Risk Disclosure Statement

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Key Way Markets Ltd
Licensed and regulated by the Abu Dhabi Global Market ("ADGM") Financial Services Regulatory Authorit("FSRA") with Financial Services Permission Number 190005

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NAGA
EVERYTHING MONEY

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1. INTRODUCTION

This Risk Disclosure Statement (the "Statement") is provided to you (hereinafter the "Client" or the "Prospective Client") as required by the Financial Services Regulatory Authority ("FSRA") Rules regarding the risks associated with Buying and Selling transactions with **Key Way Markets Ltd** ("the Company").

The Company's operating trade name is "NAGA", and it is incorporated in Abu Dhabi Global Market ("ADGM") under Company Registration Number 000003041 and licensed and regulated by the ADGM Financial Services Regulatory Authority (License no. 190005) of the United Arab Emirates, having its registered address at Al Sila Tower, 21st Floor, Office No. 2, ADGM Square, Al Maryah Island, Abu Dhabi, UAE.

All Clients and Prospective Clients should carefully read the following risk disclosures and warnings contained in this Statement, before applying to the Company for a trading account and before they begin to trade with the Company.

By agreeing to the Company's Terms & Conditions when opening a trading account with the Company, the Client also declares that he understands the risks involved as these are presented in this Statement. It is important that the Client remains aware of the risks involved, that they have adequate financial resources to bear such risks and that they monitor their positions carefully.

Investing and trading in financial markets can offer opportunities, but it also involves significant uncertainty. The value of financial instruments may rise or fall, sometimes rapidly and unexpectedly. In certain circumstances, a Client may lose part or all of the invested capital.

The Company provides investment services in relation to the following products, with each of these products carrying different characteristics and levels of risk:

- Contracts for Difference ("CFDs")
- Stocks (the term "Shares" may be used interchangeably)
- Exchange Traded Funds ("ETFs").

CFDs, in particular, are complex and leveraged instruments. Because leverage allows a Client to control a larger position with a relatively small deposit, both profits and losses can be magnified. It is possible for a Client to lose the entire investment quickly, by losing all of their capital outlay and any profits not redeemed. Clients should only trade CFDs if they fully understand how they work and are financially prepared to bear the risks involved. Retail Clients should be aware that there is a risk of losing money and accumulating of losses rapidly. In particular, Retail Clients should be aware that transacting in OTC Leveraged Products such as CFDs results in most Retail Clients losing money.

Stocks and ETFs are generally considered less complex than CFDs, but they are not risk-free. Their value can fluctuate due to market movements, company performance, economic developments, and other external factors. Clients may receive back less than the amount initially invested.

The Company does not provide investment advice or recommendations regarding the suitability of any product. Clients are responsible for assessing whether a particular investment aligns with their financial objectives, knowledge, experience, and risk tolerance. If Clients are uncertain, they should seek independent financial advice before proceeding.

Past performance of any financial instrument should never be interpreted as a guarantee of future results. Before engaging in trading activities, Client must carefully read and understand all sections of this Statement, including the definitions, specific product risks, general risk factors, and the risks associated with electronic trading systems.

The percentage of active Retail Clients trading with the Company who were profitable was 22.14% in Q4 2025, 24.31% in Q1 2026, 37.87% in Q2 2026 and 36.28% in Q3 2026.

2. CLASSIFICATION OF FINANCIAL INSTRUMENTS

Financial instruments may be classified as complex or non-complex for regulatory purposes.

- Complex instruments, such as CFDs, are characterized by derivative structures, embedded leverage, non- standardized pricing, and increased risk of rapid losses. These instruments may be difficult to understand and may expose Clients to heightened market sensitivity and volatility.
- Non-complex instruments, such as certain Stocks and UCITS-compliant ETFs, are generally more transparent and straightforward in structure. However, they remain subject to market, liquidity, and other systemic risks. The Company only offers UCITS-compliant ETFs, where UCITS refers to Undertakings for Collective Investment in Transferable Securities. This Statement may not identify all risks associated with CFDs, Stocks, and ETFs.

3. PRODUCT-SPECIFIC RISK DISCLOSURES – CFDS

CFDs are derivative contracts entered into between the Client and the Company. They allow the Client to speculate on the price movement of an underlying asset without acquiring ownership of that asset.

Appropriateness: The Company is obliged to assess whether trading in CFDs is appropriate for Clients, taking into consideration your knowledge, experience, and, where relevant, your financial situation and ability to bear losses. This assessment is conducted to determine whether Clients possess the necessary understanding of the risks associated with such complex financial instruments. However, the performance of an Appropriateness Assessment by the Company does not relieve Clients of their responsibility to independently evaluate whether trading in CFDs is suitable for their personal financial objectives and risk tolerance. The ultimate decision to engage in CFD trading rests solely with the Client or the Prospective Client. Clients are required to ensure that they fully understand the nature, structure, and risks of the products and services offered, including the potential for rapid and substantial losses. If Clients do not possess sufficient knowledge or experience to adequately comprehend these risks, they should refrain from trading and consider seeking independent professional advice before proceeding.

Nature of CFDs: A CFD reflects the difference between the price of an underlying instrument at the time the contract is opened and the price at the time it is closed. Underlying instruments may include shares, indices, commodities, foreign exchange pairs, ETFs, cryptocurrencies, or other financial assets. CFDs are traded over-the-counter ("OTC"), meaning they are not executed on a regulated exchange. Clients may choose to buy (going "long") CFD units or to sell (going "short") CFD units. With both long and short trades, profits and losses will be realized once the position is closed. When trading CFDs, Clients can speculate on price movements in either direction: Profits will be realized or suffered depending on the extent to which a Client's forecast about the price movement of the underlying asset is correct. Therefore, the return depends on the size of the performance (or movement) of the underlying instrument and the size of the Client's position.

Leverage and Margin Risk: CFDs are leveraged instruments. Leverage allows a Client to control a position significantly larger than the capital deposited as margin. This mechanism proportionally magnifies both gains and losses. Even a small adverse market movement may result in a disproportionately large loss relative to the initial margin deposited. In volatile markets, losses may occur rapidly and may exceed the margin available in the account. Clients are required to maintain sufficient margin at all times. If the equity in the trading account falls below the required maintenance margin, which is defined as a margin level of 50%, positions may be automatically closed ("margin close-out"). Such forced liquidation may occur at unfavorable market prices. Retail Clients benefit from Negative Balance Protection ("NBP"), meaning that they can never lose more than their deposited funds. This protection does not prevent the loss of the entire invested amount.

Volatility and Gapping Risk: Financial markets may experience sudden and extreme price movements ("gapping"), particularly during periods of economic announcements, geopolitical events, or low liquidity conditions. In such circumstances, execution may occur at prices materially different from those requested. Stop-loss orders do not guarantee execution at a specified price.

Short-Term and Speculative Nature: CFDs are generally intended for short-term trading strategies. Holding positions for extended periods may expose Clients to overnight financing charges (swaps), increased volatility risk, and compounded exposure. CFDs are not suitable for investors seeking stable income generation or long-term capital preservation strategies.

No Ownership or Corporate Rights: Trading CFDs does not confer ownership rights in the underlying asset. Clients do not receive voting rights or shareholder privileges. In addition, there is no delivery of the underlying asset and all settlements are made in cash.

Credit and Counterparty Risk: As CFDs are OTC products, the Company acts as the counterparty to Client trades. Accordingly, Clients are exposed to the Company's ability to fulfill its financial obligations. Subsequently, the notion of clearing house protection does not exist.

Slippage Risk: Slippage refers to the risk that an order is executed at a price different from the price requested by the Client. This typically occurs during periods of increased market volatility, reduced liquidity, rapid price movements, or when significant economic announcements or geopolitical events take place. In such circumstances, market prices may change between the time an order is submitted and the time it is executed, resulting in execution at the next available price. Slippage may be either negative (resulting in a less favorable price) or positive (resulting in a more favorable price), and can affect market orders, stop-loss orders, and pending orders. Clients should be aware that slippage is an inherent feature of financial markets, particularly in leveraged products such as CFDs, and may materially impact the outcome of a transaction.

Stop-Loss and Loss Limitation Orders Risk: Stop-loss orders and other loss-limitation mechanisms are designed to reduce potential losses by automatically closing a position once a specified price level is reached. However, such orders are not guaranteed and may not be executed at the requested price. In conditions of heightened volatility, limited liquidity, rapid market movements, or price gapping in the underlying asset or reference price, execution may occur at the next available market price, which may be materially worse than the level set by the Client. Accordingly, stop-loss and similar protective orders may fail to effectively limit losses. Retail Clients should be aware that, particularly during highly volatile trading conditions, stop-loss orders may not prevent significant losses, and reliance on such mechanisms does not eliminate market risk.

Financing and Overnight Holding Costs Risk: CFDs are typically subject to financing charges when positions are held open beyond the end of a trading day. These charges, commonly referred to as overnight swaps, reflect the cost of maintaining leveraged exposure to the underlying asset. Depending on the direction of the position and prevailing interest rate differentials, such costs may be either debited from or credited to the Client's account; however, in most cases they represent an additional expense. These charges accrue on a daily basis and may be compounded over time, particularly where positions are held for extended periods. Consequently, the accumulation of overnight financing costs may materially reduce potential profits or increase losses, even in circumstances where the underlying asset moves in the Client's favor. Clients should therefore carefully consider the impact of such ongoing costs when engaging in CFD trading, especially where positions are not actively managed on a short-term basis.

4. PRODUCT-SPECIFIC RISK DISCLOSURES – STOCKS

Stocks represent equity ownership in a corporation and may entitle the holder to dividends and voting rights, depending on the share class. While holding stocks does not grant the shareholder direct involvement in the day-to-day management or operational decision-making of the company, it provides economic rights linked to the company's performance.

Shares are generally classified into two principal categories: common shares and preferred shares. Common shares typically grant voting rights at shareholders' meetings and may entitle the holder to dividends, subject to declaration by the company. Preferred shares, on the other hand, generally provide priority over common shares with respect to dividend distributions and claims on assets in the event of liquidation, but they usually do not carry voting rights.

Market and Company-Specific Risk: The value of shares is influenced by a wide range of factors, including corporate earnings, management decisions, industry developments, macroeconomic conditions, and investor sentiment. Share prices may fluctuate significantly and unpredictably. Adverse developments affecting a particular issuer, sector, or economy may result in substantial losses.

Small and Medium Capitalization Companies: Shares of smaller companies often exhibit higher volatility, lower liquidity, and greater sensitivity to economic cycles. Such companies may face limited access to capital and higher business risk, increasing the probability of significant price fluctuations.

Dividend Risk: Dividends are not guaranteed. Companies may reduce or eliminate dividend payments at their discretion.

5. PRODUCT-SPECIFIC RISK DISCLOSURES – ETFS

ETFs are collective investment vehicles traded on exchanges. They may replicate the performance of a specific index, sector, commodity, or strategy. Rather than requiring investors to purchase individual securities or asset baskets directly, ETFs are structured to replicate the performance of a specific underlying index or asset group. By doing so, they provide investors with indirect exposure to the performance of that benchmark.

ETFs may differ in structure and investment methodology, including but not limited to the following variations:

- Physically replicated ETFs, which acquire and hold the actual underlying assets that comprise the benchmark index (commonly equities), and synthetically replicated ETFs, which use derivative instruments to obtain exposure to the benchmark's performance
- Income-distributing ETFs, which pay out dividends or income generated by the underlying assets to investors, and accumulating (or capitalizing) ETFs, which reinvest such income within the fund to enhance potential capital growth
- Smart beta ETFs, which apply alternative weighting methodologies or additional screening criteria beyond traditional market capitalization weighting, with the objective of achieving improved risk-adjusted returns relative to the benchmark.

Underlying Asset Risk: The value of an ETF is directly influenced by the performance of the assets it holds or tracks. Therefore, investors are indirectly exposed to the risks associated with those underlying assets.

Tracking Error Risk: An ETF may not perfectly replicate the performance of its benchmark due to management fees, transaction costs, rebalancing strategies, or structural inefficiencies.

Liquidity Risk: Although ETFs are exchange-traded, liquidity may vary depending on market conditions and trading volumes. In stressed markets, spreads may widen significantly.

Synthetic ETF Risk: ETFs using derivatives or swap arrangements to replicate performance are subject to additional counterparty risk.

6. GENERAL RISK DISCLOSURES

Market Risk: Market risk refers to the possibility of losses arising from adverse movements in the overall financial markets. Asset prices may fluctuate significantly due to macroeconomic developments, geopolitical tensions, changes in interest rates, inflation expectations, central bank policies, fiscal measures, corporate earnings announcements, or unexpected global events. Such movements may occur rapidly and without prior warning. In stressed or volatile market conditions, price changes may be extreme, and correlations between asset classes may increase, reducing the effectiveness of diversification strategies. Market risk is systemic in nature and cannot be fully eliminated through portfolio diversification. Clients should be aware that financial instruments may decline in value sharply and that recovery of losses is not guaranteed.

Volatility Risk: Volatility refers to the degree and frequency of price fluctuations in a financial instrument or market. Highly volatile markets may experience rapid and substantial price swings within short periods of time. Elevated volatility increases the likelihood of significant gains or losses and may impact the execution of orders, including stop-loss and limit orders. During periods of extreme volatility, bid-ask spreads may widen considerably, and liquidity may deteriorate. Clients should understand that volatility can materially increase trading risk, particularly in leveraged products.

Liquidity Risk: Liquidity risk arises when a financial instrument cannot be bought or sold promptly at or near its fair market value. Liquidity may be affected by market disruptions, reduced trading volumes, market closures, or exceptional economic conditions. In illiquid markets, Clients may be unable to close positions at desired prices, or at all, which may result in losses exceeding initial expectations. Reduced liquidity may also increase transaction costs and slippage. Liquidity risk may be particularly pronounced in smaller-cap securities, emerging market instruments, or during periods of financial stress.

Leverage Risk: Leverage allows a Client to gain exposure to a large position with a comparatively small capital outlay. While leverage enhances potential returns, it equally magnifies potential losses. A minor adverse price movement in a leveraged position may result in substantial losses relative to the margin deposited. In certain circumstances, losses may accumulate rapidly,

triggering margin calls or forced liquidation of positions. Clients must carefully consider their capacity to withstand losses before engaging in leveraged trading.

Credit and Counterparty Risk: Credit risk refers to the possibility that an issuer or counterparty may fail to fulfill its financial obligations. In the case of bonds or structured products, this may arise from issuer default or insolvency. Counterparty risk arises in OTC transactions, where the Client is exposed to the financial stability and performance of the counterparty, including the Company. Although regulatory safeguards and capital requirements exist, such measures do not eliminate credit risk entirely. Deterioration in a counterparty's financial condition may adversely affect the value or settlement of transactions.

Currency (Foreign Exchange) Risk: Currency risk arises when financial instruments are denominated in a currency different from the Client's base currency. Exchange rate fluctuations may significantly impact the value of investments, independently of the underlying asset's performance. Adverse currency movements may reduce returns or increase losses. Currency markets can be volatile and are influenced by macroeconomic factors, geopolitical developments, interest rate differentials, and market speculation.

Interest Rate Risk: Interest rate risk refers to the impact of changes in prevailing interest rates on the value of financial instruments. Rising interest rates may negatively affect equity valuations, fixed-income securities, and certain derivatives. Conversely, falling interest rates may have different implications depending on the asset class. Interest rate changes may also affect the cost of holding leveraged positions, particularly where overnight financing or swap charges apply.

Regulatory and Legal Risk: Regulatory and legal risk arises from changes in laws, regulations, taxation frameworks, or governmental policies that may affect financial markets, specific industries, or particular instruments. Regulatory interventions (such as trading restrictions, leverage limitations, short-selling bans, or market suspensions), may significantly impact trading conditions and investment outcomes. Such changes may occur with limited notice and may materially alter the risk-return profile of investments.

Operational and Technological Risk: Operational risk encompasses losses resulting from inadequate or failed internal processes, systems, human error, or external events. Trading through electronic platforms depends on reliable technological infrastructure, including hardware, software, internet connectivity, and data transmission systems. System failures, cyber-attacks, communication disruptions, power outages, or software malfunctions may prevent order execution, cause delays, or result in incorrect processing of transactions. Clients are also exposed to risks associated with unauthorized access to their trading accounts due to compromised credentials or cybersecurity breaches. The Company is not responsible, and makes no warranties regarding the access, speed, availability or security of internet or network services.

Execution Risk: Execution risk refers to the possibility that orders may not be executed at the expected price or within the anticipated timeframe. Market conditions, latency, slippage, and order routing delays may result in execution at less favorable prices. In fast-moving markets, price changes may occur between the time an order is placed and the time it is filled. Stop-loss and limit orders are not guaranteed and may be executed at materially different levels.

Gap Risk: Gap risk arises when the price of a financial instrument moves sharply from one level to another without trading at intermediate prices. This typically occurs following major economic announcements, geopolitical developments, or market closures. In such circumstances, protective orders may be executed at significantly different prices than anticipated, leading to larger-than-expected losses.

Systemic Risk: Systemic risk refers to the possibility that instability within a particular financial institution, sector, or market may trigger widespread disruption across the financial system. Financial crises, banking failures, sovereign debt crises, or large-scale economic shocks may significantly impair market functioning, liquidity, and investor confidence.

Taxation Risk: The tax treatment of financial instruments depends on individual circumstances and applicable jurisdictional regulations. Tax laws may change over time, potentially altering the after-tax return of investments. Clients are solely responsible for understanding and fulfilling their tax obligations. The Company does not provide tax advice.

Inflation Risk: Inflation risk refers to the potential erosion of purchasing power over time. Even if an investment generates nominal returns, inflation may reduce the real value of those returns.

7. COPY TRADING/SOCIAL TRADING NOTICE AND RISK DISCLOSURE

The Company offers its clients the ability to access, follow, and replicate the trades of other traders through information and/or social trading features available on its trading platform.

- Copy trading is a form of automated trading in which a client's account (follower) is configured to replicate the positions taken by another trader (signal provider). When the selected trader opens, modifies, or closes a position, the same action is executed proportionally in the follower's account, without requiring prior approval for each individual transaction
- Social trading allows clients to observe, share, discuss, and analyze other traders' strategies, performance metrics, and market views. In addition, clients can follow or copy other traders' activities, while retaining user discretion over execution decisions.

Clients and prospective clients are expressly advised that Social Trading involves significant risks. All clients should carefully review this Notice prior to engaging in such trading activity. This Notice provides a general overview of certain risks; it does not address all risks, nor does it assess how such risks may apply to each client's individual circumstances.

Nature of Copy/Social Trading: Copy Trading involves the automated execution of trades on a client's account without manual intervention. Clients retain the sole discretion to select which trader(s) or strategy to follow or copy. Clients must consider their full financial situation, including all liabilities, prior to engaging in Copy Trading. Copy Trading is highly speculative and may result in losses that exceed the amounts invested in copying a trader. Social Trading provides discretion to the client over execution decisions. Both Copy Trading and Social Trading are provided solely for informational purposes and do not constitute investment, financial, or legal advice. Any reliance on information available through the Company's platform or websites, including the Copy/Social Trading Features, are undertaken at the Client's own risk. The Company shall not be liable for any losses incurred as a result of using Copy/Social Trading Features. Clients are responsible for conducting their own research and independently determining the suitability of any strategy, trade, or investment based on their personal objectives and financial circumstances.

Mechanics of Copy/Social Trading: Trades executed via Copy Trading are copied according to a proportional amount of the signal provider's trade. Copied trades are intended to replicate the leverage, stop loss, and take profit levels of the signal provider, to the extent permitted by platform rules. Trades below the platform's minimum trade size may not be executed. Copied trades may be modified or closed automatically when the signal provider modifies or closes their trades. Clients must be prepared to bear the loss of their entire investment in copied trades and accept full responsibility for any losses arising from automatic execution. Clients who modify, cancel, or place additional orders in their accounts may experience results materially different from those of the signal provider. Similarly, withdrawing from copied trades may alter the allocation proportion and free margin, potentially resulting in materially different outcomes.

Past Performance and Hypothetical Results: Any historical performance, statistics, or other information regarding platform traders presented on the Company's platform or website is not indicative of future results. Such information is hypothetical and should not be relied upon as a guarantee of future performance. The Company makes no representation or warranty that any signal provider will achieve any particular profit or loss. The Company does not guarantee the execution of any order, including stop orders such as Stop Loss, at the designated price. Clients may incur losses exceeding the amount originally invested in copied trades. Results may vary depending on numerous factors, including account size, settings, and market conditions.

Limitation of Advice and Responsibility: The Copy/Social Trading Features and any information made available via the Company's platform or website do not constitute investment, tax, or financial advice of any kind. Decisions to copy traders or execute trades remain the sole responsibility of the client. The Company does not provide advice, directly or indirectly, through the availability of Copy/Social Trading Features or platform content. Clients must use the platform's information as a basis for independent research and decision-making.

8. CONFLICTS OF INTEREST

The Company, its associates, relevant persons, or other connected parties may, in the course of providing services, have interests, relationships, or arrangements that are material to a transaction or order, or that may conflict with the interests of the Client.

Circumstances that may give rise to a material conflict of interest include, but are not limited to:

- Employee remuneration or bonus structures linked to trading volume or other performance metrics
- Receipt or provision of inducements from or to third parties in connection with client referrals or trading activity.

The Company has established policies and procedures to identify, prevent, and manage conflicts of interest. For further details, including the Company's arrangements to mitigate such risks, Clients should refer to the Company's Conflicts of Interest Policy (the "Policy"), available on the Company's website.

Clients have the right to object to any conflicts of interest, however by entering into a Client Agreement with the Company for the provision of investment services, the Client is consenting to an application of this Policy on him/her. Further, the Client consents to, and authorizes the Company to, deal with the Client in any manner which the Company considers appropriate, notwithstanding any conflict of interest or the existence of any material interest in a transaction, without prior reference to the Client. In the event that the Company is unable to deal with a conflict of interest situation, it shall disclose this to the Client.

The Company is constantly conducting an in-depth analysis of its business and organizational arrangements including best execution arrangements, inducement practices, remuneration practices and investment research/marketing communication procedures, to ensure that all likely conflict of interest situations are identified regardless of materiality. The Company has identified the following circumstances which give rise to a conflict of interest entailing a risk of damage to the interests of one or more Clients as they cannot be sufficiently managed, as a result of providing investment services: a) Commissions received by its Liquidity Provider as regards OTC Derivatives: The Company's Liquidity Provider pays the Company a rebate commission for the order flow sent for execution. For the Company to manage the potential conflicts arising out of this practice, it has put in place the procedures and arrangements below regarding the commissions received by its Liquidity Provider:

- The Company has examined this and has recorded how the selection of the specific Liquidity Provider enhances the quality of the services provided to Clients and the steps taken in order not to impair the Company's duty to act honestly, fairly, and professionally in accordance with the best interests of its Clients. In particular, the selection of the Company's Liquidity Provider is not biased towards the most lucrative terms for the Company and best execution can be ensured. In addition, the Company may charge Clients extra fees over and above the charges of its Liquidity Provider.
- The Company's Liquidity Provider has the capacity, ability, capability, knowledge, and experience to act as a price aggregator since it aggregates prices from different trading venues. Thus, the Company receives from its Liquidity Provider the already aggregated prices as part of its service to the company. This enables the Company to always comply with its Best Execution obligation, since the Clients receive the best available price(s) from across a pool of price feeders. The Company declares that this benefit does not induce it to favour the particular Liquidity Provider over other Liquidity Providers and it is confident that the Client would be better off under this arrangement compared to the use/employment of other arrangements (including other Liquidity Providers). b) Company's Personnel It is understood that the Clients' turnover shall not be reduced because of the inducement paid to the Company's personnel. In no case shall the commission affect the Clients' return/turnover.

The variable remuneration may only be applied to Customer Service Representatives (hereinafter the "CSR").

The CSR will receive a commission of a fixed amount upon the completion of the online training(s) provided to each Client and based on his/her monthly assessment by the Company in accordance with the Remuneration Policy that is in line with all the laws and regulations regarding fixed and variable remuneration based on conditions. c) Affiliate's Commission The Company may use affiliate(s) and sub-affiliates from time to time as a distribution channel. Key Way Group Ltd provides affiliation services to the Company through sub affiliation. The Company pays both affiliate and sub affiliates with inducements for the introduction of Clients through the affiliates' website.

Both affiliate and sub affiliates are paid a fixed amount either on a pay per lead i.e., per the Client who clicks on a banner or online advertisement and enters the Company's website and registers, and/or on a per activation basis i.e., per Client who clicks on a banner or any online advertisement and enters the Company's website, registers, finalizes the onboarding process and makes a deposit. For the Company to manage the potential conflicts arising out of this practice, and fulfil its obligation to act honestly, fairly, and professionally acting at best in accordance with the best interests of its Clients, upon payments of induction to any third party it has put in place procedures and arrangements regarding the commissions received by its affiliates. Thus, the Company: i. Performs Due Diligence and a comprehensive appraisal of the individual or the legal entity that will act as an affiliate, to ensure that it is of sufficiently good repute ii. Ensures that the affiliate possesses the relevant means (i.e., maintain a website with relevant content) to introduce Clients that belong to the identified positive target market as specified by the Company. A detailed description of the affiliate's source(s) of traffic (digital and offline) which the affiliate intends to use for the

purposes of introducing potential Clients to the Company, will be further obtained iii. Any website that will be used by an affiliate, will be used upon only Compliance's prior approval iv. Ensures that any marketing material that will be used by the affiliate may be used upon only Compliance's prior approval v. The Compliance function conducts regular reviews of the affiliate parties' webpages to ensure that the approved material was not altered in any way that impairs or jeopardizes compliance with any regulations vi. The Company performs the compliance call which is mandatory to all Clients that make a deposit and is considered as an additional verification measure performed by the Company as the final step of the Client's onboarding procedure. This additional measure can easily bring to light whether the Client was pushed by the affiliate to make a deposit and/or whether has any negative feedback against the affiliate.