WPP Media US Inventory Quality & Brand Safety Policy

What does WPP Media stand for?

We believe that our clients should invest in digital advertising, which is efficiently delivered to the targeted demo, viewable by a human, served in an appropriate editorial environment, underpinned by independent industry certification and 3rd party verification, and respectful of user experience and privacy.

Introduction

This document describes the WPP Media approach and recommendations with a view to minimize the risk of clients' advertisements being placed next to content that is not **contextually brand safe and suitable** and foster **data protection and privacy** culture.

The approach is applied across all digital channels and formats.

Evolution

The digital ecosystem changes rapidly and the risks are ever evolving. To counter this, we are continually developing our approach and tools in order to identify and eliminate our client's exposure to new threats that emerge within the digital advertising ecosystem, including DOOH, CTV, Audio, Gaming, etc. Our Brand Safety approach will evolve over time to remain effective.

Definitions

Contextual Brand Safety and Suitability: The evaluation of ad placements & adjacencies in proximity to content defined as below the Brand Safety Floor, content that does not meet advertiser's risk tolerance (low, medium, or high) and content that is contextually unsuitable for the specific brand.

The IAB Tech Lab Content Taxonomy defines 11 categories of harmful content:

- Adult & Explicit Sexual Content
- Illegal Arms & Ammunition
- Crime & Harmful Acts to Individuals and Society; Human Rights Violations
- Death, Injury or Military Conflict
- Online Piracy
- Hate Speech and acts of aggression
- Obscenity & Profanity
- Illegal Drugs/Tobacco/e-Cigarettes/Vaping/alcohol
- Spam & Malware
- Terrorism
- Debated Sensitive Social Issues

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In their most extreme forms, no ads should ever appear adjacent to such content. Furthermore, it is recognized that based on how that content is presented, there may be cases where some, most or all clients would be comfortable with those adjacencies.
We adhere to the definitions and Risk Rankings set forth in the IAB Tech Lab Content Taxonomy. See here for the complete updated document TAXONOMY.

BRAND SAFETY FLOOR [NEVER SUITABLE]	HIGH RISK SUITABLE	MEDIUM RISK SUITABLE	LOW RISK SUITABLE	CONTEXTUALLY RELEVANT
Graphic, excessive use or promotion and advocacy of harmful content	Glamorization/ gratuitous depiction of harmful content	Dramatic depiction and topical news coverage of harmful content	Educational, informative, scientific or documentary treatment of harmful content	Endemic Target Relevant Related Interests Local Interest Professional Interest

Brand Suitability is the content that meets advertiser's risk tolerance (low, medium, or high) and is contextually relevant for the specific brand, or conversely content which does not align with the brand values of a client. Brand values will differ from brand to brand e.g. environments inappropriate or illegal for an alcohol or gambling brand may be acceptable to a confectionary brand.

Insertion order (IO): contract used when buying advertising placements detailing governing terms, campaign parameters, pricing, and counting and verification methodology.

Exclusion List: pre-verified inappropriate schedule of domains and apps. The WPP Media Mandatory Exclusion List is implemented by default.

Inclusion List: pre-verified appropriate schedule of domains and apps

Our Commitment to Clients

Our agencies engage with clients to set specific risk tolerance levels on a scale of low, moderate or high. We recommend the media buying methods, baseline controls and verification technology designed to accommodate different brand sensitivities.

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Our WPP Media buying units or media agency then can implement measures that reflect each client's agreed specific brand safety terms.

Best Practice: Inventory Quality

1. ***Consult with clients on their Risk Tolerance to inform tactical planning***
2. Apply an MRC accredited 3rd. party verification vendor to monitor, filter and block invalid inventory on all programmatic, reserve and social campaigns. WPP Media preferred partners are Double Verify, IAS
3. Apply proprietary WPP Media or client custom brand Inclusion Lists and WPP Media Mandatory Exclusion List, WPP Media Optional Exclusion List and Better Ads Experience Report
4. Avoid non-transparent ad networks, audience extension, and aggregator PMP's
5. Perform a careful inventory analysis for all buys post-campaign from all methods of buying
6. Trade/optimize to human viewable inventory
7. Assess the data collection practices and contract terms for all data partners

Best Practice: Programmatic Self-Service

1. Apply WPP Media Mandatory Exclusion List, as well as relevant client exclusion lists, to all programmatic buys.
2. Employ WPP Media domain and app Inclusion List across all viable programmatic inventory strategies.
3. Where inclusions or exclusion lists aren't feasible (CTV, Programmatic Guaranteed, etc.) make sure that publishers are aware of any and all relevant brand safety and suitability concerns that they can exclude on their end
4. Cross-reference with WPP Media Mandatory and Optional Exclusion Lists, Better Ads Experience blocklist and GDN custom Exclusion List
5. Employ a WPP Media Preferred verification partner (DV, IAS) to Pre-bid filter for viewability, fraud & contextual brand safety, monitor all post-bid activity and block non-brand safe placements
6. Block unauthorized Resellers based on Ads.txtapp-ads.txt status and where available sellers.json Authorized Inventory
7. Participate in DSP Fraud Refund Programs
8. Track inventory quality against measurable KPI:
   a. CPA, vCPM, Cost Per Point/Brand Lift (CPPL), Total Quality CPM (qCPM), etc.
9. Pursue VAST 4.1 compliant/Open Measurement enabled sources

10. Consolidate on WPP Media Preferred Exchanges and DSP's
11. Perform a careful inventory analysis for all buys mid- and post-campaign to ensure delivery against inclusion/exclusion list, as well as performance (viewability, rates, etc.).

Methodology

WPP Media may manage ad misalignment through a combination of the following 5 practices:

1. *Trading* – wherever possible buying inventory directly from high quality and trusted media owners
2. *Contractual protection* – agreeing contractual trading terms that protect the interests of our clients
3. *Technology* – using independent verification technology to monitor and inform our strategies and to support client requirements through, pre and post bid blocking, as mandated by the client
4. *Operational procedure* – having defined processes to monitor and vet media
5. *Industry accreditation* – gaining and supporting accreditations from local industry bodies, where available

The principles outlined in this document apply across digital display, video and mobile media.

Investment

WPP Media recommends buying digital media inventory where the domain is visible via 1st or 3rd party reporting to minimize the risk of our clients' ads being misplaced in inappropriate or fraudulent environments.

There are several buying models which are recommended by WPP Media and its agencies, depending on the client's brand safety risk tolerance:

<u>Publisher Direct Buys</u>

To provide the highest level of the brand safety, ad fraud protection and viewable inventory, for all our clients, WPP Media recommends media to be bought directly from publishers. Through buying media directly from trusted partners, it is possible to increase the transparency and integrity of media bought.

WPP Media will also manage campaign level media procurement to align with the brand values specified by the client, thus providing a further layer of brand safety protection.

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<u>Publisher Direct Programmatic Buys</u>

WPP Media recommends direct programmatic buys with full domain transparency and content verification enabled. WPP Media also recommends an inclusion list approach which can be tailored to the product or brand advertised. All mandatory exclusion lists and client exclusion should still be applied, and WPP Media also recommends an inclusion list approach which can be tailored to the product or brand advertised. Depending on the nature of the publisher and/or media channel, the level of client comfort and publisher side controls in place buying teams may forgo the usage of pre-bid brand safety, fraud or viewability tools as well as inclusion lists, but inventory quality metrics should be closely monitored whenever possible.

<u>Programmatic Open-Exchange Buys</u>

WPP Media has made considerable efforts to provide our buying teams with a suite of tools to mitigate the risks involved with buying across the open exchange. Where strategic or tactical objectives call for open exchange buying, WPP Media recommends implementation of strict inclusion lists which have been pre-scrubbed against the WPP Media Exclusion Lists. Additionally, WPP Media will recommend the use of independent verification technology to monitor, filter, block, or target ads. Where approved by the client, WPP Media will implement pre-bid segments to optimize for higher viewability and contextually safe editorial environments and mitigate against ad fraud. Lastly, programmatic teams should utilize only WPP Media approved and preferred exchanges and where DSP technology allows focus investment through direct supply paths that lead to premium publishers.

<u>Network, Aggregator and Third-Party Managed Buys</u>
WPP Media may buy from networks, aggregators or managed service providers. In such instances, we will apply WPP Media Mandatory Exclusion List, strongly recommend the Optional Exclusion List, and bespoke inclusion lists chosen by our buying units as appropriate for the client and campaign. WPP Media will recommend the use of independent verification technology to block ads.

Contractual Protection
WPP Media seeks to agree on legal assurances with our technology and publisher partners to minimize the risk of advertising being placed in non-brand safe contextual environments. In most cases WPP Media sets out publisher terms and conditions for the United States formed by the 4As/IAB Standard Terms and Conditions for Internet Advertising for Media Buys One Year or Less (Ver. 3.0) as a starting point or other bespoke terms which provide increased protection to our clients.

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Technology

WPP Media agencies use MRC accredited, independent verification technology to minimize the risk of ads appearing next to unsafe content.

Verification technology is used to develop, maintain, and implement the WPP Media Mandatory and Optional Exclusion Lists, WPP Media Inclusion List, and client-bespoke inclusion lists, where relevant to the buying model and as agreed with the client. We also contract with independent verification providers for custom applications like You Tube inclusion lists, Facebook publisher allow lists and Facebook & You Tube Select exclusions.

Independent verification technology is implemented across campaigns (subject to client approval) by WPP Media in desktop, mobile web, in-app, CTV and Social media platforms. Third party verification tagging, and platform integrations make it possible for WPP Media to monitor inventory for inappropriate content, fraudulent traffic and viewability levels.

WPP Media can use such technologies to monitor, filter, block and/or target, as agreed with the client. We can support the implementation of and optimization towards any leading verification technology specified by the client and available in the US. WPP Media always recommends MRC accredited independent verification technology.

Operational Procedure

WPP Media applies the WPP Media **Mandatory Exclusion List** to all buys managed through our Prisma campaign management system. The list is curated by using input from independent syndicated data providers, law enforcement sources and clients when they notify us of domains that infringe their copyright. In addition to blocking piracy & counterfeit goods websites and apps, this list includes US/EU sanctioned entities. WPP Media also maintains an Optional Exclusion List to extend Brand Protection to additional categories of unsuitable content.

- We can implement general or bespoke client inclusion lists.
- WPP Media Ad Ops teams can implement independent verification tags. WPP Media can work with any independent verification technology, required by the client, for the purposes of monitoring and/or pre- or post-bid blocking.
- Agency teams regularly track campaigns to ensure that the client's requirements are satisfied. They can deliver campaign monitoring and post-campaign reports.

Takedown Policy

WPP Media's standard takedown policy for ad misalignment is as follows:

Within 24 hours of notice from Agency, Media Company shall make best commercial efforts to remove Advertiser Ads placed adjacent to editorial promoting violence, sex, profanity,

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racism, sexism, religion, gambling, pornography, abortion, or any other highly explosive subject matter; provided however that (i) such content shall not be in violation of this subsection where provided in an educational and/or informational context and (ii) UGC shall not be in violation of the subsection so long as Media Company makes reasonable commercial efforts to ensure Approved UGC complies with this subsection and makes best commercial efforts to remove any Advertiser Ads adjacent to non-compliant Approved UGC not more than 24 hours following notice thereof.

Compliance with and Support of Industry Accreditation & Regulation

WPP Media is an active contributor to industry regulation initiatives and is committed to helping create and uphold industry standards. We support the Media Rating Council (MRC), Trustworthy Accountability Group (TAG), the Brand Safety Institute (BSI), Partnership for Responsible Addressable Media, and IAB TechLab. WPP Media holds TAG Certifications for Brand Safety, Anti-Fraud, and Anti-Piracy. We maintain Board level or Steering Committee memberships in TAG, Tech Lab, BSI and the MRC. We are staffed with a certified Brand Safety Officer and a TAG Compliance Officer.

Note: While WPP Media works to continuously meet the goals and objectives of this Brand Safety Policy, there are circumstances in which limitations imposed by publishers or clients, as well as technological limitations and other factors, will limit these efforts and our ability to apply best practices. This Brand Safety Policy is generalized in nature and is in addition to and not intended to limit any more specific contractual obligations that have been agreed by and between WPP Media and any publisher.