

Marketing Compliance Manual — Independent Marketer Program

AI Trade Pros · Powered by WebPros · WEB PROS MARKETING, LLC

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1. Purpose and Who It Binds

What this Manual is. This Manual is the operating rulebook for everyone who promotes AI Trade Pros, its software and education products, or the Wealth Share Model. It implements the Marketing Agent Compliance Program in counsel's memorandum of October 1, 2026, adopted in full (Counsel Review Response §4F), and sits beneath the Independent Marketer Program Agreement, the Independent Marketers Disclosure, the Terms of Service, and the Plan Rules. Where those documents are stricter than this Manual, they control.

Who it binds. Every Independent Marketer (referred to in counsel's memoranda as a marketing agent) who holds a referral link, a replicated page, or compensation eligibility; every member who publishes content mentioning AI Trade Pros; every employee, contractor, or Model Provider who produces field material; and every field leader who runs a webinar, livestream, group chat, or training. Certification under §11 is a condition of activation: a marketer who has not certified has no link and earns nothing.

Who administers it. The Compliance Committee owns this Manual and holds stop-work authority over any campaign, channel, or marketer; the Compliance Lead ([NAME]) runs daily approval, monitoring, and enforcement. Anything touching the regulated CTA affiliate ("[CTA AFFILIATE NAME], LLC", to be formed) is handled by that affiliate's Compliance Officer (§8). Only the current version is in force.

2. The Three Rules

Marketers are trained to classify any sentence under one of three rules before saying or posting it.

The Product Rule. Marketers may sell, describe, and demonstrate approved products — the education curriculum, the Tech Pass tiers, the Software License Activation, and the free tier — using approved descriptions (§3). They may not invent features, promise results, or suggest any tier buys rank, credits, or Flow access.

The Opportunity Rule. Marketers may explain how the Wealth Share Model works, mechanically, using Company materials and nothing else (§4). They may never predict, project, imply, or illustrate what anyone is likely to earn, in words or in lifestyle imagery.

The CTA Rule — the Marketing Wall. Marketers never solicit regulated trading accounts, never recommend a Model Provider, strategy, leverage, or account size, never say how much to fund, and never earn anything from any trading or CTA variable. When a prospect asks about Model Following, margin, or any program placed under the CTA affiliate, the marketer's only permitted act is neutral routing to the Company-approved enrollment doorway (Appendix, Script C). The Wall is enforced in contract (below), in code (the Qualification Firewall blocks every trading and CTA variable at the qualification engine), and in supervision (§12).

Marketing Wall — contract-ready text. The following clause is incorporated into the Program Agreement, the Policies and Procedures, and field training:

Independent Marketers are authorized solely to promote Company-approved AI Trade Pros products, services, and Wealth Share Model materials. Unless separately approved in writing by the applicable regulated affiliate and properly registered or exempt as determined by counsel, an Independent Marketer shall not solicit any discretionary commodity trading account, recommend enrollment in any program operated by a registered commodity trading advisor, recommend any futures, margin, leverage, Model Provider, strategy, or account size, request or accept member trading funds, or receive compensation based upon advisory enrollment, performance contributions or advisory fees, account funding, account value, trading volume, or trading results. Any inquiry concerning a regulated trading program must be directed to the regulated advisor through the Company-approved enrollment channel without recommendation or suitability commentary by the Independent Marketer. Breach of this clause is a material breach of the Agreement.

3. What Marketers Sell and How to Describe It

The approved description. AI Trade Pros is a U.S. trading-education and software platform. The approved paragraph, which may be shortened but never embellished: "AI Trade Pros is an education and software platform. You open and keep your own account at your licensed U.S. exchange. Our software connects through an API key you create that can trade but can never withdraw. You learn with our curriculum, set your own limits, and can switch the software off at any moment. The Company never holds your money, never trades against you, and never tells you what to buy."

What the software does and does not do. It provides education, portfolio and risk tools, and — where enabled for the member's jurisdiction and tier — Model Following: the member chooses an independent Model Provider (a Master Trader or an AI Algo), sets exposure limits, and the software replicates that provider's trades into the member's own account within those limits, subject to the member's kill switch. Tech Pass tiers unlock software capability only. Marketers may state published prices (Contributor \$159, Pro \$249, Elite \$349 monthly plus \$90 activation; illustrative pending counsel) and must say the free tier genuinely trades. The software does not hold, pool, or transmit funds, act as counterparty, give individualized advice, charge per trade, generate signals of its own, or guarantee any outcome.

Margined spot vocabulary. The only permitted term for the U.S. instrument class is "margined spot" — the actual asset, bought and sold in the member's own exchange account, with the venue extending margin against the member's own collateral under the venue's rules. Marketers never say "futures," "perpetuals," "perps," or "contracts" about any U.S. feature, and never describe margin as live: U.S. automated margin is a venue capability for a later phase, on hold pending counsel sign-off. Phase One is unleveraged spot.

The Company gives no signals; members choose a Model Provider. This sentence is required, in substance, in every explanation of Model Following. Marketers may say that providers exist and that members choose; naming a provider as "the best," "safest," or "the one I use" is a model recommendation and breaches the Wall.

The performance contribution. It is an open pricing decision and is described, if at all, only as: "Some tiers may offer an optional performance contribution, invoiced monthly on your own net gains like usage-based software billing, never deducted from any balance, and never owed in a losing month." Marketers never call it a fee and never present it as evidence the software is profitable.

4. Opportunity Claims

The mechanical-explanation rule. The Wealth Share Model may be explained only as mechanics, in the Company's wording: a one-time 40% Fast Start on a personally referred member's initial Tech Pass purchase, one

hop, never recurring, never on trading; ten weekly Flows funded from program revenue after Fast Start, operating costs, and a disclosed 10% platform fee; qualification by counts of currently active members — "active" meaning verified use, never payment status — under the published qualification paths in the Marketers Disclosure; Performance Bands up to five credits per Flow and a one-generation, service-based Mentor Match; credits as bookkeeping units, not shares or equity; Company & Founder Positions disclosed and capped; no purchase required to participate.

What a marketer may never say or imply. No earnings claim, ever. Specifically prohibited in any wording that carries the same meaning: "replace your salary"; "quit your job"; "passive income"; "financial freedom"; "four referrals will pay your bills"; "anyone can make \$10,000 a month if they work"; "build 100 people and you will earn \$X"; that any rank, Flow, or income level is likely or typical; that a non-earner "did not work hard enough"; any dollar figure attached to a Flow, band, or position beyond the published Fast Start arithmetic; any worked example multiplying hypothetical recruits by hypothetical payouts; and any use of "residual," "recurring," "investment," "returns," "dividends," or "guaranteed."

Lifestyle content is an earnings claim. Luxury cars, private jets, large homes, luxury vacations, watches, cash, or commission checks shown in connection with AI Trade Pros communicate an expected financial result and are treated exactly as a spoken dollar claim. "I'm not saying you'll make this, but..." does not cure it.

The Income Disclosure Statement rule. None exists today. Until the Company has statistically reliable data on participant revenue, expenses, zero earners, losses, tenure, and distribution of compensation, no marketer may state or imply typical or average earnings in any form. Once an Income Disclosure Statement is published from real data, marketers use it exactly as approved — same figures, captions, and placement, no excerpting of favorable rows — wherever the opportunity is explained.

5. Performance and Trading Claims

Controlled regulatory content. Anything describing what trading, a Model Provider, or the software has produced or might produce is controlled content a marketer may not create, adapt, or republish. Unless the item is platform-provided creative carrying its required labeling with equal prominence, marketers never publish: return projections; "consistent income" or "target return" language; profit screenshots, account statements, leaderboards, Flow balance displays, or isolated winning trades; win rates, Sharpe ratios, drawdown figures, or backtests; "what \$10,000 becomes" illustrations; claims that any model or the software is "safe," "conservative," "low-risk," or "suitable for everyone"; or claims that CFTC or NFA registration means anything has been "approved." Back-office screens are confidential and never appear in public or semi-public content.

The internal modeling figure. The Company's internal model uses a 2.5% monthly / 30% annualized assumption. It never appears in any field material, deck, script, chat, or conversation; publishing it is a step-three violation under §13.

Regulatory status. Marketers state the Company's status only in the approved wording of the Regulatory Status Disclosure. Once the CTA affiliate is registered, the only permitted statement about it is the factual registration sentence its Compliance Officer approves, never expanded into "CFTC approved," "NFA approved," or "regulated means safe." Until then, marketers say nothing about it.

The hypothetical-results legend. Where any performance display is approved, it carries with equal prominence, in the same frame, substantially: "Hypothetical or past performance results have inherent limitations. No representation is made that any account will or is likely to achieve results similar to those shown. Simulated results do not reflect actual trading, liquidity, slippage, or the financial risk of real trading, and may not account for a

member's ability to withstand losses. Trading involves substantial risk of loss." The CTA Compliance Officer may require additional Interpretive Notice 9025 language; the marketer may not crop, shorten, or caption over the legend.

6. Material-Connection Disclosure

The required line. Every post, video, livestream, review, replicated page, group message, or spoken pitch recommending AI Trade Pros carries: **"Independent Marketer for AI Trade Pros. I may receive compensation from purchases made through my referral."** The shorter wording in the Marketers Disclosure ("I earn commissions and rewards if you join through my link") is acceptable only where a platform's character limit makes the full line impractical, placed as this section requires.

Placement. With the content, where the prospect sees it before acting: in the first lines of a caption, not after a "more" fold; spoken and on screen in video, not only in the description; at the top of a replicated page, not the footer; never in a hashtag string, an unrelated profile field, or a linked page. On a livestream it is repeated at reasonable intervals.

Testimonials. A marketer's own experience may be shared only if genuine and current, accompanied by the statements that results are not typical and that trading involves substantial risk of loss, and never with a performance figure, Flow figure, or back-office image.

7. Approved Materials and Version Control

Central approval. All material mentioning the Company, its products, or the Wealth Share Model is created or approved centrally. Marketers use only items in the Approved Materials Library, as issued. Marketer-created material is submitted through the back-office Material Review queue and may not be used until it carries an approval record.

The approval record. Every approved item carries five fields, visible in the Library and embedded in file metadata: version identifier; creator; reviewer (plus the CTA Compliance Officer for CTA-touching items); approval date; permitted channels of use. The Library archives every version with the substantiation file for each factual statement; withdrawn versions are flagged, not deleted.

Edits and reposts are new material. A repost that changes substance — a new caption, a crop that removes the disclosure or legend, a voice-over, a stitched reaction — needs its own approval. Sharing an approved item unchanged, disclosure intact, in a permitted channel, does not.

Replicated pages. Replicated subdomains and landing pages are built only from approved templates. The marketer populates name, photo, contact, and link fields and may not edit copy, add sections, embed third-party content, or alter the disclosure and risk blocks. The Compliance Lead may lock or take down any page without notice.

8. CTA-Touching Material — Separate Approval Track

Why it is separate. Once registered, the CTA affiliate is an NFA Member subject to NFA Compliance Rules 2-9 (supervision) and 2-29 (communications with the public and promotional material) and to Interpretive Notices 9025 (hypothetical performance), 9037 (websites, social media, and electronic communications), and 9039 (audio and video advertisements). NFA treats social posts, chat rooms, and group messages concerning commodity-interest accounts as promotional material, so the ordinary §7 process is not adequate.

What goes to the track. Any item that names the CTA affiliate, describes Model Following as an advisory service, refers to a Model Provider's trading, describes margined or leveraged activity, or discusses enrollment beyond the neutral routing language. It is routed to the CTA affiliate's Compliance Officer ([NAME]) and reviewed under the CTA Promo Review Procedures. Audio or video material that makes a specific trading recommendation or describes past or potential profits is filed with NFA at least ten days before first use under Interpretive Notice 9039, and no marketer uses it until the CTA Compliance Officer confirms approval in writing.

Who may use it. Ordinary marketers may use CTA-touching material only as issued, unchanged, in a permitted channel. Any marketer who wishes to go beyond neutral routing must first be reviewed by the CTA affiliate for Associated Person status, registered where required, trained under the CTA's supervisory procedures, and compensated only under a counsel-approved CTA arrangement. Until then the Wall applies in full.

9. Outreach Channels

Email. Commercial email goes only through the Company's email system or an approved vendor, with truthful headers and subject lines, the sender's identity and the Company's physical address, and an unsubscribe honored within ten business days under CAN-SPAM. Personal bulk email is prohibited.

Calling. Outbound calling is subject to the FTC Telemarketing Sales Rule and the National Do Not Call Registry. Marketers call only prospects with a documented inquiry or consent, after scrubbing against the national registry and the Company's suppression list, within permitted hours, with truthful caller identification.

Texting. Marketing texts require prior express written consent captured in the Company's consent ledger, with a working STOP mechanism, under the TCPA. Because state "mini-TCPA" and direct-marketing statutes can be stricter, any texting campaign runs only through a Company-approved system and vendor configured for the recipient's state. Personal mass texting is prohibited.

Entity-wide suppression. An opt-out, STOP, or do-not-call request received by any marketer is an opt-out from the entire Company, entered into the central suppression list the same day and honored by every marketer's tools. Contacting a suppressed person is a violation regardless of who received the original request.

Prohibited practices. No purchased "investment," "crypto," or "trader" leads. No scraping of platforms, directories, or group memberships. No spoofing of identity, number, or sender. No unapproved autodialers, robocalls, prerecorded messages, or AI voice agents. No mass unsolicited direct messaging.

10. Funds and Credentials

The rule. Marketers never receive, request, hold, forward, or transmit exchange passwords; API keys or secrets; seed phrases, private keys, or recovery codes; trading funds, stablecoins, or crypto of any kind; banking credentials; KYC documents; or member-specific trading, leverage, funding, or model instructions. Identity verification, API connection, and any CTA onboarding are completed by the member directly inside the Company's or the CTA affiliate's secured process.

Consequence. The Company's non-custody position depends on no one touching member funds or credentials; one marketer "helping" by holding a key converts a marketing channel into a custody and money-transmission exposure. Collecting member funds, credentials, API keys, seed phrases, or KYC documents is a termination offense at the first instance, with clawback where the Program Agreement permits and escalation under §13.

11. Certification and Training

Pre-activation certification. Before receiving a referral link, replicated page, or compensation eligibility, the marketer completes the certification course in the back office and passes a scenario test. The test presents real situations — a prospect asks which Model Provider to follow; a prospect asks how much to deposit; a member wants to post a screenshot; a leader wants to say "four referrals pays your Tech Pass" — and requires the marketer to classify each under the Product Rule, the Opportunity Rule, or the Marketing Wall and choose the compliant response. Passive acknowledgment is not certification ([PASS MARK]% pass mark, [N] attempts).

Annual recertification. Every marketer recertifies annually on the then-current Manual and on any material change (a new Plan Rules version, publication of the Income Disclosure Statement, activation of the CTA affiliate). A lapse suspends marketing privileges and Flow eligibility until completed, with Fast Start on sales made during the lapse held.

Curriculum. Ten modules: (1) approved product descriptions and prohibited product claims, including margined spot vocabulary and the margin hold; (2) Wealth Share mechanics and the earnings-claim prohibition under FTC Act §5 and the FTC MLM Guidance; (3) lifestyle and testimonial rules; (4) the Marketing Wall and the Associated Person solicitation boundary; (5) prohibited trading and performance claims and the hypothetical-results legend; (6) social media and the material-connection disclosure under the FTC Endorsement Guides; (7) CAN-SPAM, TSR/DNC, TCPA, and state texting procedures; (8) privacy, credential, and funds prohibitions; (9) complaints and escalation; (10) the enforcement ladder and the consequences of circumvention. Field leaders complete an additional leader module on webinar conduct, chat moderation, and supervisory duties.

12. Monitoring

What is monitored. On a rolling schedule and in response to reports: public social media (keyword and hashtag sweeps for Company, product, and Flow names and the banned-vocabulary list); every replicated page (automated diff against the approved template); recorded webinars and livestreams; Telegram, WhatsApp, Discord, and similar groups in which the Company is promoted, which marketers must register with the Compliance Lead when they create or administer them; and third-party sites attributable to the field. Every flagged item is logged to the compliance file with a disposition.

The High-Risk Promoter program. A marketer is designated High-Risk on any of: a prior §13 violation at step two or above; audience reach above [THRESHOLD]; running webinars or livestreams; administering a promotional group chat; any mention of Model Following, margin, or a Model Provider in monitored content; or a complaint alleging an earnings or performance claim. High-Risk Promoters are subject to recorded-webinar review (every event recorded through a Company-approved system and reviewed within [N] business days), heightened chat sampling, and field-leader certification — the leader module plus a live scenario interview with the Compliance Lead — before running any group event. Any High-Risk Promoter who solicits CTA accounts is referred to the CTA Compliance Officer for Associated Person review. The suspension protocol is immediate: on a credible report of a material violation, privileges are suspended and links disabled first, and review follows.

Field leaders supervise. A certified leader corrects a violation in their event or chat on the spot and reports it the same day; silence is itself a step-one offense.

13. Enforcement Ladder

Step one — correction and retraining. A minor first offense (missing disclosure, slightly off product description, unapproved but otherwise compliant repost): prompt removal or correction, written notice, and mandatory retraining

on the relevant module within [N] days.

Step two — suspension of privileges or commissions. A repeated non-material offense or failure to complete retraining: temporary suspension of marketing privileges, replicated page, referral link, and Flow eligibility for a stated period, with Fast Start held.

Step three — immediate suspension pending review. A material earnings claim, an unapproved trading-performance claim, publication of the internal modeling figure, or any CTA solicitation beyond neutral routing: immediate suspension of all privileges and compensation regardless of history, with a decision by the Compliance Lead within [N] business days.

Step four — termination, clawback, and escalation. Guaranteed returns or income; fraudulent testimonials; deliberate circumvention of approval, disclosure, or suppression controls; collection of member funds, credentials, API keys, seed phrases, or KYC documents; or repeated unregistered CTA solicitation: termination of the Program Agreement, clawback where the Agreement permits, forfeiture of unpaid Fast Start and Flow credits tied to the violation, and regulatory or legal escalation where the Compliance Committee and counsel determine it is warranted.

Appeals. Step-two and higher decisions may be appealed in writing to the Compliance Committee within [N] days; the suspension stays in force during the appeal.

14. Complaints and Escalation

Reporting. Anyone may report a suspected violation to compliance@aitradepros.com with a link, screenshot, or recording. Marketers must report violations they observe; retaliation against a reporter is a step-four offense.

Timelines. Every report is acknowledged within two business days. Reports alleging an earnings claim, performance claim, CTA solicitation, or funds or credential collection are triaged within one business day and, where credible, trigger the §12 suspension protocol the same day. Other reports are dispositioned within ten business days. The reporter receives a closing notice stating whether action was taken, without disciplinary detail.

CTA matters. Any report touching the CTA affiliate, a Model Provider's trading, or solicitation of a regulated account is copied the same day to the CTA Compliance Officer, who leads that part of the review under the CTA's procedures and keeps the CTA's own record. The Company does not resolve a CTA matter unilaterally.

Regulatory inquiries. Any regulator or exchange contact concerning a marketer goes immediately to the Compliance Lead and counsel; no marketer responds on the Company's behalf.

15. Permitted / Prohibited Matrix

Topic	An ordinary Independent Marketer MAY	An ordinary Independent Marketer MAY NOT
SaaS / LMS products	Describe approved features, published pricing, the free tier, and genuine educational and software functionality from the Approved Materials Library.	Invent features, promise results, describe margin as live, call the U.S. instrument "futures" or "perps," or claim a tier buys rank, credits, Flow access, or income.
Wealth Share Model	Explain approved mechanics — Fast Start, Flows, Performance Bands, Mentor Match, "active" as verified use — using Company materials; quote the Marketers Disclosure.	Predict likely income, guarantee Flow advancement, attach dollar figures to Flows, use lifestyle imagery, or state typical earnings before an approved Income Disclosure Statement exists.

Topic	An ordinary Independent Marketer MAY	An ordinary Independent Marketer MAY NOT
CTA program	Provide the approved neutral routing information to the Company-approved enrollment doorway (Script C).	Recommend enrollment, a Model Provider, strategy, leverage, account size, funding amount, or suitability, unless separately reviewed, registered, and supervised by the CTA affiliate.
Trading results	Use only platform-provided or CTA-approved performance material, unchanged, through approved channels, legend intact.	Publish screenshots, statements, leaderboards, profit claims, backtests, target returns, win rates, "safe/low-risk" claims, or the internal 2.5%/30% figure.
Regulatory status	Accurately state actual registration status using approved wording only.	Say "CFTC approved," "NFA approved," "government backed," or that registration means safety or endorsement.
Customer data	Collect ordinary lead and contact data through approved Company systems with documented consent.	Collect passwords, API keys or secrets, seed phrases, private keys, trading funds, KYC documents, banking credentials, or member-specific trading instructions.
Social media	Use approved templates with the material-connection disclosure placed with the content; share genuine experience with the not-typical and risk statements.	Use lifestyle imagery, hidden disclosures, back-office screens, unapproved CTA or trading content, or substantive edits without re-approval.
Outreach	Email, call, and text only through Company-approved systems, to consenting or scrubbed recipients, honoring the entity-wide suppression list.	Buy "investment leads," scrape contacts, spoof identity, run autodialers or robocalls, mass-DM, or ignore an opt-out received by anyone else.

16. Recordkeeping

The compliance file. For each marketer the Compliance Lead keeps a back-office compliance file containing certification and recertification records with test results; every material approval record and the archived item with its substantiation; monitoring results and dispositions; complaints and closing notices; notices, takedowns, suspensions, terminations, appeals, and remediation; consent and suppression records for any outreach; and High-Risk Promoter records.

CTA records. The CTA affiliate keeps separate records of CTA promotional material, NFA filings and approvals, Associated Person reviews, and its supervisory actions; the Company's file cross-references them without duplicating them.

Retention and audit. Records are retained not less than five years from creation or from the end of the marketer relationship, whichever is later, and longer where counsel directs or a matter is open; CTA records follow NFA retention requirements. Records stay readily accessible for the quarterly field-compliance audit, the annual policy review, and any regulatory request, under the Company's record-retention and privilege protocols. The Compliance Committee reports each quarterly audit to counsel and re-approves this Manual annually.

Appendix — Sample Scripts

Each script is approved material (version MCM-A-1.0) and may be used as written; changing its substance makes it new material under §7.

Script A — Product introduction. "AI Trade Pros is an education and software platform for people who want to learn to trade and use software in their own account. You open and keep your own account at your licensed U.S. exchange — we never hold your money. Our software connects through an API key you create that can place

trades but can never withdraw. There's a free tier that genuinely trades, and paid Tech Pass tiers that unlock more software capability. You set your own limits and you can switch it off any time. Trading involves substantial risk of loss, and you can lose everything you trade with. I'm an Independent Marketer for AI Trade Pros, and I may receive compensation from purchases made through my referral. Want me to send you the product page?"

Script B — Opportunity explanation. "There's also a referral program called the Wealth Share Model. I'll tell you how it works, not what it pays, because nobody can tell you that. If someone you personally refer buys a Tech Pass, you earn a one-time Fast Start of forty percent of their first purchase — once, never on renewals, never on anyone's trading. Then there are ten weekly Flows, a share of company profit after costs; you qualify by counts of members actually using the platform, under the paths published in the Marketers Disclosure. Credits are bookkeeping units, not shares. You don't have to buy anything to participate. Most marketers earn modest amounts and many earn nothing, so please don't join expecting income. Here's the Marketers Disclosure — read all of it before you decide."

Script C — CTA-neutral routing. "That's a question about the regulated trading program, and I'm not able to advise on it — I can't tell you whether it's right for you, which Model Provider to follow, how much to fund, or whether to use margin. The regulated advisor handles all of that directly. If you'd like to learn more, here is the Company's enrollment page, and the advisor's own disclosure document explains the program and its risks. Anything about the software or the education, I'm happy to walk you through."

Prepared for review by counsel. Not legal advice. Must be reviewed by qualified legal counsel before adoption.