

Guidelines for Influencers and Affiliates

Trade Republic Bank GmbH (“**Trade Republic**”) sponsors Influencers and Affiliates (“**Influencers**”) to produce (in the Influencers’ own responsibility) social media content with regard to financial instruments. These Guidelines shall give an overview of the understanding of minimum standards Influencers shall comply with. However, it is not a comprehensive list and it does not replace an individual and local review of the legal environment. Trade Republic expects the Influencers to be aware of and comply with all applicable laws and regulatory requirements. Especially in the area of financial products and investments, specific laws and regulations apply. These include but are not limited to: The revised Markets in Financial Instruments Directive (“**MiFID II**”), the Market Abuse Directive (“**MAD**”) and the Market Abuse Regulation (“**MAR**”).

Guideline 1: Address conflict of interest

Influencers must identify and address conflicts of interest. In particular, this applies if Influencers or related persons are involved in this specific financial product (e.g. being shareholders). This means: If Influencers or related persons hold a specific stock, they have to make -everyone consuming the content produced by them- aware of this fact. Otherwise, Influencers have to abstain from creating content about such specific stock or financial products.

Guideline 2: Label the content correctly and communicate clearly

If Influencers are publishing an advertisement by Trade Republic (not “sponsoring” but a real advertisement) he/she must label it with accurate labels such as #advertisement or #collaboration. If Influencers are publishing editorial content sponsored by Trade Republic he/she must label it with accurate labels such as #sponsored by or #sponsored. Labels must be provided in a legible format and in the local applicable language. Influencers must communicate all information addressed to customers in an honest, clear, and not misleading manner.

Guideline 3: No prior communication

Influencers may not discuss financial instruments which will be subject of future content with third parties. This also includes private conversations and is independent from the future assessment of the financial instrument being positive or negative.

Guideline 4: No trading before and after publishing content

Influencers may not trade the respective financial instruments which are subject of the content at least four (4) weeks in advance and two (2) weeks after publishing the content. This is only - again - Trade Republic’s understanding in this regard. Influencers must verify what the local standards and legal regulations are.

Guideline 5: Self-Commitment

Influencers are bound by regulations, such as Art. 20 Regulation 596/2014, which regulate standards for Investment Recommendations. Only if Influencers are journalists they are bound by an equivalent appropriate regulation, including an appropriate “self-commitment”. Influencers must be part of such self-commitment and/or comply with the applicable regulations under Regulation 596/2014 and MiFID II.

These Guidelines are only the minimum standard and do not replace an independent and comprehensive examination of the applicable laws by the Influencers. Trade Republic does not assume any liability. Trade Republic also does not warrant that these Guidelines are comprehensive and sufficient.