

## WPP Media Global Quality & 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.

### 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.

WPP Media teams may develop local brand safety recommendations which take into account local industry best practice.

### 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

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

- Debated Sensitive Social Issues
- Hate Speech and acts of aggression
- Illegal Drugs, Tobacco, e-Cigarettes, Vaping, Alcohol
- Obscenity & 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 appear prior to and during programming). 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 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.

**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

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

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 and environments and generate valid impressions. 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-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

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## 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 and its agencies will recommend the media buying methods, baseline controls and verification technology designed to accommodate different brand sensitivities.

Our local WPP Media buying unit or media agency will take on the responsibility to implement measures that reflect each client's agreed specific brand safety terms.

## Methodology

WPP Media manages contextual brand safety, ad fraud and viewability through a combination of the following 5 practises:

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's brand safety standards.
5. *Industry accreditation* – gaining and supporting accreditations from local industry bodies, where available.

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

### 1. Trading

WPP Media buys digital media inventory where the domain is visible to minimise the risk of our clients' ads being misplaced in inappropriate or fraudulent environments.

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

#### Direct Buys

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.

### Direct Programmatic Buys

When available and used in the local market, WPP Media recommends direct programmatic buys if full domain transparency and content verification is allowed by the publisher. WPP Media also recommends an inclusion list approach which would be tailored to the product advertised. WPP Media 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 the WPP Media Mandatory Exclusion List is implemented. 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.

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

WPP Media may buy from networks, aggregators or managed service providers. In such instances, we will apply WPP Media Mandatory 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.

## **2. Contractual Protection**

WPP Media seeks to agree on legal assurances with our technology and publisher partners. These assurances may be negotiated differently, depending on the market. The assurances also differ from market to market and may contain specific stipulations:

- to minimise the risk of advertising being placed in non-brand safe contextual environments
- to minimise the risk of advertising being subject to fraudulent traffic
- to define take down policy

### 3. Technology

WPP Media 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 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. Third party verification tagging makes it possible for WPP Media to monitor inventory for inappropriate content, fraudulent traffic and viewability levels.

WPP Media 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 market.

This may be limited if publishers in certain markets do not accept independent verification on their properties. WPP Media actively works to educate all supply partners about the best practice including independent verification.

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

### 4. Operational Procedure

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

#### Contextual brand safety

- WPP Media applies the WPP Media [Mandatory Exclusion List](#) by default. The list is curated with several global data partners and independent technology providers. The 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 Ad Ops teams are able to implement independent verification tags and track campaigns. 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 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.

### 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 and apps 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 Ads.txt or App-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 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 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 regional and national IABs and supports national industry initiatives such as Digital Ad Trust (France), MRC and TAG (US and UK). WPP Media is committed to upholding the industry standards.

### **User Experience**

WPP Media adheres to the recommendations of the Coalition for Better Ads<sup>3</sup> by not recommending any of the 15 'bad experience' mobile and desktop formats, short video formats<sup>4</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>5</sup>.

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<sup>3</sup> <https://www.betterads.org/>

<sup>4</sup> <https://www.betterads.org/standards/>

<sup>5</sup> <https://iabtechlab.com/standards/ad-blocking/lean/>



## Data Protection & Privacy

WPP Media is committed to complying with applicable data protection and privacy legislation, including the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and other relevant legislation.

Our Data Protection Officer is based in London.

During the execution of advertising campaigns, WPP Media 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 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 global 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>