIREMENTS FOR COLD CALLING

If a non-professional investor or potential investor has consented to cold calling, but did not determine the time or method of communication, the person calling on behalf of the Company must assess whether the recipient wishes to continue the communication. If not, the call must be ended.

Furthermore, communications with non-professional investors or potential investors are only allowed on business days between 9 AM and 6 PM local time in the jurisdiction where the investor is located.

The person making the call for the Company must avoid exerting undue pressure on the non-professional investor-client during the communication and must be able to prove this at any time.

12. AUTHORIZATION & GOVERNANCE

The Company's Board of Directors is responsible for establishing written guidelines, ensuring adequate controls, and implementing proper procedures for the delivery of investment and/or ancillary services. They are also responsible for overseeing the execution of this Responsible Marketing Communications and Advertising Policy. The Board must ensure that compliance mechanisms and internal audit systems are in place to oversee this policy’s proper enforcement.

The Company’s Compliance Officer is responsible for the development of this policy, while its final approval rests with the Board of Directors, after the Compliance Officer’s review.

This policy is reviewed at least annually or more frequently if required, to incorporate any changes in regulatory and statutory requirements, as well as updates reflecting the Company's strategic goals or shifts in the internal (business) and external (market) environment.

The Company's directors, executives, and staff are responsible for effectively implementing this policy. They must report any instances of non-compliance to the Compliance Officer and work together to address any issues according to the corrective actions outlined in this policy.

13. MISCELLANEOUS

The Board of Directors may deviate from the provisions of this policy in exceptional circumstances if warranted by specific situations.

The Responsible Marketing Communications and Advertising Policy will be reviewed and, if necessary, revised and approved by the Board of Directors on an annual basis or whenever required.