

EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Signatory: Ebiquity Plc

Name of the Signatory

Ebiquity Plc

About the Signatory

Ebiquity, listed on the London Stock Exchange (AIM:EBQ), is the world leader in media investment analysis. We harness the power of data to provide independent, fact-based advice, enabling brand owners to perfect media investment decisions and improve business outcomes. We are a data-driven solutions company helping brand owners drive efficiency and effectiveness from their media spend, eliminating wastage and creating value. We do not plan, buy, or sell media, but we enable our advertiser clients fact-based recommendations on how to make their media investments work better for them.

Ebiquity is therefore able to provide independent, unbiased advice and solutions to brands because we have no commercial interest in any part of the media supply chain. With more than 500 media specialists, we have the largest pool of dedicated media professionals outside of the agency groups. We are physically present in 24 markets globally, representing ~80% of the world's media investments. This means that we are best placed to advise multinational brand owners, and our media analyses and reporting can cover more than 100 national markets. In the last 12 months we provided media audit and evaluation services for 75 of the top 100 advertisers, with 500+ advertiser clients globally. Although headquartered in the UK Ebiquity has a local EU market office presence in Denmark, France, Germany, Italy, Portugal, Spain and Sweden, but provides services to clients across all EU markets.

A number of our service offerings relevant to the digital media ecosystem are consistent and aligned with the objectives of the EU Code of Practice on Disinformation, and our support to advertiser clients in creating the effective and actionable monitoring, evaluation and reporting of media investments to those websites or media properties that are disseminating harmful content and disinformation is a natural extension of our capabilities. Our standard media governance digital audit applies a set of rules-based principles that structurally identify and quantify the opportunity for value improvement across five pillars of analysis; Supply chain inefficiencies, Transparency, Activation, Ad Quality, and Ad engagement. These evaluation criteria assess ad placements across programmatic, display, video, social and search media buys. Extending the rules-based principles to encompass those media properties involved in the propagation of disinformation would guard against advertiser funding of such sites.

In 2022 Ebiquity launched its Responsible Media Investment initiative, a survey of 42 global advertisers, representing advertisers that are committed to leverage data and tech to create reportability, and power principle-driven growth. To enable responsible practices in their media

buying, advertisers need to create visibility of their partners across the supply chain and match their media investment data to ESG sources. It is key to systematically analyse investments against a group of issues, such as: Disinformation, Environmental Sustainability, Diversity and Inclusion, Made for Advertising websites, and Privacy and Data Protection.

Disinformation undermines trust in social, political, economic, and scientific institutions and can lead to real world harms. By defunding disinformation, advertisers help fight other issues such as climate change denial, racism and discrimination. We were able to confirm the hypothesis that brand advertisers are unknowingly and inadvertently funding platforms that publish harmful disinformation content, such as climate change denial and discriminatory content, through their programmatic advertising buys. Without exception, the pioneering brands in our pilot programme for the Responsible Media Investment initiative have taken immediate action to exclude these domains moving forward.

Ebiquity also worked with key industry and data partners in establishing the Responsible Media Investment initiative, such as the World Federation of Advertisers (WFA), the Global Disinformation Index (GDI), and Iffy.News. We share many of the same values as these partners such as a commitment to Neutrality, Independence and Transparency; neutrality in that we are non-political, nonpartisan, and global in nature; Independence in that we do not take funding from media companies or grants from technology companies, our funding is from the fees for services provided to advertisers; Transparency in our commitment to understand, and identify as clearly as possible the end-to-end financial flows in the media ecosystem, and ultimate accountability of where each advertiser euro goes.

The Responsible Media Investment approach identifies those categories of disinformation (e.g., 5G, racial, anti-vax, Covid, climate change, pseudo-science etc.), and on a monthly reporting basis, identifies the digital activity and properties that advertisers have invested into and reporting on the where? and the how much? with a view to avoiding further such placement since Brands face severe reputational risk when accidentally funding harmful disinformation platforms.

This unique positioning of Ebiquity's services for advertisers is entirely consistent with section II of the Code, **Scrutiny of Ad Placements**, and especially section II (g):

"The Signatories recognise that all parties involved in the buying and selling of online advertising and the provision of advertising-related services need to work together to improve transparency across the online advertising ecosystem and thereby to effectively scrutinise, control and limit the placement of advertising on accounts and websites belonging to purveyors of Disinformation."

The general approach taken by Ebiquity also provides a strong platform for developing a robust methodology in supporting the EU Code of Practice on Disinformation in providing estimates of current and historic level of such investment, and the potential disinformation value savings of future avoidance. These capabilities will be covered further in our proposal for being appointed as the Independent Estimator.

<i>If you are a trade association, provide information about your membership and any other relevant information.]</i>	
Service name	Description of the service
Not applicable	

II. Scrutiny of Ad placement	
List of adopted commitments and measures ¹	
<p>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</p>	<p>Measure 1.4. Relevant Signatories responsible for advertising related services to advertisers/brand owners, will provide transparent evaluation and recommendations to enable their clients to place advertising through ad sellers that have taken effective, and transparent steps to avoid the placement of advertising next to Disinformation content or in places that repeatedly publish Disinformation.</p>
	<p>Qualitative reporting elements and service level indicators²</p> <p>QRE 1.4.1: Relevant Signatories that are responsible for the media investment analysis and advice regarding the buying of advertising will describe their processes and procedures to ensure they enable their clients to place advertising through ad sellers that take the steps described in Measure 1.4.</p>

¹ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

² Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

data to report on the accuracy and effectiveness of controls and services around ad placements.

Ebiquity's Responsible Media Investment service is deployed by a number of global advertisers to identify where their media buying investments may be going to those media properties disseminating disinformation, and to provide an evaluation and reporting process to eliminate them from subsequent media plans, and therefore defund and demonetize such media properties.

Ebiquity's Responsible Media Investment service will provide transparent, actionable, and granular media site level insights to advertisers as to which media properties disseminating disinformation are on their media schedules, how much is being invested, which the advertiser can subsequently exclude, directly affecting the funds flowing to such ad sellers.

Although not directly involved in the planning, execution or placement of media, Ebiquity plays a key support role to advertisers in the audit, evaluation and recommendations for improvement in these transactions. The Responsible Media Investment evaluation puts in place a key governance procedure to filter all media buys by an advertiser for adherence to pre-determined principles of responsible investment (including disinformation) and identifies where non-compliance may be occurring and requiring remedial action.

<u>Commitment 3</u>	<u>Measure 3.1</u>	<u>QRE 3.1.1</u>
	<u>Measure 3.2</u>	<u>QRE 3.2.1</u>
	<u>Measure 3.3</u>	<u>QRE 3.3.1</u>
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>As detailed above in support of each commitment specified, Ebiqity is in a unique position in the media ecosystem, as an independent and objective media specialist that advertisers trust to offer an impartial evaluation of their advertising investment. Since we do not plan, buy or sell media, nor have any controlling investment in our business by agencies, media owners or tech specialists, we can be affirmative as to facts and truth regarding media investments, without fear or favour. We have asserted our support for those commitments that reflect our unique position in the media ecosystem, namely the identification of where ad budgets flow, to whom, and how much, with a view to advising advertisers on remedial actions to defund those that seek to profit from them with disinformation. Furthermore, and given Ebiqity's capabilities and skill sets, we would be most willing to participate in the dedicated Subgroup and its work (on demonetisation) and look forward to the opportunity to discuss this further.</i></p>		

VIII. Transparency Centre

List of adopted commitments and measures ³		Qualitative reporting elements and service level indicators ⁴
<u>Commitment 34</u>	<u>Measure 34.3</u>	<u>QRE 36.1.2</u>
<u>Commitment 35.</u>	<u>Measure 35.1.</u>	<u>QRE 36.1.2</u>
	<u>Measure 35.2.</u>	<u>QRE 36.1.2</u>
<u>Commitment 36.</u>	<u>Measure 36.2.</u>	<u>QRE 36.1.2</u>
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>The Ebiqity service on Responsible Media is primarily one direct to subscribing advertiser clients, rather than a general monitoring of the marketplace. From the individual advertiser reports an aggregate picture will emerge as to the levels of investment, e.g., absolute value in euros, and percentage of total budgets being allocated to disinformation sites, types of disinformation category (e.g. AntiVax, Anti-Semitic etc.) and investment by each category, by month. This empirical data can then be utilised to forecast and estimate potential total market value investment. We can report number of advertisers using this service, in which member state, and the quantum of spend identified as going to bad actors which represents the demonetisation opportunity. We would anticipate a six-monthly updating of data and metrics.</i></p>		

³ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁴ Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

IX. Permanent Task-force	
List of adopted commitments and measures ⁵	Qualitative reporting elements and service level indicators⁶
<u>Commitment 37</u>	<u>QRE 37.6.1</u>
<u>Measure 37.1</u>	
<u>Measure 37.2</u>	
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>Ebiquity's position in the media-ecosystem and its extensive relationship with global advertisers, as previously described, makes it well-placed to support the Permanent Task-force as per the objectives (a) – (f) in leveraging practical and expert knowledge of the disinformation facts, trends, and developments across the EU member states. The insights and learning from the Ebiquity Responsible Media initiative and service will be an important contribution to the aims and objectives of the Task force is establishing and refining the purposes, the scope, and success of the Code.</i></p>	

⁵ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁶ Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

X. Monitoring of the Code	
List of adopted commitments and measures ⁷	Qualitative reporting elements and service level indicators⁸
<u>Commitment 40</u>	<p><u>Measure 40.2</u></p> <p>Periodic reporting on incidence levels recorded by Ebiquity advertiser clients.</p> <p><u>Measure 40.3</u></p> <p>Trends and changes in incidence levels, categories of disinformation, and estimated investment levels, and projection of potential incidence and ad value at individual EU market level.</p>
<u>Commitment 41:</u>	

⁷ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁸ Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)

Relevant metrics collated by Ebiquity from its Responsible Media Investment analysis will be shared on an aggregated level from its sample of participating advertisers. This will be anonymised to protect individual advertiser confidentiality. These metrics will be used as a real-world, and fact-based foundation for market extrapolation, with variance and trends tracked over subsequent periods

Signature



Nick Waters CEO

Date and place

16/12/2022

Ebiquity Plc

Chapter House,

16 Brunswick Place,

London

N1 6DZ

London