Ligatus Advertising Guidelines
Introduction

This document describes our Advertising Guidelines, detailing which ad campaigns and creatives can and cannot be booked within our network of premium publishers. The latter is of great importance to us and our business as we stand for high-quality partners with valuable content in order to create a user experience we can all benefit from.

When it comes to the following standards we primarily focus on complying with statutory (local) law. In addition, we guarantee our partners that we shall deliver high-quality advertisements on their pages that follow the law and adhere to certain creative standards - as these lead to a better experience for users as well. To retain that level, we reserve the right to reject certain advertisements and stop campaigns at our sole discretion. Please understand that we need to enforce the following rules in order to maintain a legal and high-quality ad network. Not just for our clients but also because we owe this to our partners and their great reputation in the market.

Ligatus Advertising Guidelines

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I. Our “ground rules”

Advertising illegal content, promoting illegal activities or infringing the rights of others will always be forbidden in our network. Especially, we consider the following content criteria (in whole or in part) as illegal or inappropriate and will ban this from our network:

- Content that constitutes **hate speech**, is defamatory, libellous or promotes racial intolerance against an individual, group or organization
- False, untrue or misleading statements
- **Pornographic** or obscene content
- **Violence**
- Showing or marketing the following products:
  - Illicit **drugs** and drug paraphernalia
  - Illegal **replicas** or imitations of designer goods (and similar)
  - **Tobacco** and tobacco-related products (including e-cigarettes)
  - **Weapons** and ammunition (e.g., firearms, firearm components, fighting knives, guns)
- Content regarding programs which compensate users for clicking on ads or offers, performing searches, surfing websites, or reading emails
- **Hacking** content, Malware (and similar)
- Content or material that is religious and/or promotes one religion over another

II. Example of our Guidelines in detail

These ground rules come in a lot of different variations and it would be impossible to list them all. We reserve the right to decide if a violation is at hand on a case-by-case basis.

Here are some examples for possible violations of and limitations to our ground rules and/or creative standards in our network:

- **Comparative advertising**
  - means advertisements that name a competitor's product or service to show or suggest it is worse than the product advertised (e.g. “Nissan Sentra - more horsepower and torque than Hyundai Elantra”, “Sorry Starbucks, the people have voted - Costa”)
  - can also be indirect (i.e. not mentioning the other brand's name)

- **Fake user comments**
  - User comments that look like they originate from Facebook (when they really don't) are considered fake (indicator: oftentimes not clickable)
  - Comments that seem genuine but sound “too good to be true”. In that case we reserve the right to investigate the matter internally and make a decision based on that investigation and our experience in the market. We will notify our customers and give them a chance to prove us wrong. If they can't, we have to decline the advertisement or it needs to be amended.

It is the **advertiser's responsibility** to ensure to have the necessary rights to use any submitted images, logos, and text, and that no intellectual property rights of any third parties are infringed.

**Special rules for Images**

- An advertising image must be objectively **relevant** to the product or service being advertised. There should be a clear, simple, and logical link (product, theme, advertising campaign, or metaphor) between the image supplied and the ad message to users. Images can pique users' curiosity, but they must not mislead users by featuring products that are not available, or picturing a product or service that is substantially different than the one offered.
• Images with **poor overall quality** can be rejected as the user experience could suffer.

• **Sexually suggestive images** are considered to violate our ground rule regarding “Pornography and obscene content”
  - Images must be appropriate for a general audience. Images that focus on particular body parts for sexual effect are not allowed. Ads that use sexually suggestive images to promote completely unrelated products will be declined.

• Images should not feature **people of public interest** (e.g. government officials or celebrities and famous members of society) and other official landmarks or emblems (e.g. government buildings, documents, police cars, flags, ...) to promote unrelated commercial offers as these images imply an association with the government and/or that person which is inaccurate.

• Image components that imply functionality, including buttons containing generic calls-to-action like “Free!”, “Click here”, “Buy now”, fake system alerts, play buttons that suggests video capability, close buttons, drop down lists, message alerts, incoming call notifications, updates, badges, or any other imitation of mobile or tablet notifications or functions, etc. are not allowed.

• Images that leverage **fear, sensitive political or cultural topics, tragic words or salacious content** to promote a time commercial products or offers are not allowed.

• Images that use **race baiting, bigotry** or similar offensive techniques to promote products or services are not allowed.

• Viscerally impactful images such as close up images of medical conditions, blood, body parts, or bodily fluids are not allowed (as we consider them a violation of our ground rule “Violence”).

• Images cannot include **individuals smoking and/or consuming other tobacco products**.

### Special rules for Headlines and Text

• Text in uppercase or the usage of **solely capital letters** can be rejected.

• The use of **slang or obscene vocabulary** is not allowed.

• It is not allowed to use the topics **religion, politics or sex**.

• Advertising of products concerning sensitive topics (e.g. vaginal infections, incontinence, haemorrhoids, erectile dysfunction) have to be addressed responsibly and due to market standards in the respective field.

• Editorial content on a landing page needs to be **marked as an “Advertorial”** or similar in order to be transparent to users.

• Using the headline/text “**News**” and/or pretending to be a news page when actually it's a product advertisement is misleading and therefore in violation of our ground rule.
  - Fake news can not be in whole or in part content of the landing page or the ad itself. In case we have reason to believe that some news content is “fake”, we reserve the right to investigate the matter internally and make a decision based on that investigation (factors may be: the legal imprint, the advertiser company, the page as a whole, fake comments, quotes, dead links). We will notify our customers and give them a chance to prove us wrong. If they can't, we have to decline the advertisement or it needs to be amended.

### Special rules for Landing Pages

• It is the customer's responsibility to provide the **required legal information** (or the link hereto) on the landing page in a manner that is obvious and “easy-to-find”, marked as “**Imprint**”, “**Contact**” or similar. **Please note:** what is required legal information might differ from one Ligatus country to another.

• It should be ensured that the content of the landing page as well as the web address (URL) matches the content advertised. If we have reason to believe that the advertising is misleading of the product/content on the landing page, we reserve the right to decline such advertisement.

• If **awards of the advertised products** are mentioned (e.g. “Best Product on the market 2016”) there has to be an easy-to-find link or other reference to the organisation who granted that award on the landing page.

• **Buzz campaigns** can be rejected. They include companies sharing online videos, usually centered around something humorous, controversial, sexual, unusual or outrageous, hoping to bring the user on a page where the first goal is to sell advertising. Those websites focus on advertising revenue instead of content. As a general rule these websites have less than 60% relevant content related to the ad and the rest is advertising content for monetization.

• **Fake Deadlines/Shortage of time**
- We will not accept ads and/or linked landing pages on which a product or service is advertised in a way that puts a time
  pressure on users in order to “Get the best price now” or “Don't wait, tomorrow could be too late” if such pressure is - in
  reality - non-existent and simply implemented to push sales numbers. Such marketing conduct is illegal as these are untrue
  statements and it is especially misleading to potential buyers.

III. Examples of Guidelines following Local Restrictions

We also implemented the Guidelines below to follow some restrictions that local law requires in the Ligatus countries. Obviously, we
cannot cover all of the various regulations here in this wider-scale document. Hence, our Customers must themselves guarantee
the adherence of advertisements with applicable law at all times.

The following information on these issues shall serve as an overview and help to our Customers. It is not conclusive, nor does it
replace profound legal advice in case of doubts regarding the advertising content. This is the sole responsibility of our customers.

Here are some of the “classic” issues we face with local law restrictions:

French Audience
  - Ads directed to a **French audience** that is physically located in France (French IP address) must be in French language or at
    the least contain a French translation.

FOREX (Foreign Exchange Market)
  - To advertise FOREX-related products and services, the Customer must be accepted by the financial authority of the respective
country (e.g. AMF for France, Sermaye Piyasası Kurumu for Turkey) and we need to reserve the right to ask written proof of
  that before the campaign can start.
  - If the ad indicates that users can earn money, it can be obligatory to explain the dangerosity of the trade (e.g. possible loss or
    risk market, possible addictions).
  - Trading leverage communication is not allowed.

Pharmaceuticals and similar products
These products (and advertising them) are - usually - heavily regulated as they can carry a potential health risk to consumers. We
recommend checking any advertisements in this sector legally, especially (but not limited to):

  - The landing page must contain certain information on:
    - The advertiser (e.g. identity and address of the business incl. full corporate name)
    - Essential features of the goods / services (e.g. final price, payment and delivery conditions, cancellation / withdrawal right)
    - Specific pharmaceutical compulsory statements (e.g. ingredients, composition, active substances, therapeutic indications,
      contraindications, side effects, points of contact in emergencies)

  It cannot include:
    - A statement that the product cures or prevents diseases (if not proven)
    - Otherwise prohibited statements (e.g. advertise with a medical professional recommendation, testing or practice; advertise
      with an abusive, abhorrent or misleading illustration of the human bodies’ mutation due to diseases or damages or the effect
      of a pharmaceutical inside the human body or in parts of the human body)
    - Misleading (objectively incorrect) testimonials/letters of recommendation

Gambling
Another risky (addiction, bankruptcy) field of products and services for advertisements that leads to a lot of legal regulation, e.g.:
• The Customer must have a valid gambling license of the respective gaming authority (e.g. ARJEL for advertising in France), including the right to advertise his services online. We reserve the right to check this on a case-by-case basis.

• Ligatus has to consider penny auctions as gaming as long as there is no official statement of the respective gaming authority that it does not estimate the respective business concept as gambling.

• The above usually does not apply to penny auctions in which a possible win can be used to buy a product or service. In that case, gambling might not be apparent.

Alcohol

• As opposed to tobacco products (which cannot be advertised at all) these products can generally be subject to advertisements but are strongly limited and monitored by the authorities as they carry a potential high health risk for consumers.

• Advertising must, therefore, not whitewash the effects of alcohol on body and mind as well as advertise excessive consumption and certain “positive” effects or depict an unhealthy attachment or addiction to alcohol.

• It is especially problematic to target or refer to minors, even only indirectly, or depict minors or people who clearly appear to be minors, consuming alcohol.

• Any association between the consumption of alcoholic beverages and driving motorised vehicles is forbidden as well.