Iconebene, Level 7, Office 6, Plot 441, Reduit Road, Ebene, Cybercity, Mauritius
www.doto.com

Marketing Policy Doto Partners

INTRODUCTION:

DOTO Global Ltd ('the Company' or 'DGL') has implemented this manual to ensure legal and ethical marketing communications best practices throughout the company's operations.

The purpose of this manual is to establish the framework of advertising and marketing of financial products. The manual is structured according to the guidelines issued by the Financial Services Commission, Mauritius.

The manual aims to enable the users to place the legal requirements into real case scenarios to ensure a better comprehension of the legal framework and a more efficient implementation.

This manual serves as a high-level resource and reference for DGL employees & service providers collectively known as 'Parties'.

It will be distributed to all employees whose line of work entails the planning and/or execution of marketing communications. This may also include the marketing department's personnel and any other employee related to developing & executing marketing communication activities.

Additionally, the manual will be shared with the service providers of DGL who are engaged in marketing and advertising.

Marketing Communications

Marketing Communications is defined as any and all advertising and marketing materials in any medium of communication, including but not limited to any electronic or online communication, marketing materials, publications, and all marketing operations which are used to introduce clients to DGL.

The following types of advertising and marketing materials which may potentially be viewed or perceived as marketing communications are:

1. **Investment recommendations/research/advice** such as execution ideas, market or trader commentary, or other informal short-term recommendations

2. **Generic material** such as reports analyzing or commentating on general political, economic, or market issues, industries, asset classes, types of investments, or broadly based indices and material explaining models.

3. **Educational materials** such as general Forex trading training seminars, guides, and other instructional information.

1) Be accurate, fair, clear, and not misleading.

2) Don't guarantee, promise profits, or guarantee against losses.

3) Present opportunities and risks in a balanced manner.

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4) Ensure information is sufficient for and is presented so that it is likely to be understood by the average member of the public to whom the information is directed or the person likely to receive the information.

5) Do not disguise, diminish, or obscure important items, statements, or warnings.

6) Don't promote non-DGL products or offers with the DGL logo.

7) Don't use unqualified statements. Any facts should be backed up by a source.

8) When referring to financial instruments, make it clear that CFDs are being discussed and not the underlying assets.

9) Have appropriate risk warning materials for all clients.

10) Ensure the format of the risk warning is clearly readable, in a prominent place, and with visible colors.

11) Do not use the name of FSC, Mauritius and any regulator in a way that would indicate or suggest the endorsement or approval by the regulator of the products or services of DGL.

12) Text must be published on DOTO.com related to financial markets, news, or other financial related services/products that offer trading information.

Risk Warnings and Disclaimers

A. Risk Warnings on the Website Footer of Doto.com (Standard Risk Warning)

HIGH-RISK INVESTMENT WARNING: Trading Forex and CFDs is highly speculative, involves significant risk of loss, and is not suitable for all investors. Before trading, you are strongly advised to read and ensure that you understand the relevant risk disclosures and warnings here: Risk Disclosure.

New risk warning updated on 05/04/2023 (Due to Google/FB Limiations to use 'CFDs' on ads) Currently we are applying this risk warning on the Doto's website footer. Risk warning: Trading derivatives is highly speculative, carries an inherent risk of loss, and is not suitable for all investors. Before trading, you are strongly advised to read and ensure that you understand the relevant risk disclosures and warnings here.

There is a substantial risk that you may lose all of your initial investment. We advise you to consider whether trading leveraged products is appropriate for you in light of your own personal circumstances. Ensure your full understanding of all risks involved before trading.

Any opinions, news, research, analysis, prices, or other information contained on this website is provided as general market commentary and does not constitute investment advice. Doto does not accept any liability for any loss or damage, including without limitation to, any loss of profit, which may arise directly or indirectly from the use of or reliance on such information.

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The content on this website is subject to change at any time without notice. The content is provided solely for the purpose of assisting clients with independent investment decisions. Doto has taken reasonable measures to ensure the accuracy of the information on the website. However, it does not guarantee its accuracy and does not accept any liability for any loss or damage which may arise directly or indirectly from the content or your inability to access the website, or for any delay in or failure of the transmission or the receipt of any instruction or notifications sent through this website.

In order to become a client of Doto, you must be 18 years old or reach the full legal age of maturity as determined by the laws of the country in which you live.

Doto is a registered trademark of Doto Holdings Limited. Doto Holdings Limited is a UK holding company of Doto Europe Ltd, DOTO Global Ltd, and Weybridge Financial Markets Limited.

Doto Europe Ltd is licensed and regulated by the Cyprus Securities and Exchange Commission, License No. 399/21. DOTO Global Ltd is licensed and regulated by the Financial Services Commission, Mauritius, License No. C119023978. Weybridge Financial Markets Limited is licensed and regulated by the Financial Services Authority, Seychelles, License No. SD063.

All financial services rendered on this website under the trading name Doto are provided by DOTO Global Ltd.

Payment transactions are managed by MWS Financials Services Limited; Registration No. HE 422258; Legal address: Agios Fylaxeos, 1, KMPG Center, Ground Floor.

General Marketing Communication Guidelines

In case of any restrictions (e.g. Google policy), it is possible to use the following version of this risk warning:

HIGH-RISK INVESTMENT WARNING: Trading financial instruments involves significant risk of loss, and is not suitable for all investors. Before trading, you are strongly advised to read and ensure that you understand the relevant risk disclosures and warnings here: Risk Disclosure.
There is a substantial risk that you may lose all of your initial investment. We advise you to consider whether trading leveraged products is appropriate for you in light of your own personal circumstances. Ensure your full understanding of all risks involved before trading.
Any opinions, news, research, analysis, prices, or other information contained on this website is provided as general market commentary and does not constitute investment advice. Doto does not accept any liability for any loss or damage, including without limitation to, any loss of profit, which may arise directly or indirectly from the use of or reliance on such information.

The content on this website is subject to change at any time without notice. The content is provided solely for a purpose of assisting clients with independent investment decisions. Doto has taken reasonable measures to ensure the accuracy of the information on the website. However, it does not guarantee its accuracy and does not accept any liability for any loss or damage which may arise directly or indirectly from the content or your inability to access the website, for any delay in or failure of the transmission or the receipt of any instruction or notifications sent through this website.

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Doto Europe Ltd is licensed and regulated by the Cyprus Securities and Exchange Commission, License No. 399/21. DOTO Global Ltd is licensed and regulated by the Financial Services Commission, Mauritius, License No. C119023978.

Weybridge Financial Markets Limited is licensed and regulated by the Financial Services Authority, Seychelles, License No. SD063.

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B. Risk Warning for Landing pages Doto.com (Standard Risk Warning);

Trading Forex, CFDs, and Financial Instruments is highly speculative and involves a significant risk of loss and may not be suitable for all investors. Before trading, you are strongly advised to read and ensure that you fully understand the relevant risk disclosures and warnings. Seek independent advice if necessary.

New risk warning updated on 05/04/2023 (Due to Google/FB Limiations to use ‘CFDs’ on ads) Trading derivatives is highly speculative and involves a significant risk of loss and may not be suitable for all investors. Before trading, you are strongly advised to read and ensure that you fully understand the relevant risk disclosures and warnings.

Seek independent advice if necessary.

There is a substantial risk that you may lose all of your initial investment. We advise you to consider whether trading leveraged products is appropriate for you in light of your own personal circumstances. Be sure you fully understand all the risks involved before trading.

In case of any restrictions (e.g. Google policy), it is also possible to use the following version of this risk warning:

Trading financial instruments involves a significant risk of loss and is not suitable for all investors. Before trading, you are strongly advised to read and ensure that you fully understand the relevant risk disclosures and warnings. Seek independent advice if necessary.

There is a substantial risk that you may lose all of your initial investment. We advise you to consider whether trading financial instruments is appropriate for you in light of your own personal circumstances. Ensure you fully understand all the risks involved before trading.

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C. Risk warning during live account applications.

Trading Forex, CFDs and financial instruments on margin carries a high level of risk and may not be suitable for all investors. There is a possibility that you may sustain a loss of your entire investment. Therefore, you should not invest or risk money that you cannot afford to lose. Before using DOTO Global Ltd services, please acknowledge all the risks associated with trading.

New risk warning updated on 05/04/2023 (Due to Google/FB Limiations to use 'CFDs' on ads) Trading derivatives on margin carries a high level of risk and may not be suitable for all investors. There is a possibility that you may sustain a loss of your entire investment. Therefore, you should not invest or risk money that you cannot afford to lose. Before using DOTO Global Ltd services, please acknowledge all the risks associated with trading.

In case of any restrictions (e.g. Google policy), it is possible to use the following version of this risk warning:

Margin trading carries a high level of risk and may not be suitable for all investors. There is a possibility that you may sustain a loss of your entire investment. Therefore, you should not invest or risk money that you cannot afford to lose. Before using DOTO Global Ltd services, please acknowledge all the risks associated with trading.

D. Risk warning when making an additional version for the short trigger and service emails informing users that they have registered an account, completed a deposit, withdrawn money, etc.

Trading Forex, CFDs, and financial instruments on margin carries a high level of risk. Never invest money that you can't afford to lose. Before using DOTO Global Ltd services, please acknowledge all the risks associated with trading.

New risk warning updated on 05/04/2023 (Due to Google/FB Limiations to use 'CFDs' on ads) Trading derivatives on margin carries a high level of risk. Never invest money that you can't afford to lose. Before using DOTO Global Ltd services, please acknowledge all the risks associated with trading.

E. Social media, videos, and banners risk warnings. One of the following must be used:

1. Leverage products are speculative in nature and may result in losses or profit. Before you begin trading, please ensure that you fully understand the risks involved.

2. Trading carries a risk of financial loss.

In case of any restrictions (e.g. Google policy), it is possible to use the following version of this risk warning:

1. Trading may result in losses or profit. Before you begin trading, please ensure that you fully understand the risks involved.

2. Trading carries a risk of loss.

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F. Risk warning for search engine optimization, campaigns, articles, webinars, seminars and presentation materials.

Trading financial instruments carries a high level of risk which is not suitable for all investors due to their complex nature. You are strongly advised to read and ensure that you fully understand the relevant risk disclosures and warnings. Seek independent advice if necessary.

G. Risk warning for additional versions of press releases such as information on the company's news, updates, etc. that are not related to trading and published in outer media.

This material is for informational purposes only. Trading financial instruments carries a high level of risk, which is not suitable for all investors due to their complex nature.

H. Risk warning for analysis and information about analytic materials.

This is a marketing communication. The content is published for informative purposes only and should in no way be construed as investment advice or recommendations. DOTO Global Ltd will not accept liability for any loss or damage, including without limitation to any loss of profit which may arise directly or indirectly from the use of or reliance on such information.

I. Where appropriate, all clients/potential clients must be referred to the Risk Disclosure Policy on the DGL Statement - https://doto.com/risk-disclosure.

J. Risk warning for charts when they are used for marketing communications. Any screenshots of charts from the trading terminal need the following disclaimer:

Source: Doto trading platform, financial instrument name, hourly/daily/weekly chart (Between XX.XX.2020 to XX.XX.2020). Accessed: XX.XX.2020, at XX.00AM/PM GMT.
Please note that past performance is not a reliable indicator of future results.

Disclaimer: Charts for financial instruments in this article are for illustrative purposes and do not constitute trading or investment advice or a solicitation to buy or sell any financial instrument provided by DGL. Past performance is not necessarily an indication of future performance.

K. Risk warning when making an indication of past performance.

1) Must include appropriate performance information which covers the track records of at least **6 months**.

2) If the financial instrument data is shorter than **6 months**, then the whole period (date of issuance – until date) should be shown in which the financial instrument has been offered.

3) Annualized returns must not be presented if the financial instrument has a track record shorter than **12 months**.

4) The reference period and the source of information (financial instrument price) must be clearly stated.

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5) The information must contain a prominent warning that the figures refer to the past and that past performance is not a reliable indicator of future results.

The following are some examples and suggestions:

1) Past performance is not necessarily a guide to future performance.

2) The financial instrument has returned 8.0% this year up until October 2020 and 6% p.a. over 24 months.

3) If you had placed $10,000 in the XYZ (name of financial instrument) in 1985, it would be worth $740,000 today.

4) Past performance is not a guide for future performance, nor is it a reliable indicator of future results or performance.

L. Risk warnings in reference to partner programs.

Partners are business introducers acting as independent, non- exclusive contractors who are not brokers, employees, or representatives of the DOTO/DGL. Entering into a partner program does not imply, suggest, or result in creating any legal partnership, joint venture, agency, relationship, etc. with DOTO/DGL, or in binding the DOTO/DGL by any statement, promise, representation, dealing, warranty, or covenant undertaken or expressed by a partner.

M. Risk warnings when making an indication of future performance

1) It must not be based on a reference to simulated past performance.

2) It must be based on reasonable assumptions supported by objective data.

3) Where the information is based on gross performance, the effect of commissions, fees, or other charges must be disclosed.

4) It must contain a prominent warning that such forecasts are not a reliable indicator of future performance such as:

a. Future returns may vary.

b. Past performance is no indication or guarantee of future performance.

c. These statements are not a guarantee of future performance and undue reliance should not be placed on them. Such forward-looking statements necessarily involve known and unknown risks and uncertainties, which may cause actual performance and financial results in future periods to differ materially from any projections of future performance or result expressed or implied by such forward-looking statements.

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d. Please remember that past performance may not be indicative of future results. Different types of financial instruments involve varying risks, and there can be no assurance of the future performance of any specific financial instrument.

N. All risk warnings should be reviewed with the following guidelines:

1) Important information, statements, or warnings are shown using clear and bold type styles across neutral backgrounds.

2) The size of the important information, statement, or warning is proportionate when considering the content size and orientation of the promotional material as a whole.

3) Risk warnings are contained within their own distinct border, thus drawing the reader's attention.

4) Risk warnings are clearly stated within the main body of the advertisement and ahead of the 'small print' (i.e. the additional product/legal text and firm contact information).

5) Risk information appears on the website landing page where the client first arrives when following a promotional link.

6) Risk warnings should remain fixed on the screen even when the client scrolls up and down on respective web pages.

7) The risks are repeated on linked pages further into the website product chain.

8) While using a promotional ''button'', which redirects a potential client to Doto.com, then the risk warning must be positioned below or close to such button and be clearly visible to the potential clients.

4. Requirements for All Marketing Communications

A. All parties shall ensure that the information they address to, or disseminate in such a way that it is likely to be received by, retail or corporate clients or potential retail or corporate clients including marketing communications satisfies the following conditions:

The information includes the full legal name of the company & regulated License Information. **Example: DOTO Global Ltd is licensed and regulated by FSC Mauritius and holds an Investment Dealer License No: C119023978.**

The information is accurate and always fair, clear, complete, concise, unambiguous, and shall be created bearing in mind the interest of the public in general and to the target audience in particular.

The information must always be fair and prominent regarding any relevant risks when referencing any potential benefits of an investment service or financial instrument. **Example: The value of financial instruments can both increase and decrease and traders may lose all their capital.**

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The information is sufficient for, and presented in a way that is likely to be understood by, the average member of the group to whom it is directed or by whom it is likely to be received.

Example: Our target audiences are retail traders from the entire spectrum of society. Since we are addressing an audience represented by all educational levels, we should not use complicated financial terminology.

The information should not be disguised. Do not diminish or obscure important items, statements, or warnings. **Example: Disclaimers/Risk warning statements should always be clear in readable fonts (size & style) and depicted within sufficient time frames for one to read, at least the same size as the rest of the text in the advertisement or in smaller text where it is prominently outlined.**

The information is consistently presented in the same language throughout all forms of information and marketing materials that are provided to each client unless the client has accepted to receive information in more than one language.

The information is up-to-date and relevant to the means of communication used.

B. Marketing Communication materials must not infringe on the intellectual or any other property rights of any third party. All images used in promo materials must be legal and not violate people's privacy rights. The rights to use images and photographs of people must be purchased legally. Promo materials must be made legally without infringement of anybody's rights.

It is prohibited for all employees and service providers to use promo materials made in compliance with the Doto Brand Style Guide and the company brand identity in campaigns promoting competitors or any third parties. The Trade Brand Visual Style Guide can be found on Jira.

C. All branded promo materials must comply with the Doto Brand Style Guide. It is a set of recommended brand identity rules aimed at keeping a single tone in marketing, user communications, and the integrity of the corporate identity for Doto. The Doto Brand Visual Style Guide can be found on Jira.

D. Where the information refers to a particular tax treatment, an advertisement shall disclose adequate information concerning all applicable taxes and the impact of such taxes on consumers and potential consumers.

E. The reference for marketing communications regarding what is prohibited or discouraged is located in Appendix 1.

F. Comparisons must be meaningful and presented in a fair and balanced way. Example: If we are to compare our education services with that of a competitor’s, we need to be comparing apples to apples. Hence, clearly distinguish amongst the type of services, and make direct and fair comparisons.

The sources of the information used for comparisons must be specified. Example: If we are to compare our educational services with a competitor’s and claim that ours are the best in the market.

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The key facts and assumptions used to make the comparison must be included. Example: Following on the aforementioned example of our education services, one should ask, “Why are we saying that our educational experience is the best or better than someone else’s?” A key fact to include might be real feedback from people who attended workshops/online seminars. The element of a real-life scenario through a client’s testimony could be one of the possibilities to address this.

Where performance awards received are included in an advertisement for a financial product, the grantor of the award shall be clearly identified and the award explained. An advertisement shall make it clear if an award is granted by a person related to the company.

Rules for Banners

Key points for designing effective communications:

1. Easy to understand language with short, understandable messages. The language used should be appropriate for the target audience, jargon-free, and contain simple and short messages.

2. Designed for a target group of consumers. Communications should be designed to meet the needs of the target audience of consumers.

3. Key information should be displayed prominently and framed effectively.

4. The correct use of images and graphics according to Appendix 1 and Appendix 2 should be applied.

5. Banners must have balanced information and use a font size for the indication of relevant risks that is at least equal to the predominant font size used throughout the information provided. Also, a layout should be used ensuring such information is prominent.

6. The banner must have risk warnings and use a font size in the indication of relevant risks that is at least equal to the predominant font size used throughout the information provided. Also, a layout should be used ensuring such information is prominent.
7. Ambiguous wording should be avoided.

8. Do not use hashtags (#) on the banner.

Rules for Campaigns

Key points for designing effective campaigns:

1. The contact information of the organizer of the campaign is required including the business name and contact details (address, email, telephone).

2. The time period for the consumer game is required including the start and end dates and the hour if necessary. For example, consider whether the market hours should be included.

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3. A list of prizes with their description and value is required. If a winner can choose a prize, then it must be specified out of which products. If there is only one prize per participant, the respective information must be added.

4. Requirements for participants are required such as the residency of a participant if necessary, participant must be adult, each person can participate only once, etc. However, a client can participate as a natural person and with a legal entity where he/she is the sole owner.

5. Conditions for participation are required such as what a client must do in order to participate in the game. This includes participation in interim lottery draws and chances to reach the final.

6. The time and description of when and how the winner or winners will be chosen is required. This includes the winners of interim campaign draws and the winner of main prize. This should also include a description of the ranking of the participants with similar or identical results (e.g. total points or time) or excluding this option should be considered.

7. The announcement of winners and through which channel and whether the winners will be contacted personally should be considered.

8. The information about using the data of the winner and associated disclosure of the name of the winner and required documentation should be considered.

9. The delivery of prizes, the location or reference to postal delivery, time period during which the prizes will be delivered, etc. should be considered

10. The possibilities in obtaining additional information such as web addresses, email addresses, telephone numbers, and the address of a local branch and main office address should be considered.

11. A procedure and deadline for handling any complaints such as contact details for the submission of complaints is required.

12. In case the campaign is targeted towards clients of a certain region, an option to communicate in this language must be ensured. This also means that Campaign Rules/Terms and Conditions must be in the local language.

Rules for Videos

1. Risk warnings must be prominent and not disappear under the media player menu.

2. Risk warnings must be visible throughout the video.

3. The final frame of the video must have a longer risk warning and the DGL company registration information.

4. The minimum text size for risk warning in videos is:

   a. 20 pixels for the longer risk warning in the end of the video;

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b. 26 pixels for the shorter risk warning shown throughout the video.

Social Media

A. Twitter

1. Follow the rules of Twitter.
2. Use risk warnings.

B. Facebook

1. Follow the rules of Facebook.
2. Use risk warnings.

C. Linkedin

1. Follow the rules of Linkedin.
2. Use risk warnings.

D. Google Ads

1. Include the link to Doto.com.
2. Use risk warnings.
3. A button should be available for display advertising.
4. Follow the Google Ads rules.

E. Instagram

1. Follow the rules of Instagram.
2. Use risk warnings.

F. When the traffic (Client/Potential clients) is routed from social media to the DGL website, the standard risk warning and disclaimer must be used for all website web pages.

Terms and Phrases to Avoid

A. Any marketing communication must avoid extensive use of technical, legal terminology or complex language, and the inclusion of excessive details in an advertisement which may not convey a clear message to the consumers and potential consumers if the likely audience is unfamiliar with the concepts.
B. There can be no failure to distinguish DGL financial instruments from the underlying assets they represent. For example, the accurate thing to say regarding cryptocurrencies is that we have cryptocurrency CFDs.

C. Parties shall always ensure that any reference to the involvement of the Financial Services Commission (FSC), Mauritius in advertisements shall not be construed or imply that the FSC has approved the advertisement, taken any responsibility for the soundness of the financial products,

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that it has recommended the financial products, or that statements and opinions expressed in the advertisement are true and accurate.

D. The logo of the Commission shall not appear or be reproduced in marketing communications and advertisements.

E. Phrases such as “best performing” or “first” may only be quoted if it is appropriately supported by an independent source available to the consumers for verification.

F. One should not use absolute and superlative adjectives like “the easiest”, “the most profitable”, and similar word combinations

G. An advertisement must not include wordings such as “safe”, “secure”, “risk-free”, “protected”, “warranty”, “guarantee” or “promise” that may lead the consumers and potential consumers to believe that they cannot lose money or that capital is guaranteed. Save and except, where an advertisement guarantees or assures any minimum rate of return or yield, resources sufficient to support such a guarantee may be indicated.

H. An advertisement shall not provide the impression to consumers that their savings or investments will invariably increase in value. The language used must avoid implying any urgency or emergency for making savings or investments, save and except, where regulatory deadlines apply. Words and phrases including but not limited to “get rich quick”, “greater wealth awaits you”, “you too can be rich”, and “invest now before it is too late” shall be avoided.

I. An advertisement shall not use unreasonably promising language in regards to the potential return to be derived from financial products. Statements such as “high rewards await you”, “you will reap high returns”, and “you will be a winner” shall not be allowed.

J. An advertisement shall not aim to undermine competitors in such a way as might jeopardise the reputation of the industry. The advertisement should be clear and in simple language and, where applicable, contain supporting graphics.

K. An advertisement shall not contain language and graphics which are inconsistent with its corresponding disclosure documents. For instance, where a prospectus, offer document, or any other contractual document contains a special risk warning, it would be misleading if such advertisement suggests “low risk”.

L. The chart below provides a few references for presenting opportunities and risks in a balanced manner.

✖ Do Not USE	✔ Use
‘Easy’ or ‘simple’ in relation to trading.	‘Easy’ in relation to the platform usage or tools.
‘Secure trading’, ‘providing trades with the ability to safe trade’.	‘Security’ if parties refer to the IT security of DOTO systems or trading platforms.

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'Use your spare time to earn money', 'you can become a profitable trader', 'profit anytime and anywhere', 'more income', 'risk free trading', teach you how to trade, or pictures of money.	'Risk free' if you refer to the demo account only.
'Best', 'highest'	'One of the best', 'one of the highest', 'one of the top'
Trade shares, forex, commodities, indices, and ETFs with DOTO Global Ltd.	DOTO Global Ltd offers CFDs on shares, forex, commodities, indices and ETFs.
'No experience needed', 'you do not need any experience or understanding	
Do not use words like 'play', 'gamble' or 'bet' in association with trading.	

Fees and Costs

First, where a fee or cost is referred to in an advertisement of a financial product, it must give a realistic impression of the overall level of fees and costs a consumer and potential consumer is likely to pay.

When a claim about a fee or cost is used in the heading of an advertisement, any exclusions or qualifications shall also be contained within the heading or be clearly and prominently noted within the advertisement.

Next, where an advertisement for a financial product makes a claim about the fees or costs associated with an advisory service, this must be clearly stated, and any qualification should be clearly and prominently noted in the advertisement.

Where applicable, the disclaimer 'terms and conditions apply' may be included in the advertisement. The advertisement shall not suggest that the advisory service is 'free' or 'low cost' if, in fact, the consumer will pay for the service indirectly through the fees and costs of the financial product. For example, where commissions are derived from product fees and these are not related to the consumer, or through administration fees, incorporating fees, or costs associated with the advisory service.

Lastly, an advertisement for a financial product shall state clearly when certain benefits are mutually exclusive, that is, which cannot be simultaneously earned.

Approval of Marketing Communications

The following is a list of the necessary considerations for the approval of all marketing communications in regards to Doto/DGL:

A. All marketing and/or promotional materials and information that promote, mention or implicitly refer

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to any services by the Company, or contain any statements made on behalf of the Company, or by employees/representatives/service providers of the Company explicitly acting and/or being represented in such capacity, including but not limited to communications/advertisements such as banners and landing pages, printed media articles, interviews or ads, outside advertisements, leaflets, email distributions, videos, social media exhibits, etc that are not based on pre-approved templates must be sent to the in-house legal advisor, compliance officer, and/or the appointed manager of the Company for review and approval prior to distribution to the public, clients, and/or potential clients.

B. The process of review, approval, and record keeping of marketing material will be managed by DOTO Global Ltd. The name of the system JIRA and the description of the process flow is under the marketing compliance task.

C. Hyperlinks from an advertisement on the relevant web pages to other documents or web pages shall not be acceptable unless the other documents and information on the other web pages have been forwarded to the Commission prior to the date of first issue or use of the said advertisement or promotional materials where appropriate.

Monitoring

The DGL Compliance Team will monitor marketing communications and the website on an on-going basis to ensure compliance with this manual.

This manual may be updated at any time, as regulatory bodies may change legislation and/or the interpretation of legislation. Consequently, parties will always have to comply with the updated guidelines.

APPENDIX 1

Specific rules regarding items forbidden under DOTO marketing:

1. Features that the Doto products do not have, and services that the Company does not provide.

2. Alive or dead celebrities and public figures (actors, artists, athletes, footballers, monarchs, and royal family members, parliamentarians, politicians, civil servants, etc.) without explicit permissions.

3. War, political, social, racial conflicts, political processes (e.g. elections)

4. Violence

5. Illegal activity of any kind

6. Discrimination based on race, gender, religion, nationality, sexual orientation, or age

7. Religious figures of any religion such as Jesus Christ, Buddha, priests, monks, rabbis, etc.

8. Any religious signs, symbols, pictographs, etc.

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9. Adult, erotic, sexual content

10. Underwear or people wearing only underwear in an erotic or sexual context
This rule applies to the promo materials targeted at the audience from the countries with a predominance of Muslims or Hindus, as well as to ads that promote web pages hosted on the doto.com domain name, which uses the Company logo, and the mobile apps that have the Company name and logo.

11. Weapons or armed people

12. Alcoholic beverages and the context of drinking them

13. Minors or the disabled

14. The poor or declassed alone or in comparison with the benefits that they might get trading on Doto

15. Any food to present Doto as a food source

16. Any promises of living a luxurious life after trading on Doto

17. Profit guarantees

18. The use of the words/phrases such as “win-win”, “100% winning”, etc. in the description of trading strategies.

19. Specific income indicators in any currency such as "earn $10,000 per day, €500 in an hour, 100 rubles in a minute”, etc.
It is allowed to specify the profit yield in promo materials using the wording “up to”.
When using this promo approach, it must be taken into account that the profit yield and terms of trades are different for CFD and FX products.

20. Promises of getting a specific profit such as “make 110% profit”
However, it is allowed to use messages like “you can make a profit of up to 100% but there is a risk of losing your capital”.

21. Calls to continue trading on the platform to make up for losing trades such as “Lost your deposit? Get it back!” or “You can get your money back!”, etc.

22. Misleading statements that trading CFDs or Forex are a low-risk investment, except when speaking about demo accounts.

23. Such statements as “everybody makes money”, “it’s easy/exciting to make money by trading", etc. Instead it is best to use phrases such as “trading is simple but not easy!” or “may all your trades be green.”

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24. Such phrases as “win/make money”, “work from home”, “get income”, and others with the notion of making money by trading instead of having a steady job.

25. Calls to quit one’s job or any hint of the idea that trading on Doto without training and experience can be a food source.

26. Claims of success, lifestyle changes, financial freedom, or any other unreasonable user benefits.

27. Money (banknotes and coins) received as a result of trading on Doto
However, it is allowed to use money in ads as an investment asset. This rule applies to promo materials that promote web pages hosted on the DOTO.com domain name, ads that mention the brand and have the Company logo, and the mobile apps that have the Company name and logo.

28. Children and motherhood with the intended meaning that Doto can be a source of securing the future for children.

29. Trading on Doto as a source of funds for health treatment and maintenance.

30. Such word/word combinations as “binary”, “options”, “digital options”, or any other word combinations with these terms in any language.

APPENDIX 2

Country-based Rules I

Thailand

It is prohibited to show and/or mention:

1. Coins and banknotes with images of the current or past kings of Thailand.
2. Obsolete or outdated Thai banknotes.
3. Legs in any context.
4. Finger/fingers pointing gestures. In any promo material, a person’s palms should be faced down with all fingers extended.
5. The fig (Figo) gesture as it has a negative meaning in the Thai culture.

1. Promo materials may not contain any separation or typification of any nation, social group or gender in Malaysia that might associate them with certain values and/or origin.
2. It is prohibited to use abbreviations and acronyms of Malaysian words that are not widely used.
3. It’s better to use promo materials that reflect the Malaysian culture, identity, and the multiracial nature of Malaysia’s population.

Columbia

It is prohibited to show and/or mention:

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1. National symbols of Colombia.
2. Content that contains or incites expressions of violence, cruelty, anxiety, fear or superstition.
3. The OK gesture.
4. The horned hand (rock on!) gesture.
5. The sticking out tongue gesture as it has a negative meaning in the country's culture.

Argentina

It is prohibited to show and/or mention:

1. National symbols of Argentina.
2. Content that contains or incites expressions of violence, cruelty, anxiety, fear or superstition.
3. The OK gesture.
4. The horned hand (rock on!) gesture.
5. The sticking out tongue gesture as it has a negative meaning in the country's culture.

Vietnam

It is prohibited to show and/or mention:

1. Vietnamese national symbols.
2. Chairman Ho Chi Minh.
3. Success stories of people who made a huge amount of money and/or quickly got rich. The Vietnamese audience considers products promoted in such a way a scam.
4. The crossed fingers gesture as it has a negative meaning in the country's culture.
5. Finger summoning gesture as it has a negative meaning in the country's culture.

Turkey

It is prohibited to show and/or mention:

1. Muslim religious symbols and Muslim religious rituals.
2. A Turkish family in any disrespectful light.
3. The OK gesture as it has a negative meaning in the country's culture.
4. The fig (Figo) gesture as it has a negative meaning in the country's culture.
5. No pictures of left hand or demonstrations of left-handed actions are allowed for use in promo materials. The use of one's left hand for any action has a strong negative religious connotation in Muslim countries.
6. Turkey's fight against Armenia, the Kurdish question, Syrian refugees, and/or the division of Cyprus between Greece and Turkey.
7. Turkish political and public figures.
8. Football in a negative light.

Egypt

It is prohibited to use:

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The OK gesture as it has a negative meaning in the country's culture.

No pictures of left hand or demonstrations of left-handed actions are allowed for use in promo materials. The use of one's left hand for any action has a strong negative religious connotation in Muslim countries

The UAE

It is prohibited to use:

The OK gesture as it has a negative meaning in the country's culture.

No pictures of left hand or demonstrations of left-handed actions are allowed for use in promo materials. The use of one's left hand for any action has a strong negative religious connotation in Muslim countries

Saudi Arabia

It is prohibited to use:

The OK gesture as it has a negative meaning in the country's culture.

No pictures of left hand or demonstrations of left-handed actions are allowed for use in promo materials. The use of one's left hand for any action has a strong negative religious connotation in Muslim countries

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