

Responsible Marketing Policy

This Policy, which applies to UP Fintech Holding Limited, its subsidiaries, and consolidated affiliated entities (the “Company”), sets out our commitment to the responsible marketing of our products and services, and applies to all forms of commercial communications promulgated by our Company.

I. General Key-principles

The Company’s approach to marketing shall be consistent with the International Chamber of Commerce Marketing & Advertising Code, which includes the following key principles:

1. All marketing communication should be legal, decent, honest and truthful.
2. Marketing communications should not offend standards of decency currently prevailing in the country and culture concerned. They should not abuse consumers’ trust or exploit their lack of experience or knowledge.
3. Marketing communications should respect human dignity and not incite or condone any form of discrimination or anti-social behavior.
4. Marketing communications should not mislead the consumer with respect to the products or services.
5. Marketing communications should be clearly distinguishable and when appearing in a medium containing news or editorial content, where appropriate, labelled as such. They should not misrepresent their true commercial purpose.
6. The identity of the marketer should be apparent.
7. Marketing communications should not denigrate or ridicule competitors or their products or services, other firms, organizations or persons. Marketing communications should not make unjustifiable use of the name, logo or trademark of another firm or institution, and should not take undue advantage of the goodwill belonging to others.
8. Special care should be taken in marketing communications directed to or featuring

children or teenagers.

9. When collecting personal data from individuals, care should be taken to respect and protect their privacy by complying with relevant rules and regulations.
10. Whatever the nature of the activity, medium or technology, responsibility is shared by all parties concerned, commensurate with their respective role in the process and within the limits of their respective functions.

II. Regular Employee Training

Employees who are responsible for our advertising receive regular training. This particularly applies to individuals working in sales and marketing. Such seminars are either conducted locally in a classroom setting or as e-learning courses.

We ask new employees to participate in onboarding training on the topic of review and approval of promotional materials and other external communications.

III. Welcome Feedback from Clients

Client engagement and feedback is welcomed through our websites, social media platforms and consumer-specific phone lines and email accounts. Through these communication channels, we monitor direct product and service feedback, interact with consumers to address questions or concerns, maintain a database to track trends and provide performance reports to business unit leaders.