

SeedL's consumer and partner solutions will carry advertising for the benefit of keeping user (and where applicable, partner) costs low. However, the below policy is designed to ensure both our partner's systems and our own reputation is upheld by the attached governance of the displayed advertising.

SeedL carry three types of advertising:

1. Direct advertising from paying organisations.
 - Banner advertising displayed across SeedL and Partner solutions.
 - Logos of sponsors displayed on SeedL and Partner solutions.
 - Banner adverts sponsoring information newsletters.
2. Automated partner ad technology display advertising.
 - User's search history being analysed and relevant adverts displayed to that user which may interest them specifically (Cookie based advertising) subject to this policy.
 - Advertising within a selection of allowed broader classifications as set out in this policy which an advertising partner deems as relevant to our users.
3. Recruitment based advertising.
 - Recruitment adverts which may match a user's area of study or job title.
 - Adverts that are searched for via our recruitment portal.

Introduction

SeedL's Advertising Policy (the "Policy") is based on the UK Code of non-broadcast Advertising, Sales Promotion and Direct Marketing Practice ("CAP Code") which regulates online and non-broadcast advertising which is operated and enforced by the Advertising Standards Authority (ASA). The Policy is derived from the following three principles:

- 1. LEGAL** – No Advertisement should contain anything that is in breach of the law nor omit anything that the law requires.
- 2. DECENT** – No Advertisement should contain content that is: likely to cause grave or widespread offence or embarrassment; not suitable for publication or display; or likely to subject SeedL (or its partners) to criticism or embarrassment.
- 3. HONEST & TRUTHFUL** – No Advertisement should, whether by inaccuracy, ambiguity, exaggeration, omission, or neglect, mislead users about any matters likely to influence their attitude to the advertised product or service.

By following these principles, we aim to:

- Create fair and transparent rules that can be followed by all our customers;
- Protect the interests and reasonable expectations of the users of our products;
- Demonstrate our support for the codes and guidelines set out in the CAP Code; and
- Meet the obligations imposed both on ourselves (as provider of the adverts) and upon our Advertisers under law and regulation in the United Kingdom.
- Certain industries and trade associations have their own self-regulatory codes for advertising and marketing. Advertisers who are members of these associations should refer to these codes.

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1. LEGAL

Advertisers agree in placing orders for advertising with SeedL that the content of their advertising will comply with all relevant laws, statutes, and regulations in place, and which apply to the products and/or services that they wish to advertise (in the location that they wish to advertise them, where applicable), including the CAP Code. For the avoidance of doubt, compliance with the requirements of any part of the Policy does not absolve the Advertiser of responsibility for ensuring compliance with any applicable law or regulation covering the same subject matter. In the event of any direct conflict between the provisions of the Policy and any applicable law or regulation, the provisions of the applicable law or regulation shall prevail solely to the extent necessary to resolve any conflict.

This is SeedL's Policy. Depending on the Product or Service you purchase you may also be subject to other third party's Advertising Policies.

SeedL will not allow advertising for:

- Consumer credit such as unsecured loans, payday loans & credit cards.
- Financial products or services designed to facilitate illegal purposes, e.g., to avoid applicable taxes, or money laundering
- Cryptocurrencies and cryptocurrency related products including, but not limited to initial coin offerings, cryptocurrency exchanges, and cryptocurrency wallets
- Non-regulated binary options (regulated binary options may be allowed with Policy review)
- Advertising for binary options is not allowed in the European Union
- Ponzi schemes, pyramid schemes, or other legally questionable business opportunities, particularly if returns on investment rely solely on adding participants to the scheme or the consumer must pay a subscription fee or buy a specific product to join, and the value proposition of doing so is undefined.
- Gambling products and services.
- Alcohol products.
- Medical (except Vets & Pharmacies) and health and beauty products and treatments.
- Food, nutrition and food supplements.
- Slimming products, treatments and establishments.
- Films, DVDs, video, streaming service providers, computer and console games that have an 18+ certificate or rating.
- Dating and introduction services.
- Environmental claims.
- Matters of public controversy including matters of a political or industrial nature.
- Religious organisations.
- Adult shops, stripograms, escort agencies and premium-rate sexual entertainment services.

Additionally, we restrict the following types of advertising unless in receipt of explicit written consent of the partner and/or the SeedL operations team.

- Charitable causes.
- Advertising that could risk competing with the partner (such as neighbouring town centres), which could attract users away from the partners'.

Any classification of advertising protected by legislation, imposes an obligation upon the advertiser to ensure that they are appropriately qualified and authorised by the relevant regulatory body. In the interests of our users, we will only accept advertising in the professions listed below from advertisers holding the appropriate qualifications. SeedL reserves the right to vary the list from time to time.

Note. Criminal and civil remedies can be brought by a regulatory body against any individual who does not comply with the above.

The following professions are protected by legislation (note, this list is not exhaustive):

ACCOUNTANTS, ARCHITECTS, BARRISTERS / SOLICITORS, NOTARIES, PHARMACIES, VETS, GAS ENGINEERS. Example: Only qualified solicitors who hold a current practicing certificate issued by the Law Society are permitted to either advertise or otherwise state or infer that they are Solicitors.

Advertisers who carry out regulated activities must comply with the Financial Services and Markets Act 2000 ("FSMA") and the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005. Regulated activity under FSMA is subject to regulation by the Financial Conduct Authority (FCA). This includes products such as:

- Investments (for example, stocks and shares).
- Savings and bank accounts.
- Insurance (for example, motor, home, travel) providers, brokers, and advisors.
- Pensions.
- Mortgage providers, brokers, and advisors.

Where advertisements fall under these regimes advertisers will be required to complete and sign a Credit and Financial Services Advertising Customer Declaration ("CFSA") in accordance with SeedL's Advertising Terms & Conditions.

Advertisements must adhere to policies that are set out by regulators with regards to Advertisement Content, including (but not limited to):

- Advertisement Content that includes a specific interest rate must also include text indicating that this is the typical APR. If the typical APR interest rate is included in the ad copy, the interest rate must be immediately followed by the text "(typical APR)."
- Any invitation or inducement to engage in investment or to engage in claims management activity must be made by an approved or authorised person or it is exempt. It must also make clear that the value of investments is variable and can go down as well as up.

2. HONEST

SeedL media is distributed on an unsolicited basis and the contents should be acceptable to people within a wide range of sensibilities. Even though an advertisement may be legal, advertising copy can be offensive to a number of people. Accordingly, to avoid causing widespread embarrassment or upset, we reserve the right not to permit advertising where we, in our discretion, feel it may cause offence. Specifically: –

- i. No advertising is permitted for Massage Parlours or Escort Agencies or those that offer ways of obtaining sexual gratification in any SeedL product;
- ii. No images of full-frontal nudity shall be permitted;
- iii. No advertisements that promote discrimination on the grounds of a person's religion, race, sex, disability, or sexual orientation or age.

3. Truthful

Advertisers must not mislead any consumer by omitting important information. They must not mislead by hiding important information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

Using claims such as “clinically” and “scientifically proven” or “with guaranteed results” is not permitted unless the Advertiser holds documentary evidence to prove claims that consumers are likely to regard as objective and that are capable of objective substantiation. SeedL may ask for such evidence and the Advertiser shall within seven (7) days of a request from us, provide or arrange the provision of the relevant documentary evidence. In the event, that it cannot be provided, SeedL shall have the right to decline, suspend or cease to publish any Advertisement or part of any Advertisement, or suspend any Service, immediately and without prior notice nor compensation for loss of visibility.

The CAP Code states that comparative claims in advertising are permitted, provided they are not misleading in any way. Comparisons can only be made between products or services of the same or similar type.

- Advertising should not resemble any other so closely that it misleads or is likely to cause confusion.
- Never use well known slogans or copy used by other advertisers as they are likely to be trademarks or protected by copyright.
- Never copy the visual style of advertising used by others to avoid trademark, copyright infringement or passing off.

Landing Pages

URLs which direct users to an advertiser's website(s) on clicking an advert or logo, must offer a continuation of user experience. A company's home page is acceptable, but deep links to specific pages must offer the user an understanding of the landing page's relevance to the advert displayed. URLs must be directed to a website which is owned and operated by the advertiser. SeedL will routinely check landing pages of advertisers and suspend URLs that do not comply.

Brand Association

SeedL and its partner sites take no responsibility for the accuracy, quality or reliability of adverts displayed on its platform. Displaying adverts on SeedL.com or partner sites is not an endorsement of any product or service from any other advertiser, partner or SeedL. Any suggestion of association of an advertiser to SeedL or a partner site without written approval of the same is strictly prohibited.

Recruitment Advertising

In addition to the policies laid out above, if advertising a vacancy via SeedL Jobs or an advertiser displaying banner adverts on SeedL.com for vacancies (either for your own business or if acting as an employment agency on behalf of a client) the following additional policy applies.

Employment Agencies and Employment Business Regulations 2003

For the purpose of the Conduct of Employment Agencies and Employment Business Regulations 2003 (the "Regulations"), we operate as a digital platform only and are not an employment business and do not introduce or supply work-seekers to hirers (or vice versa). This means that we do not:

- Obtain sufficient information for potential recruiters to select a suitable jobseeker for the position which the recruiter seeks to fill;
- Obtain confirmation of the identity of a jobseeker or that they have the experience, training, qualifications or authorisation to work in the position to be filled or that they wish to undertake the role to be filled;
- Take any steps to ensure the jobseeker and recruiter are each aware of any requirement imposed by law or otherwise which must be satisfied by either of them to permit the jobseeker to fulfil the position to be filled;
- Take any steps to ensure that it would not be detrimental to the interests of the jobseeker or the recruiter for the jobseeker to fulfil the position to be fulfilled;
- Give any indication to recruiters whether jobseekers are unsuitable (or suitable) for any position to be filled in any circumstances;
- Propose jobseekers to recruiters or provide any information about them.
- Take up any references in relation to a jobseeker; or,
- Make any arrangements for accommodation of jobseekers.

The Regulations seek to ensure that jobseekers are only proposed by employment agencies for roles for which they are properly qualified and that recruiters are only offered jobseekers who have the appropriate levels of experience, training, qualifications and authorisation for the position to be filled. Since we are only a digital platform and do not propose or introduce jobseekers to recruiters or vice versa, it is recommended that, if you are a jobseeker you undertake the steps set out in the Regulations to ensure your suitability for the role advertised or, if you are a recruiter, to ensure a jobseeker's suitability for the role.

These could include:

- i. If you are a jobseeker; checking the identity of the recruiter and the nature of its business, the commencement date and duration of the position, the position to be filled including type of work, location, hours and risks to health and safety, experience, training, qualifications and authorisation which the recruiter considers necessary or are required by law or otherwise to undertake the position, whether any expenses are payable by you as a

jobseeker or whether there are any requirements imposed by law or otherwise for you to satisfy before taking up a position.

- ii. If you are a recruiter; checking the identity of the jobseeker and that the jobseeker has the experience, training, qualifications and authorisation required by law or otherwise for the position and whether there are any requirements imposed by law or otherwise for you, as the recruiter, to meet to enable a jobseeker to take up a position.
- iii. In addition, where professional qualifications are required or where jobseekers are to work with vulnerable persons or children, you should obtain copies of the relevant qualifications or authorisation, obtain at least two references from people who are not relatives of the jobseeker and undertake a disclosure and barring service (DBS) check of the jobseeker. For more details of how to undertake a DBS check (formerly a criminal records bureau – CRB), please click [here](#).

IR35 Tax Legislation

Recruiters will need to be aware of the IR35 legislation when posting job adverts, namely advertising that targets candidates including but not limited to independent contractors, freelancers, interim and/or consultant. The recruiter must comply to the rules derived from the IR35 legislation and apply where necessary.

The application of the legislation in question must be done with reasonable care when defining the IR35 of the Jobseeker's status and in the absence of reasonable care the recruiter will automatically become liable for any omission. The discretion lies with You to be updated with your obligations under the IR35 legislation.

Equality Act 2010

Subject to the clauses above, you must comply and adhere to all applicable laws when using our services, including but shall not be limited to the Equality Act 2010 and the Code of Practice on Employment provided by the Equality and Human Rights Commission. You must not use our services with the intention to discriminate or place the Jobseekers at a disadvantage when deciding or approaching them to fulfil a job vacancy. You hereby confirm that the content of the job advert will comply with all your obligations hereunder and within the aforementioned Legislation and Code of Practice on Employment. You shall indemnify Us against any claim brought by an individual arising from your breach of this obligation or any other of these Recruiter Terms.

Recruitment Advert Terms

(a) No duplicating of jobs at the expense of other Recruiters jobs.

(b) No gratuitous use of keywords in job descriptions or job titles. "Gratuitous" means deliberately inserting words, strings of words, or repeating job titles, with the intention of influencing position in the results listing, or increasing the number of page views.

(c) Job advertisements placed on SeedL must be for genuine employment vacancies only. Customers are prohibited from placing advertisements for other products or services, either relating to or unrelated to recruitment including, but not limited to, traineeships, vacancies seeking 'business owners', paid or non-paid surveys, affiliate schemes, franchise roles and opportunities, pyramid selling schemes or any other so called 'business opportunity'.

(d) Customers/Advertisers must not charge or accept at any time any fee or other payment from jobseekers, applicants or those who have been successfully offered a position by the Customer including, but not limited to, investment fees, franchise fees, joining fees, setting up fees, training fees, monthly fees, application fees, administrative fees and one-off set-up fees regardless of whether or not such fees or payments are refundable. Furthermore, Customers/Advertisers must not require or request jobseekers, applicants or those who have been successfully offered a position by the Customer to provide or purchase any material or merchandise as part of accepting or performing any role advertised.

(e) Contact telephone numbers, URLs or email links (live or text only) are not permitted in the body copy of the job description page. Email links are permitted from the 'send an email' link and url linking is permitted from the 'apply online' link.

(f) Any advertising that uses the name or logo of the company being recruited for is limited to one entity and logo per advert.

(g) Advertisements which appear to discriminate on grounds of (but not limited to) sex, race or disability are illegal and may result in proceedings being taken against both the advertiser and the publisher. Advertisements are accepted by SeedL on the basis that the Recruiter confirms that any requirement or qualification which may appear to discriminate illegally is in compliance with any exemption available under the relevant legislation. Notwithstanding this confirmation, if we nonetheless believe that an advertisement may be discriminatory we may at our discretion either amend the advertisement or remove it from the site without liability to you to make any refund of amounts paid or due to be paid in respect of the posting or otherwise and will inform you accordingly.

(h) Job advertisement placed on SeedL must be accessible and available for the jobseekers to review and apply. If we become aware that the job advert is no longer in existence or is not available for the jobseekers to access, We reserve the right to remove the job advert from our job board without any prior notification to you. This will include if the job advert is within the agreed term specified in your order Form and it is no longer in existence, we will remove the job advert immediately.