



EXHIBIT A

FRAUD DETECTION AND CONTROL POLICY

1. Fraud Detection Policy Statement and Definitions

1.1 This document outlines the COMPANY's **policy concerning any kind of fraudulent traffic/installs**, which is/are strictly prohibited, and facilitate the development of controls and rejection procedures.

- a. "**Fraudulent Traffic/Installs**" refer to the leads, actions, installs, downloads or user registrations generated by means of any device, program, robot, sign-up script, automatic entry system or any other malicious software, mobile device farms, and any other actions, directed to deceit of COMPANY and getting illegal benefit, which is materially injurious to the COMPANY.
- b. "**Incentivized traffic**", including paid, cash back websites /apps or comparable schemes, if such kind of traffic was not previously allowed for an advertising campaign, shall be considered as fraudulent.

1.2 Herewith, COMPANY informs PUBLISHER about using Scalarr (<http://scalarr.io>) as a third-party solution for quality assessment of traffic/installs subject to fraud in order to protect the assets of COMPANY.

1.3 The reports provided by Scalarr shall be treated by PUBLISHER as sufficient evidence for traffic/installs being subjected to fraudulent, and rejected and excluded from the total amount of payment for the conducted advertising campaign.

1.4 PUBLISHER hereby agrees not be paid for fraudulent traffic/installs.

2. Fraud Control Policy and Rejection Statement

2.1 Results of the traffic/installs quality assessment will be provided to PUBLISHER in the form of following reports:

- a. Aggregated, indicating the total number of fraudulent installs and fraudulent reasons (Scalarr_AggregatedFraudReport).

- b. Scalarr Conversion Fraud Report (Scalarr_FraudReport).

2.2 Scalarr Conversion Fraud Report will include the following information:

- Install Time shows the time at which the game/app was installed.
- IP reveals the IP address from which the game/app was installed.
- App Name shows the name of the game/app that was installed.
- Publisher states the source of the traffic.



- Sub Publisher – the traffic detailing within a single source.
- Campaign – the name of ad campaign within a single source of traffic.
- Country – the country in which the game/app was installed.
- Fraud Type – could consist of such values as "Classic Click Spam"; "Modified Click Spam"; "Click Injection"; "Bots, Device Farms"; "Smart Bots"; "Intelligent Device Farms" and means the type of fraudulent activity.
- Fraud Features could consist of such values as "Classic Click Spam TTI Distribution"; "Modified Click Spam TTI Distribution"; "Click Injection TTI Distribution"; "GP Referrer API Anomalies"; "Abnormal Engagement Outliers"; "Events Time Distribution Outliers"; "Abnormal User Progress Activity"; "Post-install Events Distribution Outliers" and provide an explanation one of the various anomalies found within provided traffic.

The detailed explanations of Fraud Types and Fraud Features used by Scalarr can be found by the link ([Scalarr Vocabulary](#)).

2.3 Herewith, to ensure effectiveness and confidentiality of fraudulent traffic/installs rejection procedure COMPANY also reserves the right to:

- a. Decide whether to stop traffic sources, participating in advertising campaigns from PUBLISHER, or advertising campaign of PUBLISHER unilaterally without further explanation of the reasons of such stop.
- b. To ask PUBLISHER for the details on the methods of conducting advertising campaigns, placements of advertising, the content of promotional materials, as well as other information if this information, in the opinion of COMPANY, might be helpful for identifying and preventing fraudulent actions against the COMPANY from the side of PUBLISHER or any other third party.
- c. Based on the principles set out by the agency Interactive Advertising Bureau (IAB) - [IAB Anti-Fraud Principles and Taxonomy](#) do not provide PUBLISHER with additional information on the detected fraudulent installs to avoid the risk of adaptation approaches used by fraudsters.

2.4 In addition to the above, PUBLISHER agrees with requirements of COMPANY that:

- a. Any advertising campaign of PUBLISHER must be conducted in accordance with all applicable local, state, national and international laws and regulations.
- b. During the advertising campaign, PUBLISHER is prohibited from using the content, which is illegal, libelous, offensive, fraudulent or obscene, as well as, content that contains viruses or is otherwise able to interfere or attempt to interfere with the proper operation of the Services.
- c. All information received, including but not limited to reports shall be treated by PUBLISHER as confidential, and shared only in case when the disclosure of such information is necessary to satisfy any applicable law, regulation, litigation or government request.