

**AT&T Code of Conduct**  
**for AT&T Short Code and 10-Digit A2P SMS Messages**  
March 1, 2021

**Code Applicability**

This Code of Conduct (Code) applies to Messaging Partners and Messaging Senders (as defined below) and other entities that send Messages to AT&T subscribers via the Short Code Application-to-Person (A2P) messaging systems and 10-digit long code (10DLC) A2P Messages (including toll-free). 10DLC A2P Messages includes A2P SMS traffic originating from 10DLCs outside of AT&T's network to be delivered to AT&T mobile Customers. This Code is subject to change at AT&T's discretion.

**Code Purpose**

This Code's purpose is to **protect** AT&T Customers from abuse and unwanted Messages while encouraging a robust Messaging ecosystem. This Code provides meaningful and clearly-defined conduct and messaging **Policies** to supplement existing compliance-related **guidelines** (including but not limited to industry guidelines and best practices) and is designed to:

- Deliver Customer control and choice for Messages they receive,
- Encourage Messaging Partners and Message Senders to adhere to laws, regulations and industry guidelines (e.g., TCPA; CTIA Industry Best Practices).
- Enable AT&T to enforce Code and related contractual provisions against Messaging Partners, Message Senders and other entities sending Messages.

This Code provides a set of conduct and acceptable use requirements imposed by AT&T on Messaging Partners and Messaging Senders and other entities that send Messages to AT&T Customers. It does not address and should not be interpreted as addressing the permissibility of Messaging under applicable laws and regulations. AT&T expects Messaging Partners and Message Senders will consult legal counsel to ensure they are complying with applicable laws and this Code of Conduct.

**Definitions and Parties**

**A2P Message** – Any SMS Message to or from a mobile subscriber account for which the content is generated in whole or in part by an automated process or for which a single manual send command results in multiple Messages being sent. A group Message where all recipients of a small social group receive the same Message and the content is personal and non-commercial is excluded from the definition of an A2P Message.

**AT&T Customer (or Customer)** – individuals subscribed to AT&T's wireless services including pre and post paid wireless service

**Aggregator** – A party that offers Service Providers and/or other Aggregators a messaging service connected to mobile messaging, including but not limited to mobile phone based SMS/MMS/RCS messaging and messaging APIs; and is sending or receiving Messages via a direct connection to either a Service Provider, Mobile Network Operator or Inter-Carrier Vendor.

**Inter-Carrier Vendor (ICV)** – A party that provides network connectivity to, from, and/or between Mobile Network Operators, Aggregators and messaging Service Providers.

**Message(s)(ing)** – refers to messages sent to AT&T Customers via the Short Code Application-to-Person (A2P) messaging systems and 10-digit long code (10DLC) A2P Messages (including toll-free). 10DLC A2P Messages includes A2P SMS traffic originating from 10DLCs outside of AT&T's network to be delivered to AT&T mobile Customers.

**Message Sender** – means a brand, an individual (Influencer), or any a third-party (whether a formal legal entity or not) who directly, using a Service Provider’s and/or other Aggregator’s services or through other means sends Messages to AT&T Customers and is responsible for the Message content.

**Messaging Partner** – An Inter-Carrier Vendor, Aggregator or Service Provider with a direct or indirect contractual relationship with AT&T.

**Mobile Network Operator** – A special type of Service Provider that holds a license to use RF spectrum for mobile messaging.

**Service Provider** – A party that offers end users and/or Message Senders a messaging service connected to mobile messaging, including but not limited to mobile-phone-based SMS/MMS/RCS messaging and their messaging APIs.

Note that a single party may be any combination of an ICV, Service Provider, and/or Message Sender in the context of a particular messaging stream. Figure 1 below illustrates many of the possible interconnections.

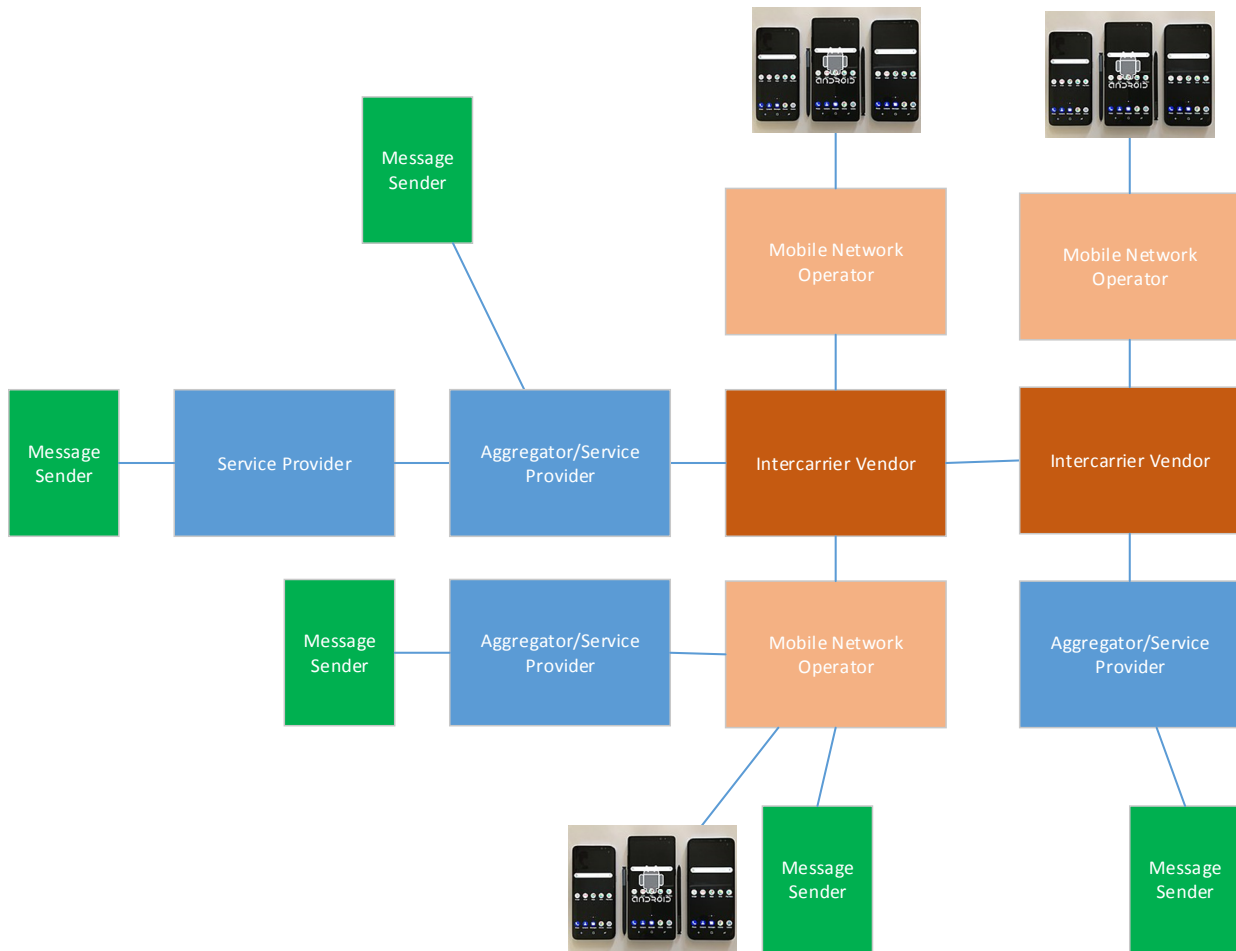


Figure 1. Connectivity Illustration

### **Code Enforcement – During Trial and Post Commercial Launch**

Failure to comply with this Code including but not limited to its Policies may, at AT&T's sole discretion, result in any of the following without prior notice:

- Downgrade in Message service class(es),
- Suspension of Messaging campaign(s), number, Messaging Partner and/or Message Sender, and/or,
- Termination of Messaging campaign(s), number, Messaging Partner and/or Message Sender.

### **Policies**

AT&T imposes the below Policies on Messages and Messaging campaigns. In its discretion, AT&T may revise these Policies without notice to the Aggregator and/or, if identified, the Service Provider and Message Sender based on observed Messaging campaign characteristics, such as Customer complaints and unsubscribe requests.

#### **Message Classes**

- In its sole discretion, AT&T assigns and authorizes the Message Sender to use one or more message classes (Message Classes(es)), initially based on an assessment and evaluation of the applicant and provided information.
- To protect its customers, AT&T's authorization will include conditions and contingencies, to be implemented by the Message Sender/Partner.
- Message Classes may be adjusted by AT&T without notice to the Aggregator and/or, if identified, the Service Provider and Message Sender.
- Message Senders and Aggregators may also request changes to Message Classes, which AT&T in its sole discretion will evaluate.

#### **Messaging Limits/Conditions**

AT&T imposes the following volume, anti-spam and other conditions on Messaging in order to protect its customers.

- P2P and Unregistered A2P Rate Limiting: Unless explicitly authorized in writing by AT&T, neither P2P nor unregistered A2P Messages shall exceed AT&T's maximum P2P message sending rate.
- A2P Class-Based Per-Campaign Rate Limiting: For cases explicitly authorized by AT&T, 10DLC A2P Messages SHALL contain Message Class tags that conform to AT&T's "Messaging Tagging Requirements and Specifications, Version 1.2" on ingress to AT&T's network. Note that class tags may be supplied by the Message Sender, or by a Service Provider, Aggregator and/or an Inter-Carrier Vendor as a service to the Message Sender. Only authorized Message Class tags appropriate for the type of Message SHALL be used.
- Class-Based Default Policy: Each Message Class has a default AT&T anti-spam policy assigned to it. This Policy includes a maximum authorized per-campaign Message rate and policies for traffic pattern and content-based Message blocking.
- Aggregator, Service Provider and Campaign-Based Non-Default Policies: AT&T anti-spam Class-Based Default Policies may be overridden manually (i.e., by manual assignment) or algorithmically to policies based on perceived or observed reputation of the Aggregator, Service Provider and/or Campaign. AT&T frequently changes its anti-spam policies as needed to mitigate abusive traffic. Such changes may be made by AT&T without notice.

**Customer Consent to Messaging is Required**

- AT&T requires Message Senders have proper AT&T Customer consent for each Message sent. The type of consent that is required depends on the type of Message content sent to the Customer.
- The table below includes the types of Messaging content and the associated consent that is required by AT&T. Other legal obligations and requirements may apply, and by providing the table below, AT&T does not purport to state that Messages sent that comply with consent requirements outlined below are consistent with applicable law. For each Message sent to a Customer, it is the obligation of the Message Sender to determine and comply with the legal obligations and requirements that apply to the Message.
- Customers can revoke consent at any time and in any way. Unless in conflict with applicable laws, Customer opt-out requests must be honored, whether they are made by phone call, email, or text of the word “Stop” or a reasonable equivalent (case insensitive).
- The Customer must give the appropriate consent for the given Message type. When providing consent, a Customer must know the entities who will be authorized to send Messages using the consent.
- Accordingly, a Message Sender must clearly and conspicuously communicate the authorized entities when obtaining consent, and a Customer’s consent must explicitly name the entities authorized to send under the consent.
- Consent may not be obtained using deceptive methods. In addition, **Customer consent may not be bought, sold, rented, or shared.**

<b>Types of Messaging Content &amp; Required Consent</b>		
<b>Customer Initiated Conversational</b>	<b>Informational</b>	<b>Promotional</b>
<p>Conversational Messaging is a back-and-forth conversation that takes place via text. If a Customer texts a business first and the business responds quickly with a single Message, then it is likely conversational. If the Customer initiates the conversation and the business simply responds, then no additional permission is expected. Conversational Messaging does not include scenarios where a Customer provides their phone number and agrees to future Messages; rather they are scenarios where a Customer sends a message and the business or other entity responds immediately or soon thereafter in response to the Customer’s message.</p>	<p>Informational Messaging is when a Customer gives their phone number to a business and agrees to be contacted in the future for a non-promotional purpose. Appointment reminders, welcome texts, and other non-promotional alerts fall into this category because the first text sent by the business fulfills the Customer’s request. A Customer needs to agree to receive texts for a specific informational purpose when they give the business their mobile number.</p>	<p>Promotional Messaging is a Message sent that contains a sales or marketing promotion. Adding a call-to-action (e.g., a coupon code to an informational text) may place the Message in the promotional category. Before a business sends promotional Messages, the Customer should agree in writing to receive promotional texts. Businesses that already ask Customer to sign forms or submit contact information can add a field to capture the Customer’s <b>affirmative</b> consent.</p>

<p>First message is always sent by the Customer, Two-way conversation. Message responds to a specific request</p>	<p>First message is sent by the Customer or business. One-way or two-way conversation. Message contains information.</p>	<p>First Message is sent by the business. One-way alert Message promotes a brand, product, service, entity, or individual. Prompts Customer to buy something, go somewhere, or otherwise take action.</p>
<p><b>IMPLIED CONSENT</b> When a Customer initiates a text message exchange and the business only responds to each Customer with relevant information, then no verbal or written permission is expected.</p>	<p><b>EXPRESS CONSENT</b> Unless an exemption applies, the Customer should give express permission before a business sends them a text Message. Customers may give permission over text, on a form, on a website, or verbally. Customers may also give written permission.</p>	<p><b>EXPRESS WRITTEN CONSENT</b> The Customer should give express written permission before a business sends them a text Message. Customers may sign a form, check a box online, or otherwise provide consent to receive promotional text Messages.</p>

**Customer Opt-out Must be Offered/Honored**

- Consent must be revocable without penalty to Message recipient beyond the termination of any ongoing benefit that the Message recipient would receive without the revocation.
- Application-originated Informational and Promotional messaging must contain a notice that a Customer may opt-out of future communications by replying with the word “stop” (or a reasonable equivalent) in any combination of lower and upper case.
- AT&T deactivation files must be processed daily and those CTN’s removed from the messaging provider / Message Sender’s data base for future messaging.
- A “high” volume or percentage of opt-out Messages may result in suspension or termination of a specific messaging campaign and/or blocking of sending numbers.

**Customer opt-in and opt-out must work correctly**

- Opt-in lists, systems and processes may only contain or add Customers who have properly opted in.
- Unless otherwise permitted or required by law, all Opt-out requests must be promptly honored.
- Opt-out notices should explicitly notify recipients that the word “Stop” may be used for opt-outs, but must also honor reasonable equivalent responses, such as “Quit” or “Wrong Number” (reasonable equivalent means a response that a reasonable person would know is intended to communicate a desire not to receive additional text Messages).
- For avoidance of doubt, Customer originated conversational messages indicating a desire to opt-out through the use of the “stop” keyword (or equivalent) also must result in a cessation of the indicated Messaging, regardless of whether the Messages include an opt out notice.
- Providing help such as in response to the word “help” is encouraged.

### Promotional Messaging Containing Advertisements

All Promotional Messaging containing Advertisements must comply with and enforce (a) the Coalition for Better Ads Initial Better Ads Mobile Web Experiences Standards (the “**Coalition for Better Ads Standards**”) located at [www.betterads.org/standards](http://www.betterads.org/standards) (provided that if a published AT&T advertising standard differs from the Coalition for Better Ads Standard, then the AT&T standard will apply and (b) the AT&T Advertising and Analytics Advertising Guidelines set forth in **Schedule 1, attached hereto**.

### Prohibited Messages and Messaging Campaigns

AT&T prohibits the Messages, Messaging campaigns and content listed below (Prohibited Messages/ing). Any exceptions require written AT&T approval.

- Messaging used for affiliate lead and/or commission generation,
- Messaging campaigns and/or accounts which AT&T, at its sole discretion, determines to be affiliate-related,
- Loan advertisements with the exception of Messages from direct lenders for secured loans,
- Credit repair,
- Debt relief,
- Loan, debt consolidation, debt relief and student loan programs from any enterprise that is not able to grant loans itself; affiliate lead generation for these financial programs is prohibited,
- Affiliate marketing programs that seek to obtain opt-in subscriber lists,
- Work from home, ‘secret shopper,’ and similar advertising campaigns,
- Lead generation campaigns that indicate the sharing of collected information with third parties,
- Campaign types not in compliance with industry best practices including but not limited to the recommendations of or prohibited by the CTIA Short Code Monitoring Handbook, Version 1.7 or later,
- Deceptive, fraudulent, and potentially fraudulent or deceptive Messaging including but not limited to “Phishing,” scams, deceptive marketing, etc.,
- Message content that threatens AT&T Customers,
- Messaging resulting in excessive complaints or opt-out requests,
- Distribution or malware or app downloads from non-secure locations,
- Messaging that, in AT&T’s sole discretion, abuses or harms its Customers or is otherwise inappropriate.

If a Message Sender sends or attempts to send Prohibited Messages/ing, AT&T may perform an account review. The review can result in, without limitation, the restriction, suspension and/or termination of:

- sending rights for a provisioned phone number or short codes,
- high-throughput access,
- provisioning rights for new phone numbers or short codes,
- all network services,
- the Message Sender, and/or,
- the Service Provider.

Service Providers, Aggregators and Inter-carrier Vendors are expected to prevent Prohibited Messages/ing on their own networks to prevent these types of content at the intake source.

## Prohibited Messaging Techniques

AT&T requires Messaging Partners and Message Senders follow acceptable, industry best Message sending practices. AT&T prohibits Messaging sent using techniques designed to avoid Customer/network protections outlined in this Code and industry best practices (“Prohibited Techniques”). Prohibited Techniques include but are not limited to the following practices:

- **Snowshoe Sending Prohibited**
  - Snowshoe sending is a technique used to send Messages from more source phone numbers than are needed to support an application’s function. This technique often lacks a legitimate purpose and is used to evade per-sender rate limits and other spam filters.
  - Messaging use cases that require the use of multiple numbers to distribute “similar” or “like” content must be declared in the campaign submission as requiring number pools for appropriate class designation.
  
- **Filter Evasion Assistance Prohibited**
  - Sending mechanisms designed to evade spam controls are prohibited.
  - Service Providers are expected to work with AT&T to resolve spam and unwarranted blocking issues.
  - The practice of a Messaging Partner or anyone else automatically providing a sender with new phone numbers to replace phone numbers blocked by a receiving network is specifically prohibited.
  
- **Dynamic Routing Prohibited**
  - Each 10DLC or short code must have a single route (i.e., ordered sequence of Service Providers, Aggregators and Inter-Carrier Vendors) in the delivery path to a given destination phone number.
  - AT&T recognizes Message routing may change, but it is expected to change infrequently. For example, it may change as a result of changing contractual relationships. It should not change dynamically. The delivery path must include the assigned Service Provider as the originating service provider.
  - This does NOT prohibit re-routing traffic as needed to maintain service in the event of major network outages, but MUST not be performed to circumvent accidental or intentional spam blocking.
  
- **Shared Codes Prohibited**
  - Shared 10DLC or short codes are prohibited, although AT&T reserves the right (in its sole discretion, which may be unreasonably withheld) to grant an exception, such as for a specific enterprise-based use case.
  - No new shared short codes should be onboarded and AT&T will terminate and prohibit the use of any existing shared short codes in the near future with the rollout and commercial availability of 10DLC A2P Messaging. The termination date will be communicated with advance notice.
  - The use of a single 10DLC or short code to be “sub-aggregated” in a manner that allows multiple parties control of content and/or receiving phone numbers is prohibited. AT&T reserves the right to grant exceptions when appropriately requested via campaign submission. If approved, such campaigns will be assigned an appropriate Message Class designation to help prevent blocking of wanted Messages (interactive messaging, Bots, RCS).

- **URL cycling/Public URL shorteners**
  - The practice of using multiple FQDNs (i.e., host.domain) in bulk Messaging with similar Message content is prohibited, as the practice is often used for the purpose of evading filters and/or diluting reputation metrics. AT&T reserves the right to grant exceptions when appropriately requested. If approved, they will be assigned an appropriate Message Class designation to help prevent blocking of wanted Messages (interactive messaging, Bots, RCS).
  - The practice of using public URL shorteners in bulk Messaging is prohibited and Messages containing them may be subject to blocking.
  - The practice of using multiple public URL shorteners (i.e., host.domain/path) in bulk messaging with similar Message content (e.g., for the specific purpose of evading filters and/or diluting reputation metrics) also is prohibited.
  
- **References to Anonymous and Opaque Web Sites and Phone Numbers Prohibited in Bulk Messaging**
  - Messages must not contain URLs that redirect to landing websites that do not unambiguously identify the website owner (i.e., a person or legally registered business entity) including commercially reasonable contact information.
  - Landing websites that collect personal information must have a published, conspicuously-accessible privacy policy.
  - Messages must not contain phone numbers that are assigned to or forward to unpublished phone numbers. AT&T reserves the right to grant exceptions, such as when the “owner” of the phone number (i.e., a person or legally registered business entity) is unambiguously indicated in the Message.
  
- **Deactivation Files**
  - Aggregators and Service Providers assume responsibility for managing information about deactivated and recycled mobile phone numbers.
  - They must either enforce deactivations themselves or ensure that deactivation information is made available to Message Senders with a requirement for the Message Sender to manage opt-out of deactivated numbers.



## SCHEDULE 1

### AT&T ADVERTISING AND ANALYTICS GUIDELINES

All advertisements must comply in all respects with these AT&T Advertising and Analytics Guidelines (the or these “**Guidelines**”). Advertiser agrees to treat the Guidelines as confidential information of AT&T, and will hold the Guidelines in strict confidence exercising a degree of care not less than the degree of care used by advertiser to protect its own confidential information that it does not wish to disclose.

- These Guidelines are intended to provide general guidance. They are not inclusive or exhaustive and are subject to change at AT&T Advertising & Analytics’ discretion, at any time.
- AT&T Advertising & Analytics reserves the right in its sole discretion to reject, remove, or require elimination or revision of any advertisement that does not comply with these Guidelines or is otherwise unacceptable to AT&T Advertising & Analytics in its sole discretion. Instead of rejecting an advertisement in its entirety, AT&T Advertising & Analytics may, but is not required to, provide Agency/Advertiser/Programmer with a written explanation of its rejection so that Agency/Advertiser/Programmer may resolve any specifications and standards conflict. AT&T Advertising & Analytics does not warrant to Agency/Advertiser/Programmer that advertisements or content of other customers will comply with such publishing standards and guidelines. Agency/Advertiser/Programmer will not represent to any third party that AT&T approves or endorses any such third party’s product and/or service.
- Agency/Advertiser/Programmer agrees to treat the Guidelines as confidential information and will hold the Guidelines in strict confidence exercising a degree of care not less than the degree of care used by Programmer to protect its own confidential information that it does not wish to disclose.
- I. **General Advertising Guidelines for Digital & TV for DIRECTV and U-Verse**  
**All Advertising must comply in all respects with these Guidelines. Advertising may not contain any material that falls into the following categories or that links to such material:**
  - Advertising which is in whole or in part defamatory, obscene, indecent, profane, vulgar, repulsive, provocative, lewd, pornographic, offensive, either in theme or in treatment, or that contains strong sexual, prurient, explicit or erotic themes, for any promotion of products, services or programming;
  - Products or sites that suggest the availability of prostitution services;
  - Nudity, nude beaches or naked cruises or resorts and any club or bar featuring nude performers or promotes nudity;
  - Products or sites depicting or providing how-to materials about pedophilia or other non-consensual contact;
  - Products or sites that advocate, glorify or promote rape, torture, cannibalism, suffering or death;
  - Excessive or graphic violence (e.g., cannot depict vivid blood scenes or show a person being shot, killed or stabbed);
  - Products that descramble cable or satellite signals in order to get free services;
  - Products that promote software or techniques that bypass copyright protections;
  - Counterfeit, fake or bootleg products or replicas or imitations of designer products;
  - False, unsubstantiated or unwarranted claims for any product or service, or testimonials that cannot be authenticated;
  - Pyramid or illegal multilevel marketing schemes;
  - Products or sites of questionable legality (e.g., miracle cures, witchcraft, fortune or good luck products);

- Products or sites that appear to facilitate or promote the evasion of laws (e.g., radar detectors, etc.);
- Products or sites that offer fake identification or falsified documentation;
- Appeal for funds;
- Topics that can appear controversial;
- Promotes firearms, fireworks and ammunition (including by mail order);
- Products or sites that have gambling (digital advertising only) or have illegal gambling as a central theme;
- Promotes services, contests or games that predict winners of races or sporting events;
- Advertising that misrepresents or ridicules on the basis of age, color, national origin, race, religion, sex, sexual orientation or disabilities;
- Trivializes historic events such as the Holocaust, the Irish Famine or September 11th;
- Profanity or infers profane words or gestures;
- Hate speech or defamatory, libelous or threatening sites;
- Depicts, promotes or is designed to facilitate alcohol abuse, illegal or habit-forming drug use or use of tobacco, e-cigarettes, or marijuana products; and/or
- The misuse of Emergency Broadcast System (EBS) tone or graphic.

## II. Alcohol Advertising

In addition to the aforementioned, the following apply to the sale of advertising for alcoholic beverage brands. All advertisements must comply in all respects with these Guidelines, as well as all other applicable AT&T Specs and Standards, content guidelines, and any restrictions in contracts with third parties. These Guidelines are subject to change at AT&T Advertising & Analytics' discretion.

### A. Digital Ads:

Alcohol advertisements may be permitted with AT&T Advertising & Analytics' prior written permission. Media placement must pass the "71.6% LPA Standard." Advertising and marketing should be placed only where at least 71.6 percent of the audience is reasonably expected to be above the legal purchase age (LPA), which in the United States is 21 years of age.

### B. Television Ads (DIRECTV and U-verse):

In addition to the aforementioned, the following apply to television ads:

- No alcohol product advertising shall include on-camera consumption, or the representation or sound effects of drinking.
- Products shall not be promoted for the intoxicating effect that may be achieved by their consumption or by their alcohol content.
- Advertising shall not depict the use of alcohol as a sole purpose of any activity.
- All advertising that includes the sale of alcohol beverages should conclude with a tagline similar to the following: "Please drink responsibly."
- Placement of advertising will be determined on the basis of content and audience composition. All advertising is subject to AT&T Advertising & Analytics' review prior to air.
- Alcohol advertisements may be permitted with AT&T Advertising & Analytics' prior written permission, and then only when directed to an audience over the age of 21.
  - DIRECTV and U-verse short form advertisements must comply with individual network agreements and professional and collegiate sports

league restrictions. All broadcast networks carried as part of AT&T's DIRECTV and U-verse systems have their own unique advertising restrictions.

- Interactive Advertising Channels on DIRECTV and U-verse must be preceded by an age verification screen. If the viewer does not certify that he/she is over the legal purchase age of 21 years, he/she will be directed to a warning screen stating that he/she is ineligible to view this channel and he/she will be directed to turn to another channel.

### III. **Gambling/Gaming**

- Ads for short-term pay to play fantasy sports contests that would be viewed by subscribers (e.g., illegal in states, including, but not limited to, Alabama, Arizona, Delaware, Georgia, Hawaii, Idaho, Illinois, Iowa, Louisiana, Montana, New York, Nevada, Texas, Vermont, and Washington) may be permitted in Kansas, Massachusetts, or West Virginia, with AT&T Advertising & Analytics' prior written permission. Media placement must pass the "70% LPA Standard." Advertising and marketing should be placed only where at least 70 percent of the audience is reasonably expected to be above the legal purchase age (LPA), which in the United States is 21 years of age. Daily Fantasy Sports are deemed to be illegal in the states that have not rendered an opinion or passed a law.
- In addition to the aforementioned sections of these Guidelines, **acceptable Television Ads gaming:**
  - DIRECTV and U-verse short form advertisements must comply with individual network agreements and professional and collegiate sports league restrictions. All broadcast networks carried as part of AT&T's DIRECTV and U-verse systems have their own unique advertising restrictions.
  - Interactive Advertising Channels on DIRECTV and U-verse must be preceded by an age verification screen. If the viewer does not certify that he/she is over the legal purchase age of 21 years, he/she will be directed to a warning screen stating that he/she is ineligible to view this channel and he/she will be directed to turn to another channel.

### IV. **Competitive Advertising Guidelines**

With respect to direct competitors of AT&T, all advertisements will be evaluated on a case-by-case basis.

- All the aforementioned and following Sections apply.
- In AT&T Advertising & Analytics' discretion, and with approval by the inventory owner, advertising of products and services competitive to AT&T's internal brands may be permitted provided:
  - The advertising does not disparage AT&T company products or services.
  - The advertising competitive to our internal brands is not conquering AT&T or utilizing AT&T data to promote the competitive brand.

### V. **Political Advertising Guidelines**

All advertisements concerning political candidates, campaigns, political parties or other political organizations will be evaluated on a case-by-case basis. In addition to our Guidelines, which apply to political advertising, for non-candidate advertisers AT&T Advertising & Analytics reserves the right to review, request modifications to, or reject any advertisement at its sole discretion. However, such discretion will not be exercised with the intent to favor or disfavor any particular candidate or political party.

#### A. **Acceptable political ads include:**

- Ads expressly advocating the election or defeat of clearly identified candidates that are placed by candidates, political parties, or third parties.
- Comparative advertisements focusing on the positions of the candidates and/or parties are acceptable.
- Ads soliciting financial contributions, or other support, to political candidates or parties.
- Ads that are sponsored by qualified candidates for office.

**B. Unacceptable political advertisements include, but are not limited to:**

- Ads that are libelous, defamatory or not in full compliance with the applicable law.
- Ads that contain hate, violent or racist rhetoric or symbols, or material reasonably expected to be offensive to “Publisher” users, without regard to ideological or partisan content.
- Ads that utilize a “pop-up” or a “daughter screen.” Note: Ads utilizing unsolicited audio content must conform to existing “Publisher” advertising guidelines.

***NOTE:** To be a “qualified candidate” an individual must, at a minimum, have met the definition of “candidate” under applicable federal or state law. Please note there may be circumstances in which “Publisher” Inc. shall impose additional requirements on advertisements by political candidates.*

**VI. Other General Standards (inclusive, but not a comprehensive, list)**

- Advertisements must comply with all of the aforementioned sections in these Guidelines.
- Advertisements must comply with individual network agreements.
- Advertisements must comply with the professional and collegiate sports league restrictions and any league and team exclusivities if applicable.
- Children’s Advertising Guidelines: <http://www.asrcreviews.org/wp-content/uploads/2012/04/Guidelines-FINAL-FINAL-REVISED-20142.pdf>
- FTC Tips and Advice for Advertising and Marketing: <https://www.ftc.gov/tips-advice/business-center/advertising-and-marketing>
- Diet and Supplement Guide: <https://www.ftc.gov/tips-advice/business-center/guidance/dietary-supplements-advertising-guide-industry>
- ERSB Advertising Guidelines: [http://www.esrb.org/ratings/principles\\_guidelines.aspx](http://www.esrb.org/ratings/principles_guidelines.aspx)
- MPAA Advertising Guidelines: [www.filmratings.com/downloads/advertising\\_handbook.pdf](http://www.filmratings.com/downloads/advertising_handbook.pdf)