

February 2019

The Ebiquity Code of Conduct

About this Code of Conduct

In the ever-more complex and rapidly-evolving media and marketing ecosystem, brands greatly benefit from unbiased advice from independent consultants. As one of the world's leading independent media and marketing consultancies, at Ebiquity we've published this Code of Conduct to specify the standards we strive to adhere to and to detail how we intend to work with our clients and their partners. It's our blueprint for ensuring that we create value in a way that recognises everyone's role in the marketing ecosystem. It also helps ensure that we deliver analytics and advice to consistently high standards around the world.

These principles are designed to help brands receive maximum benefit from our consulting advice across all of our services.

This Code of Conduct is based on more than 20 years advising the world's biggest brands, as well as comprehensive discussions with brands, agencies, and industry associations. It covers five principal areas: independence, remuneration, confidentiality, data processing, and ways of working. This addresses how we operate, the basis on which we are paid, the rules we apply to client and agency data, and how we work with our clients and their partners.

This is a living document and we will regularly review and revise it to reflect industry and marketplace changes. You can find the latest version on our website.

Key principles

- › **Independence**
 1. We are independent of the media supply chain
 2. We have no monetary relationships with our clients' media agencies
 3. We work primarily for brands, not media owners or agencies

- › **Remuneration**
 1. We receive revenue from the consulting services we provide to brands
 2. We do not benefit from financial incentives based on cost savings
 3. Our fees in the area of contract compliance reviews are not based on recoveries

- › **Confidentiality**
 1. We ensure confidentiality of our clients' media data and enter into non-disclosure agreements
 2. We aggregate our clients' data into our media benchmarking pool on an anonymous basis
 3. We maintain confidentiality of our clients' financial contract compliance data

- › **Data handling**
 1. We regularly review our protocols in respect to how we handle our clients' media data
 2. We aim to ensure data handling is swift, easy, and accurate for all partners
 3. We do not use pricing data collected in agency selection projects for benchmarking purposes

- › **Ways of working**
 1. We strive to work with all parties in a professional manner and in a spirit of collaboration
 2. We endeavour to operate timelines that are fair for all parties
 3. We aim to provide meaningful explanations to our recommendations

Independence

1. We are independent of the media supply chain

Structure: we are independent media advisors, meaning we do not offer media execution and trading services. Furthermore, we are not part of, nor do we own in whole or in part, a media agency, media owner, or an advertising trading technology business.

We have also published a [Statement of Independence](#) which provides further details on how we ensure that we remain independent from the media supply chain.

2. We have no monetary relationships with our clients' media agencies

Governance: we operate wholly independently of media agencies. While we work closely with our clients' media agencies, we are not directly associated – nor have financial relationships - with any media agency or media owner in a way that compromises our independence in the marketplace.

3. We work primarily for brands, not media owners or agencies

Focus: we work primarily for, and entirely in the interests of, brands – and not for media owners or media agencies. Our services are tailored to helping clients optimise their media investments.

Remuneration

1. We receive revenue from the consulting services we provide to brands

Income: our consultants generate revenue primarily from the advice we give to brands. In providing services that involve both brands and their media agency partners, our clients are always the brand and not the media agencies.

2. We do not benefit from financial incentives based on cost savings

Incentives: we often demonstrate cost savings brands can achieve by optimising the efficiency and effectiveness of their media spend. But we do not receive financial incentives based on cost savings.

3. Our fees in the area of contract compliance reviews are not based on recoveries

Fees: the fees from contract compliance reviews are not based on recoveries as a result of our projects.

Confidentiality

1. We ensure confidentiality of our clients' media data and enter into non-disclosure agreements

NDAs: Brands, agencies, and consultants should treat all media data confidentially, only using it for the purposes set out in non-disclosure agreements (NDAs). We sign NDAs with our clients and with their media agency partners. Our NDAs prevent one brand's data being shown to or used by another brand or agency. Access to client data is limited to employees who require access in order to provide Ebiquity services.

2. We aggregate our clients' data into our media benchmarking pool on an anonymous basis

Anonymity: we aggregate a brand's data as part of our anonymous pool of data, which we use to provide clients with media performance benchmarks. During the course of client engagements, we may produce relevant statistics about the size of our pools on an aggregate basis.

3. We maintain confidentiality of our clients' financial contract compliance data

Separation: we maintain confidentiality of our clients' contract compliance data, and don't share specific findings regarding one client with another. In cases where we conduct both media performance and contract compliance reviews, these are carried out by separate Ebiquity teams.

Data handling

1. We regularly review our protocols in respect to how we handle our clients' media data

Security: we recognise that data security is a key concern for our clients and their media agencies, and we are continually striving to improve our data security. We recommend data is transferred via a secure interface. For this purpose, we have developed EbiquityConnect™ – a secure data transfer tool – which can be used by our clients and their media agency partners to transfer data to us.

2. We aim to ensure data handling is swift, easy, and accurate for all partners

Collection: all parties have an interest in swift, easy, and accurate transmission of data between the agency and us. EbiquityConnect™ allows agencies to provide data in a way that minimises the demands on their resources.

3. We do not use pricing data collected in agency selection projects for benchmarking purposes

Separation: pricing data acquired during requests for proposals as part of agency selection project will only be used for the relevant pitch and assessment exercises. We never transfer such data for use in our benchmarking pools.

Ways of working

1. We strive to work with all parties in a professional manner and in a spirit of collaboration

Standards: we recognise each party's role and value in the media ecosystem. When delivering work on behalf of brands, we strive to work with them and their partners in an objective, professional, and collaborative manner. This includes, where timelines and client consent allow, opportunities for all parties to comment on initial findings prior to presenting final project findings.

2. We endeavour to operate timelines that are fair for all parties

Timelines: in providing our services we aim to propose and adhere to timelines that work for all parties. When responsible for managing the timeline as part of our scope of services, we strive to let all parties know of any changes to agreed timelines as early as possible.

3. We aim to provide meaningful explanations to our recommendations

Clarity: we recognise that we have a responsibility to sufficiently explain our findings in a way that enables all parties to understand the reasons behind our recommendations. Where possible, the data we analyse is verified using third party sources in order to ensure meaningful results.

We are a leading **independent** marketing and media consultancy

Our ambition is to help brands harness the power of data, analytics, and technology to improve marketing outcomes

With 18 offices globally, we offer full coverage of the world's largest advertising markets:

- › Working with 80 of the world's top 100 advertisers
- › 650+ employees in 14 global markets including London, Paris, Madrid, New York, Sydney and Singapore
- › Listed on the London Stock Exchange (AIM:EBQ)

Our consultants and experts work with market-leading local and global brands across three key areas:

- › **Media**
Achieve higher media performance through best-in-class media management and transparency
- › **Analytics**
Build evidence-based marketing programmes rooted in data and analytics
- › **Tech**
Design the right technology ecosystem to drive higher value from digital investments