

Affiliate Marketing Guide

General

This guide will help put you on the road towards creating a successful, lawful engagement with your users when promoting Coinbase. Applicable laws regulating affiliate marketing are complex and the most important thing to remember is that creativity in the ever changing online landscape is not an excuse to avoid legal compliance. If anything, legal compliance must be at the forefront of your campaign to ensure trusting and transparent engagement with your user base, and so your latest promotion does not become one of the “don’ts” of affiliate marketing history. Remember, all Coinbase Affiliate Program Agreement terms and conditions apply to your Coinbase campaigns.

FTC and CAP Code are not the only regulatory agencies enforcing the rules. Other countries will have their own marketing and advertising laws and regulatory bodies that publishers will need to adhere to. We highly recommend that you refer to the rules and guidance applicable to each jurisdiction as this will allow you to make sure that you are not breaking rules applicable to affiliate marketing as an advertiser.

- CAP Guidance for Online Affiliate Marketing: <https://www.asa.org.uk/advice-online/affiliate-marketing.html>
- CAP Guideline for Effective Disclosures on Social media: <https://www.asa.org.uk/uploads/assets/uploaded/3af39c72-76e1-4a59-b2b47e81a034cd1d.pdf>
- FTC Endorsement Guides: <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-publishes-final-guides-governing-endorsements-testimonials/091005revisedendorsementguides.pdf>
- FTC’s Guideline for Effective Disclosures in Digital Advertising: <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf>
- FTC Guideline for Disclosure on Social Media: https://www.ftc.gov/system/files/documents/plain-language/1001a-influencer-guide-508_1.pdf

Disclosures

It isn't enough to make a disclosure. It is your responsibility as a publisher and advertiser that the disclosures you make are clear and conspicuous, that users notice them, and are able to understand the disclosure means you may receive compensation by advertising and promoting Coinbase. Although technical compliance with the laws applicable to affiliate marketing is required, strive to maintain a standard that your users and site visitors easily

understand the relationship between you and Coinbase. Ultimately, clear and conspicuous disclosures improve the user experience, because they help users understand the nature of the media and content they are consuming.

A special note when advertising in the United Kingdom:

- **All ads** in the UK must include the following disclaimer:
 - “Cryptocurrency is not regulated by the UK Financial Conduct Authority and is not subject to protection under the UK Financial Services Compensation Scheme or within the scope of jurisdiction of the UK Financial Ombudsman Service. Investing in cryptocurrency comes with risk and cryptocurrency may gain in value, or lose some or all value. Capital gains tax may be applicable to profits from cryptocurrency sales.”
- All ads in the UK that reference **crypto pricing and/or FOMO messaging** should include:
 - “Content is for informational purposes and is not investment advice. Past performance is not indicative of future results. Investing in cryptocurrency comes with risk.”, **in addition** to the above disclaimer.
- **Note:** These guidelines will likely change in Q3 of 2022, when we expect the FCA regulations come into effect.

Disclosures for Social Media

Do’s	Don’ts
<ul style="list-style-type: none"> ● Make your disclosure using hashtags like #ad, #advertisement, #sponsored, or #promotion. ● Place your disclosure at the very beginning of your post ● Include written disclosures (e.g. #ad) at the beginning of the video description (including video stories) within your photo content, in addition to the post description. For videos or live streams, also include an audible disclosure. 	<ul style="list-style-type: none"> ● Put your disclosure at the bottom of a post or mix in middle of other hashtags ● Only rely on tagging the advertiser or the platform to disclose on your behalf. ● Make it difficult for your audience to know you're being compensated by Coinbase ● Only include a disclosure on your video content or photo content if you can also add it to a post description.

Disclosures for Editorials, Blogs and Other Non-Social Content

Do’s	Don’ts
<ul style="list-style-type: none"> ● Prominent: Ensure your disclosure appears ‘above the fold’ meaning the user doesn’t have to scroll down to 	<ul style="list-style-type: none"> ● Put the disclosure at the footer of your site, or in an inconspicuous spot (i.e. middle of the page on the side,

<p>see it. In addition, make the disclosure stand out visually so your user has every opportunity to see it. And, make sure it's easy to read (e.g. contrasting text colors with page background color).</p> <ul style="list-style-type: none"> ● Proximate: Put your disclosure near the relevant content (e.g. posting, statement, or endorsement) that causes you to have to make a disclosure. At a minimum the disclosure should be on every page that contains affiliate link(s). ● If hyperlinking to a disclosure page, ensure the link itself is prominent and proximate. For example, make the link a color that stands out to the user. 	<p>bottom of post, etc.). In addition, don't bury your disclosure in an "About Us," "Terms of Service," "Privacy Policy" or other similar section.</p> <ul style="list-style-type: none"> ● Put in color or font that is difficult to read (i.e. light gray on white background) ● Only put a disclosure on your home page, on a disclosure page, or a link to one in your footer ● Make your disclosure tough to understand ● Only state 'we use affiliate links'
--	--

Geographic Restrictions

Coinbase's products and services are not available in every country or in every state, territory, or province within a given country. While it's understandable that certain users in restricted areas may access generally available content, any targeted marketing campaigns which promotes Coinbase, including sending links related to Coinbase, must not be directed within the below prohibited jurisdictions. This list of restricted countries was last updated in December 2021 and may continue to be updated from time to time.

- **North America:** State of Hawaii (United States), Mexico
- **Latin America and the Caribbean:** British Virgin Islands, Bermuda, Cayman Islands, Colombia, Costa Rica, Dominican Republic, Ecuador, Granada, Guatemala, Jamaica, Peru, Saint Lucia, and Uruguay
- **Europe:** Andorra, Austria, France, Gibraltar, Guernsey, Monaco, Netherlands, and Norway
- **Africa and the Middle East:** Afghanistan, Algeria, Bahrain, Belarus, Côte d'Ivoire, Crimea, Djibouti, Egypt, Ethiopia, Georgia, Guinea-Bissau, Iraq, Israel, Jordan, Kuwait, Lebanon, Lesotho, Liberia, Macedonia, Mauritania, Morocco, Namibia, Niger, Qatar, Russia, Saudi Arabia, Senegal, Seychelles, South Sudan, Sudan, Syrian Arab Republic, Tanzania, Tunisia, and United Arab Emirates
- **Asia Pacific, Central Asia and Japan:** Australia, Bangladesh, China, Hong Kong, India, Indonesia, Macau, Malaysia, Mongolia, Myanmar, Philippines, Republic of Korea, Taiwan, Thailand, Uzbekistan, and Vietnam

- Other:** any jurisdiction in which trading and/or usage of cryptocurrency or digital assets is prohibited, or any country or jurisdiction subject to embargo or sanctions by the U.S. Government (“Sanctioned Jurisdictions”), including, without limitation, Cuba, Iran, North Korea, Northern Sudan and Syria (or any additional country or jurisdiction added to this list by Coinbase from time to time, in its sole discretion, with notice to you).

Offers/Incentives

As a Coinbase Affiliate, you may decide to provide an incentive or offer directly to your user base. You are permitted to make direct incentives or offers to your users so long as you: (i) communicate clearly the incentive or offer is coming from you and not Coinbase, and (ii) ensure the incentive or offer is presented accurately and includes any required disclosures, relevant information, and/or terms and conditions as provided below. If you wish to run an offer or incentive which differs from the categories of offers or which does not use the disclosures exactly as listed below, you must contact Coinbase for its prior written approval before publishing the offer or incentive.

Note: Any offer or incentive which uses the word “free” must clearly communicate the requisite actions required to be eligible for the free reward.

<u>Type of Offer</u>	<u>Guidelines for Offer</u>	<u>Applicable Disclosures</u>
Currently Available Coinbase Offer	<ul style="list-style-type: none"> Use the exact language Coinbase uses to promote its offer. For example, if Coinbase’s website or ads state “Get \$5 in Bitcoin when you sign up for Coinbase” you must use this exact language in your promotion of this offer. Use the exact disclosure language Coinbase uses applicable to that offer. Ensure your disclosures are used in accordance with the guidance in the Disclosures section. Ensure that you only promote a Coinbase offer while the Coinbase offer is live and valid. Remove any promotion of an expired offer. 	<p>For the offer which promotes <u>receiving an amount of Bitcoin upon signing up with Coinbase</u>, use the following disclosure:</p> <p><i>“After your photo ID is verified, BTC will be added to your portfolio. Limited time offer. Offer available to new users who have not previously verified their identification. Offer not available to new users who were referred to Coinbase through the Referral Program or who have previously opened an account using different contact information. Coinbase may update the conditions for eligibility at any time.”</i></p> <p>For the offer which promotes <u>receiving an amount of Bitcoin upon making a user’s first trade with Coinbase</u>, use the following disclosure:</p> <p><i>“After your first trade, BTC will be added to your portfolio. Limited time offer. Offer</i></p>

		<p>available to new users who have not previously made a crypto purchase on Coinbase. Offer not available to new users who were referred to Coinbase through the Referral Program or who have previously opened an account using different contact information. Coinbase may update the conditions for eligibility at any time.”</p> <p>For the offer which promotes the <u>amount of reward earning potential through the Coinbase Earn product</u>, use the following disclosure:</p> <p><i>“Limited while supplies last and amounts offered for each quiz may vary. Must verify ID to be eligible and complete quiz to earn. Users may only earn once per quiz. Coinbase reserves the right to cancel the Earn offer at any time.”</i></p>
Currently Available Coinbase Offer Plus an Affiliate Offer	<ul style="list-style-type: none"> • Follow all guidelines above applicable to promoting a Coinbase offer • Make clear that the Affiliate offer is separate and distinct from the Coinbase offer • Make clear that Coinbase will provide the benefits of the Coinbase offer and the Affiliate will provide the benefits of the Affiliate offer 	<ul style="list-style-type: none"> • The same disclosures applicable to the Coinbase offer • Disclosures based on the Affiliate offer
Affiliate Offer Only	Make clear the Affiliate offer is coming from and offered by the Affiliate and not from Coinbase	Any disclosure deemed necessary by the Affiliate to ensure compliance with legal requirements and the Disclosures section in these guidelines

Content

General Content Guidelines

Coinbase desires to maintain its brand and image in the marketplace. To do that, we rely on our affiliates to ensure the promotion of Coinbase is in a similar form and fashion to how Coinbase promotes itself. If you choose to make statements or claims about Coinbase, or a Coinbase product or service, make sure the statement or claim is something that Coinbase

has previously published and is up to date. You cannot, however, make statements or Claims about Coinbase, or its products or services, that would require proof that Coinbase itself doesn't have. If you are making an endorsement of Coinbase, your statements must reflect your honest opinions, beliefs, or experiences and must not be false, misleading, or unsupported.

In addition and to maintain our brand's integrity, you are restricted from promoting Coinbase on sites and apps that contain or reference categories related to:

1. adult content, pornography, weapons, graphic violence (including any violent video game images), alcohol, drugs, tragedy, transportation accidents, sensitive social issues, political in nature, or gambling;
2. content that is offensive, profane, hateful, threatening, harmful, defamatory, libelous, harassing, or discriminatory (whether based on race, ethnicity, creed, religion, gender, sexual orientation, physical disability, or otherwise); and/or
3. soliciting any unlawful behavior.

Upon Coinbase's request, you shall immediately comply with Coinbase's instructions to modify or remove published content.

Specific Content Guidelines

You may wish to mention Coinbase in a consistent communication style and tone as Coinbase does. For examples of current copy for you to use in your marketing assets, please [click here](#).

Brand Use Requirements

You must comply with our trademark usage guidelines set out below when using Coinbase's trademarks, service marks, trade names, logos, fonts, names of Coinbase software, products, and services, and any other Coinbase branding elements, whether registered or unregistered (collectively, "Coinbase Marks" or "Marks") in your promotional and advertising materials.

By using our Coinbase Marks you acknowledge that: Coinbase is the sole owner of those Marks; you promise not to use the Coinbase Marks except as expressly authorized by Coinbase; and all use of the Coinbase Marks and goodwill associated with your use will inure to the benefit of Coinbase. You agree not to take any action that is in conflict with Coinbase's rights in, or ownership of its Marks, including without limitation registering any Coinbase formative trademark or domain name. Coinbase may review your use of the Coinbase Marks at any time and reserves the right to terminate, modify or require modification to any such use at any time.

Trademark Usage Guidelines

1. You may only use the Coinbase Marks in educational, advertising, promotional, and sales material as authorized by Coinbase in this Guide and in the format provided [here](#), or as otherwise provided to you by Coinbase. We reserve the right to prohibit the use of our Coinbase Mark in AdWord programs at our sole discretion.
2. You may not alter the image of the Coinbase Marks in any manner, including but not limited to, changing the proportion, color, or font of the Mark, or adding or removing any element(s) of the Mark.
3. The Mark must appear by itself with reasonable spacing between each side of the Mark and other visual, graphic, or textual elements, or as otherwise approved by Coinbase. Under no circumstances should the Mark be placed on any background which interferes with the visibility, readability or display of the Mark.
4. Do not combine our Coinbase Mark(s), either in whole or in part, with another mark(s) to create a new mark, domain name, or tagline (including #hashtags and slogans).
5. Do not use a registration ® with any Coinbase Mark.
6. Do not change any element of the Coinbase Mark through hyphenation, abbreviation, alternate spelling, spacing, pluralization, capitalization, or stylization. Prohibited examples: Cbase, C-Exchange, Coin-Base.
7. You may not use any Coinbase Mark to disparage Coinbase, its products or services, or in a manner that, in Coinbase's sole discretion, may diminish or otherwise disparage or tarnish Coinbase's goodwill in any of its Marks.
8. You may use Coinbase Marks only to promote Coinbase in your capacity as a Coinbase affiliate, as accessible and provided in your Impact account.

Coinbase reserves the right, as it determines in its sole discretion, to modify these guidelines and/or the approved Coinbase Mark(s) at any time and to take appropriate action against any use without permission or any use that does not conform to this Guide.