



TAG Certified Against Fraud Guidelines

Version 1.0

Released May 2016

About the TAG Certified Against Fraud Program

The mission of the TAG Certified Against Fraud Program is to combat fraudulent non-human traffic in the digital advertising supply chain.

In order to guide companies in fighting fraud effectively, the TAG Anti-Fraud Working Group has developed Certified Against Fraud Guidelines, as well as a suite of anti-fraud tools to aid in compliance with those guidelines.

Companies that are shown to abide by the Certified Against Fraud Guidelines receive the “Certified Against Fraud” Seal and can use the seal to publicly communicate their commitment to combatting fraudulent non-human traffic in the digital advertising supply chain.

About the Trustworthy Accountability Group

The Trustworthy Accountability Group (TAG) is a first-of-its-kind, cross-industry accountability program fighting criminal activity across the digital advertising supply chain. TAG works collaboratively with companies throughout the supply chain in four areas critical to the continued growth and development of the \$50 billion digital advertising industry:

- Eliminating Fraud
- Combatting Malware
- Fighting Internet Piracy
- Promoting Transparency

A joint marketing-media industry program, TAG was created by the American Association of Advertising Agencies (4A's), Association of National Advertisers (ANA), and Interactive Advertising Bureau (IAB).

To learn more about the Trustworthy Accountability Group, please visit www.tagtoday.net.

Table of Contents

- 1. Executive Summary 4**
- 2. Certification Process 5**
 - 2.1. Application 5**
 - 2.1.a. Certification Fee 5
 - 2.2. Qualification 5**
 - 2.3. Methods of Certification..... 5**
 - 2.3.a. Self-Certification 6
 - 2.3.b. Independent Validation 6
 - 2.4. Publication of Certification Status 7**
 - 2.4.a. “Certified Against Fraud” Seal 7
 - 2.5. Continued Compliance..... 7**
 - 2.5.a. TAG Compliance Officer 7
 - 2.5.b. Compliance Team 8
 - 2.5.c. Training 8
 - 2.5.d. Quarterly Reviews 8
 - 2.5.e. Remediation 8
 - 2.5.f. Renewal 9
- 3. Covered Parties 10**
 - 3.1. Buyer..... 10**
 - 3.2. Direct Seller 10**
 - 3.3. Intermediary 10**
 - 3.4. Alignment with Parties Covered by TAG Inventory Quality Guidelines 11**
- 4. Certification Requirements 12**
 - 4.1. Requirements Table 12**
 - 4.2. Complete TAG Registration 12**
 - 4.3. Have a Designated TAG Compliance Officer 13**
 - 4.4. Comply with MRC IVT Guidelines 13**
 - 4.4.a. Exception Process 13
 - 4.5. Implement the Payment ID Protocol 13**
 - 4.6. Employ Domain List Filtering 14**
 - 4.7. Employ Data Center IP List Filtering..... 14**
 - 4.8. Comply with Publisher Sourcing Disclosure Requirements 14**
- 5. Governance, Enforcement & Appeal 15**
 - 5.1. Governance and Oversight..... 15**
 - 5.2. Complaints of Non-Compliance 15**
 - 5.3. Validating Complaints 15**
 - 5.4. Loss of Certification 16**
 - 5.5. Appeal and Recertification 16**

1. Executive Summary

Advertisers expect their content will be viewed by human beings with the potential to buy their products and services. However, criminal organizations have attacked the digital ad ecosystem with malware that generates non-human traffic and defrauds legitimate participants in the supply chain. As a result, advertisers end up paying a material portion of their campaign dollars to criminals who generate ad impressions that are never seen by humans.

The 2016 ANA / White Ops Bot Fraud study estimated that advertisers lose \$7.2 billion per year globally to bot-generated, non-human traffic. Bot traffic impacted a wide variety of websites including those of well-known and premium publishers. Most of the bots visited real websites run by real companies with real human visitors. Those bots inflated the monetized audiences at those sites by 5 to 50 percent.

TAG works to combat the negative impact of fraudulent traffic by developing anti-fraud standards and protocols for all types of entities in the digital advertising supply chain.

The mission of the TAG Certified Against Fraud Program is to combat fraudulent non-human traffic in the digital advertising supply chain.

2. Certification Process

The TAG Certified Against Fraud Program is voluntary and represents the ongoing process of defining and maintaining guidelines for effectively combating fraudulent non-human traffic in the digital advertising supply chain.

Companies that achieve the “Certified Against Fraud” Seal enter into an agreement with TAG in which the company is responsible for making inquiries, obtaining relevant and necessary reports, and otherwise regularly reviewing its activities so that it can represent and confirm at all times that it is in compliance with the Certified Against Fraud program.

2.1. Application

Before a company can apply for the “Certified Against Fraud” Seal, that company must first be “TAG Registered.” Companies can learn more and apply for TAG Registration by contacting TAG directly or applying online at www.tagtoday.net.

Once a company has been approved as “TAG Registered,” the TAG Compliance Officer designated through TAG Registration application may contact TAG directly to begin the process for that company to achieve the “Certified Against Fraud” Seal.

2.1.a. Certification Fee

There is an annual fee required for participation in the Certified Against Fraud Program. The certification fee supports the TAG infrastructure for processing and publishing certification, as well as for the continued development and evolution of the Certified Against Fraud Program as needed to meet changes in technology and business practice.

2.2. Qualification

Any company that has been approved as “TAG Registered” can apply to participate in the Certified Against Fraud Program.

Requirements to achieve the TAG “Certified Against Fraud” Seal differ according to a company’s role in the digital advertising supply chain. These requirements are outlined in “Certification Requirements” section of the Guidelines.

2.3. Methods of Certification

The “Certified Against Fraud” Seal can be achieved at two different tiers: self-certification and independent validation certification. A company has the option to choose one tier or the other. The selected method is recorded and displayed on the TAG website.

Self-certification is obtained with a self-attestation that the company is adhering to the Certified Against Fraud Guidelines. Independent validation certification is obtained by inviting an independent vendor to validate that a company is adhering to these guidelines. The process is parallel for both except that in an independent validation, the validating company submits additional required attestation paperwork and reports.

Since the internal processes for both certification tiers are the same, a company that certifies under self-certification can add independent validation certification at any time to achieve the higher level of certification.

2.3.a. Self-Certification

Self-certification is obtained with a self-attestation that the company is adhering to the Certified Against Fraud Guidelines. Entities that wish to achieve the TAG “Certified Against Fraud” Seal should submit to TAG a completed Certified Against Fraud Self- Attestation Checklist and supporting materials for each of the relevant certification requirements. Following review of the self-attestation checklist and materials, TAG will notify the company as to whether they have met the relevant requirements of the Certified Against Fraud Guidelines, or whether additional information is needed in order to confirm compliance.

2.3.b. Independent Validation

To achieve certification by independent validation, a company must invite an independent vendor to validate that the company is compliant with the Certified Against Fraud Guidelines. A validating company may be any accredited auditing company such as a licensed law firm or licensed CPA. In addition, any company that specializes in digital media audits that submits for and is approved by TAG may conduct independent validations.

While independent validation was designed to provide limited assurance, ensuring that all Certified Against Fraud Guidelines are being met within the company’s operations, technology and supporting documentation may take some time to review. Review time depends on several factors such as company operations maturity level, organization size and complexity and technology.

Independent validation will include review of, but is not limited to, the following:

- Job description of the compliance officer.
- Training policy and procedures.
- Internal audit policies and procedures.
- Established policies and procedures related to internal control.
- Policies and procedures related to adding new traffic sources, including how new traffic sources are vetted (and “re-vetted”)
- Policies and procedures related to complaint handling/resolution to ensure compliance with the Certified Against Fraud Guidelines.
- Testing performed by the company as part of the quarterly review process (refer below for additional details regarding the quarterly review).

To achieve independent validation, the validating company must submit the following to TAG:

- Compliance Officer and Executive Attestations
- Independent Validation Attestation
- Quarterly audit report

2.4. Publication of Certification Status

With training and consistent monitoring procedures in practice, the company is certified when required documentation is submitted and certification status is posted to TAG's website. Upon certification, TAG sends materials to the company's TAG Compliance Officer on file for promoting the company's Certified Against Fraud status.

The TAG publishes announcements for companies that have successfully implemented the Certified Against Fraud Guidelines. The list TAG website is updated as needed to reflect all current Certified Against Fraud companies.

2.4.a. "Certified Against Fraud" Seal

Companies that are shown to abide by the Certified Against Fraud Guidelines receive the "Certified Against Fraud" Seal and can use the seal to publicly communicate their commitment to combatting fraudulent non-human traffic in the digital advertising supply chain.

2.5. Continued Compliance

Recognizing that companies both large and small apply for Certified Against Fraud certification, no requirements are made for the resources needed to support Certified Against Fraud compliance aside from the requirements that Certified Against Fraud companies always have a designated TAG Compliance Officer.

2.5.a. TAG Compliance Officer

To ensure that Certified Against Fraud companies continue to maintain compliance with these guidelines, the compliant company must designate a TAG Compliance Officer. This is usually done in the process of the company's application for TAG Registration, prior to participation in the Certified Against Fraud Program.

No requirements are made for the job description or specific title or role requirement of the Compliance Officer, aside from its independence from sales and marketing as described below. The role of the TAG Compliance Officer is described on the TAG website.

The TAG Compliance Officer oversees the quarterly review process to ensure compliance with the Certified Against Fraud Guidelines. If the company chooses to achieve certification by independent validation, the TAG Compliance Officer facilitates an independent vendor review

for initial certification and each year for renewal. The independent vendor submits a letter of attestation validating the company's compliance with Certified Against Fraud.

2.5.b. Compliance Team

While the only requirement for the resources needed to support Certified Against Fraud compliance is the designation of a TAG Compliance Officer, it is also recommended that a company have in place a Compliance Team that includes and assists the TAG Compliance Officer in monitoring compliance with the Certified Against Fraud Guidelines.

2.5.c. Training

"Certified Against Fraud" training is required for the company's TAG Compliance Officer, and is scheduled during the application process. The Compliance Officer is encouraged to attend the first training available after beginning the application process and must complete training within three months of the company having achieved the "Certified Against Fraud" Seal. Training must be renewed on an annual basis.

2.5.d. Quarterly Reviews

Certified Against Fraud training for compliance focuses on outlining the principles for internal reviews. Quarterly reviews create consistency across the industry.

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

- The Certified Against Fraud Guidelines are consistently and completely followed.
- Control activities discussed during Certified Against Fraud training are formally documented.
- Potentially fraudulent activity is 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 (i.e., web site traffic logs, etc.), both statistically and judgmentally based, should be used to validate that the existing control structure is designed correctly and operating effectively.

2.5.e. Remediation

Independent Validation may result in findings that require remediation. In these situations, it is the responsibility of the Independent Validator to inform the TAG that remediation is required before the Independent Validation is complete. This will ensure complete transparency during the process. The details provided by to TAG by the Independent Validator will remain confidential.

Upon successful remediation, Independent Validation Attestation will be submitted accordingly.

2.5.f. Renewal

Certification under the Certified Against Fraud Program is an ongoing process and must be renewed each year. The Certified Against Fraud renewal documentation must be provided by November 30th for the previous calendar year, which allows for independent validation to be completed in December and announcement of all compliant companies in January. TAG sends renewal notifications to all certified companies prior to the November 30th renewal submission date.

3. Covered Parties

The TAG Certified Against Fraud Program is applicable to three types of entities across the digital advertising supply chain:

- Buyers,
- Direct Sellers, and
- Intermediaries.

3.1. Buyer

Buyers are advertisers who own the advertisements for placement on the seller's site or ad agencies that directly represent the advertisement owner.

The most direct buyer is a brand company represented in the advertisements that it wants to place on the seller's inventory.

However, most prominent brands hire an agency to manage their advertising campaigns. A brand-appointed agency is an Authorized Advertiser Agent (AAA). An AAA represents an advertisement owner under a contractual, often financial agreement, between the advertisement owner and the AAA. An AAA is also a direct buyer.

The advertisement owner may appoint more than one AAA, but only the advertisement owner may designate a representative AAA. An AAA may not appoint another AAA or transfer its designation as an AAA to another agent.

3.2. Direct Seller

The most direct seller is a publisher company that provides content to an audience. This type of seller's inventory is ad space that offers 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. This agent is an Authorized Publisher Agent (APA). An APA is also a direct seller. Publishers formerly appoint APAs and the relationship is established with a contractual, and often financial, agreement.

A publisher may choose to have one exclusive APA to provide more control over its inventory or may have more than one authorized agent per site (domain). In either case, only the inventory owner may designate a representative APA. An APA is prohibited from appointing another APA or transferring its designation as an APA to another non- APA agent.

3.3. Intermediary

Intermediaries include both Indirect Sellers and Indirect Buyers.

An intermediary may be an indirect seller in that it sells publisher inventory but does not have a direct, contractual relationship with the publisher. For example, an intermediary such as a network or exchange, may have an agreement with a publisher-appointed APA to resell remnant inventory but does not have a direct relationship with the publisher.

As an example to distinguish a direct seller from an intermediary, a publisher may partner with a company that is acting as an APA to manage its non-reserved inventory. The APA offers the publisher’s inventory to various networks on a site-specific basis. When those networks contract with the APA to purchase inventory from the publisher, then the APA is a direct seller to the networks. If one of those networks resells the inventory purchased from the APA, the network is an intermediary of the publisher’s inventory.

An intermediary may be an indirect buyer in that it does not have a direct relationship with the advertisement owner, but may be qualified to assign the direct buyer’s advertisements to a seller’s inventory.

An intermediary purchases seller inventory without formally representing an advertisement owner. For example, a technology company may purchase inventory in anticipation of placing a direct buyer’s advertisements in the purchased seller inventory.

Also, an intermediary may purchase remnant inventory without any initial representation of the advertisements it will place in the purchased inventory. In many cases, an intermediary may purchase inventory as an indirect buyer and then become an indirect seller of the inventory purchased.

3.4. Alignment with Parties Covered by TAG Inventory Quality Guidelines

The definitions of parties covered by the TAG Certified Against Fraud Guidelines align with definitions used in section 1.1 of the TAG Inventory Quality Guidelines version 2.1 as follows:

IQG	Certified Against Fraud Certificate
Direct Sellers and APAs	Direct Seller
Indirect Sellers	Intermediary
Direct Buyers and Authorized Advertiser Agent (AAA)	Buyer
Indirect Buyers	Intermediary

4. Certification Requirements

Requirements to achieve the TAG “Certified Against Fraud” Seal differ according to a company’s role in the digital advertising supply chain.

To achieve the TAG “Certified Against Fraud” Seal, entities must, according to the below table, meet the following sub-criteria according the types of activities a given entity employs.

4.1. Requirements Table

	Scope	Buyer (Purchases Media)	Direct Seller (Sells Inventory Directly)	Intermediary (Buys or sells inventory indirectly)
Complete TAG Registration.	Administrative	✓	✓	✓
Have a designated TAG compliance officer.	Admin	✓	✓	✓
Comply with MRC IVT Guidelines.	Fraud	✓	✓	✓
Employ Domain list filtering.	Fraud		✓	✓
Employ Data Center IP list filtering.	Fraud		✓	✓
Comply with Publisher Sourcing Disclosure Requirements.	Transparency		✓	
Implement the Payment ID Protocol.	Transparency			✓

4.2. Complete TAG Registration

In order to achieve “Certified Against Fraud” Seal, a company must first be “TAG Registered.” Companies can learn more and apply for TAG Registration by contacting TAG directly or visiting www.tagtoday.net.

4.3. Designated TAG Compliance Officer

In order to achieve “Certified Against Fraud” Seal, a company must have identified a TAG Compliance Officer. (The TAG Compliance Officer is usually designated in the course of that company’s application for TAG Registration.)

The role of the TAG Compliance Officer is described in greater detail in the “Continued Compliance” section of the Guidelines.

4.4. Compliance with MRC IVT Guidelines

The Media Rating Council (MRC) developed [Invalid Traffic \(IVT\) Detection and Filtration Guidelines](#) to aid in modernizing industry measurement standards for the filtration and disclosure of invalid traffic to better address the risks that exist in today’s digital media environment.

In order to achieve the “Certified Against Fraud” Seal, a company must, for all inventory, either:

- For each type of inventory delivered by your institution, comply with MRC IVT Guidelines by becoming an MRC Accredited Certified Against Fraud Vendor or be certified against MRC GIVT guidelines by an independent auditor
- For each type of inventory delivered by your institution, employ an appropriate MRC Accredited Certified Against Fraud Vendor or a vendor certified against the MRC GIVT Guidelines by an independent auditor
- Employ a 3rd party ad server that meets one or the other of the above requirements.

4.4.a. Exception Process

A publisher that is not sourcing traffic may seek an exception to this requirement by attesting that they do not source traffic. The exception is revoked for 12 months if an MRC Accredited Certified Against Fraud Vendor or vendor certified against the MRC GIVT guidelines by an independent auditor reports more than 5% IVT on inventory representing at least 10% of the publisher’s inventory pool.

Sourced Traffic is defined in the TAG Publisher Sourcing Disclosure Requirements as any method by which publishers acquire more visitors through third parties. A third party that receives monetary consideration from a publisher to drive traffic to another publisher’s site is referred to as a “paid traffic source.”

4.5. Payment ID Protocol

In order to achieve “Certified Against Fraud” Seal, any company acting as an Intermediary must implement the TAG Payment ID Protocol.

The objective of the TAG Payment ID Protocol is to reduce the volume of illegitimate ad inventory sold by enabling media buyers to avoid untrustworthy parties in the supply chain; and take effective remedial action if some party is supplying illegitimate inventory.

Implementation guidelines for the Payment ID Protocol are available to companies participating in the Certified Against Fraud Program at no cost.

4.6. Domain List Filtering

In order to achieve “Certified Against Fraud” Seal, any company acting as a Direct Seller or Intermediary must implement Domain List filtering.

Domain List filtering is the practice of developing or subscribing to a list of internet domains that have been identified through business and technical means to have a high risk of being the destination for invalid traffic, and therefore of generating invalid ad impressions, and of applying this list to current and future transactions.

The TAG Domain Fraud Threat List is available to meet this requirement. Implementation guidelines for the TAG Domain Fraud Threat List are available to companies participating in the Certified Against Fraud Program at no cost.

4.7. Data Center IP List Filtering

In order to achieve “Certified Against Fraud” Seal, any acting as a Direct Seller or Intermediary must implement IP List filtering.

IP List filtering is the practice of developing or subscribing to a list of IP addresses that have been identified through business and technical means to have a high risk of being the origin of invalid traffic, and therefore of generating invalid ad impressions, and of applying this list to current and future transactions.

The TAG Data Center IP List is available to meet this requirement. Implementation guidelines for the TAG Data Center IP List are available to companies participating in the Certified Against Fraud Program at no cost.

4.8. Publisher Sourcing Disclosure Requirements

In order to achieve “Certified Against Fraud” Seal, any company who acts as a Direct Seller must comply with TAG Publisher Sourcing Disclosure Requirements (PSDR). The TAG PSDR is available to companies participating in the Certified Against Fraud Program at no cost.

5. Governance, Enforcement & Appeal

Compliance with the Certified Against Fraud Program is peer-enforced. In order to ensure that the value of Certified Against Fraud Program is maintained, formal processes are in place regarding governance and oversight of the program, as well as for companies to make complaints about non-compliance, and to appeal such complaints.

5.1. Governance and Oversight

The Certified Against Fraud Program is governed by the TAG Board of Directors (Board). The TAG Board will:

- Evaluate any complaints made against companies that have achieved the “Certified Against Fraud” Seal and determine the responsible party and penalty.
- Provide guidance and vision for current and future Certified Against Fraud Program efforts.
- Oversee and ensure progress of Certified Against Fraud efforts.
- Evangelize the program in the marketplace.
- Ensure any policy issues within the Certified Against Fraud effort is properly shared with the TAG Policy Leadership.

5.2. Complaints of Non-Compliance

Complaints made against a companies that have achieved the “Certified Against Fraud” Seal may be one of two complaint types:

- Generalized non-compliance with Certified Against Fraud Guidelines
- Non-compliance with a subcomponent of Certified Against Fraud Guidelines

Complaints regarding Certified Against Fraud non-compliance may affect certification.

A company that is party to a transaction involving entities “Certified Against Fraud” may submit a complaint against another party of the transaction regarding any non-compliance experienced. The complaint must include specific evidence of non-compliance and must be signed by someone of at least manager level at the company making the complaint.

To submit a complaint, please contact TAG directly at info@tagtoday.net, or online at www.tagtoday.net.

5.3. Validating Complaints

Upon receiving a complaint, the Board votes on whether the complaint is valid. If deemed valid, the accused Certified Against Fraud company is notified of the complaint before the Board makes a judgment regarding the complaint.

Before judgment on a complaint is made, the accused company may repudiate the allegation of non-compliance or remediate any alleged incidents of non-compliance.

If the Board makes a judgment against the accused company, the company must work in a good faith effort to resolve the complaint as quickly as possible.

5.4. Loss of Certification

If three or more complaints against a single company are deemed valid within a six-month period and valid complaints are not resolved within that six-month period, certification for the Certified Against Fraud-certified company is removed. The company must cease to market itself as a Certified Against Fraud-certified company and the company name is removed from the published list of companies that are certified to TAG's Certified Against Fraud Certification Requirements. Complaints are not made public.

5.5. Appeal and Recertification

Within 10 days of the Board decision to remove certification, the company may appeal before the full Board.

In order to become recertified, the company must provide documentation on how and when the complaint was addressed and the steps it has taken to ensure that similar problems will not occur in the future. Documentation of complaint resolution must be presented before the full Board.

If the majority of the Board is satisfied with the explanations and evidence of resolution, the company may pay a recertification fee to TAG and resume marketing itself as a "Certified Against Fraud" Seal company. The company is also republished to the list of companies that have achieved the "Certified Against Fraud" Seal.