

SCHEDULE 4

Influencer Disclosure Policy

Social Media Posts:

Include #ad or AD “above the fold” in a way that is clear and conspicuous.

Videos and Livestream:

- **All Video Descriptions:** Include “above the fold” in a way that is clear and conspicuous:
(a) #ad or AD; or (b) a disclosure that influencer was paid to make the video.
- **Adult-Directed Videos:** “AD” must be clear and conspicuous starting on the first frame of the video and lasting for at least 5 seconds. For videos 6 minutes or longer, repeat such disclosure at the 5-minute mark and again every 5 minutes for the length of the video.
- **Child-Directed Videos:** (a) “AD” must be clear and conspicuous starting on the first frame of the video and lasting for at least 5 seconds; and (b) Include a verbal disclosure at the beginning of the video that it is an “ad for [Client] [or Brand/product].” For videos 6 minutes or longer, repeat verbal disclosure at approximately the 5-minute mark and again approximately every 5 minutes for the length of the video.

Note: Client reserves the right, in the review process, to make changes based on content, platforms and local laws.

Influencer must comply with the most current FTC regulations. For more information:

<https://www.ftc.gov/tips-advice/business-center/guidance/native-advertising-guide-businesses>

<https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-publishes-final-guides-governing-endorsements-testimonials/091005revisedendorsementguides.pdf>

<https://www.ftc.gov/tips-advice/business-center/guidance/ftcs-endorsement-guides-what-people-are-asking>

March 2018