



APMA Subnetwork Code of Conduct

Version 1.1 - Second draft for Compliance Taskforce Review

This Code sets out the *minimum standards* required for Subnetworks to operate within affiliate and partner marketing programmes.

The Code is designed to support:

- Programme governance
- Partner due diligence
- Risk management
- Protection of compliant publishers
- Protection of the correct attribution of sales and credit.

The Affiliate & Partner Marketing Association has created this Code to serve as an industry standard that any business can use when assessing Subnetworks.

Status of this Code

The Code:

- Is a voluntary industry standard
- Does not replace contractual obligations (including programme terms and conditions)
- Does not constitute regulation
- Does not create legal enforcement powers for the APMA

Commercial responsibility remains with advertisers, agencies and networks.

Definitions

Advertiser

A brand operating an affiliate or partner marketing programme.

Network/Platform

An affiliate network or tracking platform.

Publisher

A party promoting an advertiser for performance-based remuneration.

Subnetwork

An organisation aggregating multiple publishers under one account.

Subnetwork Publisher

A publisher operating under a subnetwork account.

Programme

An advertiser's affiliate or partner marketing arrangement.

Signatory

A subnetwork organisation that has agreed to comply with this Code.

The APMA's role

The Code is a voluntary industry standard.

The APMA:

- Defines the standard
- Maintains a public list of Signatories
- Facilitates transparency where concerns are raised

The APMA is **not** a regulator and does **not** enforce commercial decisions.

These are decided at the discretion of individual businesses.

The Code

Clause 1: Transparency

Subnetwork activity must be **fully transparent at the publisher level**.

Anonymous or aggregated publisher activity that cannot be attributed to an identifiable publisher is **not compliant with this Code**.

Transparency requires the Subnetwork to disclose, upon request or by default:

- The publisher name
- The domain, application or distribution environment used
- Valid publisher contact details.
- The traffic source or promotional method

Traffic source transparency must include the channels through which users and customers are reached, including websites, social platforms, messaging platforms, applications or other distribution methods.

Where redirect or intermediary domains are used to route affiliate traffic, these domains must be disclosed and attributable to the Publisher or technology generating the activity.

Redirect domains, passthrough domains, or tracking domains must not be used to obscure the identity of the Publisher or the origin of the traffic.

Publisher identification must be possible **at all times**.

Activities where the publisher cannot be identified are non-compliant.

NB: What do we mean by ‘transparency’? See [xxxx GUIDE](#) for our definition.

******the APMA is also producing a guide to sit alongside the Code, a development of the guide released in May 2025 and updated in December 2025:***

<https://theapma.co.uk/wp-content/uploads/Subnetworks-matrix-May-2025-v2-Dec-2026.pdf>

Clause 2. Publisher Control

Advertisers, agencies and networks must be able to exercise control at the individual Subnetwork publisher level.

This includes the ability to:

- Approve or reject individual publishers
- Apply restrictions at the publisher level
- Remove publishers

If publisher-level control cannot be applied, the Subnetwork **does not meet the requirements of this Code**.

Clause 3. Attribution and traffic activity

Subnetworks must not:

- Generate clicks without user action
- Inject, hijack or overwrite tracking without user intent
- Trigger hidden redirects or background clicks
- Deploy tools that alter attribution without approval

Activity must not overwrite or displace traffic from compliant Publishers.

Clause 4. Stand-down/soft-click and restriction management

If a Publisher is subject to the following:

- Stand-down/soft-click
- Programme removal
- Reduced attribution
- Activity restrictions

and then it is active via a Subnetwork, the same restriction must be applied immediately when the Publisher operates through the Subnetwork.

If this cannot be applied at the Publisher level, the Publisher should be removed. This includes where the Subnetwork is not able to separate out Publisher activity.

Clause 5. Technology disclosure

In line with the principles set out in Clause 1, Subnetwork publishers using technologies that may alter attribution or the user journey must be declared.

These technologies include, but are not limited to:

- Browser extensions
- Toolbars
- Software
- Link rewriting or interception
- On-site overlays or content injection
- Any technology that alters tracking or attribution

Where such technologies are used, they must operate in accordance with the attribution rules of the affiliate network/platform and advertiser programme terms and conditions.

We refer any Subnetwork and its publishers to their obligations under the [2015 Downloadable Software Code of Conduct, specifically section 5](#)

Clause 6. Visibility

The identity of the publisher must be identifiable at all times.

Acceptable identification may include:

- Publisher name
- Domain or application
- Publisher account ID linked to a known publisher

Publisher IDs alone are **not sufficient where they cannot be mapped to a specific publisher identity.**

Clause 7. Reporting

Subnetworks must be able to provide:

- Publisher-level performance reporting
- Domain or application-level information
- Traffic source information
- Reporting broken down by day, including commentary on material movements in traffic or sales where requested

Information must be provided within a reasonable timeframe when requested by advertisers, agencies or networks/platforms.

Where there are unusual spikes or other material changes in traffic, clicks, leads or sales, the Subnetwork must be able to provide sufficient supporting information to explain the activity.

Information must be provided within a reasonable timeframe when requested by advertisers, agencies or networks/platforms.

Clause 8. Compliance processes

Subnetworks must operate internal compliance procedures, including:

- Publisher onboarding checks
- Ongoing activity monitoring
- Investigation and removal processes for non-compliant activity

Subnetworks must maintain valid and up-to-date contact information for all Publishers operating within the subnetwork.

This information must be sufficient to allow the publisher to be contacted regarding traffic sources, compliance matters or payment administration.

Clause 9. Audits and cooperation

Subnetworks must cooperate with reasonable audit or information requests from Advertisers or Networks.

Where suspicious or difficult to identify traffic is observed, Subnetworks will be asked to provide a list of redirect domains.

Clause 10. Signatories

The APMA will maintain a public record of organisations that commit to this Code.

This status may be used by Advertisers, Agencies and Networks/Platforms as part of their preferred partner selection process and risk assessment.

DRAFT