

## ENABLE TRANSPARENCY

## CERTIFIED FOR TRANSPARENCY

Certification Guidelines

Version 1

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## ABOUT THE CERTIFIED FOR TRANSPARENCY PROGRAM

The mission of the TAG Certified for Transparency program is to give advertisers, brands, and advertising agencies appointed to manage digital advertising campaigns on behalf of advertisers and brands, greater transparency into the details of their digital advertising campaigns.

In order to enable companies to promote a transparent environment, the TAG Transparency Working Group maintains the Certified for Transparency Guidelines. Companies that are shown to abide by the Certified for Transparency Guidelines can achieve the Certified for Transparency Seal and may use the Seal to publicly communicate their commitment to fostering an environment of trust in the marketplace.

#### **ABOUT TAG**

TAG, the Trustworthy Accountability Group. is the leading global certification organization fighting criminal activity, promoting Brand Safety and increasing trust in media. TAG's mission is to:

- Eliminate fraudulent traffic;
- Facilitate threat intelligence;
- Promote brand safety;
- Enable transparency in digital advertising.

TAG advances those initiatives by bringing companies across the digital advertising supply chain together to set the highest standards.

TAG is the first and only registered Information Sharing and Analysis Organization (ISAO) for the digital advertising industry.

To learn more about the TAG, please visit www.tagtoday.net.

1. Executive Summary	4
2. Certification process	6
2.1. Application	7
2.1.a. Participation Fee	7
2.2. Qualification	7
2.3. Geographic Applicability of Certification	7
2.4. Method of Certification	8
2.5. Publication of Certification Status	8
2.5.a. Certified for Transparency Seal	8
2.6. Continued Compliance	8
2.6.a. TAG Compliance Officer	9
2.6.b. Compliance Team	9
2.6.c. Training	9
2.6.d. Quarterly Internal Reviews	10
2.6.e. Recertification	10
3. Covered Parties	11
3.1. Direct Buyers	12
3.2. Direct Sellers	12
3.3. Intermediaries	12
3.4. Vendors	12
4. Certification Requirements	14
4.1. Requirements Table	15
4.2. Complete TAG Registration and Be a TAG Member in Good Standing	15
4.3. Have a Designated TAG Compliance Officer	15
4.4. Complete the Certified for Transparency Training Annually	16
4.5. Employ a TAG-Recognized Transparency Utility	16
4.5.a. Use of TAG TrustNet	16
4.6. Employ and Honor Ads.txt and App-Ads.txt	16
4.7. Employ and Maintain Sellers.json	17
5. Allegations of Non-Compliance & Appeal	19
6. Appendix A	21

## EXECUTIVE SUMMARY

The lack of transparency in digital advertising creates a myriad of issues including fraudulent activity, malicious attacks, piracy, brand safety, etc. With the continual rise and constant innovation within digital advertising, transparency has become an increasingly important hygiene factor for all media buyers and planners. Marketers are more conscious than ever in working with partners who will not only deliver results, but ensure the brand's message is safeguarded from any malicious activity within the ecosystem.

The mission of the TAG Certified for Transparency program is to give trusted businesses industry-wide recognition in their efforts for achieving high levels of transparency and accountability across their operations. Through increased campaign visibility, brands, advertisers and their media agencies now have a tangible way to better select and manage their partners.

The TAG Certified for Transparency Program promotes the flow of media spend to digital advertising organizations who uphold an industry regulated framework for transparency. By haromonizing campaign log-file data across the entire supply chain and establishing an always on 'shared-truth', the certificate provides choice and control for buyers and increases the value of inventory for seller.

## CERTIFICATION PROCESS

The TAG Certified for Transparency Program is a voluntary self-regulatory digital advertising industry initiative. It represents the on-going process of defining and maintaining guidelines for promoting the flow of advertising budgets to participants in digital advertising upholding an industry regulated framework for providing transparency to buyers.

TAG certifies companies at the entity level, rather than certifying a specific product or business line within a legal entity. To achieve the TAG Certified for Transparency Seal, companies must show that all of its material operations related to ad monetization services within a particular geographic market, or markets, are in compliance with the relevant requirements of the Certification's requirements.

#### 2.1. APPLICATION

Before a company can apply for the Certified for Transparency Seal, that company must first complete the process of becoming "TAG Registered" and enrolling in the Verified by TAG Program. Companies can learn more and apply for TAG Registration by contacting TAG at info@tagtoday.net or visiting <a href="https://www.tagtoday.net">www.tagtoday.net</a>.

Once a company has been approved as "TAG Registered" and enrolled in the Verified by TAG Program, the company's designated TAG Compliance Officer may contact TAG directly to request enrolment in the Certified for Transparency Program in order to begin the process for that company to achieve the Seal. In order to participate, a company's TAG membership must include access to that Program.

#### 2.1.a. Participation Fee

There is an annual fee, which is encompassed in annual membership fees, for participation in the Certified for Transparency Program.

#### 2.2. QUALIFICATION

Any TAG member company that has been enrolled in the Verified by TAG Program and whose TAG membership includes participation in the Certified for Transparency Program can participate in the Program and apply for the Seal.

Requirements to achieve the TAG Certified for Transparency Seal differ according to a company's role in the digital advertising supply chain. These roles and requirements are outlined in Sections 3 and 4 of this document.

## 2.3. GEOGRAPHIC APPLICABILITY OF CERTIFICATION

The Certified for Transparency Seal can be achieved in certain geographic markets. However, upon achieving certification, a company is only permitted to use the Certified for Transparency Seal in the specific geographic markets in which TAG has found the company's operations to be in full compliance with the Certified for Transparency Guidelines. Additionally, any use of the Seal must identify the geographic markets to which it applies.

Companies can choose to certify operations either by country (e.g. United States, United Kingdom), or by region (e.g. North America, Europe). Companies must clearly state which option it is applying for certification in its application for the Certified for Transparency Seal.

#### 2.4. METHOD OF CERTIFICATION

Companies must apply to achieve the Certified for Transparency Seal through TAG validation only. Self-Attestation is not available in the Certified for Transparency program.

Certification through TAG validation is obtained by the company inviting TAG to review and validate that the company has achieved full compliance with the Certified for Transparency Guidelines, as well as a series of binding attestations from the company in which it attests to having achieved full compliance with the Certified for Transparency Guidelines and that it will maintain compliance throughout the certification period.

TAG validation will include examination of, but not limited to, the following:

- Job description of the TAG Compliance Officer.
- Training policy and procedures.
- Internal audit policies and procedures.
- Established policies and procedures related to internal control.
- Policies and procedures related to the requirements of the Certified for Transparency Guidelines.
- Policies and procedures related to complaint handling/resolution to ensure compliance with the Certified for Transparency Guidelines.
- Testing performed by the company as part of the internal quarterly review process.
- Testing performed to ensure successful integration with a TAG-Recognized Transparency Utility.

Entities that wish to achieve the TAG Certified for Transparency Seal through TAG validation should submit to TAG: the Application for TAG's Certified for Transparency Seal, signed TAG Compliance Officer Attestation and Business Executive Attestation, as well as any supporting documents or materials required by the Program.

## 2.5. PUBLICATION OF CERTIFICATION STATUS

With training and consistent monitoring procedures in place, the company is certified when TAG determines the company to be in full compliance with the Certified for Transparency Guidelines, based on the required documentation submitted. TAG notifies the company of its certification status, and that certification status is posted to the TAG Registry. Upon certification, TAG sends Certification Seal materials to the company's designated TAG Compliance Officer for use in promoting the company's Certified for Transparency Seal status.

#### 2.5.a. Certified for Transparency Seal

Companies that are shown to meet the Certified for Transparency Guidelines requirements receive the Certified for Transparency Seal and can use it to publicly communicate their commitment to promoting transparency in the digital advertising supply chain.

#### 2.6. CONTINUED COMPLIANCE

Companies that are shown to meet the requirements of the Certified for Transparency Guidelines and achieve the Certified for Transparency Seal must maintain compliance throughout the certification period and renew their compliance annually.

#### 2.6.a. TAG Compliance Officer

Companies participating in the Certified for Transparency Program must designate a qualified TAG Compliance Officer. This is usually done in the process of the company's application for TAG Registration, prior to participation in the Certified for Transparency program.

The duties of a TAG Compliance Officer include:

- Serving as the primary point of contact between TAG and the company regarding all aspects of the company's TAG membership. This includes receipt of notice concerning any changes to TAG Certification program(s).
- Completing the required training modules for each TAG Certification program in which the company participates.
- Educating internal teams on the requirements of each TAG Certification program in which the company participates and notifying those internal teams of any changes.
- Overseeing the company's processes related to compliance with the requirements of each TAG Certification program in which the company participates.
- Facilitating internal review of the company's compliance with the requirements of each TAG certification program in which the company participates, including independent auditor review where appropriate.
- Taking on additional responsibilities applicable to each of the TAG programs in which the company participates (as appropriate).

The minimum qualifications for a TAG Compliance Officer include:

- Reporting relationships whereby compliance assessments are not influenced or biased by operations personnel being tested for compliance.
- Adequate technical training and proficiency in testing and assessing compliance.
- Adequate knowledge of the subject matter covered in each of the TAG Certification programs in which the company participates (i.e. advertising technology, various functions within the digital advertising supply chain, etc.).
- Adequate independence within the company to avoid conflicts of interest with regard to assessing compliance with TAG program requirements.

A TAG Compliance Officer does not need to hold a particular title or job description within the organization, as long as that individual has independence from sales and marketing functions.

The role of the TAG Compliance Officer is further described in the TAG Compliance Officer Role Description, available on www.tagtoday.net.

#### 2.6.b. Compliance Team

While the only requirement to support compliance with the Certified for Transparency Guidelines is the designation of a TAG Compliance Officer, it is also recommended that a company have in place a Compliance Team to assist in meeting and maintaining compliance with the Certified for Transparency Guidelines.

#### 2.6.c. Training

Certified for Transparency training is required for the company's designated TAG Compliance Officer to complete annually. The Compliance Officer is encouraged to complete the online training, after a company is enrolled in the Certified for Transparency Program, in order for the company to achieve the Certified for Transparency Seal. Training must be renewed on an annual basis in order for a company to maintain its Certified for Transparency Seal from year to year.

TAG provides training through online streaming video available through the TAG Member Portal, so that TAG Compliance Officers are able to obtain training regardless of geographic location or time-zone. TAG Compliance Officers can learn more by emailing info@tagtoday.net.

#### 2.6.d. Quarterly Internal Reviews

Quarterly internal reviews ensure that a company that has been awarded the Certified for Transparency Seal maintains full compliance with Certified for Transparency Guidelines throughout the year.

The TAG Compliance Officer is responsible for overseeing quarterly internal reviews, which should ensure that:

- The Certified for Transparency Guidelines are consistently and completely followed.
- Control activities discussed during Certified for Transparency Guidelines training are formally documented.
- Potential violations of the Certified for Transparency Guidelines are detected in a timely fashion.
- Appropriate corrective measures are taken in a timely fashion.

Internal reviews should also include a risk analysis of certain control functions to assess how much testing is needed to validate adherence. Also, actual testing of data, both quantitatively and qualitatively, should be used to validate that the existing control structure is designed correctly and operating effectively.

#### 2.6.e. Recertification

Certification is an on-going process and companies that achieve the Certified for Transparency Seal must be recertified annually. Companies that achieve the Certified for Transparency Seal must apply for recertification by January 31 each year in order to be considered for recertification in that calendar year. TAG sends recertification notifications to all certified companies prior to the start of the recertification submission period.

TAG reviews all applications for recertification and notifies companies whether they have achieved recertification by March 1.

# COVERED PARTIES

The Certified for Transparency Seal is applicable to several types of covered parties across the digital advertising supply chain:

- Direct Buyers
- Direct Sellers
- Intermediaries
- Vendors

Companies applying for the Certified for Transparency Program must apply for the Seal under all relevant covered party categories and meet the requirements relevant to each category, as described in Section 4.1.

#### 3.1. DIRECT BUYERS

Direct Buyers are advertisers who own advertisements for placement in inventory on the publisher's websites or other media properties or advertising agencies that directly represent such advertisers. A Direct Buyer is an advertiser – a brand company represented in the advertisements that it wants to place in the publisher's inventory. However, many brands hire an advertising agency to manage their advertising campaigns. A brand-appointed agency is also a Direct Buyer, except in cases it operates as an Intermediary. To qualify as a direct buyer the agency must directly represent the advertiser.

#### 3.2. DIRECT SELLERS

Direct Sellers are publishers that provide content to an audience. This type of Direct Seller sells ad space inventory on its websites or other media properties that offer value to advertisers depending on the size and demographics of the audience.

While a publisher may sell this inventory directly, larger publishers may appoint an agent to manage and sell this inventory. Such an agent is also a Direct Seller. To qualify as a Direct Seller, the agency must directly represent the publisher.

#### 3.3. INTERMEDIARIES

An Intermediary is a company that owns and/or operates a technology or service that allows for the purchase of digital inventory for the purpose of ad placement. Intermediaries include both Indirect Sellers and Indirect Buyers.

- An Intermediary may be an Indirect Seller in that it sells a Direct Seller's inventory.
- An Intermediary may be an Indirect Buyer in that it is qualified to assign a Direct Buyer's advertisements to a Direct Seller's inventory.

Any covered party that connects a Direct Seller to a Direct Buyer or an Indirect Seller through an ad technology layer or redirect is also an Intermediary.

#### 3.4. VENDORS

A Vendor is a company that owns and/or operates a technology that allows for certain services to be provided to the digital advertising industry.

Vendor services may include, but are not limited to:

- Measurement
- Invalid traffic detection and removal
- Content validation
- Anti-piracy

#### • Anti-malvertising

These entities do not transact inventory but may be able to append to the creative payload or be declared in a digital advertising campaign.

# CERTIFICATION REQUIREMENT

Requirements to achieve the Certified for Transparency Seal may differ according to a company's role in the digital advertising supply chain. To achieve the Certified for Transparency Seal, an entity must meet relevant criteria based on the types of functions it undertakes.

To achieve the Certified for Transparency Seal, a company must meet the requirements for all the categories in which it operates, according to the table below.

#### 4.1. REQUIREMENTS TABLE

Requirements	Scope	Direct Buyer	Direct Seller	Intermediary	Vendor
Complete TAG Registration and be a TAG Member in Good Standing	Administrative	V	V	V	V
Have a designated TAG Compliance Officer	Administrative	<b>√</b>	<b>√</b>	√	√
Complete Certified for Transparency Training annually	Administrative	V	√	V	√
Employ a TAG- Recognized Transparency Utility	Transparency	V	√	V	√
Employ and Honor Ads.txt and App-Ads.txt	Transparency		√	√	
Employ and Maintain Sellers.json	Transparency			√	

## 4.2. COMPLETE TAG REGISTRATION AND BE A TAG MEMBER IN GOOD STANDING

To achieve the Certified for Transparency Seal, any participating company must first become a TAG member by completing the process of becoming "TAG Registered" and enrolling in the Verified by TAG Program (See Section 2.1). Companies can learn more and apply for TAG Registration by contacting TAG at info@tagtoday.net or visiting www.tagtoday.net. Companies seeking the Certified for Transparency Seal must also have an active TAG membership that includes participation in the Certified for Transparency Program, have a valid TAG membership agreement in place, and be current on payment for all TAG membership fees.

## 4.3. HAVE A DESIGNATED TAG COMPLIANCE OFFICER

To achieve the Certified for Transparency Seal, any participating company must have designated a qualified TAG Compliance Officer. The role of the TAG Compliance Officer is described in section 2.6.a of this document.

## 4.4. COMPLETE THE CERTIFIED FOR TRANSPARENCY TRAINING ANNUALLY

To achieve the Certified for Transparency Seal, any participating company's designated TAG Compliance Officer is required to complete the online training, after a company is enrolled in the Certified for Transparency Program, as outlined in Section 2.6.c.

## 4.5. EMPLOY A TAG-RECOGNIZED TRANSPARENCY UTILITY

To achieve the Certified for Transparency Seal, any participating company acting as a Direct Buyer, Direct Seller, Intermediary and/or Vendor, must employ a TAG-Recognized Transparency Utility (See Appendix A) when an Advertiser requires the use of a transparency utility.

How a company complies with this requirement will depend on the covered party category(ies) into which the company falls, the covered party(ies) function(s) which the company fulfils (See Section 3 for Covered Parties and Functions), and the TAG-Recognized Transparency Utility required by an Advertiser.

- Direct Buyers fulfilling the function of advertisers must employ a TAG-Recognized Transparency Utility as they feel is necessary to ensure transparency into their digital advertising campaigns. These Direct Buyers must also require that their brandappointed agency, Intermediary, Vendor and Direct Seller partners employ a TAG-Recognized Transparency Utility as directed.
- Direct Buyers fulfilling the function of a brand-appointed agency must employ a TAG-Recognized Transparency Utility as required by advertisers. These Direct Buyers must also require that their Intermediary, Vendor and Direct Seller partners employ a TAG-Recognized Transparency Utility as directed by advertisers.
- Intermediaries must employ a TAG-Recognized Transparency Utility when required to do so by the Direct Buyer.
- Vendors must employ a TAG-Recognized Transparency Utility when required to do so by the Direct Buyer.
- Direct Sellers must employ a TAG-Recognized Transparency Utility when required to do so by the Direct Buyer.

#### 4.5.a. Use of TAG TrustNet

TAG TrustNet is available to assist companies in meeting this requirement. This utility uses distributed ledger technology (DLT) which provides advertisers with transparency into their digital advertising campaigns. The full process for utilizing TAG TrustNet is outlined in the TAG TrustNet Member Requirements<sup>1</sup>.

## 4.6. EMPLOY AND HONOR ADS.TXT AND APP-ADS.TXT

 $<sup>^{\</sup>rm 1}\,https:\!/\!/www.tagtrust.net/member-requirements$ 

To achieve the Certified for Transparency Seal, any participating company acting as a Direct Seller and/or Intermediary must implement and honor ads.txt and app-ads.txt files as required for each covered party category in which that company falls, as defined in Section 3.0.

- If a participating company is acting as a Direct Seller, that company must publish and maintain an ads.txt file on every domain that it monetizes through digital advertising. If that company owns and operates properties in the app environment, it must also create a public record of its Authorized Sellers and Resellers by publishing an appads.txt file for every app that it monetizes through digital advertising.
- Direct Sellers must also utilize the Certification Authority field for each ads.txt and appads.txt file which the Direct Seller publishes. Where applicable, the Certification Authority field must include, at a minimum, the TAG ID for each Intermediary listed as having a DIRECT or RESELLER relationship with the Direct Seller. In instances where a DIRECT or RESELLER Intermediary partner is not a member of TAG and does not have a TAG ID, the Direct Seller may leave the related Certification Authority field blank.
- If a participating company is acting as a Direct Buyer and/or an Intermediary, that company must honor a Direct Seller's ads.txt file if one has been published, buying only from entities identified within the published ads.txt file. If that company is transacting with app inventory, it must also honor a Direct Seller's app-ads.txt file if one has been published, buying only from entities identified within the published app-ads.txt file.

Implementation of ads.txt is described in the IAB Tech Lab Ads.txt Specification<sup>2</sup>.

Implementation of app-ads.txt is described in the <u>IAB Tech Lab Authorized Sellers for Apps (app-ads.txt</u>) Specification<sup>3</sup>.

## 4.7. EMPLOY AND MAINTAIN SELLERS.JSON

To achieve the Certified for Transparency Seal, any participating company acting as a Intermediary must employ Sellers.json. Intermediaries must disclose to TAG the company's methodology for timely maintenance of their Sellers.json file.

Intermediaries are also required to implement Identifier Names within their Sellers.json file. Specifically, Intermediaries must use "TAG-ID" as a NAME, and include their TAG ID as the VALUE for that NAME, within the IDENTIFIER object in their Sellers.json file.

Companies may find their TAG ID within the company information section, at the top of their home-page on the TAG Member Portal. Otherwise, a company may email <u>info@tagtoday.net</u> for assistance regarding their TAG ID.

Implementation of Sellers, json is described in the IAB Tech Lab Sellers, json Specification.<sup>4</sup>

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<sup>&</sup>lt;sup>2</sup> https://iabtechlab.com/wp-content/uploads/2021/03/ads.txt-1.0.3.pdf

 $<sup>^3~</sup>https://iabtechlab.com/wp-content/uploads/2019/03/app-ads.txt-v1.0-final-.pdf\\$ 

<sup>4</sup> https://iabtechlab.com/wp-content/uploads/2019/07/Sellers.json\_Final.pdf

# ALLEGATIONS NON-COMPLIANCE & APPEAL

Companies that achieve the Certified for Transparency Seal must meet and maintain compliance with the relevant requirements for the Certified for Transparency throughout the certification period. Failure to comply can result in consequences, including but not limited to the loss of certification and use of the Certified for Transparency Seal. Certified companies are permitted to review allegations of non-compliance, submit rebuttal evidence, seek review of decisions of non-compliance and appeal any final decision.

The formal process governing non-compliance can be found in TAG's Due Process for Allegations of Non-Compliance and Appeal, available on <a href="https://www.tagtoday.net">www.tagtoday.net</a>

## APPENDIX A

## TAG RECOGNIZED TRANSPARENCY UTILITIES

· TAG TrustNet



tagtoday.net