Campaign Policy

Quantcast requires its Customers, Authorized Users, Clients, and Affiliates ("Clients") using Quantcast products and/or services, including the Quantcast Platform (also, "Platform"), to comply with the standards and requirements outlined in Quantcast policies, including this Campaign Policy and, for Platform Clients, the Implementation Guide for Restricted Advertising Categories and Restricted Data, available in the Platform Help Center, to configure their campaigns and ad sets to comply with this Policy. In addition to this Campaign Policy, all users must also comply with all applicable laws, rules, ordinances, codes, and regulations, including, without limitation, applicable industry-specific ethical, professional, and/or self-regulatory requirements. In the US, Clients and advertisers must comply with the NAI Code of Conduct in effect at the time of campaign launch. By using Quantcast advertising services or technology, Client agrees to the privacy requirements posted <u>here</u>.

Quantcast reserves the right, in its sole discretion, to (1) review accounts, campaigns, ads, and/or usage of Quantcast products and services, including but not limited to those campaigns planned, launched, and delivered through the Platform for compliance with this Campaign Policy; and (2) suspend, require revisions to, and/or terminate accounts, campaigns, and/or creatives as a result of such review. Where possible, Quantcast will attempt to notify Clients when a violation of the policy occurs. In such cases, Clients may contact their Account Manager for assistance, but remain responsible for all actions initiated using Quantcast products and/or services, whether or not Quantcast was also involved in the selection and/or provision of campaign services and/or strategies.

Note that Quantcast classifies Clients at the Advertiser level into industry categories consistent with the Interactive Advertising Bureau ("IAB") advertising industry categories. Accounts for advertisers operating in industries that may implicate Restricted Advertising Categories (see below) are subject to periodic review, and campaigns may be held prior to launch.

Quantcast may provide functionalities such as location and demographic targeting. Quantcast makes no representation that such functionalities are sufficient to ensure Company's compliance with applicable laws regarding restrictions on advertising, including minimum age or other requirements. Company is solely responsible for ensuring that its ads and campaigns comply with all applicable laws.

Prohibited Content and Practices

<u>A given campaign or ad set may implicate one or more Prohibited Content and Practice and/or Restricted Data types: all campaigns</u> and ad sets must comply with all implicated restrictions.

Campaigns that promote and/or contain the following content are prohibited:

- Products, services, or activities that are *illegal or of questionable legality*, such as sites that sell fake identification cards or academic cheating services;
- Use of Quantcast products or services to *discriminate* against specific groups of people through affirmative targeting or exclusion; or use of discriminatory content/creatives;
- Use of Quantcast products or services to exploit vulnerable populations,
- Sexually explicit or pornographic content (excluding campaigns for undergarments, adult products, and other products that meet certain restrictions);
- Outside of North America, campaigns for *healthcare products and services* (excluding personal hygiene, cosmetic, first aid, and wellness products);
- *Hate speech*, which is defined as abusive or threatening speech or writing that expresses prejudice against a protected class, e.g., race, religion, or sexual orientation; *intolerance, discrimination, profanity, or inciting violence*;
- False advertising and/or content that is unfair, misleading, deceptive, abusive, or false, through claims, imagery, or suggestion;

- *Illegal drugs, recreational drugs*, and/or or products that facilitate their use, even in geographies where such substances or products may be legal; content that promotes or glamorizes the consumption of illegal drugs;
- Tobacco, nicotine, and/or products that facilitate their use, including e-cigarettes;
- Personal weapons and ammunition (excluding cooking equipment, kitchen and hunting knives, hunting equipment other than guns, airsoft guns, non-functioning antique and replica guns, decorative swords, paintball guns and accessories, gun ranges, and publications related to guns unless prohibited by law);
- Content that infringes on intellectual property rights of others;
- Content that includes or disseminates malware, spyware, and/or computer viruses; and/or
- Content or advertising that is *designed to reach children* under 16.

Restricted Data Types

In connection with the use of any Quantcast product or service, where prohibited by applicable law (or where enhanced/heightened consent is required), Clients may not collect, use, or provide to Quantcast personal data revealing a restricted attribute or characteristic (Restricted Characteristics) explicitly, by inference, or otherwise, including in creatives and/or strategies like targeting and/or tagging. Restricted Characteristics are defined by applicable law and include but are not limited to:

- Race or ethnicity/ethnic origin, color, and national origin, including citizenship or immigration status
- Religious and/or philosophical beliefs
- Political opinions or affiliations
- Health or concerning health (including mental health, genetic, and biometric data/information)
- Sexual life and/or sexual orientation
- Marital and/or familial status
- Disability or handicap
- Trade union membership
- Criminal convictions or offenses

Restricted Advertising Categories

Accounts and campaigns in the following categories are subject to periodic review; campaigns may be held prior to launch.

Quantcast permits the use of its products and services for the following categories, which may be updated from time to time at Quantcast's sole discretion. For the avoidance of doubt, Clients remain responsible for compliance with all laws, regulations, and reasonable industry customs, including but not limited to campaign content and strategy.

In certain geographies, the collection of information about certain user attributes or characteristics, or the inference thereof, is not permitted by law. For all Quantcast Campaigns, Clients are prohibited from targeting audiences, tagging pages, or otherwise using Quantcast products or services in a way that would collect information from users, or would allow inferences about users to be made, relating to attributes or characteristics prohibited by law or self-regulatory codes (*see Restricted Data Types*). Similarly, Platform clients are prohibited from inputting Interests while creating an audience that could lead to reaching users based on one or several Restricted Characteristic(s).

Alcohol

- Advertising is supported for Alcohol campaigns, including alcohol products such as beer, wine, spirits, non-alcoholic drinks
 used as mixers, alcohol-related destinations such as vineyards, bars, and distilleries, and to a limited extent, alcohol delivery
 services, where available and permitted by law. Campaign restrictions vary by geography, and Clients remain responsible for
 compliance with all laws, regulations, and industry standards, including procuring and maintaining valid licensure, where
 required.
- Creatives must contain a responsible drinking disclosure as required by laws of the geography where the ads are displayed and/or self-regulatory codes, such as: "*Please drink responsibly*"; "For legal drinking age: 21+" [or other age as required].
- Where required by law, landing pages must include age self-verification for visitors (age varies by geography).
- Ad delivery must be tailored to a permissible age group. For example, in the United States, site delivery locations must meet a minimum visitor composition of 21+ (other variations by geography). Additionally, some geographies may have display time prohibitions, such as requiring that ad timing avoids placement during, before, or after childrens' programming.
- Campaigns must not: appeal to minors; include athletes or portray characters who appear under the age of 25; make health, therapeutic, or social status claims (e.g., by claiming to reduce stress levels or improve sex life); and/or depict irresponsible or dangerous consumption or irresponsible activities while drinking (e.g., driving, operating machinery).

Cannabis and Products Related to its Use

- Campaigns for Cannabis and Products related to its use are limited to audiences in Canada. Clients remain responsible for compliance with all applicable regulations.
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request.
 - Clients must undertake reasonable steps to ensure that the ad cannot be viewed or accessed by young persons;
 - Only information or brand preference campaigns are permitted.
- Cannabis and related products ad campaigns must not: contain any direct or implied health, curative, drug, or other therapeutic claims (including claims of physical, mental health benefits or cosmetic benefits); be directed to, attract or appeal to minors (such as with cartoons, child-friendly public figures, showing CBD as toys, marketing CBD as candy, etc.); be by means of a testimonial or endorsement; associate the promotion with an alcoholic beverage, tobacco or vaping product.

Cannabidiol ("CBD")

- Cannabidiol campaigns are limited to certain geographies within the United States and Canada. Clients remain responsible for compliance with all applicable regulations.
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request.
 - Some geographies may have display time prohibitions, such as requiring that ad timing avoids placement during, before, or after childrens' programming.
- For any permitted CBD product campaigns, Clients must confirm: the CBD product is derived solely from hemp and <u>not</u> from cannabis plants; and the CBD has a THC composition below the locally mandated requirement (0.3% or less* in most

geographies, but lower elsewhere, e.g., in Idaho, 0%).

- All campaigns related to vaping or vapable CBD are prohibited, including vapable CBD oil, cartridges, and products related to their use (including vaporizers, pens, pipes, etc.). Campaigns for Delta-8 are also prohibited.
- Landing pages for permitted CBD campaigns may not include sale of prohibited products, even if the campaign is promoting a permitted product. For example, a campaign advertising CBD gummy bears with a landing page that also sells smokable CBD cartridges and e-cigarettes is not permitted.
- CBD ad campaigns must not: contain any direct or implied health, curative, drug, or other therapeutic claims (including claims of physical or mental health benefits); or attract or appeal to minors (such as with cartoons, child-friendly public figures, showing CBD as toys, marketing CBD as candy, etc.).

Casinos and Gambling

- Where permitted by law, campaigns for casinos and gambling services are supported, including for sports betting, fantasy sports betting, online casinos, state lotteries, online horse race betting, and brick and mortar casinos.
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request.
 - Creatives must contain a responsible gambling message, such as: *"If you or someone you know has a gambling problem, help is available"*; as well as other disclosures as required, for example, providing information about the addictive risks of the advertised games of chance, the prohibition of participation by minors, and the availability of counseling and therapy.
 - Landing pages must include age self-verification for visitors (age requirement varies by geography).
 - Ad delivery must be generally tailored to a permissible age group (which varies by geography).
 - Some geographies and publishers may have display time prohibitions, such as avoiding placement during, before, or after childrens' programming and/or live sporting events, sexual, religious, and/or political media.
- Campaigns must not: appeal to minors, portray characters who appear under the age of 25; advertise casinos or gambling activities for which the Client is not licensed in each geography in which the ads shall be displayed; target individuals self-identifying as gambling addicts on "self-exclusion lists" or seeking help for gambling addictions; encourage problem gambling, promise to fix problems (social, educational, professional, or personal), or suggest gambling is an alternative to employment; and/or suggest that skill can influence games of chance.

Charitable Organizations

- Advertising campaigns for Charitable Organizations are supported at Quantcast for advocacy campaigns *(to create support for specific policies, like legal reform),* awareness campaigns *(which focus on education about causes to raise support),* and fundraising campaigns.
 - Campaigns may only be run on behalf of charities that have been formally registered as nonprofit organizations in the geographies within which the Clients wish to run their campaign(s).
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request, (such as proof of 501(c)(3) nonprofit status with the IRS in the United States or registration on the Charity Register in the United Kingdom).

Cryptocurrency

- Where permitted by law, cryptocurrency campaigns are supported for Clients with required licensure for cryptocurrencies, cryptocurrency exchanges, and products and services associated with cryptocurrency mining, including facilitating use of computing resources (such as hardware products designed for cryptocurrency mining, cloud-based cryptocurrency mining services, and guides for mining cryptocurrency).
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request.
- Campaigns for initial coin offerings and new token sales are prohibited.

Defense Industry

- Advertising for the Defense Industry is permitted in certain circumstances.
- Campaigns must not: depict firearms.

Employment

- Advertising is supported for Employment campaigns, including campaigns for recruiting, hiring, job sites, job fairs and events, and internships.
- Campaigns must not: engage in or have the effect of discrimination of legally-protected class demographics as set forth in applicable civil rights, privacy, or other laws and self-regulatory codes. The prohibition also applies to targeting criteria that may be a proxy for protected classes, sometimes including zip codes. Protected classes vary by geography but generally include:
 - Race, color, ethnicity, or national origin;
 - Religion and/or political or philosophical belief;
 - Sex, gender or gender affiliation/identity, or sexual orientation;
 - Marital status and/or familial status;
 - Age (provided the applicant has the capacity to contract);
 - An applicant's receipt of income (if derived from any public assistance program);
 - An applicant's exercise, in good faith, of any right under a consumer protection law.

Healthcare Products & Services (North America Only)

- Advertising for certain healthcare products and services is permitted in North America.
- Note that globally, campaigns for first aid, personal hygiene, beauty products, wellness, and over-the-counter products for general consumption are not considered healthcare and are supported, so long as products are not offered as a treatment for any specific condition or diagnosis.
 - Example: Band-aids are considered a first-aid product.

- *Example*: Toothpaste for general consumption is considered personal hygiene, i.e., not for the treatment of gingivitis or other conditions or diagnosis.
- *Example*: Shampoo for general consumption, i.e., not for the treatment of alopecia, dandruff, or other conditions or diagnosis.
- Example: Beauty creams and serums, i.e., not for the treatment of eczema.
- Example: Tylenol for general household use.
- Where permitted:
 - Clients may not provide to Quantcast any Sensitive Personal Information of consumers or users;
 - Campaigns must not involve any sensitive health condition (as defined by the NAI Code of Conduct);
 - Campaigns must include required disclaimers; adhere to applicable content restrictions (limitations on creatives); adhere to audience targeting requirements and restrictions.
 - Clients must have and maintain pre-clearance; authorization and/or licensure where required by law, and make such licensure available to Quantcast upon request.
- Campaigns must not: seek to target audiences based on condition diagnosis, or other Sensitive Personal Information; make false treatment claims; and/or promote products subject to recalls or significant government actions (e.g., OxyContin).

Hunting Equipment

• Advertising for limited hunting equipment is supported unless prohibited by applicable law. Advertising for firearms, even if solely for hunting, is <u>not</u> permitted, regardless of whether permitted by law.

Housing

- Advertising is supported for Housing campaigns, including campaigns selling residential and commercial real estate, purchasing residential and commercial real estate, residential commercial real estate services (agents, transactions, listings), residential real estate mortgage loans (APR < 36%), residential real estate home improvement loans (APR < 36%), residential real estate insurance (homeowners', renters'), residential and commercial real estate development, retirement and disability housing opportunities, and home improvement services.
- Non-discrimination: campaigns must not engage in or have the effect of discrimination of legally-protected classes. The prohibition extends to targeting criteria that may be a proxy for protected classes, sometimes including zip codes. Protected classes vary by geography but generally include:
 - Race, color, ethnicity, or national origin;
 - Religion and/or political or philosophical belief;
 - Sex, gender, or gender affiliation;
 - Marital status and/or familial status;
 - Age (provided the applicant has the capacity to contract);
 - The applicant's receipt of income (if derived from any public assistance program);
 - The applicant's exercise, in good faith, of any right under a consumer protection law.

Financial products and services

- Advertising is supported for Financial Services campaigns, including for credit cards (with APR < 36%), personal loans (with terms of at least 90 days and APR < 36%), loans for homes, RVs, and boats (with terms of at least 90 days and APR < 36%), nonprofit debt services (where the Client is an approved nonprofit budget and credit counseling agency or a national nonprofit association representing nonprofit credit counseling agencies), banking, financial planning and annuities, insurance (including car, home, RV, boat, and life), tax planning services, and credit monitoring services (excluding credit repair services).
 - Clients must have and maintain licensure where required by law, and make such licensure available to Quantcast upon request.
 - Clients must include specific disclosures required by local law.
- Campaigns must not promote: short-term loans with a repayment schedule of less than 90 days; high-interest loans or credit cards (i.e., with an APR of 36% or higher); credit repair services; payday loans or for-profit debt services.
- Non-discrimination: campaigns must not engage in or have the effect of improper discrimination of legally-protected class demographics as set forth in applicable civil rights, privacy, or other laws and self-regulatory codes. The prohibition also applies to targeting criteria that may be a proxy for protected classes, sometimes including zip codes. Protected classes vary by geography but generally include:
 - Race, color, ethnicity, or national origin;
 - Religion and/or political or philosophical belief;
 - Sex, gender, or gender affiliation;
 - Marital status and/or familial status;
 - Age (provided the applicant has the capacity to contract);
 - The applicant's receipt of income (if derived from any public assistance program)
 - The applicant's exercise, in good faith, of any right under a consumer protection law.

Candidate and Issue Campaigns

- Responsible advertising for Political Campaigns may be permitted in limited circumstances in the United States only on a caseby-case basis.
 - Clients must have and maintain licensure where required by law, and make such licensure available.
 - Campaign content must include disclosures and disclaimers as required by applicable law, including a "paid for" disclaimer to show the entity or the person responsible for the ad.
- Campaigns must not be funded by or otherwise involve foreign national interference; incite violence; encourage lawlessness or insurrection; include hate speech; constitute the distribution of "fake news"; or discriminate or suggest discrimination based on any protected class characteristics or otherwise.

Restricted Characteristics

• Regardless of the industry or product category, ad sets and creatives that could reveal or reasonably allow making an inference about a Restricted Characteristic of a user who showed an interest in said creative (i.e., clicking the ad) are not permitted.

- Where prohibited by law or self-regulatory code, targeting users based on a known and/or inferred Restricted Characteristic is not permitted.
- Tagging or placing pixels on websites and pages featuring content that could reasonably allow making an inference about the Restricted Characteristic of a visitor is not permitted.

This policy is not and should not be construed as legal advice and solely reflects Quantcast's policy. Clients of Quantcast products and services must seek independent advice from their own counsel regarding compliance with applicable laws, regulations, codes, and industry standards. Quantcast reserves the right to update, modify, and change these policies at any time, at its sole discretion. For the avoidance of doubt, Clients always remain liable for their campaign content and strategies, and for all activities they undertake with the use of Quantcast's products and/or services.