SPIRITMEDIA.

Brand Safety Policy

Issued: October 2026. Next review: October 2027.

1. Purpose and Scope

1.1 This policy sets out how Spirit Media Scotland decides where client advertising may and may not appear, and what we do when it appears somewhere it should not. It applies to everyone who plans or buys media for clients, including freelancers and subcontractors acting on our behalf.

2. What We Mean by Brand Safety

2.1 Brand safety is about the environment an advertisement appears in. We treat three things as separate questions: whether the content is unlawful or harmful (unsafe for any advertiser), whether it is unsuitable for this client, this audience or this message (a matter of suitability), and whether the placement could be misread as an endorsement.

2.2 Suitability differs by client. A place that is fine for one advertiser can be damaging for another, so we agree the standard with each client rather than applying one list to everyone.

3. Setting the Standard at Planning

3.1 At planning, we ask every client where their advertising could appear that would cause a problem, and who in their organisation would have to answer for it. We ask this alongside the other planning questions, not after the plan is agreed.

3.2 We agree in writing, before any buying starts: the categories and kinds of content the client wants avoided; any audience or age restrictions that apply to the product or message; and the rules the activity must meet, including the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code), the UK Code of Broadcast Advertising (BCAP Code) and any sector rules that apply.

3.3 Where a client has no view, we propose a standard, record that we did so, and ask them to confirm it.

4. Buying

4.1 We apply the brand safety standard agreed for each client to every buy. We use the controls available on each channel, such as category exclusions, exclusion and inclusion lists, and the content and placement standards of each media owner.

4.2 Where a client's sensitivity is high, we favour inventory where the content is known in advance over inventory where it is not, and we tell the client what that choice costs in reach or price.

4.3 Where we do not take the cheapest option, we document the reason.

4.4 We do not place client advertising on sites or services we know to carry unlawful content, including content that infringes copyright, promotes hatred or exploits children.

5. Checking During and After a Campaign

5.1 We review placement information from media owners and platforms during a campaign, not only at the end, and we act on what we find.

5.2 Every plan and report is read by someone who did not do the work. One thing that reader looks for is the placement a critic would quote. If the answer is a placement we would struggle to defend in public, we change it.

5.3 We state in each report what the placement information we hold can and cannot show. Where a platform does not give us placement-level detail, we say so.

6. When Something Goes Wrong

6.1 If client advertising appears somewhere unsuitable, we tell the client promptly, and in any event within two working days of becoming aware of it.

6.2 We then pause or remove the placement, ask the media owner or platform to explain what happened and to put it right, including a refund or make-good where the terms allow, and record the incident and what we changed.

6.3 We do not wait for the client to find it, and we do not play it down in reporting.

7. Advertising for Sensitive Products

7.1 Some products and messages carry extra rules about who may see them, including gambling, alcohol, products high in fat, salt or sugar, and financial promotions. For these, we apply the age and audience restrictions in the relevant codes and regulations, and we check them before the buy, not after.

7.2 We will decline or stop a placement we believe breaches those rules, and tell the client why.

8. Responsibility and Review

8.1 The Joint CEOs are responsible for this policy and for the standard of brand safety on every account.

8.2 We review this policy every year, and sooner after any significant incident or change in the rules that apply to us.