### JACK RYAN Brand Safety Policy 2023/24

We take a zero-tolerance approach to the misplacement of ads. We operate to strict brand safety principles in line with the UK Good Practice Principles which have been defined by a cross-industry collective Digital Trading Standards Group (DTSG) for review and adoption by TAG (Trustworthy Accountability Group). The JACK RYAN Brand Safety process & procedure is in place to significantly reduce the risk of the misplacement of clients digital media, in order to protect their interests and maximise investment value.

#### **Key Principles**

1.1 Suppliers of media are vetted under a strict, independent process to ensure the best practice and quality are upheld and can explain the process that form the basis of specific provisions and/or the reasonable endeavours to protect our clients.

1.2 The placement of advertising will be identified by context and should not support inappropriate or illegal content or services.

1.3 Media will be optimised to minimise fraud, ad misplacement and optimum viewability performance.

1.4 JACK RYAN will carry out 3rd party authentication of all media by the use of TAG certified verification, and any incremental solutions.

1.5 JACK RYAN have a responsibility to preserve our clients' interests and reserve the right to cancel or amend any media booking if media quality standards are not met. Subject to our standard terms and conditions of sale.

### **Our Approach to Brand Safety**

We apply a 4-tier approach to ad quality in order to service our clients. This enables clients to be confident that their programmatic and direct campaigns have a sufficient and consistent level of safety and quality as a minimum. It also ensures a flexible and customised approach can be taken for clients with varying sensitivities. Multiple technology partners are used to apply these standards and whilst no risk can be ruled out, when used collectively they have the best opportunity to reduce risk of misplacement.

**Holistic Approach**: JACK RYAN apply high minimum standards when buying quality programmatic ads which consist of both a pre and post bid approach. This is applied to all programmatic campaigns by default, requiring no client action. The standards and specifications applied include: Global and Local Blocklists, Exclusion of non-transparent URLs, Page Quality (e.g. Above the Fold), Fraud, Zero Ads, Safe from Torrents and Bot Sites, Contextual (e.g. Death, Drugs, Crime, Firearms, Mature, Profanity and Hate speech, Disasters,

Alcohol, Gambling, Accidents, War and Terror), 3rd party Prebid segment exclusions ('moderate to high risk'), Adult, Alcohol, Drugs, Hate speech, Illegal Downloads, Offensive Language, Violence, No Rating, Media Quality Barometer - Quality scoring, 3rd party post-bid monitoring - Viewability, Ad Fraud, Brand Risk.

**Customised Approach**: If a client has particular sensitivities, these can be added to the Default Approach (i.e. customised pre-bid filtering). Any additions are done on an opt-in basis. Similarly, a client can opt-out if parts of the Holistic Approach would exclude their target audience. JACK RYAN can provide suggestions when required but there is a recognised risk impact (e.g. on brand safety, pricing, delivery and performance).

**3rd Party Blocking Approach**: In addition to the pre-bid filtering used in the Default and Customised Approaches, we run blocking solutions to block their ad from appearing even after they win in the bidding process. Unless clients have opted-out, this is done with a 3rd party ad-verification company. The client and agency determine the blocking criteria and thresholds.

**Direct Approach**: Where media buys must be acquired and executed in a traditional direct approach, we follow a direct evaluation procedure that includes a 'Media Owner Suitability Assessment'. Domains are vetted and site listed, contractual agreements will be signed that verify media placement, verification standards and technologies being deployed. Unless a client opts out, for all campaigns a TAG approved 3rd party vendor is used to track and monitor relevant media quality metrics including but not exclusive to Brand Safety, Fraud and Viewability. Where required, we will supply a Site list and / or Blocklist which are comprised of environments that we do not wish clients advertising to appear against. The Media Owner is required to apply Blocklist and /or Site-list when requested.

### YouTube Specific Third-Party Ad Safety

YouTube is a platform that has higher levels of User Generated Content (USG) than any other platform. We employ human vetted channel whitelists/blacklists as is standard for all clients. We also use contextual targeting for YouTube which uses target keywords for Ad placement further reducing the risk of Ad misplacement.

#### Media Owner Suitability Assessment (New Media Owner Vetting)

Any new media owner wishing to work with JACK RYAN is required to answer the following questions and be approved:

(a) Specify if you are the owner or the authorised reseller of the inventory they are representing.

(b) Specify the viewability, brand safety and ad fraud prevention technology that is deployed. Specify the elements of the technology applied and those that are not. Please provide sample reports.

(c) Does the above technology comply TAG standards and do you have accreditation for brand safety and ad fraud?

(d) Has the audience been verified by a known and trusted third party vendor i.e. ComScore, ROUTE, RADJAR

(e) Provide clarity on take down policies and how fast post any notification of ad misplacement will they remove or pause the campaign?

(f) How regularly do you monitor/review reporting related to viewability, brand safety and ad fraud?

### Digital Take Down policy – JACK RYAN Incident Channel Policy

JACK RYAN have a strict take down policy. This policy is forms part of the 'JACK RYAN Incident Channel Policy' (JRICP) – the general policy for Paid Media.

JACK RYAN's commitment to clients to address any misplacement of ads – SLAs are agreed with all parties prior to the commencement of media to ensure any actions required can be addressed in the shortest timeframe available – within a maximum of 24 hours from notification of request.

Media owner responsible for the error will confirm in writing that the affected item has been removed/paused.

JACK RYAN will review terms and conditions to determine whether the media owner is in breach of agreed terms.

We will work with the client in regarding any specific actions in relation to the event and take necessary actions with the media owner.

### **Exclusion / Inclusion Lists**

JACK RYAN will create & supply our standard exclusion list which is applied by default. This list is regularly updated by our TAG Compliance Officer during our quarterly brand safety meetings. This list is informed by intelligence sharing and the Infringing Website List (IWL) which is shared by the City of London Police Authority. The Media Owner is required to apply these lists for all JACK RYAN clients advertising to prevent Ad Misplacement.

JACK RYAN regularly ensure that these lists are updated and are human vetted. This is to ensure the environment is brand safe and fits the campaign brief.

### **Compliance with Accredited and regulated industry practices**

JACK RYAN play an active role industry in addressing the challenges of media quality, contributing and adhering to industry regulation. We are affiliated with the Internet Advertising Bureau UK as well as TAG (Trustworthy Accountability Group) and the affiliated Digital Trading Standards Group. We are also affiliated with the UK Government Steering Group, hosted by the current Secretary of State for the Department of Media, Culture and Sport (DMCS).

JACK RYAN is currently undergoing TAG Brand Safety Certification. TAG Brand safety certified programme promotes trust and brand safety. JACK RYAN is continuously independently audited to ensure the highest levels of brand safety.

To comply with our TAG Brand Safety requirements as a Direct Buyer, our dedicated named TAG Compliance Officer has to undergo Brand Safety Training provided by TAG. We also ensure that all digital advertising agreements adhere to Brand Safety & Anti-Piracy Principles. In addition, we actively monitor and detect Ad Misplacement, document policies and procedures to minimise ad misplacement and lastly employ pirate mobile app filtering.

We also work with, but not exclusive to, bodies such as the Institute of Practitioners in Advertising (IPA) and have accredited training in place for all members of staff on the importance of Brand and reputational safety across our client and portfolio ecosystem.

#### **Fraud Prevention**

We are deeply committed to the prevention of Ad Fraud. We have made significant investment in technology and strategic partnerships to combat various forms of ad fraud such as:

- Serving of adverts to non-human traffic/bots
- Concealment of ads behind other ads
- Serving of ads on sites outside the ads.txt file
- Targeting of adverts by Bot farms

We employ domain inclusion/exclusion lists to ensure clients Ads aren't being placed on fraudulent sites or sites that could harm reputation.

We have also partnered with leading industry players like Google. These partnerships enable us to analyse invalid traffic in real-time across all digital serving platforms. This thorough scrutiny allows us to swiftly detect and eliminate invalid traffic.

As an IAB Gold Standard<sup>®</sup> 2.1 registered agency we also work closely with IAB Tech Labs to discover trends and safeguarding initiatives, including:

- Adverts being served to non-human traffic/bots
- Adverts being hidden behind other adverts
- Ads being served on sites outside the ads.txt file
- Adverts becoming target of Bot farms

Our own proprietary data dashboard and monitoring solution, iData, also uses live signals from Google and client Google Analytics to understand patterns of behaviour and alerts both our internal team and the end client where there is unusual activity; this is seen as a final layer of protection for any malicious activity.

#### **Continuous Improvements to our Brand Safety Approach**

JACK RYAN takes an agile proactive approach to testing new Brand Safety procedures to ensure the key principles of brand safety. We follow the UK government SAFE initiative and are registered for the latest Gold Standard® 2.1.

Our TAG Compliance Officer conducts quarterly internal reviews to ensure Brand Safety Certified Guidelines are being consistently and completely followed; this is in addition to a monthly site analysis report from our media owners across programmatic, display, video and native to ensure compliance with our white and black lists.

Any gaps in Brand Safety Training are addressed to keep up with industry evolution and that appropriate corrective brand safety measures are being taken in timely fashion in regard to JACK RYAN Incident Channel Policy via our strict SLA's for brand safety incidents.

#### **Further Information**

For JACK RYAN Clients, please contact your Client Partner to discuss any brand safety initiatives or contact our TAG Compliance Officer - Ryan Dunlop at <u>Ryan@jackryanmedia.com</u>