Content Guidelines

If you, as an advertiser, publisher or third-party partner of LoopMe, choose to use the LoopMe technology, you are required to adhere to the following Content Guidelines (in addition to any other agreements you have entered into with LoopMe, from time to time) and ensure that all content and serving of advertisements complies with all applicable laws.

Before using our services, please review these Content Guidelines, and any other policies from time to time, and ensure that you comply with all the elements contained herein.

Note that these Content Guidelines are not exhaustive and may be subject to change without notice, so please be sure to check back here often.

1. Prohibited Content

All types of content, products and services below are strictly prohibited from LoopMe's services.

- Fake News: Content that seeks to intentionally deceive the reader into believing something that is not true or that they are reading legitimate editorial content or fact-based news.
- Firearms and weapons: Any content related to weapons, ammunition, firearms, gun ranges, paintball guns, guns, air guns, explosives, bombs, knives or weapons of any kind and/or fireworks.
- Hate speech: Any content which insults, discriminates, defames or threatens an individual or groups of individuals based upon, including but not limited to, that individual's race, ethnicity, national origin, caste, gender, gender identity, sex, religious affiliation, age, serious disease and/or disability.
- Illegal activity or legally questionable activity: Any content which promotes, refers to and/or sells illegal products and services, products or services of questionable legality, violates the privacy rights and any other rights of others and/or that facilitates illegal activity.
- Intellectual property infringement: Any content which infringes any third-party intellectual property rights (including but not limited to, the misappropriation of a trademark or logo, distribution of copyrighted material without the express authorisation of the owner and/or sale or promotion of counterfeit goods).
- Misleading content: Any content based on fraudulent or deceptive claims. All claims must be substantiated, clear, and accurate.
- Questionable business opportunities: Any content which may be or amounts to a ponzi schemes, pyramid schemes, get-richquick schemes, free money offers or other similar money-making opportunities.
- **Religious content**: Any content regarding religion or philosophical belief, any ritual of a specific religion, religious agendas and/or events. Content cannot advocate for or promote one religion over another.
- Sexual, obscene, or pornographic material: Any content which contains adult, mature, and/or sexually-explicit products and services, gentlemen's clubs, escort services, erotic bookstores, nudity, graphic language, and excessive profanity. Any image, graphic or content that is sexual or pornographic in nature, obscene, includes nudity, sexually suggestive text, images or situations or otherwise uses inappropriate or provocative language.
- Unsecure content: Any content which contains adware, spyware, P2P application, malware, spyware, viruses, worms, Trojan horses or other harmful computer code that interferes with or disrupts the integrity or performance of the LoopMe platform and services.
- Violence & graphic content: Any content which, in LoopMe's sole discretion, is violent, graphic, objectionable, disrespectful,

vulgar or offensive, including images and language.

2. Restricted Content

LoopMe allows content and the serving of advertisements related to the below, provided that it does not fall into one of the above listed Prohibited Categories, complies with all applicable laws and meets the additional criteria as set out below:

- Alcohol: LoopMe allows content related to alcohol, provided that such content does not:
 - target individuals below the legal drinking age in the respective jurisdiction where such content is displayed;
 - imply that drinking alcohol can improve social, sexual, professional, intellectual or athletic standing;
 - imply that alcohol provides health and therapeutic benefits;
 - portray excessive drinking favourably or featuring binge or competition drinking;
 - show alcohol consumption in conjunction with the operation of a vehicle of any kind, the operation of machinery, or the performance of any task requiring alertness or dexterity; and/or
 - conflict with any applicable federal, state and local laws and regulatory guidelines relating to alcohol in the jurisdiction which the content is displayed.
- Children and minors: Any content that specifically targets minor need to comply with all applicable laws and requires prior express approval by LoopMe.
- **Cryptocurrency**: Any content which promotes Cryptocurrency must comply with all applicable laws and requires prior express approval by LoopMe.
- Dating and personals: Content must not promote one-night stands, hook-ups, and sexual encounters, infidelity and/or casual sex.
- Financial services: Content must comply with any and all guidance provided by financial governing bodies in the jurisdiction in which the content is displayed.
- **Gambling:** Content pertaining to Gambling is prohibited, however Content relating to State run lotteries is acceptable provided that they comply with applicable laws and regulations in relevant jurisdictions.
- Media and negative earned media: Direct competitors cannot promote negative earned media content that defames or otherwise compromises an industry competitor without clear disclosure.
- Medications and healthcare products: Content relating to Medications and Healthcare products are allowed except for content relating to:
 - recreational drugs;
 - erectile or sexual enhancers;
 - paternity tests;
 - controlled substances such as steroids;
 - anabolic or hormones;
 - any product that claims to have a similar effect to illegal substances, and weight loss drugs that make unrealistic claims;
 - prescription drugs-based content (unless expressly approved by LoopMe); and/or
 - online pharmacies selling medicines either with or without prescription and informative websites related to medicines (except if they are certified as per local applicable regulation and expressly approved by LoopMe).

- **Political**: Political content is content regarding political organisations, candidates, political initiatives and/or events. LoopMe supports responsible political advertising and requires all political content to comply with the local legal requirements, including campaign and election laws and mandated 'election silence periods' for any geographic areas that they target. All political content and ads must have clear disclosure (i.e., Promoted by [political party]). Political content must not:
 - portray false, untrue or misleading political content (LoopMe reserves the right to require substantiation of any factual claims);
 - exclude certain political parties without a legal basis for exclusion;
 - contain inflammatory political content;
 - portray voting or census participation as useless and/or meaningless and advise users not to vote or participate in a census; and/or
 - be paid for directly or indirectly by a non-resident foreign national or entity.
- **Surveys**: If using LoopMe's technology for the purposes of conducting a survey, you are prohibited from collecting the following information:
 - name, email address, address;
 - financial status or account information;
 - racial or ethnic information;
 - health or medical history or information;
 - sexual behaviour or orientation;
 - information about children under the age of 13;
 - political opinions or beliefs;
 - trade union membership; and/or
 - religious or philosophical beliefs.
- Tobacco and drugs:
 - Any content which promotes smoking paraphernalia, e-cigarettes, vaping, tobacco, cigars, tobacco pipes, rolling papers, smokeless tobacco must be expressly approved in writing by LoopMe; and/or
 - Cannabis and CBD related content must comply with the individual State and/or Country restrictions relating to cannabis and CBD.

3. Prohibited Creative content

In addition to the above, advertisers, publishers and/or third-party partners must comply with the following in respect of their content, inventory and/or content displayed on their inventory (including but not limited to advertisements):

- Windows Dialog or Alert Style: Any creative that a user might mistake for an OS or application-level notification rather than an advertisement, this includes, but is not limited to, deceptive ads that resemble user interface elements (e.g., text boxes) and creatives that mimic buttons or icons that claim a functionality that is not there (e.g., play, chat, wink, friends, search buttons);
- Expandable (Automatic): Ads that automatically expand without the user's engagement or action (e.g., click, touch);
- Auto-redirect: Ads that automatically redirect the user without the user's engagement or action (e.g., click, touch);
- **Downloads:** Ads that do not ask the user for permission before initiating any downloads before initiating and downloads/installations/services/fees. This includes Click-to-Call and Click-to-Subscribe ads that do not include an

intermediary landing page or other prompt that clearly explains the terms and/or fees associated with the call or subscription; and/or

• **Operation of network:** Ads which interfere with the operation of LoopMe's network. For example, use that interferes with the normal operation of an end user's device, or otherwise creates a safety or security risk to the LoopMe platform, our customers, or our end users, is prohibited.

4. Enforcement Policy

If you fail to comply with the above Content Guidelines (as amended from time to time), in addition to LoopMe's other rights and remedies, LoopMe reserves the right to suspend your use of the LoopMe technology or terminate any agreements with you from time to time without written notice.

If you have any questions about our Content Guidelines, please contact content@loopme.com.

LoopMe Brand Safety Guidelines

At LoopMe we take the issue of brand safety, fraud and viewability seriously.

1. LoopMe's Process

At LoopMe use the following methods to ensure we are delivering brand-safe traffic, technological implementations and human verification.

Human Verification

Each time a new publisher applies to work with LoopMe, the publisher may be vetted to evaluate the content of the applicable publisher sites (the "**Sites**") and to ensure the traffic is genuine. This task is undertaken by LoopMe's Publisher Support Team, who are trained to assess the quality of sites submitted to work with LoopMe.

Once analysed, sites are divided into two categories, those which are block listed outright (not brand safe) and those which are approved and 'brand safe'.

Mobile Web

The following elements are considered when ranking sites including, but not limited to:

- URL working;
- Site category;
- Last update;
- Advertising visible on the page;
- Videos on website with sound on automatically;
- Videos running at the same time;
- Local market Alexa ranking;
- Social media channels;
- Incentivised ads;
- Social media channels; and/or

• Site content.

A site may be block listed for any of the following violations:

- URL not working;
- Belongs to a Prohibited Category (as set out in our Content Guidelines);
- Page content not updated in the last 7 days;
- Videos on website running with sound on;
- Multiple videos running at the same time; and/or
- Not in local market Alexa top 50,000.
- Applications

The following elements were considered when ranking applications including, but not limited to:

- Whether the app is available on AppStore or GooglePlay;
- Site category;
- Last update;
- Advertising visible on the applications;
- AppAnnie ranking; and/or
- Incentivised ads.

An application may be block listed for any of the following violations:

- App not available on AppStore or GooglePlay;
- Belongs to a Prohibited Category (as set out in our Content Guidelines);
- App not updated during the last 60 days;
- Advertising not visible on the applications; and/or
- Not ranked on AppAnnie.

Once a site has been approved as brand safe by the Publisher Support Team it is allowed to join the LoopMe platform and be selected for campaigns. Once on-boarded, LoopMe will analyse the site's performance and monitor for any suspicious activity.

Investigations are launched for any suspicious activity. Suspicious activity includes, but is not limited to:

- Unexpectedly high traffic;
- High CTR but low impressions;
- Low post-click events;
- Unexpectedly high CTR or VCR;
- Multiple views from the same user or Device ID;
- Multiple views from the same location; and/or
- Multiple views from randomised locations.

Should any suspicious activity be detected on any site, all activity will be paused and the offending site will be suspended immediately.

Domain Block Lists

Domain block lists are enforced by LoopMe. All domains listed on the block list are excluded from LoopMe's network. Block lists have been created from our years of data mining and human audits as outlined above and are updated weekly. LoopMe can also ingest any client block lists where necessary/

Allowed List

LoopMe uses a strict allowed list of exchanges and publishers. Whitelists are based on sites and/or applications passing our verification process and categorisation as above.

• Technological Approach

LoopMe's artificial intelligence (AI) engine has been built to identify fraudulent traffic. This artificial intelligence runs across every single campaign and can isolate fraud in real-time, ensuring that should suspicious traffic occur at busy periods or when our Publisher Support Team is not available to monitor traffic (evenings and weekends), activity across the sites in question is halted immediately.

Elements the AI identifies includes, but is not limited to, the following:

- Unexpectedly high traffic;
- High CTR but low impressions;
- Low post-click events;
- Unexpectedly high CTR or VCR;
- Multiple views from the same user or Device ID;
- Multiple views from the same location; and/or
- Multiple views from randomised locations.

• Third Party Verification

To eradicate any potential brand safety and/or fraud issues, LoopMe has partnered with MRC accredited companies such MOAT, Integral Ad Science and Pixalate. These companies allow LoopMe to closely monitor all campaigns, ensuring quality traffic in brandsafe environments across the board. Specifically, they are used to determine and block any inventory that is deemed suspicious or inconsistent. Additionally, any traffic suspected of being botnet traffic is also blocked. Inventory that is unrateable by third party verification tools is blocked as it is understood that this type of inventory may be more liable to non-compliance. In addition to these partners mentioned above, LoopMe may also consider relationships with other verification companies on campaign by campaign basis, should buyers work with another third party.

LoopMe has also received TAG's Certificate Against Fraud (https://loopme.com/loopme-finalizes-tag-fraud-certification). This is a cross-industry accountability program, created for transparency in the digital ad industry. Its focus is in four areas: eliminating fraudulent digital ad traffic, combating malware, fighting ad-supported Internet piracy to promote brand integrity, and promoting brand safety through greater transparency.

LoopMe supports the IAB's recent ads.txt initiative to tackle fraud within the ad industry, and we're encouraging all our publisher partners to adopt this initiative to increase transparency in the ecosystem. Through adopting ads.txt, buyers have full transparency and are easily able to identify authorised sellers for ad inventory for each given domain. Each ads.txt file contains a list of authorised ad buyers, the assigned publisher ID for inventory within the platform and the type of relationship the publisher has with the ad buyer. This is stored in the root folder of the publisher's domain and will be accessible to all when accessing publisherdomain.com/ads.txt.

Takedown Policy

If an ad was to appear on a website or in content that a client and/or third party deems inappropriate, clients should contact <u>content@loopme.com</u>. The campaign will be paused while the issue is being investigated by the LoopMe Team. All takedown requests

received within UK Business hours (Monday-Friday 09h00 -18h00) will be actioned within forty eight (48) hours, or within the timescales specified in individual terms and conditions with best endeavours for this to be done as soon as reasonably possible.