

GARM Safe & Suitable Innovation Guide

Assessing brand safety and suitability concerns for Generative Al + the Metaverse



Introduction

An open, accessible and safe Internet that respects user control is in everyone's interest. Advertising has helped the Internet develop and will likely help develop its next phases, shaped by two new separate technological waves; the metaverse and generative AI.

Over the last four years, the Global Alliance for Responsible Media has been supporting the advertising industry in respect to safety in the digital social media sector. Our focus is on monetization and where ads are placed. We have also provided support with regard to a voluntary roadmap and flexible frameworks which promote improved transparency, controls and consistency.

In the four years that we've operated we've seen new platforms and formats enter the industry landscape. There are two changes emerging where we see the potential to inspire safety as these new digital technologies take shape – namely the metaverse and generative AI.

These are two separate technologies that are different; the metaverse represents an evolution of the digital medium, whereas generative AI represents a new technology. While these are different and distinct and each have their own different levels of concreteness and development, industry stakeholders should consider steps to encourage safe development, safe exploration – as well as safe monetization of these new territories.

This document is meant to help advertising industry stakeholders – whether ad buyers, ad sellers, or enabling partners. This playbook is aimed at providing background and support for industry stakeholders as they consider how to experiment, how to structure and connect teams that straddle advertiser, agencies and platform organizations and learn what to focus on to innovate with brand safety and suitability in mind.

This playbook is the result of collaboration from independent GARM members across a diverse range of industries.

We would like to thank GARM members who helped review research and create this guide, specifically Mars, Unilever, P&G, GroupM, Meta, Google, Publicis, Vodafone, 4As, ISBA, WFA, UM, Roblox, BSI

We recognize that every organization's experience and journey in these areas are unique and will range from the curious to the educated to the exploring to the expert. This playbook is meant to be a flexible resource to organizations and teams, no matter where they are in the journey.

- For the more advanced in these technologies, this playbook can help reaffirm current practice and help align teams and partners.
- For those starting out or curious, this playbook can help educate you on how to navigate advertising opportunities that leverage these technologies.

Finally, we should note that these technologies are energy intensive. We should encourage these technologies to be responsible-by-design and sustainable-by-design. User safety, Brand safety, Privacy and Sustainability are becoming the four table stakes in the media industry and should be extended to the way metaverses and AI are designed and built.



From insight to provocation

In GARM's charter we acknowledge that digital and social media have both a light and a shadow side. Much of our work has been dedicated to supporting that advertising doesn't play into online harms and that the industry has the necessary voluntary guidelines so that content monetization is more transparent and consistent.

As an industry, it's essential that we reflect upon our journey to this point to guide our go-forward in these next areas.

With these learnings and provocations in mind, we can now encourage ourselves to:

- 1. Test
- 2. Continue to evolve and build controls
- 3. Leverage the capabilities and features across the value chain to improve safety

What did we learn?

Digital media company policies must be clear, consistent and enforced evenly to manage fluid events and innovation

Where do we see it?

Platform policy exceptions on political officials, celebrities and ensuing oversight boards

What does it mean as we progress?

Systems, programs and experiences should go through a stress test or dry run before being made generally available or promoted

Comprehensive regulation can embrace industry development of new technology, user empowerment that embraces choice and protection

Digital safety regulation and compliance mechanisms in UK, EU, Australia

Advertisers should do their part in making needs known, while advancing the creation of complimentary frameworks for advertiser controls

Centres of Excellence on digital safety can provide guidance, but governance and compliance measurement are key to effective safety implementation

Imperfect integration of content recommendation engines, user safety and privacy systems

Third-party, audit and accreditation of technology systems and transparency tools (like blockchain) will become increasingly important

Dangers such as deepfakes, misrepresentation, fraud and underage usage will require verification and identity management resources on the technology industry and advertiser side

Fake corporate handles on social media at new product launches, counterfeit NFTs, celebrity deepfakes, Generative AI faked photos in political ads Platforms, apps, hardware providers will need to work towards verification and appropriately apply trademark and intellectual property standards to protect individuals from fraud.

Content and experiences should have appropriate labelling and access, managed by both developers and platforms with safety in mind

Generative Al

There's been a lot of activity in and coverage of Generative AI (GAI) since Chat GPT became public facing on Nov 30, 2022. Within two months of its launch, it reached 100 million active users (what took TikTok 9 months to achieve). There are now 600 new companies joining a rush to develop this new technology, according to an initial scan of CB Insights.

As with most new technology there's been equal calls of euphoria and agony. And most recently G-7 heads of state have discussed the need for a global regulatory framework to address potential harms. There have been calls for a 6-month moratorium in the development of GAI by leading academics and practitioners, but as we have seen in new technologies the locomotive will be hard to stop.

How should the industry begin to think about this new technology?

Advertising support of generative AI is still yet to come, but generative AI will certainly affect the advertising industry – whether realizing the promise of dynamic creative and media optimization, or potentially stripping publishers of traffic that would have otherwise been monetizable.

The impact of Generative AI on advertising and publishing will be real but have yet to be fully understood. The purpose of this playbook is not meant to explore the creative opportunities that GAI will represent to marketing, rather we will focus on helping understand and mitigate some of the risks as it relates to content generation and its impact on brand safety and suitability. Part of the industry's approach can be informed by policies already taken on manipulated media; however, the automation tools and the scale should cause us to reflect on whether the approach is fit for purpose and fit for the future.

Tactically speaking, we have already seen risks in crossborder data transfers for large language models, proliferation of hyper realistic deepfakes in political ads, the frictionless creation of polished made-foradvertising web sites and content sites replacing human writers with automated article generation.

These tactical risks are clear, but what are some of the strategic risks that may arise?

Negative Use Cases: GAI can be weaponized by users with negative intent and the primary threat vectors breakdown into two areas:

- 1. Harmful content at scale: The risks of GAI weaponized on a personal (phishing, cyberbullying), group (hate speech), or system (deepfakes) is real. Advertisers, agencies and platforms may need to safeguard themselves from the presence and monetization of this content, created in an automated way and at scale. The risks for coordinated attack will similarly increase.
- 2. Misrepresentation and misinformation at scale: As discussed in the metaverse section, discerning between parody and trolling will be hard. Similarly, determining fantasy depiction versus propaganda will become equally hard. In essence, intent will be increasingly important a known area for interpretation and hard for the industry to develop standards around.



Generative Al

Information Sources and Intellectual Property: GAI will also struggle until information sources are addressed in two ways:

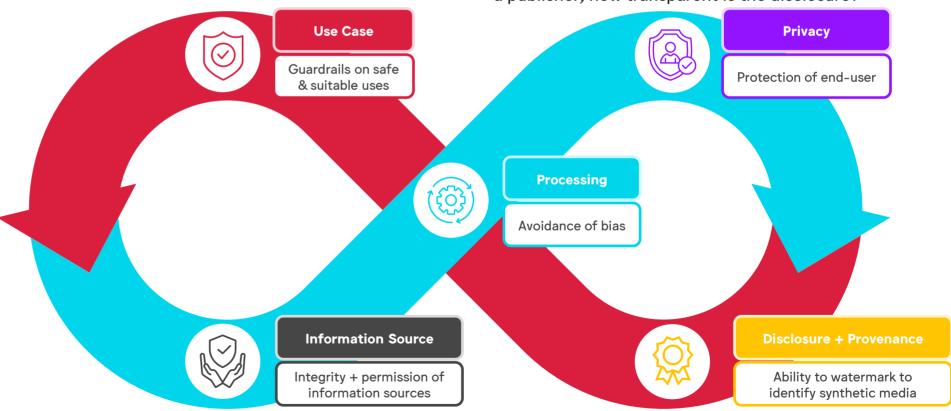
- 1. Explainability and governing input sources: As with all processes the outputs are usually only as good as the inputs. You can imagine a GAI engine that is reliant on questionable or bad content may produce negative content and conversely quality content into GAI can result in quality content. GAI engines may need to develop selection standards and simultaneously consider user control over content sources.
- 2. Fair and mutual business practices with input sources: GAI may reduce time needed to visit several sources and subscribe to content. Publishing, journalism, music creation and recording are all industries that may be disintermediated in one way or another will you need to visit said news site, will said singer need to record a new song? Copyrights and intellectual property will become a third rail issue unless a mutual business model is developed.

Bias in processing: Fairness and inclusion data practices in AI to avoid bias in processing: GAI will also need to ensure that processing technologies avoid bias.

When designing and training generative AI systems, it is important to use diverse and representative data sets to reduce the risk of bias and to carefully evaluate the quality and accuracy of the generated output. Developers of GAI will also need to ensure that processing technologies avoid bias. When designing and training generative AI systems, it is important to use diverse and representative data sets to reduce the risk of bias and to carefully evaluate the quality and accuracy of the generated output

Privacy and Confidentiality: GAI app developers will need to provide disclosure on how queries and results are fed back into the engine – are queries and the results indexed and open for review? Users' privacy will need to be clarified as GAI are privy to certain sensitive topics. Enterprise and business users will also need to have confidentiality and security systems.

Disclosure & Transparency in Production: GAI will scale the creation of net new content. To an end user or a publisher, how transparent is the disclosure?





What should the GARM stakeholders expect?

- Industry-wide efforts to introduce digital watermarking that enhance disclosure & provenance: We have started to see some efforts started by Adobe (Content Authenticity Initiative), Microsoft (Project Origin) and then an umbrella effort to create a standard for content like Coalition for Content Provenance and Authenticity (C2PA) forum that brings together the imaging industry, editing software and news media. These are encouraging signs and is a promising use case of blockchain technology. However, we may need to consider how open and willing platforms will be in accepting these signals into their systems and consider if and how they should be consumer-facing. Further, it will be natural to see potential links in this area with groups focused on security, like the Global Internet Forum for Counter Terrorism (GIFCT) and groups combatting counterfeiting efforts such as the OECD.
- Co-regulatory frameworks will evolve but the jury is out on if they will be comprehensive and support technology market development and media industry protection: The threat vectors for GAI are clear in Use Case and Information Source and Processing needs. We anticipate regulators and industry to work together to develop a series of standards, based on initial inquiries in the US, UK, EU, Australia individually and more recently at intragovernmental conversations at the G7 Summit in Hiroshima. The advertising industry should assess developments through the framework above to assess whether or not it is comprehensive enough for our industry needs.
- Tough conversations on mutual business models: GAI engines can upend creative ownership & compensation; for a musician it could be their voice, for publisher it could be their content. GAI's ability to create content could disintermediate creative owners from end-users & commercialization. We can already see some rightsholder concern and the threat of legal challenge in certain key markets, which may spur governments to weigh in on these debates. We've seen similar tensions of content licensing for news publishers in Search and this will likely only be the beginning.

What should GARM do in the midterm?

Outside of GARM

Support the creation of and adoption of voluntary provenance solutions through the content creation, moderation and monetization lifecycle

Support further independent marketplace marketplace development and safeguards for the advertising industry

Support the industry the industry with its face into tensions on commercialization and disintermediation

Continue to monitor how specific applications address privacy, confidentiality and disclosure and consider this as core elements of 'Platform Safety' for Generative Al

Watch for regulation that addresses risks to users and industry, while allowing for marketplace development

Within GARM

Seek to understand on an industrywide and aggregated basis how ad sellers and content targeting companies may spot and assess synthetic media created by GAI tools

Seek to understand on an industrywide and aggregated basis how GAI content creation engines will be assessed for quality, integrity and risk

Support the exploration of potential common understanding on Use Case, Information Source and Processing that feed into platform safety and brand safety



The Metaverse: defining it, appreciating its variety, understanding responsibilities

The metaverse has been aptly defined by Matthew Ball as

"a massively scaled and interoperable network of real-time rendered 3D virtual worlds which can be experienced synchronously and persistently by an effectively unlimited number of users with an individual sense of presence and with continuity of data, such as identity, history, entitlements, objects, communications and payments."

This definition is robust and rigorous and forward looking as it does not exist in this sense, today.

For the advertising industry stakeholder, we can also describe the metaverse using IAB's description of

"a collection of virtual spaces, or digital worlds, in which users can create content, interact with others as avatars or digital versions of themselves and move freely between worlds."

There are a series of criteria that can be used to determine if an experience should be considered as a metaverse experience:

- Immersive and expansive
- Interoperable and uncapped
- Independent and exchangeable
- Interactive, live, synchronous
- Indefinite and no geography

This guide

The most popular entry points for consumers in the metaverse is gaming, currently. Some of these metaverse platforms are at scale, while several of them are still nascent. Putting scale aside, the most interesting thing to note, is the variation of user controls and behaviours that are possible.

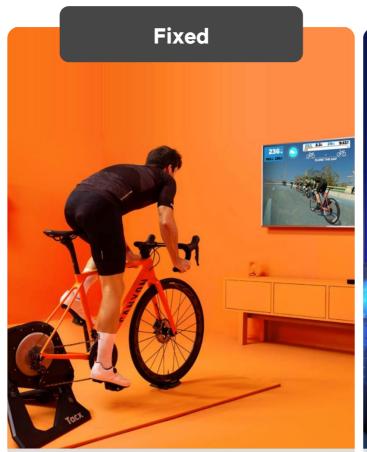
We see a continuum starting to play out in the types of platforms, environments and controls available. There are three gradations of metaverse consumer-controlled experiences, ranging from Fixed to Hybrid to Fluid.



Current points of entry

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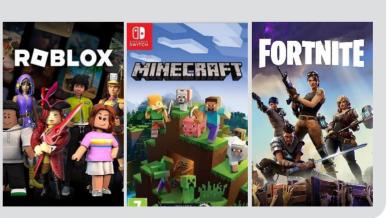


4mm
Monthly Actives
3.78 miles





100mm
Monthly Actives
18 hours





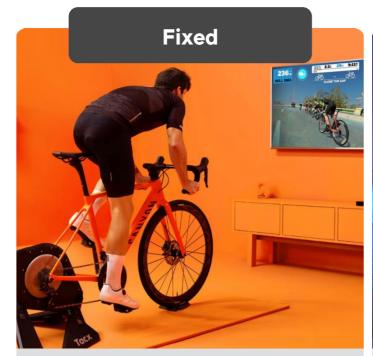
Active players 300m





Wild variations of consumer autonomy in a synthetic environment and in corresponding community represent different levels of risk. Some harmful incidents have been documented in the early days of each platform and they can be telling on the types of abuses that may be possible in each environment. Therefore, it is essential for us to consider a potential to additional layer to the model to identify general baseline model risk.

Managing risks in the metaverse is achievable but may potentially require a new frame of reference. Given the distributed nature of the experiences, concurrent community use and the multiple layers of technology, an updated layered approach to safety might be considered based on the value chain of how metaverse experiences are delivered.



Overview

An environment where the user can only do a finite set of actions in the experience that are known and controlled

Selected Examples

Zwift

Risk

LOW



Overview

An environment where users can do a set of actions and the experiences can be user controlled but are limited by software rules

Selected Examples

Roblox, Minecraft

Risk

MEDIUM

Fluid



Overview

An environment where the user has full autonomy to perform openended actions that mimic the real behaviours or enhanced behaviours via things like avatars

Selected Examples

VR Chat

Risk

HIGH

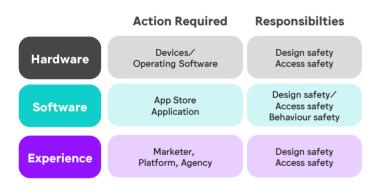


GARM: UNDERSTANDING SAFETY LEVERS ACROSS THE METAVERSE VALUECHAIN

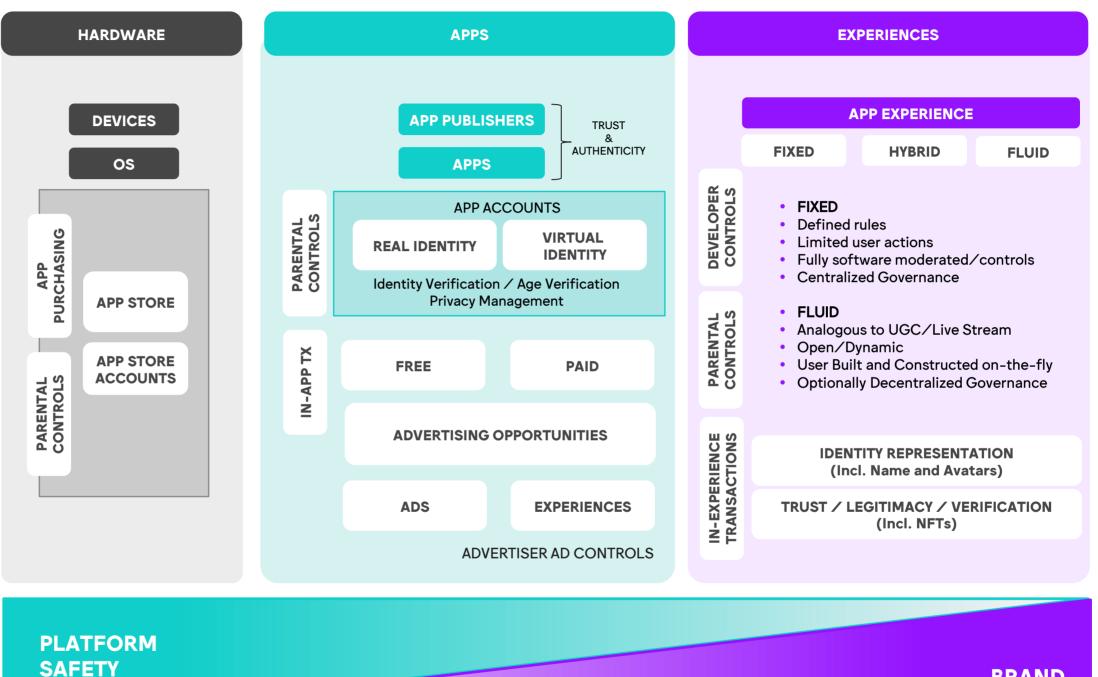
As we look at it, there are two complementary layers of safety relevant to advance:



Platform and Brand safety are delivered differently in the metaverse because of the layered approach seen in the graphic.



A layered and sequenced approach to safety is important to ensure that metaverse experiences are based on user consent & control, keeping communities safe and commercialization via advertising appropriate to the advertiser.





BRAND

SAFETY

CASE STUDY:

Lifestyle apparel creates a virtual sports world to gather its community and offer up unique merchandise [Hybrid Experience + Commerce]

Looking at a real case study, a sports lifestyle apparel brand created an immersive community experience for users. The activation allowed for users to customize their avatars, engage in a series of sports and chat with each other.

The overall activation could be categorized as being a Hybrid Experience.

The advertiser, agency and app identified the following safety and suitability concerns:

1 Appropriate access:

The program needed to ensure that users were 13+ and in the US

2 Appropriate use:

The program needed to ensure that avatar customization and lifestyle apparel was used in appropriate ways

Appropriate interaction:

The program needed to ensure community interaction avoids harassment, cyberbullying, teasing, 'trash talk'

Commerce integration:

The program's ecommerce capabilities needed to allow for a near frictionless transaction

The advertiser, agency and platform developed a series of responsibilities based on the priorities above and enlisted partners in the value chain to ensure that they were realized through a series of business rules:

Priority	Value chain accountabilities	Business Rule
Access	Devices/ Operating Software	Ensure that device ID's can be age verified Ensure that application can age verify
Use	Developer	Ensure that brand can be used in fixed ways
Interaction	Devices/ Operating Software	Block slurs Moderate comments
Commerce	Developer/ Commerce team (payments, fulfilment)	Ensure that user can transact

Through the shared accountabilities above, they were able to run an activation on the platform that was seen as a successful test and learn program:

- The brand and agency were able to learn by doing in the metaverse
- Consumer and brand safety were delivered via tech-driven and human moderation
- 3 Limited edition sales of apparel exceeded supply



Marketing models: not every activation is the same, so it is important to manage safety resourcing accordingly

As we saw in the case above, the brand had an involved activation. But not every metaverse marketing campaign will require this level of rigor. There are different models and many of them should be familiar to us from other media campaigns:

Models

Overview

Placement

Placement of a predefined piece of advertising that can be visual and/or audio in nature

Integration

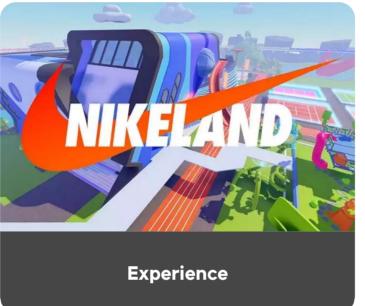
Placement of a product or a branded asset into an application, community environment (inclusive of NFTs)

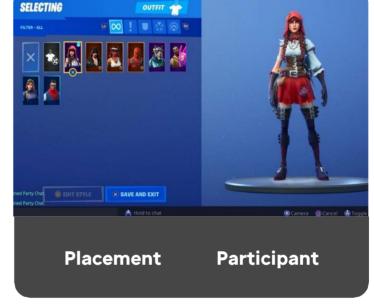
Participant

Creation of a branded avatar that users and communities can interact with

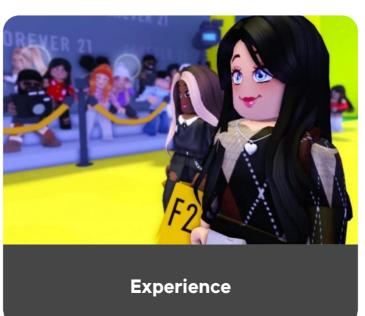
Experience

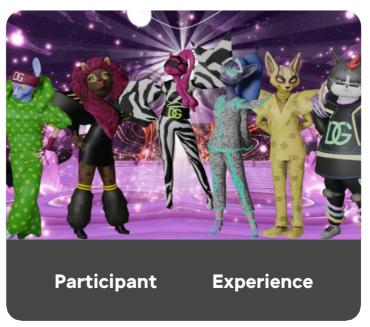
Creation of a branded space or event for users and community interaction

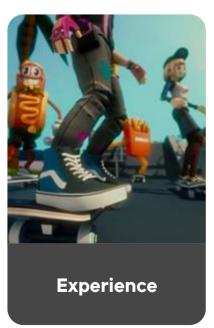












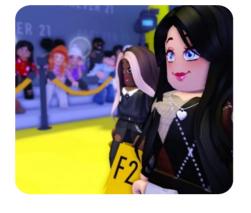
Marketing in the metaverse shows diversity in execution and continuity in models





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Nikeland

Launched in 2021 on Roblox, Nikeland is one of the metaverse proof of concepts seen to date. This activation has onepart video game, one-part online rewards for offline fitness goals, one-part social community and finally one-part ecommerce. This is truly 'a Swiss Army Knife' execution and set a high bar in engagement and driving a brand benefit (championing consumers reaching of offline fitness via community engagement).

Wendy's

Wendy's metaverse activations span several platforms where they develop a personae and presence in every single major platform – whether Roblox, Horizon World, or Fortnite. Wendy's strategy is to join the community and engage consumers wherever and whenever they are online.

Coca-Cola

Coca-Cola's first activation in the metaverse included NFTs available on OpenSeas in sales to boost donations to Special Olympics International. Since the original charity auction Coca-Cola has built out a distinctive presence spanning more NFTs, ingame presence and developing a limitededition flavour co-created by Coca-Cola's community in the metaverse, called Sugar Byte.

Forever 21

US fast fashion retailer developed a Roblox-based experience with a metaverse specialist agency. This multiyear activation features an NFT storefront and an ecommerce platform to buy limited-edition real-world clothing co-created in the metaverse.

Dolce & Gabbana

Launched as part of the Italian fashion brand's Fashion Week showcase. D&G unveiled a series of 20 custom wearables featured in Decentraland for a limited time. The fashion items were also then featured in real-world catwalks. This was seen as a PR, critic and consumer success and has propelled the brand to extend work with Mkers and SKNUPs in the eSports and NFT arenas.

Vans

Vans created a virtual skatepark on Roblox in an experience that brings skateboarding, fashion and community together in one experience. The experience spans virtual avatar creation. NFT unlocked via community participation and ecommerce opportunities. Further, the metaverse activations were linked to Vans' physical skateparks in iconic locations such as London.



Assessing safety + suitability needs: engagement model x marketing tools

With an understanding of Engagement Models and Marketing Models, we can now start to identify and consider baseline safety and suitability needs.

The assessment here is baseline only and cannot be a substitute for analyzing the content in a metaverse space or community and cannot be a substitute for analyzing how a brand message may appear in a metaverse community.

Placement

Integration

Participant

Experience

However, looking at the fluidity of engagement models and marketing models an easy-to-understand model becomes evident.

The matrix below demonstrates that increased fluidity –in engagement and experience increases baseline risk.

ENGAGEMENT MODEL Fixed Experience Hybrid Experience Fluid Experience **Advertiser Controls Needed Advertiser Controls Needed OK for Monetization Human Monitoring Needed Human Moderation Needed** LOW **MEDIUM** HIGH LOW HIGH MEDIUM LOW **MEDIUM** HIGH LOW HIGH HIGH

We can make the following assessments accordingly:

1

Fixed Experiences

with set user actions have Low Risk and should be viewed as OK for commercialization



Hybrid Experiences

will predominantly be Medium Risk and should have controls for advertisers with human oversight, which may extend into moderation depending on audience

3

Fluid Experiences

will be High Risk and should feature both controls and live moderation



MARKETING MODEL

CASE STUDY:

Staging a branded concert series in the metaverse [Fluid Experience + Placement]

Another case study we can observe is a brand sponsored a metaverse-based music concert. In this instance, insurance company signage was featured in a typical digital adaptation of a virtual concert. Therefore the marketing model used was a Placement.

The platform was a Fluid Experience which allowed the crowd to sign, to dance and to interact. Because of this the brand and the platform decided to take a series of steps:

- Managed audience access via age-gating (registration) and engagement (terms & conditions)
- Manage audience size into concert sections that could be managed
- Disclose to users that they were in a live interactive environment and make them aware of reporting tools
- 4 Monitor crowd interaction by using image and speech recognition software
- Staff each section with a live moderator to manage the audience accordingly

Because of the steps, the brand was able to sponsor a full series of 9 concerts in the summer of 2022, reaching an average of 28 million attendees per concert.



Testing & learning safely+ suitably: what to do + what to look for

Media experts like to test, learn and experiment. We've also learned that responsibility is high on a media leader's agenda.

In our research, we have identified best practices to consider.

These best practices set out four steps that media leaders should consider as they test and learn in this exciting new space.

There are a series of steps under each of the phases to consider as a team plans a metaverse activation.

Pre-campaign assessment

- Platform and device selection
- Target audience age restrictions
- Target audience geographic restrictions
- Content or behaviour restrictions

In the Pre-campaign Assessment Step, teams often consider if the platform and devices involved are appropriate for media investment, considerations covered in GARM's Brand Safety + Suitability Training Bootcamp.

Teams should then consider any audience or behaviour restrictions to their campaign or activation. This assessment will establish clear bounds for the program.

Activation assessment

- Marketing Model Identification
- Engagement Model Identification
- Baseline risk assessment

In the Activation Assessment Step, the teams often determine the Baseline Risk Assessment by identifying both the Marketing Model (Placement, Integration, Participant or Experience) and Platform Engagement Model (Fixed, Hybrid, Fluid).

Teams then determine the levels of emphasis needed in verification and moderation resourcing. Teams should also explore and consider.

Safety + suitability guidelines

- Verification requirements + rules identification
- Moderation requirements + guideline development
- Assignment of Verification + Moderation duties

In the Guidelines Step, the key output is assignment of verification and moderation roles across the value chain, with clear potential rules. The objective is to ensure that there are clear business rules established to ensure that the metaverse experience is accessed by the right users based on age and location and that the behaviours of the community stay in line with the desired experience. It's important to brief these guidelines to the relevant stakeholders in the value chain necessary for the campaign activation. This is core to ensuring the effectiveness and accountability of these guidelines.

Safety + suitability resourcing

- Align and check user verification layers (hardware, app, experience)
- Align technology moderation (app, experience)
- Resource human moderation (experience team)

In the Resourcing Step, the relevant and selected partners are briefed or engaged on the activation to ensure that the right levels of procompetitive collaboration and coordination take place. For instance, the experience team need to ensure that the app is performing using age or location verification to ensure appropriate access. Finally, it is important to ensure that live moderation teams (marketer, agency, platform, or external provider) will be using the appropriate prompts to encourage users or redirect users, as needed.

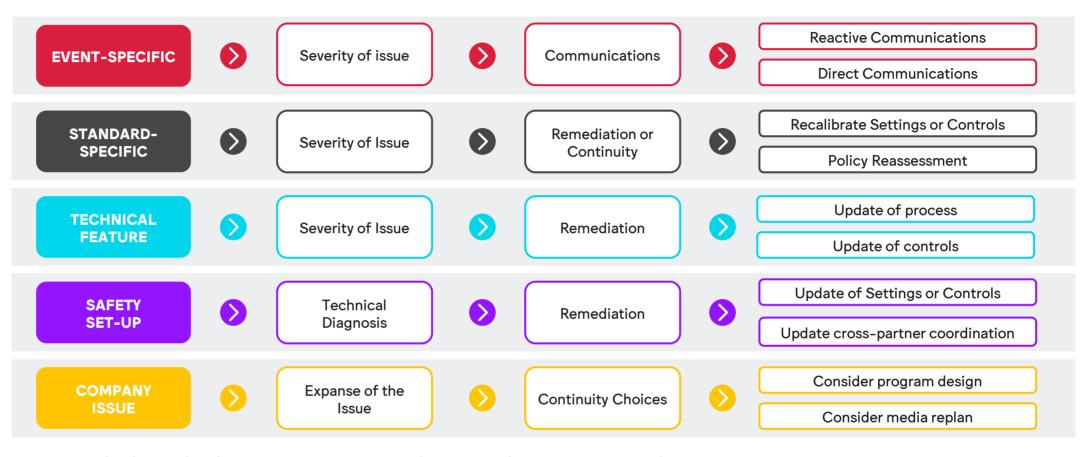


Managing potential incidents: a framework for assessment + addressing challenges

In GARM's Brand Safety + Suitability Training, we present a series of case studies and frameworks to help industry participants understand, identify and respond to various brand safety and suitability challenges.

The framework on the right encourages the appropriate areas to consider:

- Was the incident event-specific? Is the challenge time-specific, is it related to an event inside or outside the activation?
- Was the incident standard-specific? Is the challenge related to a GARM category or risk level not being upheld?
- Was the incident specific to a technical feature of the platform or program?
- Was the incident due to the safety set-up across the program team (advertiser, agency, app/platform) that allowed for the incident to emerge?
- Was the incident due to a companyspecific issue (e.g., incident relative to the marketer)?



Once the incident is diagnosed, the appropriate reactions can be considered:



As metaverse activations are live events, best practices have shown that the best plan is "to have a plan."



The following worksheet is meant to help you plan your metaverse activation safety and suitability needs:

Consideration	Self-Assessment	Notes	
Brand-specific Considerations Are there brand or category specific considerations that your metaverse activation needs to take into account?	NO UNSURE YES		Moderation
Content & Behaviour Considerations Are there specific behaviours or content that would be harmful, problematic or embarrassing?	NO UNSURE YES		on Needs
User Access: Age Are there age limits or restrictions to the metaverse experience planned? Should this also ask about enforcement of age limits?	NO UNSURE YES		
User Access: Location Are there geographical limits to the metaverse experience planned?	NO UNSURE YES		Verification Need
Integrated Functions Are there connected experiences (ecommerce, customer service) that need to be integrated into metaverse experience planned?	NO UNSURE YES		, w



Next Steps:

Share outputs from **Moderation Needs** with the following stakeholders:

- Advertiser: Marketing team, Media team, Agency Teams (creative, media, experiential)
- 2 Agency: Moderation team
- 3 Platform: Moderation team

Share outputs from **Verification Needs** with the following stakeholders:

- 1 App: Partnership/Program team
- 2 Hardware: Verification lead
- Specialist teams (Ecommerce): Team leads
- 4 Customer service: Team leads





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Competition compliance policy

The purpose of the WFA is to represent the interests of advertisers and to act as a forum for legitimate contacts between members of the advertising industry. It is obviously the policy of the WFA that it will not be used by any company to further any anti-competitive or collusive conduct, or to engage in other activities that could violate any antitrust or competition law, regulation, rule or directives of any country or otherwise impair full and fair competition. The WFA carries out regular checks to make sure that this policy is being strictly adhered to. As a condition of membership, members of the WFA acknowledge that their membership of the WFA is subject to the competition law rules and they agree to comply fully with those laws. Members agree that they will not use the WFA, directly or indirectly, (a) to reach or attempt to reach agreements or understandings with one or more of their competitors, (b) to obtain or attempt to obtain, or exchange or attempt to exchange, confidential or proprietary information regarding any other company other than in the context of a bona fide business or (c) to further any anti-competitive or collusive conduct, or to engage in other activities that could violate any antitrust or competition law, regulation, rule or directives of any country or otherwise impair full and fair competition. Please note that the recommendations included in this document are merely meant as suggestions or proposals. They are not binding in any way whatsoever and members are free to depart from them.