

TAG Brand Safety Certified Guidelines

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FINAL

About TAG's Brand Safety Certification Guidelines

The mission of the TAG Brand Safety Certification is to significantly reduce the risk of the misplacement of advertising on digital media properties of all types, thereby upholding brand safety and protecting the integrity of digital advertising. TAG's Brand Safety Certified Program promotes the flow of advertising budgets to participants in digital advertising upholding an industry regulated framework for brand safety.

In order to enable companies to promote a brand safe environment, the TAG Brand Safety Certification Working Group maintains the Brand Safety Certified Guidelines. Companies that are shown to abide by the *Brand Safety Certified Guidelines* can achieve the Brand Safety Certified Seal and use the Seal to publicly communicate their commitment to minimizing ad misplacement and fostering an environment of trust in the marketplace.

About the Trustworthy Accountability Group

The Trustworthy Accountability Group (TAG) is the leading global certification organisation fighting criminal activity, promoting brand safety and increasing trust in the digital advertising industry. TAG's mission is to:

- Eliminate fraudulent traffic;
- Combat malware;
- Prevent internet piracy, and
- Promote brand safety and greater transparency in digital advertising.

TAG advances those initiatives by bringing companies across the digital advertising supply chain together to set the highest standards.

TAG is the first and only registered Information Sharing and Analysis Organization (ISAO) for the digital advertising industry.

To learn more about the Trustworthy Accountability Group, please visit <u>www.tagtoday.net</u>.

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1. Executive Summary

Consumers associate a brand's advertising with the context in which those advertisements are displayed. Because the adjacency of an advertisement to specific types of content can cause significant damage to a brand's consumer reputation and revenue, it is imperative that advertisers have a way to ensure that their ads are not misplaced on digital media properties that contain illegal, objectionable, or even simply content in contrast with the brand's values.

The mission of the TAG Brand Safety Certified Program is to significantly reduce the risk of the misplacement of advertising on digital media of all types, thereby upholding brand safety and protecting the integrity of digital advertising.

The TAG Brand Safety Certified Program promotes the flow of advertising budgets to participants in digital advertising upholding an industry regulated framework for brand safety. The program serves the entire digital advertising supply chain by providing transparency, choice and control for buyers – enabling them to buy advertising inventory with confidence and creating a brand safety framework for sellers that increases the value of certified sellers' inventory.

2. Certification Process

The TAG Brand Safety Certified Program is a voluntary self-regulatory digital advertising industry initiative. It represents the on-going process of defining and maintaining guidelines for promoting the flow of advertising budgets to participants in digital advertising upholding an industry regulated framework for brand safety and providing transparency to buyers.

TAG certifies companies at the entity level, rather than certifying a specific product or business line within a legal entity. To achieve the TAG Brand Safety Certified Seal, companies must show that all of its material operations related to ad monetisation services within a particular geographic market are in compliance with the relevant requirements of the Certification's requirements.

2.1. Application

Before a company can apply for the Brand Safety Certified Seal, that company must first complete the process of becoming "TAG Registered" and enrolling in the Verified by TAG Program. Companies can learn more and apply for TAG Registration by contacting TAG at info@tagtoday.net or visiting <u>www.tagtoday.net</u>.

Once a company has been approved as "TAG Registered" and enrolled in the Verified by TAG Program, the company's designated TAG Compliance Officer may contact TAG directly to request enrollment in the Brand Safety Certified Program in order to begin the process for that company to achieve the Seal. In order to participate, a company's TAG membership must include access to that Program.

2.1.a. Participation Fee

There is an annual fee, which is encompassed in annual membership fees, for participation in the Brand Safety Certified Program.

2.2. Qualification

Any TAG member company that has been enrolled in the Verified by TAG Program and whose TAG membership includes participation in the Brand Safety Certified Program can participate in the Program and apply for the Seal.

Requirements to achieve the TAG Brand Safety Certified Seal differ according to a company's role in the digital advertising supply chain. These roles and requirements are outlined in Sections 3 and 4 of this document.

2.3. Geographic Applicability of Certification

The Brand Safety Certified Seal can be achieved in any geographic market. However, upon achieving certification, a company is only permitted to use the Brand Safety Certified Seal in the specific geographic markets in which TAG has found the company's operations to be in full compliance with the *Brand Safety Certified Guidelines*. Additionally, any use of the Seal must identify the geographic markets to which it applies.

Companies can choose to certify operations either by country (e.g. United States, United Kingdom), by region (e.g. North America, Europe), or globally. Companies must clearly state which option it is applying for certification in its application for the Brand Safety Certified seal.

2.4 Methods of Certification

Companies must apply to achieve the Brand Safety Certified Seal through independent validation. The certification method is recorded and displayed on www.tagtoday.net.

Certification through independent validation is obtained by the company inviting an independent auditor to review and validate that the company has achieved full compliance with the *Brand Safety Certified Guidelines*, as well as a series of binding attestations from the company in which it attests to have achieved full compliance with the *Brand Safety Certified Guidelines* and that it will maintain compliance throughout the certification period. A validating company must be an approved auditing company that includes a specialty in digital media audits.

Through independent validation, the independent auditor submits the required attestation paperwork and reports to TAG, in addition to the paperwork submitted by the company itself.

2.4.a. Certification Through Independent Validation

To achieve certification through independent validation, a company must invite an independent auditor to validate that the company is compliant with the *Brand Safety Certified Guidelines*. A validating company may be any auditing company that includes a specialty in digital media audits.

As independent validation is designed to provide external assurance, ensuring that all Brand Safety Certified roles and requirements are being met within the company's operations, technology and supporting documentation may take some time to examine. Examination time depends on several factors such as company operations maturity level, organisation size and complexity and technology. Independent validation will include examination of, but not limited to, the following:

- Job description of the TAG Compliance Officer.
- Training policy and procedures.
- Internal audit policies and procedures.
- Established policies and procedures related to internal control.
- Policies and procedures related to the requirements of the *Brand Safety Certified Guidelines.*
- Policies and procedures related to complaint handling/resolution to ensure compliance with the *Brand Safety Certified Guidelines*.
- Testing performed by the company as part of the internal quarterly review process.

Entities that wish to achieve the TAG Brand Safety Certified Seal through independent validation should have the validating company submit to TAG: an *Independent Validation Attestation, the Application for TAG's Brand Safety Certified Seal,* signed TAG *Compliance Officer Attestation* and *Business Executive Attestation,* as well as any supporting documents or materials required by the Program.

2.5 Publication of Certification Status

With training and consistent monitoring procedures in place, the company is certified when TAG determines the company to be in full compliance with the *Brand Safety Certified Guidelines*, based on the required documentation submitted. TAG notifies the company of its certification status, and that certification status is posted to the TAG Registry. Upon certification, TAG sends Certification Seal materials to the company's designated TAG Compliance Officer for use in promoting the company's Brand Safety Certified Seal status.

2.5.a. Brand Safety Certification Seal

Companies that are shown to meet the *Brand Safety Certified Guidelines* requirements receive the Brand Safety Certified Seal and can use it to publicly communicate their commitment to promoting transparency and brand safety in the digital advertising supply chain.

2.6. Continued Compliance

Companies that are shown to meet the requirements of the *Brand Safety Certified Guidelines* and achieve the Brand Safety Certified Seal must maintain compliance throughout the certification period and renew their compliance annually.

2.6.a. TAG Compliance Officer

Companies participating in the Brand Safety Certified Program must designate a qualified TAG Compliance Officer. This is usually done in the process of the company's application for TAG Registration, prior to participation in the Brand Safety Certified program.

The duties of a TAG Compliance Officer include:

- Serving as the primary point of contact between TAG and the company regarding all aspects of the company's TAG membership. This includes receipt of notice concerning any changes to TAG Certification program(s).
- Completing the required training modules for each TAG Certification program in which the company participates.
- Educating internal teams on the requirements of each TAG Certification program in which the company participates and notifying those internal teams of any changes.
- Overseeing the company's processes related to compliance with the requirements of each TAG Certification program in which the company participates.
- Facilitating internal review of the company's compliance with the requirements of each TAG certification program in which the company participates, including independent auditor review where appropriate.
- Taking on additional responsibilities applicable to each of the TAG programs in which the company participates (as appropriate).

The minimum qualifications for a TAG Compliance Officer include:

- Reporting relationships whereby compliance assessments are not influenced or biased by operations personnel being tested for compliance.
- Adequate technical training and proficiency in testing and assessing compliance.
- Adequate knowledge of the subject matter covered in each of the TAG Certification programs in which the company participates (i.e. advertising technology, various functions within the digital advertising supply chain, etc.).
- Adequate independence within the company to avoid conflicts of interest with regard to assessing compliance with TAG program requirements.

A TAG Compliance Officer does not need to hold a particular title or job description within the organization, as long as that individual has independence from sales and marketing functions.

The role of the TAG Compliance Officer is further described in the TAG *Compliance Officer Role Description*, available on www.tagtoday.net.

2.6.b. Compliance Team

While the only requirement to support compliance with the *Brand Safety Certified Guidelines* is the designation of a TAG Compliance Officer, it is also recommended that a company have in place a Compliance Team to assist in meeting and maintaining compliance with the *Brand Safety Certified Guidelines*.

2.6.c. Training

Brand Safety Certified training is required for the company's designated TAG Compliance Officer. The Compliance Officer is encouraged to attend the first training available after a company is enrolled in the Brand Safety Certified Program and must complete training in order for the company to achieve the Brand Safety Certified Seal. Training must be renewed on an annual basis in order for a company to maintain its Brand Safety Certified Seal from year to year.

TAG provides training on a regular basis via a virtual platform so that TAG Compliance Officers are able to obtain training regardless of geographic location. TAG Compliance Officers can learn more and RSVP for training sessions by visiting www.tagtoday.net.

2.6.e. Quarterly Internal Reviews

Quarterly internal reviews ensure that a company that has been awarded the Brand Safety Certified Seal maintains full compliance with *Brand Safety Certified Guidelines* throughout the year.

The TAG Compliance Officer is responsible for overseeing quarterly internal reviews, which should ensure that:

- The Brand Safety Certified Guidelines are consistently and completely followed.
- Control activities discussed during *Brand Safety Certified Guidelines* training are formally documented.
- Potential violations of the *Brand Safety Certified Guidelines* are detected in a timely fashion.
- Appropriate corrective measures are taken in a timely fashion.

Internal reviews should also include a risk analysis of certain control functions to assess how much testing is needed to validate adherence. Also, actual testing of data, both quantitatively and qualitatively, should be used to validate that the existing control structure is designed correctly and operating effectively.

2.6.f. Recertification

Certification is an on-going process and companies that achieve the Brand Safety Certified Seal must be recertified annually. Companies that achieve the Brand Safety Certified Seal must apply for recertification by January 31 each year in order to be considered for recertification in that calendar year. TAG sends recertification notifications to all certified companies prior to the start of the recertification submission period.

TAG reviews all applications for recertification and notifies companies whether they have achieved recertification by March 1.

3. Covered Parties

The Brand Safety Certified Seal is applicable to several types of covered parties across the digital advertising supply chain:

- Direct Buyers
- Direct Sellers
- Intermediaries; and
- Content Verification (CV) Services.

Companies applying for the Brand Safety Certified Program must apply for the Seal under all relevant covered party categories, meeting the requirements relevant to each category, as described in Section 4.1.

3.1. Direct Buyers

Direct Buyers are advertisers who own advertisements for placement in inventory on the publisher's websites or other media properties, or advertising agencies that directly represent such advertisers. A Direct Buyer is an advertiser – a brand company represented in the advertisements that it wants to place in the publisher's inventory. However, many brands hire an advertising agency to manage their advertising campaigns. A brand-appointed agency is also a Direct Buyer, except in cases it operates as an Intermediary. To qualify as a direct buyer, the agency must directly represent the advertiser.

3.2. Direct Sellers

Direct Sellers are publishers that provide content to an audience. This type of Direct Seller sells ad space inventory on its websites or other media properties that offer value to advertisers depending on the size and demographics of the audience.

While a publisher may sell this inventory directly, larger publishers may appoint an agent to manage and sell this inventory. Such an agent is also a Direct Seller. To qualify as a Direct Seller, the agency must directly represent the publisher.

3.3. Intermediaries

An Intermediary is a company that owns and/or operates a technology or service that allows for the purchase of digital inventory for the purpose of ad placement.

Intermediaries include both Indirect Sellers and Indirect Buyers.

- An Intermediary may be an Indirect Seller in that it sells a Direct Seller's inventory.
- An Intermediary may be an Indirect Buyer in that it is qualified to assign a Direct Buyer's advertisements to a Direct Seller's inventory.

Any covered party that connects a Direct Seller to a Direct Buyer or an Indirect Seller through an ad technology layer or redirect is also an Intermediary.

3.4 Content Verification Services

Content Verification Services are entities that assist Direct Buyers, Direct Sellers and / or Intermediaries in the prevention, detection or evaluation of ad misplacement across the digital advertising supply chain.

These entities do not transact inventory but may be able to append to the creative payload or be declared in the campaign.

4. Certification Requirements

Requirements to achieve the Brand Safety Certified Seal may differ according to a company's role in the digital advertising supply chain. To achieve the Brand Safety Certified Seal, an entity must meet relevant criteria based on the types of functions it undertakes.

To achieve the Brand Safety Certified Seal, a company must meet the requirements for all the categories in which it operates, according to the table below.

Requirements	Scope	Direct Buyer	Direct Seller	Intermediary	Content Verification Service
Complete TAG Registration and be a TAG Member in Good Standing	Administrative	4	4	1	4
Have a designated TAG Compliance Officer	Administrative	A	A	A	٧
Attend a Brand Safety Certified Training annually	Administrative	4	4	4	1
Ensure All Digital Advertising Agreements Adhere to Brand Safety Principles	Brand Safety	4	4	4	
Monitor and Detect Ad Misplacement	Brand Safety	1	1	1	
Document Policies and Procedures to Minimize Ad Misplacement.	Brand Safety	4	4	4	
Adhere to Content Verification Principles	Brand Safety				٦

4.1 Requirements Table

4.2 Complete TAG Registration and Verified by TAG Process

To achieve the Brand Safety Certified seal, any participating company must first become a TAG member, completing the process of becoming "TAG Registered" and enrolling in the Verified by TAG Program (See Section 2.1). Companies can learn more and apply for TAG Registration by contacting TAG at info@tagtoday.net or visiting www.tagtoday.net. Companies seeking the Brand Safety Certification must also have an active TAG membership that includes participation in the Brand Safety Certification Program, have a valid TAG membership agreement in place, and be current on payment for all TAG membership fees.

4.3 Have a Designated TAG Compliance Officer

To achieve the Brand Safety Certified seal, any participating company must have designated a qualified TAG Compliance Officer. The role of the TAG Compliance Officer is described in section 2.6.a of this document.

4.4 Attend a Brand Safety Certification Training Annually

To achieve the Brand Safety Certified seal, any participating company's designated TAG Compliance Officer is encouraged to attend the first training available after a company is enrolled in the Brand Safety Certification Program and must complete all required, as outlined in Section 2.6.c.

4.5 Ensure that all new and updated digital advertising agreements adhere to Brand Safety Principles

To achieve the Brand Safety Certified seal, any participating company acting as a Direct Buyer, Direct Seller and/or Intermediary must ensure that new and updated agreements for digital advertising services adhere to Brand Safety Principles listed below.

Depending on the covered party categories (see Section 3) into which a participating company falls, all participating companies must comply with the following principles:

- Direct Buyers, Direct Sellers and Intermediaries must ensure that all monetizable actions conform to either a Primary Agreement or the specific terms and policies within an agreed or signed contract.
- Direct Buyers and Intermediaries must define the criteria to be met in order for digital advertising to be presented on digital media property(ies).
- Direct Buyers and Intermediaries must select a means to minimize ad misplacement;
 - Independently validated Content Verification services; or
 - Inclusion/Exclusion Lists
- Direct Buyers, Direct Sellers and Intermediaries must define the policies and procedures, including but not limited to takedowns, used to monitor and demonstrate compliance with each applicable Brand Safety Principle.

4.6 Monitor and Detect for Ad Misplacement

To achieve the Brand Safety Certified seal, any participating company acting as a Direct Buyer, Direct Seller and/or Intermediary must ensure that 100% of their monetizable transactions are reviewed by one or more independently validated Content Verification services, or through use of Inclusion/Exclusion Lists, as defined in the company's digital advertising agreements.

Direct Sellers will be required to disclose, upon request, their policies for the additional monitoring, detection, and management of risk against ad misplacement, such as the use of editorial codes and controls.

4.7 Document Policies and Procedures Related to Minimizing Ad Misplacement

To achieve the Brand Safety Certified seal, any participating company acting as a Direct Buyer, Direct Seller and/or Intermediary must document the specific policies and procedures they have to minimize the risk of ad misplacement. These policies and procedures must include, but are not limited to:

- Identifying staff and/or tools/technology used to review and/or flag content as brand safe.
- Identifying and operationalizing technology and procedures used for the creation of inclusion/exclusion lists for content as brand safe.

4.8 Adhere to Content Verification Principles

In order to achieve the Brand Safety Certified seal, any participating company acting as a Content Verification Service must disclose all of the following Content Verification Principles their services are able to fulfil:

- Classify and/or block the serving of advertising on media properties which contains content deemed inappropriate by an advertiser and which adhere to the following technical standards.
 - Source-code
 - URL, domain, sub-domain, alias, app name, etc., including by keywords.
 - Content delivered via iFrames
 - o In Real Time
 - Content not previously validated
 - Registering changes in content
 - When JavaScript is Disabled
- Capable of incorporating lists of keywords, domains/subdomains, content categories, URLs, apps, etc, provided by the client and update the advertiser's settings into the CV product within a reasonable period of time.
- Identify instances where Content Verification is not possible.

5. Allegations of Non-Compliance & Appeal

Companies that achieve the Brand Safety Certification Seal must meet and maintain compliance with the relevant requirements for the *Brand Safety Certification* throughout the certification period. Failure to comply can result in consequences, including but not limited to the loss of certification and use of the Brand Safety Certification Seal. Certified companies are permitted to review allegations of non-compliance, submit rebuttal evidence, seek review of decisions of non-compliance and appeal any final decision.

The formal process governing non-compliance can be found in TAG's *Due Process for Allegations of Non-Compliance and Appeal*, available on www.tagtoday.net.