

Code of Practice on
Disinformation – Report of
MediaMath, Inc. for the
period December 16, 2022
to January 16, 2023

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Executive summary

MediaMath is the first Demand Side Platform (DSP), founded in 2007. MediaMath helps the world's top brands deliver personalized digital advertising across all connected touchpoints. Over 9,500 marketers in 42 countries use our enterprise software every day to launch, analyse, and optimize their digital advertising campaigns.

MediaMath recognizes that as a significant player connecting buyers and advertisers to advertising inventory, we occupy an important position in the ad ecosystem that creates an opportunity to help foster an environment free from behaviour that can impact users through intentional spread of disinformation or unintentional spread of misinformation. Because of our function connecting buyers and sellers of ad inventory, we have a role to play in preventing the monetization of sites that promote disinformation and misinformation, as well as preventing access to the ad ecosystem from entities that might leverage the ads themselves to promote disinformation and misinformation.

Additionally, MediaMath recognizes that certain types of advertising, such as political and issue advertising, may be more subject to efforts to spread misinformation and disinformation. Consequently, certain elements of transparency to users about the nature of ads and advertisers are important to ensure that the public is fully apprised of the nature of entities trying to influence their choices and opinions via political and issue advertising.

Finally, MediaMath understands the value that providing access to information about efforts to prevent the spread of disinformation and misinformation has for the public at large, for researchers, and for policy makers attempting to identify ways to curb the spread of harmful disinformation and misinformation which may have an adverse effect on society. MediaMath has taken a stand against the spread of disinformation and misinformation in its policies, procedures, tools, and activities, and we continue to support these efforts with an eye to the broader social good such efforts support.

To this end, MediaMath has undertaken specific commitments related to key areas regarding the Scrutiny of Ad Placements and Political Advertising in the European Commission's new Strengthened Code of Practice on Disinformation. These areas are the specific ones which we have determined are relevant to our business. Within these commitments, the most immediately robust information is available in the initial baseline report for the commitments related to the Scrutiny of Ad Placements. In this section, we have reported on our existing and developing efforts relevant to the EU and EEA, and the various policies, tools, and procedures we have in place to prevent the spread of disinformation and misinformation. Where data is limited or not available, commentary in the report reflects potential future directions. In the area of Political Advertising, MediaMath currently is not significantly engaged with political and issue advertising in Europe, nevertheless this is a vertical we support in other areas of the world (primarily the US and Canada), and we are generally supportive of efforts to stem disinformation and misinformation as well as create greater transparency in political and issue advertising. Consequently, our commitments related to Political Advertising represent future positions we will take should MediaMath begin to engage significantly in this type of advertising in Europe, and the comments in the baseline report reflect that future-looking perspective.

MediaMath hopes that our contribution to this effort will support broader work to prevent the flow of disinformation and misinformation.

II. Scrutiny of Ad Placements

Commitment 1

Relevant signatories participating in ad placements commit to defund the dissemination of disinformation, and improve the policies and systems which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements.

Measure 1.1

QRE 1.1.1

MediaMath will report on policies and procedures it has adopted to support Measure 1.1 including any publicly available pages, if applicable.

MediaMath has established policies that prohibit the dissemination of disinformation and misinformation as well as deceptive or misleading content as part of its user policies (see <https://www.mediamath.com/legal/terms/policies/>) and supply policies (see https://www.mediamath.com/legal/terms/supply_policy/), these are existing policies on the basis of which demonetization of disinformation and misinformation occurs, and during the covered period MediaMath has been exploring additional ways to strengthen these policies. At the time of the baseline report, MediaMath is reviewing potential user policy updates, and specific updates are not available at the time of the baseline report.

Methodology of data measurement – Bids blocked via a list of identified disinformation and misinformation sites added to MediaMath’s Universal Block List were estimated based on various internal systemic factors to obtain as accurate as possible an estimate of total disinformation and misinformation bids blocked based on the application of the block list.

<p>SLI 1.1.1 – Numbers by actions enforcing policies above (specify if at page and/or domain level)</p> <p>Pending outcome of the working group, assuming the working group determined methodology is permissible relative to confidentiality and any concerns regarding commercially sensitive information, MediaMath will report quantitatively at the Member State or language level on efforts to support Measure 1.1</p>	<p>Type of Action 1 – Queries/Bids Blocked</p>	<p>Type of Action 2 - Queries/Bids Blocked</p>	<p>Type of Action 3 [linked to the policy mentioned in QRE]</p>	<p>Type of Action 4 [linked to the policy mentioned in QRE]</p>
<p>Level</p>	<p>Page/Domain</p>	<p>Page/Domain</p>	<p>Page/Domain</p>	<p>Page/Domain</p>
<p>Data</p>	<p>Programmatic – Display Queries/Bids Blocked</p>	<p>Programmatic – Online Video Queries/Bids Blocked</p>		
<p>Member States [example, insert only if feasible]</p>				
<p>Austria</p>	<p>166,248,748</p>	<p>37,973,750</p>		
<p>Belgium</p>	<p>21,228,750</p>	<p>4,185,000</p>		
<p>Bulgaria</p>	<p>3,757,500</p>	<p>958,750</p>		
<p>Croatia</p>	<p>61,780,000</p>	<p>4,606,250</p>		
<p>Cyprus</p>	<p>3,495,000</p>	<p>2,947,500</p>		
<p>Czech Republic</p>	<p>9,298,750</p>	<p>1,585,000</p>		
<p>Denmark</p>	<p>20,027,500</p>	<p>5,973,750</p>		

Estonia	1,033,750	443,750		
Finland	8,638,749	1,921,250		
France	66,327,500	25,913,750		
Germany	495,643,748	212,046,250		
Greece	8,712,500	2,202,500		
Hungary	6,002,500	1,711,250		
Ireland	27,109,999	6,650,000		
Italy	3,532,610,000	2,263,710,000		
Latvia	21,400,000	848,750		
Lithuania	742,500	322,500		
Luxembourg	2,813,750	543,125		
Malta	2,207,500	1,300,000		
Netherlands	72,772,496	30,825,000		
Poland	329,616,250	89,013,750		
Portugal	9,073,750	4,620,000		
Romania	6,127,500	3,980,000		
Slovakia	4,981,250	981,250		
Slovenia	16,420,000	2,585,000		
Spain	49,087,500	35,621,250		
Sweden	64,742,500	6,548,750		
Iceland	1,938,748	297,500		
Liechtenstein	336,250	77,500		
Norway	30,621,250	3,795,000		
Total EU	5,011,899,990	2,750,018,125		
Total EEA	5,044,796,238	2,754,188,125		

This additional Service Level Indicator provides an estimated financial value of the actions taken by Signatories to demonetise disinformation sources (under SLI 1.1.1). It is based on media metrics available to Signatories (query/bid¹ or impression²) and applying an agreed-upon conversion factor provided by a third party designated by the Task-force of the Code (Ebiqity plc.).

¹ Request placed between a seller and buyer of advertising that can detail amongst other things website, specific content, targeting data inclusive of audience or content.

² Comprehensive calculation of the number of people who have been reached by a piece of media content by passive exposure (viewing a piece of content) or active engagement (visiting a destination).

SLI 1.1.2 - Preventing the flow of legitimate advertising investment to sites or content that are designated as disinformation	Methodology of data measurement – Estimated Queries/Bids blocked were evaluated using the third-party conversion factor (provided above by Ebiqity) to determine an estimated total value. Data for Liechtenstein, Luxembourg, and Slovakia were excluded due to the absence of conversion factor data.			
	Euro value of ads demonetised –			
Data	€ 18,451,042.48			
Measure 1.2				
QRE 1.2.1 MediaMath will outline its processes for reviewing, assessing, and augmenting its monetisation policies in order to scrutinise and bar participation by actors that systematically provide harmful Disinformation	MediaMath undertakes a user policy review approximately annually to assess needed changes. As of the time of the baseline report, that process is currently ongoing, and we are assessing if specific changes are needed. Note: MediaMath already prohibits disinformation and misinformation via certain existing policies. We are also assessing new ways to enhance the identification and blocking of disinformation and misinformation sources.			
SLI 1.2.1 MediaMath will report on the number of policy reviews and/or updates to policies relevant to Measure 1.2 throughout the reporting period. In addition, MediaMath will report on the	Methodology of data measurement			
	Nr of policy reviews	Nr of update to policies	Nr of accounts barred	Nr of domains barred

numbers of accounts or domains barred from participation to advertising or monetisation as a result of these policies at the Member State level, if not already covered by metrics shared under Measure 1.1 above.				
Data	1	TBD	0	650 domains barred in the relevant member states outlined above as represented by the bids blocked. MediaMath blocks more domains than this based on disinformation and misinformation, but this is the number relevant to the member states during the reporting period.
Measure 1.3				
QRE 1.3.1 MediaMath will report on the controls and transparency it provides to advertising buyers with regards to the placement of their ads as it relates to Measure 1.3	Advertisers and buyers have access to in-platform site transparency reporting which allows them direct insight into the pages and domains monetized. Advertisers and buyers have access to campaign level blocklisting capabilities, in addition to our network-wide Universal Block List.			
Measure 1.4	This is not relevant for us because we are not an advertiser or agency			
QRE 1.4.1	N/A			
Measure 1.5				

QRE 1.5.1 MediaMath will report on third party accreditations that satisfy this measure, most likely via participation in TAG's Brand Safety Certification.	MediaMath maintains TAG Brand Safety Certification, which includes independent validation by a 3 rd party auditor, and which broadly reviews the policies and processes related to Brand Safety, which is the general category under which disinformation and misinformation protections are contained. MediaMath's certifications can be checked by referring to the TAG website: https://www.tagtoday.net . As of the time of the baseline report, MediaMath is undergoing recertification for 2023.
QRE 1.5.2 see QRE 1.5.1	See QRE 1.5.1
Measure 1.5	Duplicate
QRE 1.5.1	Duplicate
QRE 1.5.2	Duplicate
Measure 1.6	
QRE 1.6.1 MediaMath will report on the options integrated into the platform	MediaMath has numerous Brand Safety tools integrated in the platform that offer protections against disinformation and misinformation. Network-wide we have a Universal Block List which is used to block ad delivery across the platform and which includes sites that have been added based on disinformation and misinformation. Additionally, MediaMath provides all advertisers with capabilities to run campaign-level blocklists for additional sites. MediaMath is also integrated with a number of contextual data providers who offer pre-bid data segments to block for a variety of Brand Safety reasons, including disinformation and misinformation. Several of these providers are integrated with disinformation and misinformation source rating services. All MediaMath buyers and advertisers have access to these tools.
QRE 1.6.2 See QRE 1.6.1	See QRE 1.6.1
QRE 1.6.3	Not applicable because MediaMath is not a provider of brand safety tools (MediaMath works with/integrates with such providers).
QRE 1.6.4	Not applicable because MediaMath is not a service that rates sources (MediaMath works with/integrates with such services).
SLI 1.6.1	Methodology of data measurement – Assessment of the breath of coverage of Brand Safety tools in-platform.
Data	In view of steps taken to integrate brand safety tools: % of advertising/ media investment protected by such tools: 100% of advertising and media investments are protected by the Universal Blocklist. Additionally, 100% of advertisers have access to additional optional Brand Safety tools via contextual data providers and exclusion list capabilities.

II. Scrutiny of Ad Placements

Commitment 2

Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages.				
Measure 2.1				
QRE 2.1.1 MediaMath will disclose and outline the policies we develop, deploy, and enforce to meet the goals of Measure 2.1 and will link to relevant public pages (as applicable)	MediaMath has developed user policies that prohibit the use of the MediaMath platform for the dissemination of disinformation. These policies are existing at the time of this baseline report and can be viewed here: http://www.mediamath.com/legal/terms/policies/ . MediaMath is continuing to assess whether additional policy updates and changes are needed. Enforcing these user policies is generally handled on an individual case by case basis, and MediaMath is investigating whether there are additional automated tools that might enhance enforcement.			
SLI 2.1.1 – Numbers by actions enforcing policies above MediaMath will report, quantitatively, on actions they took to enforce each of the policies mentioned in the qualitative part of this service level indicator, at the Member State or language level. This reporting would be limited to a numeric reporting of number of instances MediaMath blocked ads by member state or language based on Disinformation.	Methodology of data measurement – At present there is not a clear method to identify ads linked to disinformation that can be reported on with this measurement. In some cases, ads linked to disinformation are also linked to malware schemes that leverage disinformation-containing ads to attract user engagement. Such ads are typically blocked for other reasons indirectly related to disinformation, so identifying them solely as disinformation-containing ads is not currently feasible. We are looking into ways to enhance this.			
	Type of Action 1 [linked to the policy mentioned in QRE]	Type of Action 2 [linked to the policy mentioned in QRE]	Type of Action 3 [linked to the policy mentioned in QRE]	Type of Action 4 [linked to the policy mentioned in QRE]
Data	Data not available (TBD)	Data not available (TBD)	Data not available (TBD)	Data not available (TBD)
Measure 2.2				
QRE 2.2.1 MediaMath will describe the tools, methods, or partnerships they use to identify	MediaMath leverages third party creative scanning technologies that are designed to identify ad creatives and landing pages that contain malicious elements either through malware payloads or other ways to exploit the ad ecosystem to further the ends of bad actor entities. Entities that would engage in the dissemination of disinformation via ad content might be detected through the use of these third-party scanning technologies, which include some ability to scan ad creatives for content policy violations in addition to malicious payloads. Currently these tools are not specifically designed to combat ads containing disinformation, however MediaMath is investigating how these tools might be deployed for this purpose in the future.			

<p>content and sources that contravene policies mentioned in Measure 2.1 - while being mindful of not disclosing information that would make it easier for malicious actors to circumvent these tools, methods, or partnerships. MediaMath will specify the independent information sources involved in these tools, methods, or partnerships to the degree possible without violating confidentiality or sensitive commercial information.</p>	
<p>Measure 2.3</p>	
<p>QRE 2.3.1 MediaMath will describe the systems and procedures it uses to ensure that ads placed through its services comply with its advertising policies as described in Measure 2.1.</p>	<p>MediaMath is largely reliant currently on adherence to its user policy, which advertisers are contractually obligated to follow to retain access to the MediaMath platform. Violations of our user policy include a warning and strike process which can result in deactivation of an advertiser and a permanent ban from the MediaMath platform. Deliberate bad actor activity of any kind on the MediaMath platform, when discovered and confirmed as such, would typically result in swift prevention of access to the MediaMath platform. At present, disinformation-specific violations do not represent a measurable number of user policy violations that can be reported on in terms of actions taken. However, we are investigating ways to better identify disinformation-related violations (if they exist) and take appropriate enforcement action according to our existing policies.</p>
	<p>Methodology of data measurement – Data not available (TBD)</p>

<p>SLI 2.3.1 MediaMath will report quantitatively, at the Member State level, on the ads removed or prohibited from its services using procedures outlined in Measure 2.3. In the event of ads successfully removed, parties should report on the reach of content and advertising in violation. MediaMath will provide information to the degree possible without violating confidentiality or sensitive commercial information.</p>	<p>Number of ads removed (as well as reach of ads before they were successfully removed) – See QRE 2.3.1 for explanation of lack of data.</p>	<p>Number of ads prohibited – See QRE 2.3.1 for explanation of lack of data.</p>
<p>Data</p>	<p>Data not available (TBD)</p>	<p>Data not available (TBD)</p>
<p>Measure 2.4</p>		
<p>QRE 2.4.1 MediaMath will describe how it provides information to advertisers about advertising policies they have violated and how advertisers can appeal these policies.</p>	<p>MediaMath has a well-developed Creative Policy Enforcement process that would include enforcement of disinformation violations (if any were discovered) and a robust strike and warning process for violations, including clear communications processes with advertisers that provide them insight into the nature of the violation, as well as an opportunity to explain or dispute the violation.</p>	
<p>SLI 2.4.1 MediaMath will report quantitatively, at the Member State level, on the number of appeals per our standard procedures we received from advertisers on the application of our policies and on the proportion of these appeals that led to a change of the initial policy decision.</p>	<p>Methodology of data measurement – Data for this SLI would be obtained by reference to internal creative violation logs. At the time of this baseline report, we have not identified violations specifically related to disinformation that are relevant for reporting. This may be simply because there have been no such violations discovered during the reporting period. As per the above information in QRE 2.3.1, we are investigating potential ways (if any) to enhance disinformation violation detection.</p>	
	<p>Number of appeals</p>	<p>Proportion of appeals that led to a change of the initial decision</p>
<p>Data</p>	<p>0</p>	<p>0</p>

II. Scrutiny of Ad Placements

Commitment 3

Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services. [change wording if adapted]

Measure 3.1

QRE 3.1.1 MediaMath will outline how it works with others across industry and civil society to facilitate the flow of information that may be relevant for tackling purveyors of harmful Disinformation.

MediaMath partners with specialists in the rating of disinformation content, participates in industry groups such as the TAG (Trustworthy Accountability Group) Brand Safety Working Group and the IAB EU, in order to identify ways in which the industry at large and MediaMath in particular can enhance its protections against disinformation. MediaMath also stays plugged into the larger ad ecosystem and relevant stakeholders including other ad tech platforms, agencies, suppliers, and publishers, as well as listening to external messaging from sources such as journalists and activists in order to remain on top of new developments that may require new approaches to protection against disinformation.

Measure 3.2

QRE 3.2.1 MediaMath will report on its discussions within fora mentioned in Measure 3.2, being mindful of not disclosing information that is confidential and/or that may be used by malicious actors to circumvent the defenses set by Signatories and others across the advertising supply chain. This could include, for instance, information about the fora Signatories engaged in;

Among other activities, MediaMath has been active in TAG working groups discussing the issues of disinformation and how to protect against them, particularly in the Brand Safety Working Group, and also the Malware Working Group, which is more focused on the prevention of malicious advertising attacks, but which includes consideration of some of the technologies that might enhance detection of disinformation at the ad creative level. The particular place that disinformation occupies in the ad ecosystem is usually handled at present through Brand Safety protections, but it is clear that it spans multiple vectors, and so MediaMath will continue to engage in these fora to discuss with other industry stakeholders ways to better enhance protections against the threat of disinformation.

about the kinds of information they shared; and about the learnings they derived from these exchanges.	
Measure 3.3	
QRE 3.3.1 MediaMath will report on the collaborations and integrations relevant to their work with organisations mentioned.	Other than the working group activities discussed in QRE 3.2.1, specific new collaborations and integrations are still a work in progress, so we would expect to see reporting on additional activities at a future time.

III. Political Advertising	
Commitment 4	
Relevant Signatories commit to adopt a common definition of “political and issue advertising”.	
Measure 4.1	
Measure 4.2	
QRE 4.1.1 (for measures 4.1 and 4.2) MediaMath will declare the relevant scope of its commitment at the time of reporting and publish its relevant policies, demonstrating alignment with the European Commission’s proposal for a Regulation on the transparency and targeting of political advertising.	At the time of the submission of the baseline report, MediaMath is not generally engaged in political and issue advertising as a business vertical in Europe. All political advertising is currently subject to review and compliance with local laws and regulations, however at the time of submission, we are in the process of revising our user policies to include requirements that strengthen the scrutiny of political advertising in jurisdictions outside of the US and Canada to ensure compliance with local laws and regulations, which would include adherence to local standards regarding definitions of “political and issue advertising.”

<p>QRE 4.1.2 (for measures 4.1 and 4.2) After the first year of the Code's operation, MediaMath will state whether they assess that further work with the Task-force is necessary and the mechanism for doing so, in line with Measure 4.2.</p>	<p>In alignment with the commitment to the QRE, action here is to be determined after the first year of the Code's operation.</p>
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<h3 style="text-align: center;">III. Political Advertising</h3>	
<h4 style="text-align: center;">Commitment 5</h4>	
<p>Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services.</p>	
<p>Measure 5.1</p>	
<p>QRE 5.1.1 MediaMath will report on its policy rules or guidelines and on its approach towards publicising them.</p>	<p>MediaMath's policies regarding political advertising are contained in its user policies which can be found here: http://www.mediamath.com/legal/terms/policies/ . At the time of the baseline report, MediaMath is currently revising the user policies, including some sections relevant to political advertising in jurisdictions outside of the US and Canada, including Europe.</p>

<h3 style="text-align: center;">III. Political Advertising</h3>	
<h4 style="text-align: center;">Commitment 6</h4>	
<p>Relevant Signatories commit to make political or issue ads clearly labelled and distinguishable as paid-for content in a way that allows users to understand that the content displayed contains political or issue advertising.</p>	
<p>Measure 6.1</p>	

<p>QRE 6.1.1 MediaMath will publicise the best practices and examples developed as part of Measure 2.2.1 and describe how they relate to its relevant services.</p>	<p>MediaMath leverages best practices for political advertising outside of Europe, such as the use in the United States and Canada of the purple Political Ads icon supported by the DAA and DAAC. MediaMath is exploring how to leverage creative content detection to potentially identify violations including failure to adequately label political creative content, but this is still in exploratory investigation. MediaMath is not focused on political advertising in Europe currently, but if this becomes a vertical for MediaMath in Europe, we will apply best practices for marks and labels on political or issue ads.</p>			
<p>Measure 6.2</p>				
<p>QRE 6.2.1 MediaMath will publish examples of how sponsor identities and other relevant information are attached to ads or otherwise made easily accessible to users from the label.</p>	<p>At the time of the baseline report, there are not examples to share since MediaMath is not currently focused on political advertising in Europe. If this changes, we will provide examples in future reports.</p>			
<p>QRE 6.2.2 MediaMath will publish their labelling designs.</p>	<p>At the time of the baseline report, there are not designs to share since MediaMath is not currently focused on political advertising in Europe. If this changes, we will provide information in future reports.</p>			
<p>SLI 6.2.1 – numbers for actions enforcing policies above MediaMath will publish meaningful metrics, at Member State level, on the volume of ads labelled according to Measure 6.2, such as the number of ads accepted and labelled, amounts spent by labelled advertisers, or other metrics to be determined in discussion within the Task-force with the aim to assess the efficiency of this labelling.</p>	<p>Methodology of data measurement - At the time of the baseline report, there is not data to share since MediaMath is not currently focused on political advertising in Europe. If this changes, we will provide data in future reports.</p>			
	<p>Number of ads accepted & labelled according to 6.2</p>	<p>Amounts spent by labelled advertisers</p>	<p>Other relevant metrics</p>	<p>Other relevant metrics</p>
<p>Data</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Measure 6.3</p>	<p>Not relevant due to size of business; not applicable to invest.</p>			

QRE 6.3.1	N/A
Measure 6.4	Not relevant due to the nature of our ad serving platform (this is relevant to advertising on social networks)
QRE 6.4.1	N/A
Measure 6.5	Not relevant as this measure is for a different business type.
QRE 6.5.1	N/A

III. Political Advertising	
Commitment 7	
<p>Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for sponsors and providers of advertising services acting on behalf of sponsors placing political or issue ads. Relevant signatories will make sure that labelling and user-facing transparency requirements are met before allowing placement of such ads. [change wording if adapted]</p>	
Measure 7.1	

<p>QRE 7.1.1 MediaMath will report on the tools and processes in place to collect and verify the information outlined in Measure 7.1, including information on the timeliness and proportionality of said tools and processes.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will leverage relevant tools and processes and report on them in future reports.</p>	
<p>SLI 7.1.1 – numbers for actions enforcing policies above (comparable metrics as for SLI 6.2.1) MediaMath will publish meaningful metrics on the volume of ads rejected for failure to fulfil the relevant verification processes, comparable to metrics for SLI 6.2.1, where relevant per service and at Member State level</p>	<p>Methodology of data measurement - At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will report on meaningful metrics in future reports.</p>	
	<p>No of ads rejected</p>	<p>Other relevant metrics</p>
<p>Data</p>	<p>N/A</p>	<p>N/A</p>

<p>III. Political Advertising</p>	
<p>Commitment 8</p>	
<p>Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.</p>	
<p>Measure 8.1</p>	
<p>Measure 8.2</p>	

<p>QRE 8.2.1 (for measures 8.1 & 8.2) MediaMath will publicise the common minimum transparency obligations developed as part of Measures 8.1 and 8.2 and describe how they relate to their relevant services, including the data available to the user.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will publicise the common minimum transparency obligations in future reports.</p>
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<h3 style="text-align: center;">III. Political Advertising</h3>	
<h4 style="text-align: center;">Commitment 9</h4> <p style="text-align: center;">Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.</p>	
Measure 9.1	
Measure 9.2	
<p>QRE 9.2.1 (for measures 9.1 & 9.2) MediaMath will describe the tools and features in place to provide users with the information outlined in Measures 9.1 and 9.2, including relevant examples for each targeting method offered by the service.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will describe the tools and features in place to provide users with the necessary information in future reports.</p>

<h3 style="text-align: center;">III. Political Advertising</h3>	
<h4 style="text-align: center;">Commitment 10</h4> <p style="text-align: center;">Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, such that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparency commitments under this Code.</p>	
Measure 10.1	
Measure 10.2	
<p>QRE 10.2.1 (for measures 10.1 & 10.2) MediaMath will detail the availability, features, and updating cadence of their repositories to comply with Measures 10.1 and 10.2. MediaMath will also provide quantitative information on the usage of the repositories, such as monthly usage.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will detail the availability, features, and updating cadence of repositories in future reports, as well as provide quantitative information on the usage of the repositories, such as monthly usage.</p>

III. Political Advertising

Commitment 11

Relevant Signatories commit to provide application programming interfaces (APIs) or other interfaces enabling users and researchers to perform customised searches within their ad repositories of political or issue advertising and to include a set of minimum functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces.”

Measure 11.1	
Measure 11.2	
Measure 11.3	
Measure 11.4	
QRE 11.1.1 (for measures 11.1-11.4) MediaMath will detail the availability and features of APIs or other interfaces to comply with Measures 11.1 – 11.4. Relevant Signatories will also provide quantitative information on the usage of the APIs or other interfaces, such as monthly usage.	At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will detail the availability and features of APIs or other interfaces to comply with Measures 11.1 – 11.4 in future reports and will also provide quantitative information on the usage of the APIs or other interfaces, such as monthly usage.
QRE 11.4.1 MediaMath will report about their engagement with researchers, including to understand their experience with the functionalities of APIs or other interfaces as applicable, and the resulting improvements of the functionalities as the result of this engagement and of a discussion within the Task-force.	At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will report about our engagement with researchers.

III. Political Advertising

Commitment 12

Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices.

Measure 12.1	
Measure 12.2	
Measure 12.3	

<p>QRE 12.1.1 (for measures 12.1-12.3) MediaMath will share their research and findings publicly and with the Task-force for discussion and potential follow-up actions. MediaMath’s “research” will be limited to information it can obtain with its own internal resources and will share only what can be safely shared considering confidentiality obligations and commercial sensitivity. MediaMath is not a large enough organization to commit resources to research beyond this.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, if this changes we will share research and findings to the degree that research is possible given MediaMath’s resources, confidentiality obligations, and commercial sensitivity.</p>
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<h3 style="text-align: center;">III. Political Advertising</h3>	
<h4 style="text-align: center;">Commitment 13</h4>	
<p>Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.</p>	
<p>Measure 13.1</p>	
<p>Measure 13.2</p>	
<p>Measure 13.3</p>	
<p>QRE 13.1.1 (for measures 13.1-13.3) Through the Task-force, MediaMath with other Relevant Signatories will convene, at least annually, an appropriately resourced discussion around:</p> <ul style="list-style-type: none"> - novel risks in political advertising to develop coordinated policy - ongoing discussions on blackout periods - independent scrutiny of political or issue advertising. <p>MediaMath’s support of this will be limited in terms of resource commitments. MediaMath cannot make definitive statements as to what resources can be committed, but will attempt to participate in these discussions to the degree feasible.</p>	<p>At the time of the baseline report, MediaMath is not focused on the political vertical in Europe, however per our agreement to this commitment, we will participate in the described task force discussions to the degree feasible given resource constraints, and also given any limitations on our ability to contribute to the discussion based on our lack of focus on political advertising in Europe at the time of this report.</p>