



Marketing Policy

Version 0.1 – Last Updated: June 2018

Marketing Policy

1. INTRODUCTION

1.1 These Marketing Communication Guidelines form an integral part of the Agreement and may be amended from time to time.

1.2 The Marketing Communication Guidelines are designed to provide guidance to Affiliates when promoting the brands owned by F1Markets (Stratton Markets) in any kinds of marketing communications. When following these Marketing Communication Guidelines, you help us strengthen our corporate and brand identity.

1.3 Terms used but not otherwise defined in these Marketing Communication Guidelines shall have the same meaning as in the Business Affiliate Agreement.

1.4 In these Marketing Communication Guidelines 'you' means the Affiliate who has entered into this Agreement. 'your' and 'your's' shall be construed accordingly.

F1Markets Ltd's core principle regarding Marketing Communication, is that all information needs to be fair, clear, not misleading and not aggressive.

2. BACKGROUND

2.1 The Company represents a Forex and other CFDs brand, Stratton Markets.

2.2 Stratton Markets is owned and operated by F1Markets Ltd, registration number: HE329568 (Registered Address: Tassou Papadopoulou 6, Flat/Office 22, Agios Dometios, 2373, Nicosia, Cyprus). Head Office Address: Kolonakiou Avenue 43, 4103 Ay. Athanasios, Limassol, Cyprus. The Company is regulated by CySEC, License Number: 267/15.

2.3 F1Markets Ltd is a regulated investment services firm authorised in the conduct of its activities by the Cyprus Securities and Exchange Commission ('CySEC') under the license no. 267/15. This license authorizes F1Markets Ltd to provide within specific countries specific investment and ancillary services with regard to specific financial instruments as these are set out in the Firm's operational license.

2.4 F1Markets Ltd has the global and exclusive right for the operation of the www.StrattonMarkets.com; domains and the non-exclusive right for the use of the "Stratton Markets" brand.

Marketing Policy

2.5 **“Marketing Communication”** is defined as all and any advertising materials in any medium of communication, including but not limited to any electronic or online communication, marketing materials, publications and all marketing operation related issues which the affiliate is using to introduce clients to F1Markets Ltd.

2.6 **“Affiliate”** means any affiliate who is a party to the Agreement. The activities of the Affiliates must comply at all times with the provisions of the Agreement and be directed solely at introducing potential clients to us. Affiliates are not permitted to offer any form of investment advice, legal advice, inducement, recommendation or portfolio management to clients and/or potential clients or to handle any of their funds or cash.

2.7 Financial services are highly regulated activities and therefore full compliance with all requirements mentioned in these Marketing Communication Guidelines is required.

2.8 These Marketing Communication Guidelines should be read along with the Affiliate Terms and Conditions which forms an integral part of the Business Affiliate Agreement as it appears in the Company’s relevant website. In the event of any conflict between these Marketing Communication Guidelines and the Agreement, these Marketing Communication Guidelines shall prevail.

3. KEY GUIDELINES

In any Marketing Communication always include a risk warning: **“Trading CFDs involves a high risk of loss”**.

- **Do not guarantee or promise profits or guarantee against losses.**
- **Do not use absolute statements.**
- **Always state that the Stratton Markets electronic trading platform only offers CFD trading.**
- **Always mention that Stratton Markets is operated by F1Markets Ltd, which is regulated by Cyprus Regulator under license no. 267/15**

4. GENERAL GUIDELINES

4.1 Websites

✓ You can advertise Stratton Markets only on websites or webpages related to financial markets, news or other financial related services/products that offer trading information.

Marketing Policy

✘ You cannot advertise Stratton Markets on websites or webpages or other sources which include content that promotes sexually explicit materials, violence, discrimination based on race, sex, religion, nationality, disability and/or any other kind of website forbidden under the Agreement.

✘ When assigning an URL to promote Stratton Markets's services make sure not to include Stratton Markets in your main URL/domain name. (Examples: <http://www.strattonmarkets-news.com/> <http://www.mysite.com/StrattonMarkets-trading>). Any such action is considered as a copyright violation.

4.2 Marketing Tools

You are allowed to use the official Stratton Markets marketing tools which can be found in the 'Marketing Tools' section of your respective account. If you would like to use your own material then this must be provided to the relevant affiliate manager, who will ensure to communicate this to F1Markets Ltd and receive the relevant approval and/or comments. Any such material must at all times be pre-approved by F1Markets Ltd in writing prior to publication.

4.3 Risk Warning

4.3.1 Always notify the potential client of the risk associated with the services offered in the marketing communication.

4.3.2 Whenever you mention Stratton Markets or F1Markets Ltd in any Marketing Communication, you must include a risk warning:

"Trading Contracts for Differences (CFDs) is highly speculative, carries considerable risk of capital loss and is not appropriate for every investor. You may sustain a loss of some or all of your invested capital, therefore, you should not speculate with capital that you cannot afford to lose. You should be aware of all the risks associated with trading on margin".

OR in case of limitation of space the risk warning can be:

"CFD trading involves a high risk of loss".

4.3.3 Format of risk warning: clearly readable, in a prominent place and with visible colours.

4.3.4 Even if you are using a promotional "button" which redirects a potential client to Stratton Markets.com, then the risk warning must be positioned below or close to such button and be clearly visible to the potential clients.

Marketing Policy

4.3.5 Where appropriate you must refer the potential client to the 'Risk Disclosure Statement' on Stratton Markets website [here](#)

4.4 Do not guarantee or promise profits or guarantee against losses.

4.4.1 Trading CFDs does not always result in profits and involves a significant risk of loss of all of clients' funds invested, therefore no profits can be guaranteed. Do not imply that trading can be a way of guaranteed returns and do not guarantee that no losses shall be incurred by the potential clients. In addition, do not guarantee that you are able to assist clients who have suffered losing trades in recovering losing positions.

4.4.2 Present opportunities and risks in a balanced manner.

<p>✗ Do not use: 'easy' or 'simple' in relation to trading, 'trading can be an easy process'</p>	<p>✓ Use: 'Easy' in relation to the platform usage or tools;</p>
<p>✗ Do not use: 'secure trading', 'providing traders with the ability to safely trade'</p>	<p>✓ Use: 'Security' if you refer to the IT security of F1Markets Ltd's systems or trading platforms;</p>
<p>✗ Do not use: 'trading profits', 'use your spare time to earn money', 'you can become a profitable trader', 'profit anytime and anywhere', 'more income', 'risk free trading', or pictures of money.</p>	<p>✓ Use: 'Risk free' if you refer to the demo account only.</p>

4.5 Do not use absolute or unqualified statements.

<p>✗ Do not use: 'best', 'highest', 'complete control', 'control the market' or testimonials that do not reflect the real opinion of the individual(s) involved.</p>	<p>✓ Use: 'one of the best', 'high', 'one of the highest' 'one of the top'.</p>
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No fictitious people testimonials (written or video). Use real users when promoting Stratton Markets.

Whenever displaying data and numbers to promote Stratton Markets, please make sure ALL data is true and verified.

Make sure to add the source of your information next to the graphic/chart or add an asterisk to text passages with the respective source in the footnote.

Marketing Policy

4.6 Regulation

4.6.1 Always mention that F1Markets Ltd is licensed by the Cyprus Financial Regulator, License No. 267/15.

4.6.2 Always mention that F1Markets Ltd is the broker whilst the trading platform operated by F1Markets Ltd is www.StrattonMarkets.com

<p>✗ Do not use: 'regulated throughout the EU', 'EU licensed and regulated'.</p>	<p>✓ Use: Under the EU's Markets in Financial Instruments Directive ("MiFID"), F1Markets Ltd is permitted to passport its services into EEA member states.</p>
<p>✗ Do not use: 'Stratton Markets is fully licensed by CySEC', 'Stratton Markets is a leading online trading broker'.</p>	<p>✓ Use: 'F1Markets Ltd is licensed/regulated/ authorized by Cyprus Financial Regulator, 'F1Markets Ltd is a broker'.</p>
<p>✗ Do not use the CySEC logo, European Supervisory Authorities logos, the EU logo or flag.</p>	

4.7 Language

If your website is in a language other than English, all the relevant warnings and disclosures specified in these Marketing Communication Guidelines must be fully translated accordingly, in a correct and not misleading manner.

4.8 Contracts for Difference (CFDs)

4.8.1 Stratton Markets platform offers CFDs trading, therefore it needs to be clear in any Marketing Communication that the potential clients will trade CFDs and not the related underlying financial instrument, and that at no times shall a delivery of or transfer of title to the underlying financial instruments shall be made to the potential clients.

4.8.2 Whenever writing about Stratton Markets you need to make sure that the word 'CFDs' is mentioned. Do **NOT** say buying/ owning shares/ stocks, commodities or indices, but CFDs.

<p>✗ Do not use: Trade shares, forex, commodities, indices and ETFs with Stratton Markets.</p>	<p>✓ Use: Stratton Markets offers CFDs on shares, forex, commodities, indices and ETFs.</p>
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Marketing Policy

4.9 Incentives

4.9.1 We are **NOT** offering any bonuses to clients, that are designed to incentivize retail clients to trade in complex speculative products such as CFDs, therefore no bonus advertising is allowed. Do **NOT** use the word “Bonus”.

4.9.2 We are offering a non-trading Trading Benefits, pursuant to Company’s Trading Benefit Policy and Terms and Conditions F1Markets Ltd.

4.9.3 Always include the term **‘T&C apply’** in all Marketing Communications.

4.9.4 Format of ‘T&C apply’: Clearly readable, in a prominent place and with visible colours.

✘ Do not present this incentive as ‘risk free trades’ or ‘trades without risk’ or in any similar manner.

4.10 Audience

4.10.1 F1Markets Ltd’s services and products traded, are only available to individuals who are at least 18 years old.

4.10.2 CFDs are complex financial instruments and can only be marketed to people who would possess the necessary level of knowledge and experience.

✘ Do not use:

‘no experience needed’, ‘you do not need any experience or understanding in order to be successful and trade profitably’, ‘this platform is built in such a way that satisfies every type of trader, even beginners who are just starting to trade...’ or any similar language.

4.11 No investment advice or portfolio management

4.11.1 F1Markets Ltd is authorized to provide the investment services of:

- a) Reception and transmission of orders of financial instruments
- b) Execution of orders on behalf of the clients and

Marketing Policy

4.11.2 F1Markets Ltd is **NOT** authorized to provide the investment service of investment advice or portfolio management.

4.11.3 Affiliates must **NOT** provide any investment and/or financial advice and/or portfolio management services to the potential clients, including money management.

4.11.4 All videos must contain the following risk warning that is visible throughout the entire duration of the video: "RISK WARNING: YOUR CAPITAL MIGHT BE AT RISK". If you are recording a trading session, do not use the word "strategy", do not give investment advices and add an additional warning: "NOTE: THIS VIDEO IS NOT AN INVESTMENT ADVICE".

4.11.5 Materials should not include information regarding strategies that indicates them as trading strategies (e.g. "the Martingale trading strategy"). Instead, if you use information based on strategies, you should call it a "trading pattern" and this material should contain the following risk disclaimer: "Your capital may be at risk. This material is not investment advice".

4.12 Visual Content: A single image can be more powerful than 1000 words and so the overall presentation and imagery should not be misleading. The presentation should be balanced and not create a guarantee of success and profits. All material should be approved by the Compliance Function.

4.12 Always use your correct personal information. Do not use false personal information that could mislead clients and/or potential clients, such as false names, postal and email addresses.

4.13 Do not contact the same client using different email addresses or phone numbers.

4.14 Ensure you have clients' prior consent when sending marketing communication concerning Stratton Markets or F1Markets Ltd.

5. ADDITIONAL INFORMATION

5.1 Any relationship between F1Markets Ltd and a potential client shall be subject to a client entering into an Agreement with F1Markets Ltd; and also subject to F1Markets Ltd successfully completing its compliance, AML and other assessments of the client.

Marketing Policy

5.2 Banned Jurisdictions

F1Markets Ltd restricts offering its services to certain jurisdictions or countries and considers them as banned countries in terms of engagement with potential clients as this is defined in the Company's Terms & Conditions available on <https://strattonmarkets.com/eu/terms-and-conditions/>

5.3 F1Markets Ltd monitors all of its Affiliates' websites on an on-going-basis to ensure compliance with these Marketing Communication Guidelines. You may therefore be contacted at any time by your affiliate manager to amend and/or remove material as F1Markets Ltd may deem appropriate. If that is the case, you must comply within 24 hours. If you face any issues with the timely compliance, this should be immediately communicated to your affiliate manager who will ensure to communicate this to F1Markets Ltd, for extension of the timeframe.

5.4 Representation

The Affiliate shall under no circumstances present itself as being operated and/or representing and/or being the agent and/or employee of the Company. The relationship between the Company and the Affiliate shall be that of independent parties. To that extent, it shall not use the Company's name in a way as to give to the public and/or the regulator the impression of the above. The Affiliate shall refrain from using the Company's name or the Company's brands' name in communication with the potential clients such as in email communication in a way that it appears that the communication is being send by the Company and/or on behalf of the Company.

✘ Do not use: Partner, Advisor	✔ Use: Marketing Agent
✘ Do not use: Social Media: On your LinkedIn, Facebook, Twitter or any social media profile, don't list your position as an Stratton Markets/ F1Markets employee or representative. Printed Media: Don't use any of our logos in any business cards or flyers.	

5.6 These Marketing Communication Guidelines may be updated at any time, as regulatory bodies may change legislation and/or interpretation of legislation, and consequently you will need to comply with the updated Marketing Communication Guidelines at all times.