

PLATFORM BEST PRACTICES CHARTER



1. JOINING THE PLATFORM

- ▶ Verify the third-party seller's true identity and contact information
- ▶ Require the seller to regularly update their contact information
- ▶ Require the seller to attest that the goods are not counterfeit and/or violate local/international regulations
- ▶ Introduce product verification measures e.g. Lot number, proof of purchase, and distribution networks



2. SELLING ON THE PLATFORM

- ▶ Display the seller's verified identity, contact information, geographic origin of the goods, and ship from location
- ▶ Display accurate stock and transactions records
- ▶ Require the seller to only use sales images that (a) accurately depict the goods, and (b) the seller owns or has permission to use



3. PROACTIVE MONITORING

- ▶ Use technology to screen for counterfeit products prior to offering the seller's goods for sale (keywords and images received from brand owners can be utilized)
- ▶ Use enforcement information to prevent re-offending activity
- ▶ Investigate negative reviews and customers complaints and share all relevant information regarding observed and emerging threats with brand owners
- ▶ Allow brand owners to access and effectively search for proactively enforced IP infringements

4. ENFORCEMENT

- ▶ Design and implement policies aligned with international/local law and standards
 - ▶ Create and maintain a section where takedown and escalation processes and instructions are clearly outlined (e.g. use of reason code, handling of pushbacks)
 - ▶ Ensure a wide coverage of all IPR issues including design rights infringements
 - ▶ Implement a timely takedown process for removing infringements
 - ▶ Ensure a high level of transparency in the processing of takedown requests e.g. which stage the complaint is on and if it has to be rejected, provide explanations
 - ▶ Remove infringing listings across regions whenever they are featured in different ones, based on multi-territory certificates (EUIPO and WIPO denominated countries)
 - ▶ Implement an internal system where the reporter can retrieve notice history
 - ▶ Upon successful enforcement action, investigate the seller's other potential accounts on the platform and products on offer
 - ▶ Suspend problematic listings pending resolution in the case of subsequent pushbacks or ongoing dialogue between brand owners and sellers regarding reported infringements
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- ▶ Terminate sellers that have engaged in infringing activities on the platform three times
 - ▶ Screen sellers to prevent terminated sellers from rejoining the platform under a different alias
 - ▶ Share seller information with law enforcement and brand owners upon request e.g. inventory available, country of origin, and how many transactions have already been made
 - ▶ Notify buyers who purchased enforced counterfeits
 - ▶ Implement an internal system where the reporter can retrieve notice history



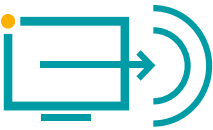
5. EDUCATION

- ▶ Create and maintain an informative section for both sellers and buyers on the Platform explaining in an accessible way what might be considered counterfeit and other IP rights violations
- ▶ Train staff members dealing with IP violation issues



6. ENGAGEMENT AND COLLABORATION

- ▶ Create regular dialogue with brand owners, brand protection service providers and other stakeholders to devise comprehensive and effective strategies on tackling infringing behaviours, particularly those related to counterfeit sales
- ▶ Be willing to refine and update policies through continuous engagement with brand owners



7. TECHNOLOGICAL COLLABORATION

- ▶ Create technology solutions for searching for and enforcing, which enable brand owners, their trusted partners and platforms to do this efficiently, effectively, and at a large scale e.g. API