

Hulu Advertising Inventory Guidelines

These guidelines (“**Guidelines**”) apply to purchases of advertising inventory sold in the U.S. on the Hulu website or application or on any Hulu-related content and digital properties (“**Hulu Advertising Inventory**”) through direct or programmatic buys as well as through Disney’s self-service tool called Disney Campaign Manager. These Guidelines are incorporated into and are a part of the applicable insertion order terms, programmatic sales terms, and, Disney Campaign Manager terms and conditions. The Guidelines do not, and cannot, provide an exhaustive list of guidelines or examples, and Hulu (including its agents or appointed representatives) reserves the right to review, accept, decline, suggest modifications to, request further information about, or remove any and all advertising on a case-by-case basis. Hulu also reserves the right to approve exceptions to these Guidelines on a case-by-case basis. Hulu may update these guidelines from time to time without notice, so please check in and review them regularly.

1. **Disclosures for Advertising Materials.** Advertising materials and the advertising sponsor must be clearly identifiable and may not be disguised as editorial content or programming as determined by Hulu. The method of disclosure can differ depending on the platform, target audience, and type of advertising, but in all cases must be clear and conspicuous. Similarly, disclosures concerning a product, service or offer, such as how a product works, what is included with a product, service, or offer, or what is excluded from a product, service, or offer, must be made clear and conspicuous to a reasonable consumer.
2. **Substantiation, Legality, Third Party Rights.** Advertisers must be able to substantiate (i.e., with existing evidence) any express or implied claims conveyed in the advertising materials, including any such claims made through endorsers. An advertised offer must be fulfilled as stated in the advertisement, and advertisements may only portray or make claims about the product or service being advertised that are accurate and truthful. Advertisements must not be false or misleading and must not infringe or violate any third party’s rights. The advertising materials and delivery thereof must comply with all applicable laws, rules, and regulations, including without limitation advertising, privacy, data security, and consumer protection laws, as well as industry self-regulatory guidelines (collectively, “**Law**”).
3. **Advertising Specifications.** Advertising materials must comply with Hulu’s advertising specifications, which can be found at <https://www.disneyadvertising.com/mediakit/hulu/>.
4. **Third Party Technology.** All third party technology included in or appended to advertising by or on behalf of the advertiser, including any tags, pixels or other software code utilized for brand safety, invalid traffic/fraud or viewability, shall be subject to Hulu’s prior written approval, and, wherever necessary, user consent. Disney’s Data Collection and Use Policy, which can be found at <https://www.disneyadvertising.com/mediakit/data-policy-general/> and Disney’s Data Collection and Use Policy – Child Directed Properties, which can be found at <https://www.disneyadvertising.com/mediakit/data-policy-child/> shall apply.
5. **Interactivity and Landing Page.**
 - Use of QR codes, click through buttons, and other interactive features in advertising materials (collectively, “**Interactive Features**”) are subject to Hulu’s technical capabilities.

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- Advertisers must ensure that any user information processed using Interactive Features complies with Law and the advertiser's privacy policy; no precise location information or other sensitive personal information should be processed from users.
- Advertisements should communicate clearly, without misleading or deceptive urls, the page the user will land on by using the Interactive Feature.
- Advertisers must ensure that Interactive Features and landing pages do not contain spyware, phishing code, malware, or other malicious code.
- Where personal information is solicited on the advertiser's landing page, (i) any collection of personal information must be in full compliance with Law, and (ii) the advertiser must clearly explain to the consumer how the advertiser will use the personal information collected, and (iii) the advertiser must provide a clear and conspicuous link to its privacy policy on the landing page from the advertisement and provide users a mechanism for opting out of or opting into data collection where required by Law.
- Advertisers who age gate their sites and apps must ensure that Interactive Features do not enable users to bypass such age gates.

6. Language. Advertisements must be in English or Spanish.

7. Food and Beverage Advertising. Advertising of food, beverages, restaurants and food services are subject to the following restrictions:

- Advertising of food, beverages, restaurants, and food services must meet The Walt Disney Company's Nutritional Guideline policy and receive Hulu approval prior to being served. Food and beverages that do not meet Disney's Nutritional Guideline criteria (found at <https://twdchealthyiving.com/nutrition-criteria/nutritional-calculator>) cannot be advertised to children and are subject to programming restrictions.
- Advertising for food, beverages, restaurants and food services that do not meet The Walt Disney Company's Nutritional Guideline criteria (e.g., sugar-sweetened beverages, candy/treats, junk chips, some quick service restaurants) should be targeted only to adults. For example, the look and feel of the advertising should be adult-oriented and kid-appealing artwork or language cannot be used (e.g. no animated characters).

8. Political, Election, and Controversial Issue Ads (e.g., lobbyists, political action committees, political parties, candidates for elected office, ballot measures, referendums, advocacy, etc.). Hulu will consider on a case-by-case basis political and election advertising, as well as advertising that presents a position on a controversial public issue, subject to the below.

- Advertising that presents a position on a controversial public issue may be unacceptable if:
 - its content, or other content referenced in the ad or otherwise disseminated by the advertiser, is deemed offensive (e.g., on racial, religious, or ethnic grounds);

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- it is an attack of a personal nature on a private individual, an attack on an individual business, or a comment on a private dispute;
 - it contains violent or otherwise graphic or potentially offensive content that is deemed to be inappropriate for Hulu's viewing audience;
 - it contains content that promotes or may incite violence, crime or any form of antisocial behavior
 - it is incompatible with Hulu's other advertising guidelines;
 - it is inconsistent with Hulu or corporate policy; or
 - it offends Hulu sensibilities.
- As part of the clearance process for such advertising, substantiation may be required to support any factual claims made.
 - Such advertising must disclose the name of the actual individual or organization that is paying for the ad. This disclosure must be in the form of a 'paid for by...' or 'sponsored by...' super, or in a form otherwise required by law.
 - Any such advertising may be subject to profile age and programming restrictions.
 - Use of any intellectual property, talent or employees of the Walt Disney Company family of brands is not authorized and should be avoided.

9. Disclosure Policy for Synthetic Media in Political and Issue Advertising.

Any political or issue advertisement containing Synthetic Media must include a disclosure in compliance with this policy and as may be required by federal, state, or local law. "Synthetic Media" includes images, audio, video, or other assets created, reproduced, or modified in whole or substantially by using software, machine learning, artificial intelligence, or any other computer-generated or technological means. Synthetic Media may include media that deceptively depicts a real or realistic-looking person, event, audio, or other subject matter.

Political or issue advertisements containing Synthetic Media must, at a minimum, comply with applicable federal, state, and local law, include a written disclosure, and, if there is synthetic audio, include an audio disclosure. Disclosures in political and issue advertisements must be clear, conspicuous, and in proximity to the Synthetic Media.

- Written disclosures in political and issue advertisements must be in an easily readable size/font and must remain on the screen long enough to be read by the average viewer.
- Audio disclosures in political and issue advertisements must be easily heard and read at the same speed, voice level, and language as the surrounding content.

The language and formatting required for such disclosures in political or issue advertisements must accurately and conspicuously disclose the use of Synthetic Media, which will vary depending on the context and may be specified by applicable law. Some examples of adequate written disclosures in political or issue advertisements in certain jurisdictions may include:

- “This [video, image, or audio] has been manipulated or generated by artificial intelligence.”
- “This [image video, or audio] has been manipulated.”
- “This advertisement was generated in whole or substantially by artificial intelligence.”
- “This [video, image, or audio] has been manipulated by technical means and does not depict real events.”

Use of technology for nondeceptive editing such as image resizing, cropping, color correction or background substitution, where the result is inconsequential or immaterial to the claims or issues in the advertising, is generally not within the scope of this policy and may not require disclosure in political or issue advertisements unless otherwise required by applicable law.

All political or issue advertisements are subject to Hulu’s advertising guidelines and policies. In addition, all political or issue advertisements must comply with applicable state or federal laws, including without limitation, all requirements relating to the form and substance of advertising disclosures and the use of Synthetic Media in advertising. Hulu retains sole discretion to decline, accept, or remove political or issue advertisements containing Synthetic Media regardless of whether they contain the required disclosures.

10. Prohibited Content. The following list describes content within advertising that is not acceptable in Hulu Advertising Inventory

- Content that is reasonably determined to be harmful, threatening, obscene, fraudulent, harassing, defamatory, including an attack of a personal nature on a private individual, an attack on an individual business, or a comment on a private dispute
- Claims or representations that could be interpreted as wrongfully discriminatory based on race, sex, gender, sexual orientation, religion, nationality, disability, or age, or any other prohibited category under applicable anti-discrimination laws
- Sensationalism (e.g., killer bees, gossip, aliens, scandal, etc.)
- Inflammatory, graphic, or offensive content, language or images, including bad language and proxies for bad language (e.g., X@#%!, bleeped out language, etc.), graphic violence, and gratuitous use of guns/ammunition/firearms/weapons, tobacco or vaping products, alcohol, illegal drugs, and marijuana
- Content that includes excretory references (animal or human)
- Content that potentially encourages imitation of unsafe, inappropriate or otherwise illegal behavior
- Content that depicts illegal activities or references to products and/or services used to assist in furtherance of illegal activities

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- Content substantially similar to the Emergency Alert System (“EAS”) or sound-alike tones
- Content that mimics news techniques (e.g., “breaking news” language, a news ticker, etc.) or has the appearance of being a news report
- Content that includes a solicitation for funds
- Sexually explicit or suggestive content including sexualized full or partial nudity, sexual innuendo, double entendres, etc. (non sexualized partial nudity will be considered on a case-by-case basis)
- Advertising materials that infringe or assist others to infringe on any copyright, trademark or other intellectual property rights
- Unauthorized or unapproved uses of products, services, creative assets (e.g. talent, characters, movie or show titles and logos, show imagery, color scheme, fonts, etc.) or employees of the Walt Disney Company family of brands
- Content or imagery that copies, mimics, parodies, or mocks current or past advertising creative of any of The Walt Disney Company family of brands
- An implied yet unauthorized affiliation or favored status with any of The Walt Disney Company family of brands
- Any content that includes the unauthorized use of intellectual property owned or otherwise controlled by The Walt Disney Company family of brands, including but not limited to the Disney brand’s name, trademark or logo in any form (e.g., voiceover, promotional codes, text overlay, etc.)
- Content that contains or promotes spyware, malware or other harmful code
- Content that implies interactivity but is not in fact interactive
- Any content that directly links to content that contains any of the above prohibited content

11. Additional Content Considerations. Advertisers who incorporate the following content or messaging should make sure to do so in compliance with all laws and industry guidelines.

- Animals — use or misuse of
- Behavior requiring safety equipment
- Contests, sweepstakes, giveaways
- Environmental claims
- Financial claims (including loans, leasing, credit, financing, layaway, financial product benefits and risks, etc.)
- Foreign language
- Health and nutrition claims
- Product demonstrations

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- Public symbols/leaders
- Telephone numbers as props
- Visual effects
- White coat as wardrobe or prop in context of health and beauty claims

12. Prohibited Products, Services, Industries or Categories. Advertising for the following products, services, industries or categories is not accepted:

- Cannabis, marijuana, CBD and related products and services
- Credit repair services, bail bonds, pay day loans, and similar services
- Death and death-related products and services (funerals, funeral homes, cemeteries, mortuaries)
- Guns, ammunition, firearms and related dangerous products (e.g., guns, weapons, bullets, fireworks, matches, lighters)
- Illicit drugs and related products and services (with the exception of anti-drug campaigns approved by Hulu)
- Money-making opportunities
- Movies with an MPA rating of "X" or NC-17
- Video Games with a rating of AO
- Products or services that are adult-themed or of a sexually explicit nature (e.g., pornography, sex sites, adult magazines, escort or paid dating, sex toys, "900" or "976" telephone services, pay-per-call)
- Tobacco (e.g., cigarettes, e-cigarettes, cigars, pipes, chewing tobacco, vaping) and related products and services, including nicotine (with the exception of anti-smoking campaigns approved by Hulu)

13. Products, Services, Industries, and Categories reviewed on a case-by-case basis. The following products, services, industries or categories will be considered on a case-by-case basis, taking into consideration various factors, including, without limitation, appropriateness of advertising content and product and programming restrictions, and age and location targeting restrictions:

- Advertising of products that may raise science and environmental issues (e.g., hunting, energy/fossil fuels, forestry/lumber, agriculture, chemicals, minerals, plastics, wildlife tourism, zoos and aquariums, etc.)
- Alcohol (e.g., beer, wine, malt beverages, hard seltzer, hard liquor, including zero-proof alcohol)
- Any direct business competitor of The Walt Disney Company family of brands (e.g., theme parks, movies, streaming services, etc.)
- Black magic, astrology, horoscopes, occult, paranormal and psychic services

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- Cosmetic or body modification procedures, including tanning in an ultraviolet device and plastic surgery
- Contests, sweepstakes, giveaways, lotteries, fantasy leagues
- Cryptocurrency and Non Fungible Token (“NFT”)- related services
- Dietary, vitamins, and nutritional supplements and weight loss drugs, products and services, including slimming products such as diet pills, food substitutes such as slimming shakes, services such as weight loss programs
- Employment services
- Financial, banking, investment, insurance, real estate, brokerage and loan services
- Gambling, casinos, and sports betting
- Government, non profit, non governmental organizations and charitable services, including public service announcements
- Movies with an MPA rating of “R”
- Television or streaming programming with a rating of “TV-MA”
- Video Games with a rating of “M” or “RP”
- Online or other dating services and personals
- Prescription pharmaceuticals and medical devices
- Professional services (legal services, doctor’s offices, etc.)
- Religion and religious themed ads
- Sexual health (e.g., condoms, contraceptives, personal lubricants, pregnancy tests, erectile dysfunction medication)
- Violent sports and recreational activities (e.g., MMA)

14. Disney Campaign Manager Specific Terms: In addition to the other Guidelines herein, the following terms are applicable to Hulu Advertising Inventory purchased through Disney Campaign Manager:

- **Language.** Advertisements submitted via Disney Campaign Manager must be in English only for technical reasons at this time.
- **Advertising to Children.** Disney Campaign Manager advertisers may not direct advertising to children under the age of 13.

15. Guidelines applicable to Hulu Advertising Inventory directed at children under 13. In addition to the guidelines above, the following additional guidelines apply to advertising directed to users whose profile indicates that they are under 13 years old.

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- **Disclosures.** In addition to text disclosures, audio disclosures should be used to make material disclosures.
- **Compliance.** The advertising materials and delivery must also comply with the Children's Online Privacy Protection Act, the Children's Online Privacy Protection Rule, as amended, and any United States Federal Trade Commission guidance on the foregoing Act and Rule (collectively, "COPPA"), the Children's Advertising Review Unit's ("CARU") guidelines, and any applicable state laws. To learn more about COPPA and CARU, see <https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule> and <https://bbbprograms.org/programs/all-programs/children's-advertising-review-unit/Ad-Guidelines>.
- **Hulu Review.** All advertisements directed to children under 13 must run through Hulu's internal ad approval system before launch.
- **Data Collection.** Advertisers must comply with Disney's Data Collection and Use Policy – Child Directed Properties, which can be found at <https://www.disneyadvertising.com/mediakit/data-policy-child/>
- **Interactive Features.** Advertisements to children under 13 should not include Interactive Features
- **Entertainment Software Products (e.g., console games, mobile games).** Advertisements to children under 13 must disclose Industry sponsored ratings for entertainment software products in video and audio. For more information on ESRB ratings, go to [esrb.org](https://www.esrb.org).
- **Films and Videos.** Advertisers should take care to ensure that only age-appropriate videos and films are advertised to children under 13. If an industry rating system applies to the product, such as the Motion Picture Association ("MPA") rating for films, the rating label must be prominently displayed.
- **Food and Beverage Advertising.** Advertising of food, beverages, restaurants and food services to children under 13 must meet Disney's Nutritional Guideline criteria (found at <https://twdchealthyliving.com/nutrition-criteria/nutritional-calculator>) as described in section 7 above.
- **Products Labeled "Keep out of reach of children".** Advertisements to children for products that are labeled "Keep out of reach of children" but are of benefit to children, e.g. sunscreen or dental products, should depict adult supervision. In such cases, advertisers must be able to support the implied claim that the product does not present a danger to children.
- **Products, Services, Industries and Categories.** Advertising for products, services, industries, and categories listed in sections 8 and 12 above will not be accepted in this inventory. Advertising for products, services, industries, and categories listed in Section 13 above will generally not be accepted, though Hulu will consider advertising for some products that could be appropriate for children (e.g., zoos and aquariums, children's vitamins, public service announcements, etc.) on a case-by-case basis.