



COMMERCIAL GUIDELINES

Section 1. Introduction

Spotzer commercials should meet the highest standards. At least, they should comply with national and local laws and regulations, standards and practices of Media Outlets, Internet standards and laws, and other applicable guidelines for advertising (collectively, “Guidelines”).

Spotzer strives to offer advertising that is truthful, substantiated, not misleading in any way, and in good public taste. To that end, these Guidelines are in place to help educate and inform advertisers as to the proper rules and norms for personalizing and running advertisements through Spotzer.

Please note, however, that these Guidelines are not intended to be all-inclusive. Media Outlets, for example, may impose additional company-specific requirements. Advertisers are responsible for adhering to all laws, rules and guidelines, and Spotzer always reserves the right to accept or reject any advertisement or require the elimination or revision of any content. You are always fully responsible for, and Spotzer shall have no liability in connection with, any content that you provide or any advertisement (including any preproduced commercial) that you run.

If you have any questions about these Guidelines, you may contact us at: legal@spotzer.com. For questions about compliance with advertising-related policies, rules and regulations, you should consult legal counsel.

Section 2. Abusiveness/Vulgarity

Advertising may not, directly or by implication, be vulgar, obscene, profane or pornographic. In some regions advertising may not contain nudity. Nor may advertising be threatening, abusive, harassing or hateful (racially, ethnically or otherwise) or otherwise objectionable in light of community norms and standards.

Section 3. Alcoholic Beverages

In some regions, advertisements for hard liquor or distilled spirits (including mixed products that contain hard liquor) may not be allowed. Advertisers may promote beer and wine, subject to national and regional laws and regulations, regulator’s rules and guidelines, media outlet and other applicable guidelines. Among other things:

- In some regions, advertisements may not depict the actual consumption of alcoholic beverages, which includes the sound effects or visuals of drinking.
- Advertisements may not encourage excessive consumption or the use of alcohol by minors.
- Advertisements generally may not refer to the strength of the beer or wine.
- Where required by law, advertisements must disclose the name and city of the brewer, producer, packer, wholesaler or reporter responsible for its broadcast.



Section 4. National Flag

Advertisements using or depicting any national flag should treat the flag in a dignified and appropriate manner.

Section 5. Availability of Products and Services

Advertisements must disclose if distribution or availability of products or services is limited. For example, if your products or services are not yet available or not available in the majority of the advertising market where your ads will be run, your ad must make this limitation clear.

Section 6. Children

Advertisements directed to children must comply with national and regional laws and regulations and with all regulator's rules and guidelines.

Section 7. Claim Substantiation

Advertising claims must be substantiated (prior to running the advertisements) with valid and reliable research or support. Claim substantiation must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 8. Comparative Advertising

Advertisements comparing products or services may not distort or exaggerate differences or otherwise create a false, deceptive or misleading impression. Comparative advertisements must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 9. Contests and Sweepstakes

Absent special circumstances and approval from Spotzer, Spotzer does not accept advertisements for contests and sweepstakes.

Section 10. Contraceptives

Advertisements for condoms or contraceptive methods and devices must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 11. Controversial Issues

Spotzer generally follows policies of media outlets, which often do not allow for the running of advertisements on controversial topics. Political advertisements are often outside the prohibition against controversial issues advertising. Any political advertisements must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.



Section 12. Demonstrations, Dramatizations, Re-enactments and Simulations

Advertisements that incorporate content which includes demonstrations, dramatizations, re-enactments, simulations, tests, experiments or other technical, mechanical, electronic or chemical exhibitions, must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines. For example, you must accurately depict the product or service involved, and you must disclose when actors are used in a re-enactment to portray actual persons.

Section 13. Dietary and Nutritional Supplements

Advertisements related to dietary supplements must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 14. Endorsements and Testimonials

Advertisements containing endorsements or testimonials must represent the honest opinions and experience of the endorser, and may not contain claims that could not be substantiated if made by the advertiser. All endorsements and testimonials must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 15. Financial Advertising

Advertising for banks, funds, stocks, bonds, commodities, insurance, real estate, and other investments must disclose all material restrictions, risk factors and qualifications and must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines, including, for instance, regulations promulgated by applicable professional or trade groups.

Section 16. Firearms and Ammunition

Spotzer does not accept advertising for firearms and/or ammunition.

Section 17. Food

Advertisements may not overstate or exaggerate the nutritional value of foods. Health claims, including claims of food being "nutritious" or "healthy" must be substantiated and in the context of a total diet. All food advertisements must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.

Section 18. Guarantee and Warranty Offers

Advertisers may be required to provide specific information (e.g., material terms) when using the terms "guarantee," "warranty" or similar words that signify a promise or guarantee. When making such guarantees, advertisers should generally disclose whether an advertised warranty is "full" or "limited", its duration, and any major limitations of the warranty. Advertisers should also provide information on where full details of the warranty are available. All guarantees and warranties must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines.



Section 19. Health- and Medical-Related Product Advertising

Advertisements related to health and medical products and services (including drugs) must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines. The media outlets have strict guidelines, which include, among other things:

For Prescription Drugs:

- Advertisements must contain warning and/or side effects information;
- The phrases "Available only by prescription" and/or "Use only as directed by your physician" generally must appear visually within the commercial.
- Use of the product may not be depicted on-camera.

For Nonprescription Drugs and Over-the-Counter Medical Devices:

- A prohibition against claims that the product alone will affect a cure;
- Absent sufficient qualification or documentation, terms such as "safe," "without risk," "harmless," or terms of similar meaning may not be used;
- Advertising appeals may not be made to children;
- The phrase "Use only as directed" must appear visually within the advertisement.

Statements From The Medical Profession:

Generally speaking, health-related professionals may not appear in commercials for a health care product or service, other than promoting their own service.

Section 20. Mail Order, Telephone, Internet, and Direct Response Advertising

All mail order, telephone, Internet and direct response advertising must comply with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable guidelines. For example:

- Any charges beyond the advertised purchase price (e.g., postage, handling, etc.) must also be disclosed.
- The time necessary for the consumer to receive the merchandise must be reasonable. For example, if time for delivery will exceed 30 days, commercials must indicate the actual anticipated time for such delivery.

Section 21. "New" Used In Advertising

Advertisers should only use the term "new" for a period of six months from the time a product or service is introduced.

Section 22. Personal Products

Advertisements for personal products (such as feminine hygiene products, home pregnancy tests, home HIV tests, adult diapers, STD medications) must follow media outlet guidelines.



Section 23. Premiums and Offers

Advertisers must ensure that the value of any premium is no less than stated and that any premiums or offers are not unsafe or detrimental to the consumer. Among other things, the Advertiser must:

- Provide all offer details, including rules, eligibility requirements, beginning and end dates, and requirements for fulfillment;
- Make sure that full details are easily accessible; and
- Give a cash refund for premium items that are returned by the consumer.

Section 24. Prohibited Commercial Presentations and Techniques

Spotzer prohibits advertisements that, among other things:

- Make claims or representations that are false or tend to deceive, mislead, or misrepresent;
- Offer unsupported or exaggerated promises of earnings;
- Use "subliminal perception" or other similar techniques;
- Give unqualified safety references, if the product's package, label or insert contains a caution, or the normal use of the product presents a possible hazard;
- Use "Bait and Switch" tactics that promote goods or services not intended for sale but designed to lure the public into purchasing substitute goods or services; or
- Make direct or implied use of government officials or any government body without official approval.

Section 25. Safety

Advertisers must assure compliance with normal safety precautions (for instance, not show passengers in a motor vehicle drinking and driving, or not wearing seatbelts).

Section 26. Solicitation of Funds

As a general matter, in recognition of media outlet's policies, Spotzer does not accept advertisements that solicit funds except in certain situations, for certain types of political campaigns, charities, non-profits, NGO's, or other similar organizations and only when in compliance with any and all applicable rules and regulations governing advertising in those contexts.

Section 27. Supers

When superimposed copy is used, it must be displayed clearly and conspicuously.

Section 28. Tobacco/Cigarettes

Spotzer does not accept advertising for cigarettes, cigars, pipe tobacco, tobacco paraphernalia and smokeless tobacco.



Because standards and practices are continually evolving and vary from medium to medium and from region to region, remember that it is always your sole responsibility to ensure that your advertisement conforms with all applicable laws, rules and regulations. These guidelines are for your information only and set forth general standards. They are by no means exhaustive and are subject to revision without notice by Spotzer in its sole discretion. Of course, Spotzer, in accordance with Spotzer's General Terms and Conditions, has the right to reject or require revisions to content for any reason whatsoever, whether or not set forth expressly in these guidelines or Spotzer's General Terms and Conditions. Spotzer shall not be responsible or liable for any commercial's (including any preproduced commercial's) compliance with national and regional laws and regulations, regulator's rules and guidelines, media outlet and other applicable rules, regulations and guidelines. Airing of your ad in no way constitutes Spotzer's approval of your ad, your content, or your use of the ad.