

# WPP Media UK Brand Safety Policy

## What does WPP Media stand for?

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

WPP Media UK businesses covered by this policy: all WPP Media UK central operations, Nexus Media Solutions (including Nexus Creative Solutions, Integrated Display, Integrated Video, Integrated Audio & Advanced TV), Goat, EssenceMediaCom UK (EssenceMediaCom London and EssenceMediaCom North), Mindshare UK, Wavemaker UK, T&P UK. For the avoidance of doubt, all WPP Media UK references will be construed as a reference to all aforementioned businesses, unless stated otherwise.

## Introduction

This document describes the WPP Media approach and recommendations with a view to:

- minimise the risk of clients' advertisements being placed next to content that is not **contextually brand safe and suitable**
- minimise the risk of clients paying for **fraudulent traffic or activity**
- define and optimise against **viewability**, including bespoke WPP Media Viewability Standard
- ensure industry-compliant positive **user experience**
- foster **data protection and privacy** culture

The approach is applied across digital channels, video channels and digital broadcasting and their related formats.

## Evolution

It is impossible to categorically prevent ads appearing in environments that are not "brand safe" or "suitable". 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. Our Brand Safety approach will evolve over time to remain effective.

## Definitions

**Contextual Brand Safety and Suitability:** avoidance of misplacement of ads adjacent to content defined as 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<sup>1</sup> defines 11 sensitive topics of content:

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

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	<ul style="list-style-type: none"> <li>• Endemic</li> <li>• Target</li> <li>• Relevant</li> <li>• Related</li> <li>• Interests</li> <li>• Local Interest</li> <li>• Professional</li> <li>• Interest</li> </ul>

In their most extreme forms, no ads should ever appear adjacent to such content (in the case of instream and broadcast video this includes appearing prior to and during programming). Furthermore, it is recognised 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 the footer for the complete updated document.

Brand suitability is the content that meets advertiser's risk tolerance (low, medium or high) and is contextually relevant for the specific brand or content which aligns with the brand values of a particular client. Brand values will differ from brand to brand e.g. environments appropriate for an alcohol or gambling brand will be different to a confectionary brand.

<sup>1</sup> <https://iabtechlab.com/standards/content-taxonomy/>

**Fraudulent Traffic and Activity:** aka Invalid Traffic, as defined by the MRC Invalid Traffic Detection Guidelines<sup>2</sup>, is defined as traffic or associated media activity (metrics associated to ad and content measurement including audience, impressions and derivative metrics such as viewability, clicks and engagement as well as outcomes) that does not meet certain quality or completeness criteria, or otherwise does not represent legitimate traffic that should be included in measurement counts. Among the reasons why traffic may be deemed invalid is if it is a result of non-human traffic (spiders, bots, etc.), or activity designed to produce IVT.

**Viewability:** measurement of an ad unit impression to evaluate whether it appears in view to a web or app user, accounting for ad placement, screen size, screen resolution, bounce rate and multiple browser tabs or multiple application windows open on any screen, to indicate the fair opportunity for an ad to be seen. A served ad impression is classified as a viewable impression based on the industry agreed criteria of percent of ad pixels and time the ad is within the viewable space of the browser or app.

### ***Global WPP Media Viewability Standard***

- Display: 100% of pixels in view for at least one continuous second
- Native, out-stream and social infeed video: 100% of pixels in view; 50 % of video played; with or without the sound; auto-played or user-initiated
- Pre-roll and mid-roll video: 100% of pixels in view; 50% of video played; with sound on; user-initiated

### ***Media Rating Council Viewability Standard***

- Display: 50% of pixels in view for at least one second
- Video: 50% of pixels in view for at least 2 seconds

**Independent Verification Technology:** a service that offers technology to ensure that ads appear only on intended sites, apps or programming and reach the targeted audience. There are three types of services:

- used to detect inappropriate content on a web page, before or after an ad appears, and allows an advertiser to block ads from serving on pages pre- or post-bid where content is deemed to be inappropriate or target ads to serve on pages where content is deemed appropriate.
- used to verify whether a served impression is a viewable impression by measuring the percent of ad pixels within the viewable space and the length of time the ad is in the viewable space of the browser or app and identifying whether that impression was served to a human.
- used to detect fraudulent traffic or activity before or after an ad appears, and allows the advertiser to block ads from serving on pages pre- or post-

<sup>2</sup> <https://www.mediaratingcouncil.org/sites/default/files/Standards/IVT Addendum Update 062520.pdf>

bid where some type of fraudulent traffic is present or target ads to serve on pages where fraudulent traffic is deemed to be absent.

**Insertion Order (IO):** contract used when buying advertising placements

**Exclusion List:** inappropriate schedule of domains and apps

**Inclusion List:** appropriate schedule of domains and apps

## Our Commitment to Clients

It is incumbent on the appointed media agency to support the client to specify their risk tolerance levels: low, moderate or high. Depending on their risk tolerance levels, WPP Media UK and its agencies will recommend the media buying methods, baseline controls and verification technology designed to accommodate different brand sensitivities. It is the responsibility of the client's chosen WPP Media UK buying unit or media agency to implement measures that reflect the brand safety terms specified by the client.

## Methodology

WPP Media manages contextual brand safety, ad fraud and viewability 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, manually check and vet media to ensure it meets WPP Media UK's brand safety standards.
5. *Industry accreditation* – gaining and supporting accreditations from industry bodies.

WPP Media UK makes concerted efforts in all 5 of these areas to minimise the risk of contextual ad misplacement and fraudulent activity, and to secure viewable inventory for our clients. The principles outlined in this document are universal and apply across all digital channels and formats.

### 1. Trading

WPP Media buy digital media inventory where the domain is visible to minimise the risk of our clients' ads being misplaced in inappropriate or fraudulent environments. WPP Media UK media agencies will only make exceptions if agreed with the client. Moreover, to provide the highest level of the brand safety, ad fraud protection and viewable inventory, for all our clients, WPP Media UK, endeavours

to buy media directly from publishers. Through buying media directly from trusted partners, it's possible to increase the transparency and integrity of media bought.

There are a number of buying models used by WPP Media UK and its agencies. It is necessary to implement brand safety procedures in different ways for each buying model:

#### Direct Programmatic Buys

Digital display, mobile or video media bought directly and programmatically from publishers is managed by the WPP Media UK Media team. The WPP Media UK Media team employ a proprietary evaluation methodology, the WPP Media Integrity Score, to identify which media is the best quality and value to procure on behalf of our buying units and clients. The Integrity Score is determined based on contextual brand safety, ad fraud rates and levels of viewability against the MRC and WPP Media viewability standards. In addition, 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. WPP Media UK will do this through using bespoke inclusion lists approved by the client.

Where media is bought directly from publishers, domains are vetted by the WPP Media UK Media team. Custom site lists are curated for certain products and in order to give our clients the publisher transparency they require, we will ask the media owner to place the tags for these products directly onto their pages. Full domain transparency must be given and content verification tracking must be allowed by the publisher. WPP Media UK reserves the right to change the mix of inventory we buy if Brand Safety standards are not met.

#### Exchange Buys

Where it is necessary for WPP Media to buy from exchanges, when agreed with the client, inclusion lists (WPP Media or a custom-client) will be applied, and at network-level WPP Media Mandatory Exclusion List is implemented. Clients can choose to use WPP Media Inclusion List which is vetted for quality (See point 4 – Operational Procedure). Clients may also choose to implement the WPP Media Optional Exclusion List. WPP Media will recommend the use of independent verification technology to mitigate risk. Where available and approved by the client, WPP Media will implement pre-bid segments to optimise for higher viewability and contextually safe and suitable editorial environments and mitigate against ad fraud. See the Operational and Technology Procedure sections (section 3 and 4 below) for further details.

For in-app buys, Nexus Media Solutions UK implements third-party verification pre-bid segments to ensure delivery in-app is brand safe and suitable.

## IO Buys from Networks, Aggregators and Third-Party Managed Services

WPP Media UK may buy from networks, aggregators or managed service providers. In such instances, we will require that the WPP Media UK best practice is adhered to through contractual agreements with the vendor (see section 2 below). WPP Media UK reserve the right to change the inventory supply mix, through the use of the WPP Media Mandatory Exclusion List, and bespoke inclusion lists chosen by our buying units as appropriate for the client and campaign. WPP Media UK will recommend the use of independent verification technology to mitigate the risk.

## **2. Contractual Protection**

### Publisher Terms and Conditions

To minimise the risk of advertising being placed in non-brand safe or unsuitable contextual environments, WPP Media UK specifies the following in its WPP Media UK Publisher Terms and Conditions):

*Ad delivery complies with any editorial adjacencies guidelines (and any other restrictions) stated on the IO.*

*No Ad is placed or attempted to be placed adjacent to content: (a) which is critical or derogatory of the relevant Advertiser or its products or services; or (b) falls below the industry agreed brand safety floor by containing and/or relating to adult and explicit sexual content, arms and ammunition, crime and harmful acts to individuals and society, human rights violations, death, injury or military conflict, online piracy, hate speech and acts of aggression, obscenity and profanity (including language, gestures and explicitly gory, graphic or repulsive content intended to shock and disgust), illegal drugs, tobacco, e-cigarettes, vaping or alcohol, spam or harmful content, terrorism or debated sensitive social issues and fake news or disinformation; provided, however, that content shall not be in violation of this subsection where provided in an educational and/or informational context.*

*Publisher shall not display or permit the display on any page where the Ads or other Deliverable(s) appear or otherwise in any manner associate the Advertiser or any content with any Site(s), person or entity that is in the business of copying, distributing, or publishing, or facilitating or enabling the copying, distribution or publication of material without authorisation from the applicable copyright holders, including but not limited to peer-to-peer sharing sites and sites containing pirated content. Without limiting the generality of the foregoing, in no event may the Ads or other Deliverable(s) be displayed or otherwise associated with any of the Site(s) listed here:*

<https://www.wppmedia.com/pages/terms-of-use>

To minimise the risk of advertising being subject to fraudulent traffic, WPP Media UK stipulates the following:

*Publisher will use all commercially reasonable technology and methodologies to prevent Fraudulent Traffic and detect and report Fraudulent Traffic should it occur. Agency shall not be obliged to pay any fees, costs or charges for Fraudulent Traffic where such Fraudulent Traffic is identified by technologies and methodologies recognized in the UK as suitable for identifying Fraudulent Traffic (or agreed between the parties) and deployed by Agency and/or Publisher.*

*Publisher does not knowingly include in the Site(s) any "virus" or other destructive programming or device that could impair or injure any data, computer system or software and takes reasonable steps to identify and mitigate against the same.*

### Goat Terms and Conditions

Where sites or blog sites are owned or controlled by an influencer, to minimise the risk of advertising in brand unsafe and unsuitable environments, Goat's Terms and Conditions stipulate the following:

*to the extent within Influencer's control, no Content is placed or attempted to be placed adjacent to editorial containing and/or relating to violence, sex, profanity, racism, sexism, religion, gambling, pornography, abortion, hate speech, extreme political views and fake news or any other highly explosive subject matter; provided, however, that sexual content shall not be in violation of this subsection where provided in an educational and/or informational context; and*

*Influencer shall not display or permit the display of Content on any Site, or otherwise in any manner associate the Advertiser or Content with any website, person or entity (or content related thereto), that is in the business of copying, distributing, or publishing, or facilitating or enabling the copying, distribution or publication of material without authorisation from the applicable copyright holders, including but not limited to peer-to-peer sharing sites and sites containing pirated content.*

Goat's Terms and Conditions also define fraudulent traffic in the influencer space and oblige the influencer not to procure it:

*Influencer will not procure Fraudulent Traffic to social media sites, blogs or digital properties on which Content will be delivered.*

### Takedown Policy

In the event an advertiser deems the content their ad is displayed against to be inappropriate, we operate a takedown policy to remove delivery across such content within 3 hours of communication. Where external parties are in breach, they are liable to pay compensation to WPP Media as per the WPP Media UK publisher terms and conditions:

*In the event of a breach by Publisher of the above clauses, Agency shall, without*



*limiting any other available remedies, be entitled to the following remedies:*

- *Ads that run in breach and Ads which are blocked from running by Agency pursuant to the above clauses shall be non-billable; and*
- *After Agency notifies Publisher that specific Ads are in breach, Publisher will use all reasonable efforts to correct such breach as soon as possible, and in any event Publisher shall ensure that such breach is corrected within a maximum of 3 hours of notification by Agency. Without prejudice to Agency's other rights and remedies, in the event that such breach has occurred in more than 10,000 impressions in any 24-hour period, 10% of the entire value of the then-active IO between Publisher and Agency shall be non-billable.*

For Direct Buys, where necessary, WPP Media will intervene directly with publishers to remove any activity and impose sanctions for any breach of contractual terms.

For Network Buys and Third-Party campaigns, our Commercial team will handle the communication with the relevant party about the removal of the offending content.

Goat's takedown window is 24 hours.

### **3. Technology**

WPP Media UK's buying unit or agencies use independent verification technology to:

- minimise the risk of ads appearing next to unsafe and unsuitable content
- minimise the risk of paying for fraudulent traffic
- optimise for higher viewability

Verification technology is used to inform WPP Media Mandatory Exclusion List, WPP Media Inclusion List, WPP Media Optional Exclusion List, WPP Media UK Fraud Database, and client-bespoke inclusion lists, where relevant to the buying model and as agreed with the client.

Independent verification technology is implemented across campaigns (subject to client approval) by WPP Media UK. Third party verification tagging makes it possible for WPP Media UK to monitor inventory for inappropriate content, fraudulent traffic and viewability levels.

WPP Media UK's buying units or agencies reserve the right to request that the publisher exclude unsuitable domains. WPP Media UK can use such technologies to block or to target or to monitor, as agreed with the client. We can support the implementation of and optimisation towards any verification technology specified



by the client available in the UK; where available.

Furthermore, where the publisher is under contract with a technology partner, infringement is flagged with that technology partner, so they can pursue offending sellers to tackle the problem at its root.

The WPP Media UK Media team, which is dedicated to procuring the best quality media supply, monitor all new publishers or website domains against brand safety metrics, provided by third party verification technologies, as part of weekly inventory management routines.

WPP Media UK always recommends industry-certified and independently audited independent verification technology.

#### **4. Operational Procedure**

When WPP Media UK clients choose direct buying model, WPP Media UK will deploy procedures as described in the Trading section (Point 1):

- Using a multi-step process to vet any media partner before engaging in a direct trading relationship.
- Deploying WPP Media UK Publisher Integrity Score which takes into consideration fraudulent activity, viewability, contextual brand safety levels and out-of-geo delivery linked to a publisher. The Integrity Score is part of the multi-step media vetting process.

The same process is applied on an inclusion list used by Nexus Media Solutions UK and WPP Media Programmatic buying teams.

The operational procedures listed below are applied regardless the buying method.

##### Contextual brand safety

- WPP Media UK applies the WPP Media Mandatory Exclusion List<sup>3</sup> by default. The list is curated with several global data partners and independent technology providers.
- The WPP Media Mandatory Exclusion List includes websites and apps engaging in IP infringement and EU/US sanctioned entities.
- We are able to implement general or bespoke client inclusion lists, where available.
- WPP Media UK Ad Ops team is able to implement independent verification tags and track campaigns. WPP Media UK can work with any independent verification technology, required by the client, for the purposes of

<sup>3</sup> <https://www.wppmedia.com/pages/terms-of-use>

- monitoring and/or pre- or post-bid blocking where available.
- Agency teams regularly track campaigns to ensure that the client's requirements are satisfied. They are able to deliver campaign monitoring and post-campaign reports.
- WPP Media UK Brand Safety policy is inserted in all IOs.

Nexus Media Solutions UK uses third-party verification tagging across display campaigns.

### Fraudulent traffic and activity

#### Supply:

- Prioritise direct publisher buys, require full domain transparency and content verification tracking
- For all direct buys, pre-vet all sites using internal process before approval
- For all buys, require application of WPP Media Mandatory Exclusion List
- Ensure all parties (SSP, CV) adhere to industry standards/certification where established
- Constant review of content verification fraud reporting for performance and quality metric suspicious results, pause all suspicious sites until review
- Buy only from Apps/Ads.txt authorised resellers
- Encourage and support implementation of sellers.json and Supplychainobject
- Nexus Media Solutions Advanced TV only buys supply on a direct basis

#### Delivery:

- Support implementation of all and recommend most rigorous and trusted fraud detection technology
- Advise on pre-bid content verification benefits
- Ensure all parties (DSP, AdServer, CV) adhere to industry standards/certification where established
- Track inventory quality against measurable spoof-proof KPI:
  - CPA, vCPM, Cost Per Point/Brand Lift (CPPL), Total Quality CPM (qCPM), etc.

#### Control:

- Constant review of content verification fraud reporting for performance and quality
- Use of best in industry CV technology for digital, video, mobile with a demonstrated capability to detect all types of fraud.

#### Viewability:

- WPP Media UK can implement campaign viewability measurement against different viewability standards: The Media Rating Council standard, Global WPP Media Standard and bespoke client requirements, as agreed with the client, and as made available by independent verification technology.
- WPP Media UK will optimise for higher viewability by moving to better-performing ad formats.

#### Goat's Operational Procedure

The Goat team uses the following methods to minimise the risks in the influencer space:

- Goat process ensures that clients are in full control. Via a real-time dashboard, the client will:
  - Have full visibility of the briefing document shared with influencers including all content rights agreements
  - Sign off influencers before any are contracted
  - Have approval of all content prior to going live
  - Access a reporting dashboard to see results in real time
- Goat have developed a shortlist of rigorously assessed and approved influencer Technology partners. This access to individual influencer data allows the Goat Team to spot abnormal spikes in engagement rates or follower numbers over time, as well as to understand more about the audience profiles in more general terms. The contractual agreements with these partners ensure that data is updated and reviewed regularly, and that they regularly check their own inventory of influencers for unusual behaviour.
- Goat Team manually review the posts of every influencer they recommend, looking for signs of fraudulent activity and that all influencer content would align with brand safety measure specified above.

### **5. Compliance with and Support of Industry Accreditation & Regulation**

WPP Media is an active contributor to industry regulation initiatives and works closely with the IAB UK Trustworthy Accountability Group (TAG). WPP Media UK is committed to following the TAG Brand Safety Certified Guidelines. WPP Media UK and its agencies hold the TAG Brand Safety certification (under the businesses previous name, *GroupM*) and undergo the annual audit process to review our policy and processes. WPP Media UK supports and encourages our partners to engage with/ or get certified to the latest version of the IAB Gold Standard<sup>4</sup>.

---

<sup>4</sup> <https://www.iabuk.com/goldstandard>

WPP Media UK also requires publishers to comply with industry-agreed standards such as TAG, as stated in the WPP Media UK Publisher Terms and Conditions:

*Publisher will endeavour to apply and uphold industry agreed digital advertising standards recognised in the UK.*

Further to this, WPP Media UK and its buying units also work with the City of London Police to exclude websites listed as copyright infringing by The Police Intellectual Property Crime Unit (PIPCU)<sup>5</sup>. We also work with World Intellectual Property Organisation.

## User Experience

WPP Media adheres to the recommendations of the Coalition for Better Ads<sup>6</sup> by not recommending any of the 15 'bad experience' mobile and desktop formats, short video formats<sup>7</sup> and in-app formats. WPP Media actively monitors for ads falling below standard and will work with supply sources to optimise away from these formats. We also support broad industry adoption of IAB LEAN principles<sup>8</sup>.

## Responsible Investment Framework

Brand Safety is part of WPP Media's Responsible Investment Framework, which is an investment framework aimed at delivering our vision of making advertising work better for people. Alongside Brand Safety, our Responsible Investment Framework has four additional pillars.

### Diversity, Equity and Inclusion

WPP Media UK believes that the brand safety practices should not negatively affect publications reaching diverse communities by excluding specific keywords or domains based on the group they are targeting. We work with our clients to prevent this from happening. WPP Media UK and Nexus Media Solutions UK inclusion lists include domains and apps, vetted for quality, which target diverse communities.

### Sustainability

In 2021, WPP announced a new commitment to reach net-zero carbon emissions in its operations by 2025, and across its entire supply chain by 2030. Media placements have a carbon footprint and reducing a campaign's carbon emissions is critical in creating a more sustainable ecosystem, advertising and otherwise. WPP Media's ambition is to assess and reduce media-related emissions through its footprint analysis and offset-approach tool.

---

<sup>5</sup> <https://www.cityoflondon.police.uk/police-forces/city-of-london-police/areas/city-of-london/about-us/about-us/pipcu/>

<sup>6</sup> <https://www.betterads.org/>

<sup>7</sup> <https://www.betterads.org/standards/>

<sup>8</sup> <https://iabtechlab.com/standards/ad-blocking/lean/>

### Responsible Journalism

WPP Media UK is committed to support quality journalism. We have direct relationships with premium publishers in the UK, and are actively working with our clients to add these to the plans, and to remove keywords that would overblock quality news content. WPP Media Inclusion List includes many premium publishers.

### Data Ethics

WPP Media UK is committed to complying with applicable data protection and privacy legislation, including the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

Our Data Protection Officer is based in London.

During the execution of advertising campaigns, WPP Media UK may use tags for the purposes of setting cookies (and other similar technologies) on devices. These tags will be served alongside advertising and we may also permit our supply partners to serve tags in this way but only to the extent agreed within the WPP Media UK client and publisher contracts.

Cookies may be used to track ad interaction data (ads served, viewed, clicked), enhanced interaction data (nature of content in relation to demographic or behavioural targeting filters) and attribution data (interactions leading to conversion/purchase). Tags may also be used to collect content data based on the referral URL to classify the content type and/or verify the appropriateness of site content using third party verification products.

The data collected is used for campaign reporting, interest categorisation, attribution analysis and content verification.

We are committed to user transparency and choice and are working with industry-developed solutions such as IAB Europe Transparency and Consent Framework and EDAA AdChoices icon.

Any new tools built internally must complete a checklist of steps to ensure all data is used and protected properly.

We are also continuously assessing our supply chain's privacy and data protection practices using our WPP Media Privacy & IT Security Self-Assessment. We require that new suppliers sign our WPP Media Data Code of Conduct to demonstrate a commitment to responsible collection, management, use, and protection of data, or abide by their own equivalent practices.

We are continuously assessing and improving our data protection practices as part of our privacy by design culture.

Our Global Privacy notice can be found here:

<https://www.wppmedia.com/pages/privacy-policy>