

WITHIN REACH

PRACTICAL GUIDANCE FOR RESPONSIBLE DIGITAL ADVERTISING

VOLUME 1

ACCESSIBILITY, AD FRAUD, SCAMS,
INVALID TRAFFIC AND MFA

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Introduction

Digital advertising shapes the online environments through which people access information, entertainment, services, and commercial messages. Its social impact is not limited to the content of advertisements or the media beside which they appear. It is also shaped by operational choices that influence who can access advertising, where advertising investment flows, which media environments it supports, how users experience advertising, and how responsibility is exercised across the supply chain.

Within Reach is a series of voluntary guidance documents designed to help the digital advertising ecosystem manage the material risks and opportunities arising from these impacts in practical, consistent, and effective ways. Volume 1 addresses six connected topic areas where companies can act today: ad accessibility, ad fraud, scam advertising, invalid traffic, made-for-advertising media, and supply-chain transparency.

How are these issues connected?

Digital advertising operates through a complex and interconnected ecosystem. The design, purchase, sale, delivery, measurement, and monetisation of an advertisement may involve several organisations and technical systems. Decisions are therefore distributed across the supply chain via contractual and technical relationships. The organisation commissioning an activity may not operate the systems through which it is performed, while the organisation operating those systems may not control the commercial objectives, content, or partner behaviour that shape the activity.

This separation can make responsibility difficult to identify, but it does not eliminate it. Each participant can influence the outcomes of digital advertising through the decisions, systems, commercial relationships, and access to information it controls. Advertisers can set campaign and procurement requirements; agencies can influence planning, activation, and reporting; ad tech companies can provide access to platforms, inventory, and data; and media owners can control advertising experiences, content environments, and authorised routes to their inventory.

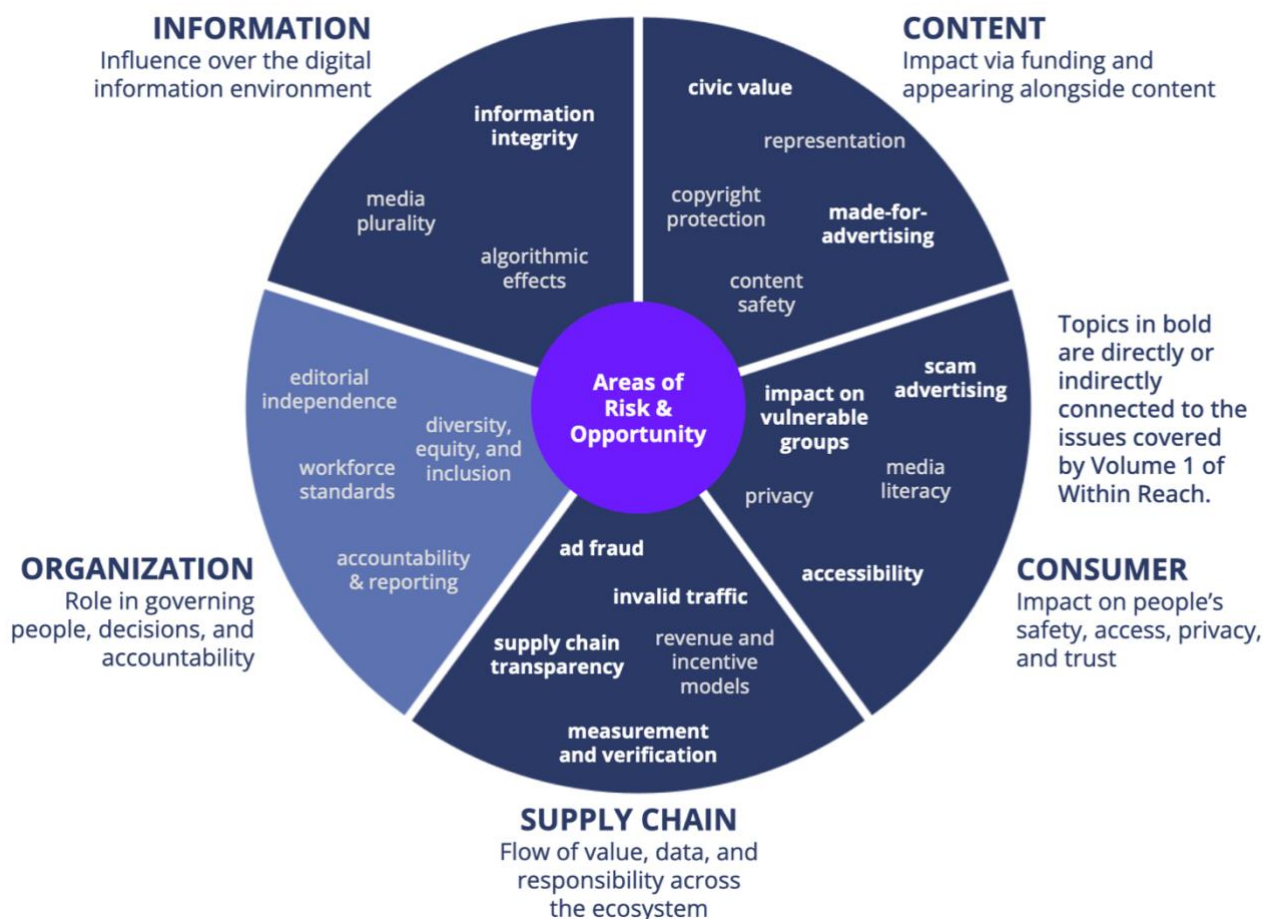
These roles are not always exclusive. A single business may act as an advertiser, media owner, technology provider, data provider, or intermediary across different parts of its operations. *Within Reach* therefore approaches responsibility by function rather than company description. Companies should consider each role they perform and apply the relevant guidance to the decisions and activities associated with that role.

The issues covered in this volume are similarly interconnected. Inaccessible advertising can exclude people from information, services, and commercial opportunities. Ad fraud and invalid traffic can distort measurement, waste resources, and divert advertising investment. Made-for-advertising media can exploit advertising incentives while contributing little value to users. Supply-chain transparency supports action across all these areas by enabling companies to

understand where advertising appears, which parties are involved, and whether stated controls are operating effectively.

Actions in one area may consequently affect outcomes in another. Partner selection, inventory-quality controls, advertiser verification, measurement practices, and commercial incentives can influence several risks and opportunities simultaneously. These connections also make it difficult for any single participant to address the issues effectively in isolation. Progress depends upon companies applying controls within their own areas of influence while sharing information, establishing compatible expectations, and supporting remediation across the supply chain.

The wheel below illustrates how the focus areas of this volume relate to the broader social-impact themes identified in *Beyond Reach*. It does not suggest that this volume directly addresses every social impact issue. Rather, it shows how practical action on accessibility, fraud, invalid traffic, MFA, and transparency can contribute to wider outcomes across the digital advertising ecosystem. This reflects the broader approach in the [Beyond Reach report](#).



What is the aim of *Within Reach*?

Within Reach provides a voluntary blueprint for companies to manage the material impacts, risks, and opportunities associated with digital advertising. It translates these considerations into practical action through the Solutions, Governance, and Transparency pillars of the *Within Reach* Baseline.

For the purposes of this guidance, digital advertising responsibility means proactively managing the material impacts, risks, and opportunities arising from how advertising is designed, bought, sold, delivered, measured, and governed. Its scope can evolve as technology, business models, and stakeholder expectations change.

Companies choosing to apply *Within Reach* should start from an existing or new double materiality assessment conducted in accordance with ESRS principles and informed by established guidance, including [EFRAG's Materiality Assessment Implementation Guidance](#). That assessment provides the basis for identifying the areas in which action is needed. *Within Reach* does not reproduce the assessment methodology; it supports companies in translating relevant findings into operational decisions.

Where the assessment identifies material areas covered by *Within Reach*, companies can establish commitments to implement the relevant baseline guidance. These commitments should guide responsibilities, resource allocation, controls, and review across the functions involved. Companies may also communicate their commitments to clients and partners and seek corresponding commitments through procurement, requests for proposals, contracts, or other business relationships.

Companies can substantiate how they fulfil these commitments using the three-level evidence ladder. This provides a common basis for assessing claims about the policies, controls, processes, and outcomes through which the baseline is implemented. The Transparency pillar supports that assessment by establishing expectations for access to the information stakeholders need to evaluate claims and make informed decisions.

The effectiveness of this approach depends on collective commitment across the ecosystem. Each company can act within its own operations and relationships, while coordination between partners supports progress where information, decisions, and responsibilities are distributed across the supply chain.

Who is the intended audience of *Within Reach*?

Within Reach is intended primarily for executives and team leaders responsible for the decisions, systems, and business relationships that shape digital advertising. This includes leadership across marketing and media, sustainability, procurement, commercial operations, product, technology, legal, and compliance functions in advertiser, agency, ad tech, and media-owner organisations.

These leaders provide the organisational foundation for implementation: connecting materiality findings to policy and business priorities, assigning responsibilities, allocating resources, and ensuring that teams have the information and processes needed to act. Because the issues covered by *Within Reach* span multiple functions, implementation depends on coordination and oversight across teams.

The baseline gives leadership a common reference for designing these arrangements, while the topic-specific and stakeholder guidance helps teams translate them into operational practice. Companies should use the guidance relevant to each role they perform, recognising that a single organisation may occupy several positions in the advertising ecosystem.

Design Principles of *Within Reach*



Completeness

Scope that addresses social impacts **across** the digital media supply chain.



Equivalence

Equivalent and **comparable** expectations across media types.



Objectivity

Approach that is **independent** of moral judgement or political views.



Feasibility

Actions that **can be implemented** in media planning & buying today.



Effectiveness

Guidance that leads to **observable improvements** in digital environments.



Adaptability

Guidance that is **general enough** to be applied across different campaigns.

Definitions

Ad accessibility refers to the practice of designing, producing, serving, and measuring advertising so that people with different visual, auditory, cognitive, physical, or situational needs can perceive, understand, and interact with the ad on substantially equivalent terms.

Ad fraud refers to the deliberate or deceptive generation, manipulation, or misrepresentation of advertising impressions, clicks, conversions, viewability, audience data, placement data, or other advertising events to obtain advertising revenue or distort campaign outcomes.

Scam advertising refers to the use of paid advertising, advertiser accounts, or advertising infrastructure to distribute deceptive identities, claims, offers, or destinations intended to exploit or harm users.

Invalid traffic (IVT) refers to traffic that should not be counted as legitimate because it does not represent a genuine, valid opportunity for an ad to be delivered to, viewed by, or acted upon by a real person in the intended context.

General invalid traffic (GIVT) is invalid traffic that can be readily identified through routine filtration, standardized checks, known lists, or clearly observable technical signals.

Sophisticated invalid traffic (SIVT) is invalid traffic that requires advanced analytics, multi-point corroboration, significant analysis or human intervention to identify and distinguish from valid activity.¹

Made for advertising (MFA) refers to websites or digital properties whose primary business model is to maximise advertising revenue through arbitrage or excessive ad monetisation, rather than provide valuable user content.

¹ IVT definitions aligned with [MRC](#) definitions that focus on means of identification.

Within Reach Baseline

The *Within Reach* Baseline provides a shared, practical reference point for companies seeking to manage the social impact considerations addressed in this volume in a consistent and accountable way.

Applying *Within Reach* is voluntary. Companies choosing to apply the baseline should fulfil the applicable expectations in the material topic areas identified through their assessment.

Should identifies a baseline expectation. Companies should fulfil each applicable expectation and be able to substantiate how they do so. Implementation can reflect their role and operating circumstances, while fulfilling the stated expectation. Where an applicable expectation remains unmet, companies should identify the implementation gap and the action planned to address it. An explanation alone does not establish that the expectation has been fulfilled.

May identifies an optional measure or implementation method. Choosing not to use that measure does not create an implementation gap, provided that the applicable should expectations are fulfilled.

Reference system. Each numbered guidance item has a fixed reference, for example WR1-ACC-02. WR1 identifies Volume 1; the middle code identifies the guidance section; the final number identifies the item. S means should (a baseline expectation); M means may (an optional measure or method). The wording and any applicability conditions remain part of the guidance.

Codes:

- **GEN** — guidance applying across topics or roles
- **ACC** — ad accessibility
- **FRA** — ad fraud
- **SCM** — scam advertising
- **IVT** — invalid traffic
- **MFA** — made for advertising media
- **SCT** — supply chain transparency
- **MO** — media owners
- **AT** — ad tech companies
- **AG** — agencies
- **ADV** — advertisers

Stakeholder guidance has its own references; these do not prescribe a mapping to topic items.

Companies should explain the scope of their application of the baseline, including the material topic areas, activities, and roles covered, and the reasons for considering expectations inapplicable. Statements about applying the baseline should accurately reflect that scope and any implementation gaps.

Solutions

Companies should implement controls appropriate to the assessed issue and their role and should review their effectiveness. They may select technical, operational, and measurement methods suited to their activities and risks. Topic-specific should statements identify any practices or standards that form part of the baseline.

Governance

Companies should establish internal policies, accountable ownership, partner expectations, review processes, and procedures for escalation and remediation. They should assess how commercial incentives and business decisions affect the issues being managed. They may incorporate expectations and remedies into contracts, procurement processes, or other commercial arrangements.

Transparency

Companies should make available the information relevant stakeholders reasonably need to understand, evaluate, verify, and act on the issues covered by the baseline. They should define what information is available, who can access it, when and how it will be provided, and how material limitations will be communicated. They may provide information through transaction data, reporting, requests, audits, or controlled-access arrangements. The choice of access mechanism should preserve sufficient actionable information while protecting confidentiality, security, and sensitive detection methods.

Topic-specific baseline reference

WR1-GEN-01 · S — The following guidance applies to the material topic areas and activities covered by a company's application of the baseline. Companies should apply the expectations relevant to the roles they perform and the systems, relationships, and information they control or influence. Where implementation depends on partners, companies should establish relevant expectations, assess available evidence, and address identified gaps through review and remediation.

Ad accessibility

The objective is to ensure that advertising experiences can be perceived, understood, and used by people with different accessibility needs, and that accessibility checks and action on findings form part of normal quality assurance.

WR1-ACC-01 · S — Accessibility requirements and technical standards vary across jurisdictions, channels, and media environments. They can apply to the surrounding service or content experience as well as to advertising itself. Companies should identify the requirements relevant to their activities and use appropriate technical references to assess accessibility.

Solutions

- **WR1-ACC-02 · S** — Companies should perform or arrange accessibility checks on relevant creative assets, landing pages, video and audio components, consent interfaces, and ad formats within their responsibilities, and address the findings.
- **WR1-ACC-03 · S** — Companies should use [Web Content Accessibility Guidelines \(WCAG\)](#) as the technical reference for checks on web-based experiences, alongside applicable requirements and relevant publisher, platform, format, or market-specific accessibility standards.
- **WR1-ACC-04 · S** — Companies should include checks early enough in creative development and campaign preparation to support remediation before launch, and record and manage unresolved findings.
- **WR1-ACC-05 · M** — Companies may combine automated testing, manual review, assistive-technology testing, and specialist assessment according to the formats and issues involved.

Governance

- **WR1-ACC-06 · S** — Companies should identify the accessibility requirements relevant to the markets, channels, and media environments in which they operate.
- **WR1-ACC-07 · S** — Companies should assign responsibility for accessibility across relevant creative, product, media, procurement, and technology teams.
- **WR1-ACC-08 · S** — Companies should integrate accessibility expectations into the workflows and partner relationships that influence advertising design, production, and delivery.
- **WR1-ACC-09 · S** — Companies should treat accessibility findings as quality issues, with responsibility for remediation and review.
- **WR1-ACC-10 · S** — Companies should define how exceptions and unresolved findings are assessed, documented, approved, and reviewed. Approval of an exception does not itself resolve the underlying accessibility finding.
- **WR1-ACC-11 · M** — Companies may communicate accessibility expectations through campaign briefs, production specifications, procurement documents, and supplier onboarding processes.

Transparency

- **WR1-ACC-12 · S** — Companies should share relevant accessibility requirements with creative agencies, media partners, publishers, and technology providers.
- **WR1-ACC-13 · S** — Companies should document known limitations associated with formats, platforms, devices, and environments.
- **WR1-ACC-14 · S** — Companies should record the checks performed, their findings, action taken, and any unresolved issues or approved exceptions.

- **WR1-ACC-15 · S** — Companies should provide sufficient documentation for partners to understand the requirements and findings relevant to their responsibilities.

Ad fraud

The objective is to prevent deliberate manipulation of advertising activity, ensure that material fraud leads to investigation and remediation, and avoid commercial practices that reward fraudulent activity.

Solutions

- **WR1-FRA-01 · S** — Companies should implement effective controls to identify, prevent, investigate, and remediate fraudulent advertising activity within their responsibilities.
- **WR1-FRA-02 · S** — Companies should select and review controls considering assessed risks, including the need to distinguish routine invalid activity from deliberate manipulation.
- **WR1-FRA-03 · M** — Companies may use fraud detection services, supply-path controls, anomaly detection, seller validation, domain and app validation, and campaign reviews.
- **WR1-FRA-04 · M** — Companies may combine campaign, transaction, account, placement, domain, app, and supply-path signals, and preventive or post-delivery controls.
- **WR1-FRA-05 · M** — Companies may commission independent verification or participate in relevant certification programmes.

Governance

- **WR1-FRA-06 · S** — Companies should adopt and implement a policy against knowingly buying, selling, monetising, facilitating, or optimising towards fraudulent activity.
- **WR1-FRA-07 · S** — Companies should define investigation and escalation processes for suspected or confirmed fraud.
- **WR1-FRA-08 · S** — Companies should assign responsibility for deciding when findings call for operational, commercial, legal, or partner-management action.
- **WR1-FRA-09 · S** — Companies should establish relevant partner expectations, assess evidence of controls, and define how identified failures will be handled.
- **WR1-FRA-10 · S** — Companies should review and address incentives and optimisation practices that reward suspicious or fraudulent activity.
- **WR1-FRA-11 · M** — Companies may incorporate expectations and remedies into contracts. Remedies may include credits, refunds, makegoods, supplier suspension, supply-path exclusion, or termination.

Transparency

- **WR1-FRA-12 · S** — Companies should report material fraud findings to affected and relevant partners.
- **WR1-FRA-13 · S** — Companies should provide sufficient campaign, supply-path, domain, app, seller, placement, and measurement information to support investigation and remediation.
- **WR1-FRA-14 · S** — Companies should disclose whether fraud controls operate pre-bid, post-bid, or at both stages.
- **WR1-FRA-15 · S** — Companies should communicate investigation outcomes and remediation actions at the level needed for partners to act.
- **WR1-FRA-16 · S** — Companies should protect sensitive detection methods while providing actionable information, including through controlled access where necessary.

Scam advertising

The objective is to prevent advertising systems from being used to deceive or exploit users through fraudulent identities, claims, offers, or destinations, and to ensure that suspected scams lead to appropriate investigation and action.

The ICC and Global Anti-Scam Alliance's [*Best Practices for Combating Scams in Advertising*](#) provides complementary guidance on advertiser verification, advertisement testing, account security, intelligence sharing, and cooperation across the supply chain.

Solutions

- **WR1-SCM-01 · S** — Companies responsible for advertiser relationships, onboarding, or account management, including agencies, should operate a risk-based advertiser verification system. The system should account for category risk, historical fraud patterns, jurisdiction and applicable regulation, regulatory status, account behaviour and history, and other relevant signals.
- **WR1-SCM-02 · S** — Companies should implement advertising screening, monitoring, and account-protection controls appropriate to their responsibilities and assessed risks.
- **WR1-SCM-03 · M** — Companies may test advertisements and destinations before or during delivery for cloaking, redirects, destination changes, and known scam patterns.
- **WR1-SCM-04 · M** — Companies may use secure authentication, least-privilege access controls, anomalous-login detection, and secure API-key management as account-protection measures.
- **WR1-SCM-05 · M** — Companies may participate in shared intelligence initiatives and exchange or use validated indicators through trusted partners to support scam detection and prevention.

Governance

- **WR1-SCM-06 · S** — Companies should assign responsibility for advertiser verification and define how assessed risk determines the checks and responses applied.
- **WR1-SCM-07 · S** — Companies should reassess advertiser risk when relevant behavioural, regulatory, payment, campaign, or other information changes.
- **WR1-SCM-08 · S** — Companies should define criteria for enhanced review and for deciding whether restrictions, suspension, or offboarding are appropriate.
- **WR1-SCM-09 · S** — Companies should establish intake, triage, escalation, and response procedures for scam reports.
- **WR1-SCM-10 · M** — Companies may prioritise reports using factors such as credibility, severity, and reports from affected parties or relevant authorities.
- **WR1-SCM-11 · S** — Companies participating in shared intelligence initiatives should establish processes for validating, applying, correcting, and challenging the information they share or use.

Transparency

- **WR1-SCM-12 · S** — Companies should explain their advertiser verification and scam-prevention approach sufficiently for relevant partners to assess it, while protecting information that would enable evasion.
- **WR1-SCM-13 · S** — Companies should share material scam indicators and findings with relevant partners where this supports investigation and prevention.
- **WR1-SCM-14 · S** — Companies should provide accessible reporting channels and communicate review status and outcomes while protecting sensitive investigative information.

Invalid traffic

WR1-IVT-01 · S — The objective is to identify and exclude activity that does not represent a valid advertising opportunity and to ensure that IVT findings inform measurement, payment, optimisation, partner review, and supply-path decisions. Controls should address both GIVT and SIVT, with implementation proportionate to assessed risks and the company's role.

Solutions — GIVT

- **WR1-IVT-02 · S** — Companies should apply routine GIVT filtration across relevant buying, selling, serving, and measurement activities within their responsibilities.
- **WR1-IVT-03 · S** — Companies should maintain and update filtration as known sources and patterns of invalid activity change.
- **WR1-IVT-04 · M** — Companies may use recognised lists, known crawler and bot detection, data-centre checks, user-agent checks, prefetch filtering, and other relevant technical signals.

Solutions — SIVT

- **WR1-IVT-05 · S** — Companies applying the baseline to material IVT should implement SIVT detection and response controls proportionate to assessed risks and their role, alongside routine GIVT filtration.
- **WR1-IVT-06 · S** — Companies should address relevant forms of concealed or manipulated activity and update controls in response to emerging techniques and recurring patterns.
- **WR1-IVT-07 · M** — Companies may use behavioural, relational, transaction, device, placement, and supply-path analysis to identify activity such as botnets, spoofing, hijacked devices, hidden ads, ad stacking, impression laundering, manipulated viewability, or falsified conversions.
- **WR1-IVT-08 · M** — Companies may use accredited or independently validated measurement services.

Governance

- **WR1-IVT-09 · S** — Companies should define IVT thresholds, escalation procedures, and responses to repeated or material IVT.
- **WR1-IVT-10 · S** — Companies should assign responsibility for investigation and for reviewing affected partners, inventory sources, optimisation logic, and supply paths.
- **WR1-IVT-11 · S** — Companies should establish expectations for partners' GIVT and SIVT controls and assess evidence that those controls are operational.
- **WR1-IVT-12 · S** — Companies should review and seek remediation from partners where evidence is insufficient or controls fail, and document how findings inform activation, monetisation, or continued-use decisions.
- **WR1-IVT-13 · S** — Companies should address optimisation practices and commercial incentives that materially increase IVT exposure or reward sources associated with repeated or material IVT.
- **WR1-IVT-14 · S** — Companies should define how invalid delivery and measurement disputes are handled, including escalation and remediation responsibilities.
- **WR1-IVT-15 · S** — Companies should select responses according to the scale, recurrence, confidence, root cause, and evidence of deliberate manipulation.
- **WR1-IVT-16 · S** — Companies should retain appropriate human oversight for material or contested findings.
- **WR1-IVT-17 · M** — Companies may specify contractual remedies, including credits, refunds, makegoods, suspension, or exclusion.

Transparency

- **WR1-IVT-18 · S** — Companies should report IVT results, methodology, filtration stage, affected inventory, and remediation actions with sufficient detail for relevant stakeholders to understand and act on findings.
- **WR1-IVT-19 · S** — Companies should distinguish filtered from unfiltered activity and explain whether reported IVT was prevented before a bid request, filtered during measurement, or identified after delivery.
- **WR1-IVT-20 · S** — Companies should report the scale, affected inventory, relevant period, and remediation outcome of material SIVT findings.
- **WR1-IVT-21 · S** — Companies should distinguish confirmed findings from indicators under investigation.
- **WR1-IVT-22 · S** — Companies should explain material differences between partner, platform, or measurement-provider methodologies where these affect reported results.
- **WR1-IVT-23 · S** — Companies should share significant findings with affected partners at the level needed for investigation and action, while protecting sensitive detection methods.
- **WR1-IVT-24 · S** — Companies should document unresolved disagreements, exceptions, and measurement limitations.
- **WR1-IVT-25 · M** — Companies may provide separate GIVT and SIVT rate reporting as an enhancement to sufficient actionable reporting.

Made for advertising media

The objective is to identify and exclude inventory classified as MFA under established policies, while ensuring that classification is evidence-based, proportionate, and open to review.

Solutions

- **WR1-MFA-01 · S** — Companies should assess inventory using documented, observable, and proportionate classification criteria informed by multiple signals.
- **WR1-MFA-02 · S** — Companies should exclude inventory classified as MFA under established policies from the buying, selling, supply admission, and monetisation activities within their responsibilities. This expectation applies to advertisers, agencies, ad tech companies, and media owners according to their roles, including where relevant activities are performed on their behalf.
- **WR1-MFA-03 · S** — Companies should review the effectiveness of their controls and address identified MFA exposure.

- **WR1-MFA-04 · M** — Companies may use signals such as ad density, refresh behaviour, paid-traffic dependence, content originality, user experience, domain or app transparency, and arbitrage indicators.
- **WR1-MFA-05 · M** — Companies may implement pre-activation controls, delivery monitoring, post-campaign review, or a combination suited to their activities and risks.

Governance

- **WR1-MFA-06 · S** — Companies should establish an MFA policy covering their relevant planning, buying, selling, monetisation, supply admission, optimisation, and reporting activities.
- **WR1-MFA-07 · S** — Companies should address incentives that reward low cost or high volume without regard to user experience, content quality, or legitimate media value.
- **WR1-MFA-08 · S** — Companies should assign responsibility for classification and exclusion decisions.
- **WR1-MFA-09 · S** — Companies should provide review and appeal processes to address false positives and disputed classifications.
- **WR1-MFA-10 · S** — Companies should review inventory sources, buying routes, and optimisation practices where material MFA exposure is identified.
- **WR1-MFA-11 · S** — Companies should document exceptions that permit continued use of inventory classified as MFA under the applicable policy and identify these as implementation gaps. A classification changed following review should be documented with the reasons for that decision.

Transparency

- **WR1-MFA-12 · S** — Companies should disclose sufficient information about their MFA methodology for relevant parties to understand the basis of classification.
- **WR1-MFA-13 · S** — Companies should provide buyers and sellers with actionable information explaining classification, exclusion, review, and challenge decisions.
- **WR1-MFA-14 · S** — Companies should report material exposure, exceptions, and actions taken in a way that allows stakeholders to identify and act on them.
- **WR1-MFA-15 · S** — Companies should communicate methodological limitations and material changes to classification criteria.
- **WR1-MFA-16 · M** — Companies may provide domain- or app-level reporting as an enhancement to sufficient actionable reporting.

Supply chain transparency

The objective is to enable participants to understand how advertising inventory is made available, whether the entities involved are authorised to buy or sell it, and whether information describing the advertising opportunity accurately represents actual delivery.

WR1-SCT-01 · S — The appropriate level of visibility differs across environments and commercial models. Commercially sensitive information can be provided through controlled-access arrangements. Companies should preserve sufficient information for verification, investigation, and informed decision-making while protecting legitimate confidentiality and security interests.

Solutions

- **WR1-SCT-02 · S** — Companies should implement applicable IAB Tech Lab standards, including ads.txt, app-ads.txt, sellers.json, and the OpenRTB SupplyChain object, according to their role and the relevant transaction environment.
- **WR1-SCT-03 · S** — Companies should ensure that the identifiers, seller records, authorisation status, and SupplyChain information they provide are accurate and consistent.
- **WR1-SCT-04 · S** — Companies should implement controls to verify that inventory and device information declared through OpenRTB accurately represents the advertising opportunity and corresponds to the environment in which the advertisement is delivered. These controls should address discrepancies between declared app, domain, placement, and device information and observed delivery.
- **WR1-SCT-05 · S** — Companies should identify and review discrepancies between authorised seller files, sellers.json records, SupplyChain objects, bidstream data, and delivered inventory.
- **WR1-SCT-06 · S** — Companies should avoid unnecessary changes to bidstream data that make inventory materially harder to identify, verify, or assess.
- **WR1-SCT-07 · M** — Companies may use bid-request validation, delivery measurement, sampled checks, and independent verification to identify discrepancies.

Governance

- **WR1-SCT-08 · S** — Companies should define minimum supply-chain information and authorisation expectations for relevant partners and buying routes.
- **WR1-SCT-09 · S** — Companies should assign responsibility for maintaining authorised seller files, seller records, and other supply-chain information they control.

- **WR1-SCT-10 · S** — Companies should review partners and supply paths where authorisation, inventory origin, declaration accuracy, or accountability cannot be established, seek remediation, and document the resulting decisions.
- **WR1-SCT-11 · S** — Companies should define the information expected in the transaction and the information to be provided through other access arrangements.
- **WR1-SCT-12 · S** — Companies should establish escalation and remediation procedures for inaccurate, incomplete, conflicting, or misleading information.
- **WR1-SCT-13 · M** — Companies may incorporate information expectations, access arrangements, and remedies into contracts.
- **WR1-SCT-14 · M** — Companies may use reporting, audits, investigations, or dispute-resolution processes to support verification and remediation.

Transparency

- **WR1-SCT-15 · S** — Companies should keep authorised seller files and seller records accurate and current.
- **WR1-SCT-16 · S** — Companies should ensure that SupplyChain objects and other supply-chain information they provide accurately reflect the transaction.
- **WR1-SCT-17 · S** — Companies should provide sufficient information to verify seller authorisation and investigate material fraud, IVT, MFA, or inventory-quality concerns.
- **WR1-SCT-18 · S** — Companies should disclose material discrepancies between declared and observed delivery information to affected partners, together with relevant verification limitations and corrective action taken.
- **WR1-SCT-19 · S** — Companies should explain material limitations in available supply-chain or bidstream information.
- **WR1-SCT-20 · S** — Companies should provide an appropriate route for controlled disclosure where information needed for verification or investigation is not available directly in the transaction.
- **WR1-SCT-21 · S** — Companies should correct material inaccuracies and notify affected partners where buying, selling, measurement, or remediation decisions could have been affected.

Substantiating application of the baseline

Effective implementation of the *Within Reach* Baseline depends on stakeholders being able to assess claims made about relevant policies, controls, solutions, processes, and outcomes. The three-level evidence ladder describes how claims relating to the baseline are substantiated, progressing from self-declaration to supporting evidence and then to independent verification or direct verifiability. It operates alongside the Transparency pillar, which establishes expectations for making relevant information available to stakeholders who need it. Higher levels provide a stronger basis for evaluating and relying on a claim. The level applies to the specific claim and the evidence supporting it, taking account of its scope, relevance, and limitations.

Level	Evidence stage	Description
1	Self-declared	The company or its partner states that the relevant policy, control, solution, or process exists or is applied. The party relying on the claim has limited means of validating it.
2	Self-declared with supporting evidence	The company supports its claim with published documentation, implementation records, reports, or other evidence. This provides visibility into its approach and activities but does not include independent verification or sufficient information for stakeholders to validate the claim directly.
3	Independently verified or directly verifiable	The claim is supported by independent verification, or stakeholders have access to sufficient underlying data and information to validate it directly. The scope, assessment method, reporting period, and material limitations are clear.

Applying the baseline by stakeholder role

WR1-GEN-02 · S — The following guidance applies the topic-specific baseline to the functions performed by media owners, ad tech companies, agencies, and advertisers. Companies should use the entries relevant to their roles within the material areas covered by their application of the baseline. A company performing several roles should consider each relevant section.

These sections provide operational guidance for applying the same baseline expectations. Where implementation depends on partners, this involves establishing relevant expectations, assessing available evidence, and addressing identified gaps through review and remediation.

Media owners

Media owners influence the environments in which advertising appears, the experience offered to users, and the routes through which inventory is sold and monetised.

Accessibility

- **WR1-MO-01 · S** — Media owners should perform or arrange accessibility checks on relevant site and app templates, video players, audio experiences, consent interfaces, and ad placements, and address the findings.
- **WR1-MO-02 · S** — Media owners should use WCAG as the technical reference for web-based experiences and assess how advertising affects keyboard navigation, screen-reader compatibility, captions, contrast, and page usability.
- **WR1-MO-03 · S** — Media owners should assign responsibility for remediation, communicate relevant requirements to partners, and document unresolved findings and exceptions.
- **WR1-MO-04 · M** — Media owners may combine automated checks, manual review, assistive-technology testing, and specialist assessment.

Ad experience and MFA

- **WR1-MO-05 · S** — Media owners should establish an MFA policy covering the inventory they sell or monetise and use documented, observable classification criteria informed by multiple signals.
- **WR1-MO-06 · S** — Media owners should exclude inventory classified as MFA under that policy from their selling and monetisation activities, including activities performed on their behalf.
- **WR1-MO-07 · S** — Media owners should review advertising experiences and monetisation practices that contribute to MFA classification and address identified issues.

- **WR1-MO-08 · S** — Media owners should provide review and appeal processes for disputed classifications and document exceptions and actions taken.
- **WR1-MO-09 · M** — Media owners may use signals such as ad density, refresh behaviour, intrusive overlays, deceptive layouts, content originality, and traffic acquisition practices.

Authorised sellers and supply-chain information

- **WR1-MO-10 · S** — Media owners should maintain accurate ads.txt or app-ads.txt files where applicable to their inventory and transaction environment.
- **WR1-MO-11 · S** — Media owners should review seller and reseller records and correct or remove entries that no longer accurately represent authorisation.
- **WR1-MO-12 · S** — Media owners should establish expectations for accurate inventory declarations and implement controls within their responsibilities to verify that declared app, domain, placement, and device information corresponds to actual delivery.
- **WR1-MO-13 · S** — Media owners should investigate discrepancies, seek remediation from relevant partners, and document resulting decisions.
- **WR1-MO-14 · M** — Media owners may use delivery measurement, sampled checks, and independent verification to support validation.

Traffic quality and ad fraud

- **WR1-MO-15 · S** — Media owners should apply routine GIVT filtration and SIVT controls proportionate to their assessed risks and role.
- **WR1-MO-16 · S** — Media owners should implement effective fraud controls and investigate significant findings.
- **WR1-MO-17 · S** — Media owners should address traffic acquisition, optimisation, and monetisation practices that generate invalid activity or reward fraudulent inventory.
- **WR1-MO-18 · S** — Media owners should define escalation and remediation responsibilities and review affected partners and inventory sources.
- **WR1-MO-19 · M** — Media owners may use traffic-source monitoring, anomaly detection, technical signals, and independent measurement.

Scam advertising and partner governance

- **WR1-MO-20 · S** — Media owners should establish relevant advertiser-integrity and scam-prevention expectations for monetisation partners, assess evidence of their operation, and address identified failures.

- **WR1-MO-21 · S** — Where media owners manage advertiser relationships, onboarding, or accounts, they should operate a risk-based advertiser verification system accounting for category risk, historical fraud patterns, jurisdiction and applicable regulation, regulatory status, account behaviour and history, and other relevant signals.
- **WR1-MO-22 · S** — Media owners should maintain accessible channels and response procedures for reports of suspicious advertisements.
- **WR1-MO-23 · S** — Media owners should implement screening, monitoring, and account-protection controls appropriate to their responsibilities and risks.
- **WR1-MO-24 · M** — Media owners may participate in shared intelligence initiatives and incorporate partner expectations into commercial agreements.

Transparency

- **WR1-MO-25 · S** — Media owners should provide sufficient inventory, seller, placement, and supply-path information for relevant partners to verify authorisation and investigate concerns.
- **WR1-MO-26 · S** — Media owners should communicate relevant accessibility findings, material fraud and scam findings, IVT results, MFA classifications and actions, and remediation outcomes.
- **WR1-MO-27 · S** — Media owners should explain control stages, material measurement limitations, and discrepancies between declared and observed delivery information.
- **WR1-MO-28 · S** — Media owners should correct material inaccuracies, notify affected partners, and provide controlled access where information needed for verification or investigation is not available directly.
- **WR1-MO-29 · M** — Media owners may provide separate GIVT and SIVT rates and domain- or app-level MFA reporting as enhancements to sufficient actionable reporting.

Ad tech companies

Ad tech companies influence access to supply and demand, the classification and routing of advertising opportunities, the controls applied during transactions, and the information available to buyers and sellers.

Supply admission and advertiser verification

- **WR1-AT-01 · S** — Ad tech companies should establish supply-admission criteria covering seller authorisation, inventory identity, traffic quality, ad experience, and MFA classification.
- **WR1-AT-02 · S** — Where ad tech companies manage advertiser relationships, onboarding, or accounts, they should operate a risk-based advertiser verification

system accounting for category risk, historical fraud patterns, jurisdiction and applicable regulation, regulatory status, account behaviour and history, and other relevant signals.

- **WR1-AT-03 · S** — Ad tech companies should reassess advertiser risk when relevant information changes and define how findings inform enhanced review, restrictions, suspension, or offboarding.
- **WR1-AT-04 · S** — Ad tech companies should maintain accessible scam-reporting channels and investigation and response procedures.
- **WR1-AT-05 · M** — Ad tech companies may participate in shared intelligence initiatives.
- **WR1-AT-06 · S** — Those participating should establish processes for validating, applying, correcting, and challenging shared information.

IVT and ad fraud

- **WR1-AT-07 · S** — Ad tech companies should implement effective fraud controls, routine GIVT filtration, and SIVT controls proportionate to assessed risks and their role.
- **WR1-AT-08 · S** — Ad tech companies should maintain and update controls in response to emerging techniques and recurring patterns.
- **WR1-AT-09 · S** — Ad tech companies should define how findings inform measurement, payment, optimisation, partner review, and supply-path decisions.
- **WR1-AT-10 · S** — Ad tech companies should assess evidence of relevant partner controls and review and seek remediation where evidence is insufficient or controls fail.
- **WR1-AT-11 · M** — Ad tech companies may select preventive controls, subsequent detection and investigation, or combinations appropriate to their activities and risks.
- **WR1-AT-12 · M** — Ad tech companies may use independent verification, accredited measurement, or relevant certification programmes.

MFA controls

- **WR1-AT-13 · S** — Ad tech companies should apply documented, observable, and proportionate MFA classification criteria informed by multiple signals.
- **WR1-AT-14 · S** — Ad tech companies should exclude inventory classified as MFA under established policies from the buying, selling, supply admission, and monetisation activities within their responsibilities.
- **WR1-AT-15 · S** — Ad tech companies should review control effectiveness, address identified exposure, and provide review and appeal processes for disputed classifications.

- **WR1-AT-16 · M** — Ad tech companies may use pre-bid controls, supply reviews, delivery monitoring, or subsequent analysis.

Accessibility support

- **WR1-AT-17 · S** — Ad tech companies should check relevant ad formats, tags, SDKs, players, consent interfaces, and other components for accessibility effects and address findings.
- **WR1-AT-18 · S** — Ad tech companies should communicate relevant technical requirements and known limitations to partners and document unresolved issues.
- **WR1-AT-19 · M** — Ad tech companies may support metadata or workflow signals that help partners identify accessible formats and manage accessibility requirements.

Supply-chain and bid-parameter accuracy

- **WR1-AT-20 · S** — Ad tech companies should implement applicable IAB Tech Lab standards, including sellers.json and the OpenRTB SupplyChain object, according to their role and transaction environment.
- **WR1-AT-21 · S** — Ad tech companies should maintain accurate identifiers, seller records, authorisation information, and transaction-path information.
- **WR1-AT-22 · S** — Ad tech companies should implement controls to verify that app, domain, placement, and device information declared through OpenRTB accurately represents the advertising opportunity and corresponds to observed delivery.
- **WR1-AT-23 · S** — Ad tech companies should investigate discrepancies between seller records, bidstream declarations, and actual delivery, and seek remediation from relevant partners.
- **WR1-AT-24 · S** — Ad tech companies should avoid unnecessary changes to bidstream information that make inventory harder to identify, verify, or assess.
- **WR1-AT-25 · M** — Ad tech companies may use bid-request validation, delivery measurement, sampled checks, and independent verification.

Governance and remediation

- **WR1-AT-26 · S** — Ad tech companies should assign responsibility for control operation, partner review, investigation, escalation, and remediation.
- **WR1-AT-27 · S** — Ad tech companies should address commercial incentives that reward invalid, fraudulent, or MFA inventory.
- **WR1-AT-28 · S** — Ad tech companies should define how material failures and measurement disputes are handled and document resulting decisions.

- **WR1-AT-29 · M** — Ad tech companies may incorporate expectations and remedies into contracts. Remedies may include refunds, credits, makegoods, suspension, or exclusion.

Transparency

- **WR1-AT-30 · S** — Ad tech companies should provide actionable methodology information, IVT results, material fraud and scam findings, MFA classification information, supply-chain information, and remediation outcomes.
- **WR1-AT-31 · S** — Ad tech companies should disclose the stages at which controls operate and distinguish confirmed findings from indicators under investigation.
- **WR1-AT-32 · S** — Ad tech companies should explain material verification limitations and discrepancies between declared and observed delivery, including corrective action taken.
- **WR1-AT-33 · S** — Ad tech companies should provide controlled access where necessary for verification or investigation while protecting sensitive detection methods.
- **WR1-AT-34 · M** — Ad tech companies may provide separate GIVT and SIVT rates and domain- or app-level MFA reports as enhancements to sufficient actionable reporting.

Agencies

Agencies translate advertiser objectives into media strategies, creative and production decisions, buying routes, partner selections, activation, and reporting. They also influence the evidence available to advertisers about how their investment is managed.

Ownership, planning, and partner expectations

- **WR1-AG-01 · S** — Agencies should assign responsibility for applying the baseline across relevant strategy, creative, production, buying, technology, procurement, and client-service teams.
- **WR1-AG-02 · S** — Agencies should translate applicable baseline expectations into planning, activation, and partner-management processes.
- **WR1-AG-03 · S** — Agencies should establish relevant partner expectations, assess evidence of implementation, and address identified gaps.
- **WR1-AG-04 · S** — Agencies should address incentives and optimisation practices that pursue low prices or high volume without adequate quality controls.
- **WR1-AG-05 · M** — Agencies may communicate expectations through briefs, RFPs, procurement documents, contracts, or other partner arrangements.

Advertiser verification and scam prevention

- **WR1-AG-06 · S** — Agencies should operate a risk-based advertiser verification system for their advertiser relationships, accounting for category risk, historical fraud patterns, jurisdiction and applicable regulation, regulatory status, account behaviour and history, and other relevant signals.
- **WR1-AG-07 · S** — Agencies should reassess risk when relevant information changes and define how findings inform further checks, escalation, and relationship-management decisions.
- **WR1-AG-08 · S** — Agencies should implement advertising screening, monitoring, and account-protection controls appropriate to their responsibilities.
- **WR1-AG-09 · S** — Agencies should maintain reporting and response procedures for suspected scam advertising.
- **WR1-AG-10 · M** — Agencies may use advertisement and destination testing, specialist verification services, and participation in shared intelligence initiatives.

Ad fraud and IVT

- **WR1-AG-11 · S** — Agencies should establish expectations for effective fraud controls, routine GIVT filtration, and risk-proportionate SIVT controls across relevant buying and activation activities.
- **WR1-AG-12 · S** — Agencies should assess evidence that these controls operate, investigate material findings within their responsibilities, and coordinate remediation with advertisers and delivery partners.
- **WR1-AG-13 · S** — Agencies should define relevant thresholds, escalation procedures, and responsibilities for handling invalid delivery and measurement disputes.
- **WR1-AG-14 · M** — Agencies may select preventive controls, delivery monitoring, subsequent analysis, or combinations suited to campaign risks.
- **WR1-AG-15 · M** — Agencies may recommend or commission independent campaign verification.

MFA management

- **WR1-AG-16 · S** — Agencies should apply documented MFA policies and exclude inventory classified as MFA under those policies from buying and activation activities.
- **WR1-AG-17 · S** — Agencies should assess the evidence supporting classifications, review exposure, and address failures in implementation.

- **WR1-AG-18 · S** — Agencies should provide routes for disputed classifications to be reviewed and communicate relevant decisions to clients and partners.
- **WR1-AG-19 · M** — Agencies may use pre-activation controls, delivery monitoring, or post-campaign reviews.

Accessibility

- **WR1-AG-20 · S** — Agencies should communicate relevant accessibility requirements early enough to inform creative, format, and production decisions.
- **WR1-AG-21 · S** — Agencies should perform or arrange checks within their responsibilities and coordinate action on findings across creative, production, media, and technology partners.
- **WR1-AG-22 · S** — Agencies should record checks, remediation, known limitations, and unresolved issues.
- **WR1-AG-23 · M** — Agencies may use automated checks, specialist assessment, and assistive-technology testing.

Supply-chain verification

- **WR1-AG-24 · S** — Agencies should establish information and authorisation expectations for buying routes and assess whether relevant partners apply the technical standards appropriate to their roles.
- **WR1-AG-25 · S** — Agencies should assess available evidence that declared inventory and device information corresponds to actual delivery.
- **WR1-AG-26 · S** — Agencies should investigate material discrepancies, seek remediation, and document resulting buying and partner-management decisions.
- **WR1-AG-27 · M** — Agencies may use supply-path reviews, delivery measurement, sampled checks, or independent verification.

Remediation and commercial arrangements

- **WR1-AG-28 · S** — Agencies should define responsibilities and processes for investigating and addressing fraud, invalid delivery, MFA exposure, accessibility findings, and material transparency failures.
- **WR1-AG-29 · S** — Agencies should communicate unresolved issues and proposed action to the relevant clients and partners.
- **WR1-AG-30 · M** — Agencies may negotiate contractual terms and remedies covering these matters.

Transparency

- **WR1-AG-31 · S** — Agencies should report relevant IVT results, methodology and filtration stage, MFA exposure and actions, material fraud or scam findings, accessibility findings, transparency limitations, remediation, and unresolved issues alongside campaign performance.
- **WR1-AG-32 · S** — Agencies should explain material discrepancies between declared inventory and observed delivery and the action taken.
- **WR1-AG-33 · S** — Agencies should communicate the scope and limitations of evidence supporting statements about their application of the baseline.
- **WR1-AG-34 · M** — Agencies may provide separate GIVT and SIVT rates and domain- or app-level MFA reporting as enhancements to sufficient actionable reporting.

Advertisers

Advertisers establish objectives, policies, budgets, partner expectations, and commercial incentives that shape how advertising is produced and purchased, including activities carried out on their behalf.

Internal ownership and policy

- **WR1-ADV-01 · S** — Advertisers should assign responsibility for applying the baseline across relevant marketing, media, procurement, legal, sustainability, technology, and brand functions.
- **WR1-ADV-02 · S** — Advertisers should translate the material areas identified through their assessment into internal policies, decision-making, and oversight.
- **WR1-ADV-03 · S** — Advertisers should maintain evidence supporting statements about their application of the baseline and identify material implementation gaps.

Partner expectations

- **WR1-ADV-04 · S** — Advertisers should establish relevant expectations for agencies, media owners, and technology partners, assess evidence of implementation, and address identified gaps.
- **WR1-ADV-05 · S** — Advertisers should define the information needed to evaluate activities performed on their behalf and assign responsibility for reviewing it.
- **WR1-ADV-06 · M** — Advertisers may incorporate expectations into procurement, RFPs, contracts, or other commercial arrangements.

KPIs and incentives

- **WR1-ADV-07 · S** — Advertisers should address targets and incentives that prioritise low cost or high volume without adequate quality safeguards.
- **WR1-ADV-08 · S** — Advertisers should incorporate relevant accessibility, fraud, IVT, MFA, and transparency considerations into campaign objectives and performance review.
- **WR1-ADV-09 · S** — Advertisers should obtain sufficient information to assess where investment flows and which controls are applied.

Accessibility

- **WR1-ADV-10 · S** — Advertisers should perform or arrange relevant creative and campaign accessibility checks, address findings within their responsibilities, and establish corresponding expectations for partners.
- **WR1-ADV-11 · S** — Advertisers should communicate requirements early enough to inform creative development, format selection, and campaign preparation.
- **WR1-ADV-12 · S** — Advertisers should record and manage unresolved findings and exceptions.
- **WR1-ADV-13 · M** — Advertisers may use specialist assessment, automated testing, manual review, or assistive-technology testing.

Ad fraud and IVT

- **WR1-ADV-14 · S** — Advertisers should establish expectations for effective fraud controls, routine GIVT filtration, and risk-proportionate SIVT controls, and assess evidence of their operation.
- **WR1-ADV-15 · S** — Advertisers should define relevant thresholds, reporting needs, escalation responsibilities, and remediation processes.
- **WR1-ADV-16 · S** — Advertisers should review significant findings with relevant partners and document how these inform campaign and partner decisions.
- **WR1-ADV-17 · M** — Advertisers may select or commission preventive controls, subsequent analysis, independent verification, or combinations suited to their risks.
- **WR1-ADV-18 · M** — Advertisers may negotiate contractual remedies for invalid or fraudulent delivery.

Scam prevention and account security

- **WR1-ADV-19 · S** — Advertisers should implement controls to protect advertising accounts and address suspected misuse within their responsibilities.

- **WR1-ADV-20 · S** — Advertisers should establish relevant account-security and scam-response expectations for agencies and other parties managing advertising on their behalf.
- **WR1-ADV-21 · S** — Advertisers should investigate and coordinate action where their identities, accounts, creatives, or destinations are implicated in suspected scam activity.
- **WR1-ADV-22 · M** — Advertisers may use secure authentication, access restrictions, account monitoring, and specialist support.

MFA

- **WR1-ADV-23 · S** — Advertisers should establish a documented MFA policy and exclude inventory classified as MFA under that policy from their media buying, including buying carried out on their behalf.
- **WR1-ADV-24 · S** — Advertisers should communicate the policy to agencies and other buying partners, review implementation evidence, and address failures.
- **WR1-ADV-25 · S** — Advertisers should establish routes for reviewing disputed classifications and document exceptions and resulting decisions.
- **WR1-ADV-26 · M** — Advertisers may use classification services, campaign controls, and delivery reviews to support implementation.

Supply-chain information and verification

- **WR1-ADV-27 · S** — Advertisers should establish information expectations sufficient to understand buying routes, verify authorisation, and assess whether declared inventory corresponds to actual delivery.
- **WR1-ADV-28 · S** — Advertisers should assess available partner evidence, investigate material discrepancies, and seek remediation.
- **WR1-ADV-29 · S** — Advertisers should document limitations affecting their ability to assess inventory, delivery, or control effectiveness.
- **WR1-ADV-30 · M** — Advertisers may commission supply-path reviews, sampled delivery checks, or independent verification.

Transparency and substantiation

- **WR1-ADV-31 · S** — Advertisers should assess evidence supporting their application of the baseline across the relevant activities performed internally and on their behalf.
- **WR1-ADV-32 · S** — Advertisers should identify the scope of statements they make about applying the baseline, including the activities and period covered and any material gaps or limitations.

- **WR1-ADV-33 · S** — Advertisers should establish reporting expectations sufficient to evaluate controls, understand material findings, and review remediation.
- **WR1-ADV-34 · M** — Advertisers may request separate GIVT and SIVT rates and domain- or app-level MFA reporting as enhancements to sufficient actionable reporting.
- **WR1-ADV-35 · M** — Advertisers may communicate their application of the baseline to clients and partners using claims supported by the available evidence.

Conclusion

The issues addressed in *Within Reach* persist partly because responsibility, information, and commercial decisions are distributed across the advertising ecosystem. Individual controls are necessary, but their effectiveness depends on whether findings influence how companies design advertising, select partners, allocate investment, and respond to failures.

Within Reach provides a basis for making those connections. Applying the baseline involves using the materiality assessment to identify where action is needed, assigning responsibility across the relevant functions, and implementing and substantiating the applicable expectations. For executive and team leadership, the next step is to establish where existing practices already fulfil those expectations and where changes are needed.

The broader opportunity is to make responsible practice a routine consideration in advertising decisions. As companies apply shared expectations and make supporting information available, buyers and sellers can better distinguish effective controls from unsupported claims, identify recurring failures, and direct corrective action to the parties able to address them. Procurement, performance reviews, product development, and partner relationships can become practical means of improving outcomes.

Success will therefore be reflected in decisions and outcomes: accessibility findings being addressed, fraudulent and invalid activity being acted upon, MFA policies influencing buying and selling, and discrepancies in supply-chain information being corrected. Through consistent application and cooperation, *Within Reach* can help make these practices an ordinary part of how digital advertising operates.



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