

**DMA COMPLIANCE REPORT**

NON-CONFIDENTIAL VERSION

ANNEX 2

DMA.100121 - Amazon; DMA.100018 - Amazon - online intermediation  
services – marketplaces; DMA.100016 - Amazon - online advertising services

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**COMPLIANCE REPORTING**

**PURSUANT TO ARTICLE 11 OF COUNCIL REGULATION (EU) NO. 2022/1925**

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**5 March 2026**

## ANNEX 2 – NON-CONFIDENTIAL SUMMARY OF AMAZON ADS SECTION 2

### SECTION 2

#### DMA Compliance Report – Amazon Ads (Online advertising service)

#### Information on compliance with the obligations laid down in Articles 5 to 7 of Regulation (EU) 2022/1925

**2.1 For each core platform service in relation to which the Undertaking has been designated as a gatekeeper pursuant to Article 3 of Regulation (EU) 2022/1925 and for each applicable obligation laid down in Articles 5 to 7 of Regulation (EU) 2022/1925,<sup>1</sup> please provide the following information:**

- (1) Amazon’s advertising services (“**Amazon Ads**”) provides business users (respectively, those promoting their brands online through advertising (“**Advertisers**”) and those that own websites and mobile apps and earn money for the placement of ads on these properties (“**Publishers**”) with a variety of reporting tools to make advertising with Amazon Ads easy to understand and monitor. This is necessary to allow business customers to size the impact of the ads that they show to consumers and in order to choose ad services that show measurable value for their business. In this Annex, Advertisers and Publishers are referred to as customers, while end users (i.e., customers) are referred to as consumers.
- (2) In terms of ad products, Amazon Ads provides the following relevant services in relation to online ads:
  - Sponsored Ads: Advertisers can buy Sponsored ads which are paid merchandising placements in the Amazon Store designed to help promote products and services that consumers can buy in the Amazon Store (in Belgium, France, Germany, Italy, Ireland, the Netherlands, Poland, Spain, and Sweden) (“**Amazon Store**”). These ads appear primarily in the Amazon Store (website and app).
  - Ads sold via the Amazon Demand Side Platform (“**Amazon DSP**”): Advertisers can use Amazon DSP technology to purchase audio ads, display ads and video ads. These ads can appear on Amazon.com, Inc. and its affiliates (“**Amazon**”) properties, like the Amazon Store or third-party owned websites and apps.
  - Amazon Publisher Services (“**APS**”): Publishers can use the APS suite of tools and technology to monetize space on their websites and apps with ads. Advertisers can bid to buy that space via the Amazon DSP or similar services run by other companies.
- (3) In addition to presenting ads to consumers as they shop in the Amazon Store, Amazon also offers, to a lesser extent, other advertising services where we connect Advertisers that promote their brands online with Publishers. Through such services, Amazon Ads help Advertisers optimize, manage, and distribute ads on third-party websites and apps.

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<sup>1</sup> The information listed in Section 2 may be omitted for the obligations that are listed in response to Section 2.3 on condition that it can be established that a specific obligation laid down in Articles 5 to 7 of Regulation (EU) 2022/1925 cannot, by nature, apply to the Undertaking’s relevant core platform service. If so, please explain why this is the case for the Undertaking.

Advertisers and Publishers can use Amazon DSP and APS technology respectively to buy and sell online advertising through the industry standard ad auction process.

- (4) Amazon Ads is focused on providing the most value possible to customers to aid the growth of their businesses. We help our Advertisers reach potential consumers and we assist Publishers to earn income through their ad-supported services. We are also focused on providing a good consumer experience and we have a team dedicated to earning and maintaining consumer trust, including by protecting their personal data. The DMA transparency requirements have given us an opportunity to expand our existing capabilities and services for both Advertisers and Publishers.
- (5) References to Advertisers also include advertising agencies that purchase advertising services from Amazon Ads on behalf of Advertisers.
- (6) Amazon provides the information in this Annex in relation to the provisions applicable to Amazon Ads following the European Commission's ("Commission") Compliance Report template form pursuant to Article 11 of Regulation (EU) 2022/1925 ("DMA"). This Annex also explains why certain obligations do not apply to Amazon Ads.

#### **Regarding Article 5(2)**

- (7) Please refer to the Article 5(2) chapter in the Compliance Report.

#### **Regarding Article 5(6)**

- (8) Please refer to the Article 5(6) chapter in the Compliance Report.

#### **Regarding Article 5(8)**

- (9) Please refer to the Article 5(8) chapter in the Compliance Report.

#### **Regarding Article 5(9)**

**2.1.1 The following statement confirming compliance with the obligation in line with Article 8(1) of Regulation (EU) 2022/1925: '*[Name of the Undertaking] confirms that as of [DATE] it has ensured compliance with the obligation laid down in Article [reference to the Digital Markets Act's Article/paragraph specifying the obligation] of Regulation (EU) 2022/1925.*'**

- (10) Amazon confirms that from 6 March 2024, it complied with the obligations laid down in Article 5(9) for Amazon Ads.

**2.1.2 An exhaustive explanation of how the Undertaking complies with the obligation, *including* any supporting data<sup>2</sup> and internal documents. Please provide a detailed description of any measures that ensure such compliance, indicating whether such measures were already in place pre-designation or if they were implemented post-designation.**

**The description of all the above-mentioned measures must enable the Commission to verify whether the Undertaking has demonstrated**

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<sup>2</sup> The Undertaking shall have any underlying raw data ready to be made available to the Commission in the event the Commission requests this raw data.

**compliance pursuant to Article 8(1) of Regulation (EU) 2022/1925 and should, at a minimum, include:**

**i) an explanation on how the Undertaking complies with the obligation based on all measures that were already in place pre-designation or that the Undertaking has implemented post-designation, and**

- (11) Article 5(9) requires Amazon Ads to provide Advertisers (and their authorized third parties) with “*information on a daily basis free of charge*” about: (a) the prices and fees those Advertisers pay; (b) the remuneration received by Publishers; and (c) the metrics on which these fees and prices are based. Advertisers that use Amazon Ads products already received online reports that contain pricing information about the ad campaigns that Amazon Ads delivers prior to 6 March 2024. Amazon Ads’ invoices also already itemized all fees that Amazon charges to Advertisers (**Section 2.1.2.i.A** below).
- (12) **Section 2.1.2.i.B** below details how Amazon Ads strengthened its pricing transparency for customers by expanding its existing pricing report functionality to disclose fees with additional granularity. Amazon Ads made a pricing guide (“**Pricing Guide**”) available for Advertisers to explain fee metrics. Amazon Ads also provides DMA-specific reports for Amazon Ads shown on third-party websites/apps.

***A. Previously existing pricing transparency for Advertisers***

- (13) Prior to 6 March 2024, Advertisers who bought ads from Amazon Ads had free of charge access to reports that provided metrics for Advertisers to see pricing information about the ads that we delivered. These features already addressed the Article 5(9)(a) requirements of disclosing to the Advertiser “*the price and fees paid by that Advertiser*”. Amazon Ads already provided Advertisers with real-time access to pricing information, including:
- The gross amount that Amazon pays the Publisher including any fees for an ad, with the name of the domain of the website or app on which the ad was shown.
  - Itemized fees from Amazon Ads (e.g., Amazon DSP console fee, targeting fee, and supply quality fee).
  - Prices paid by the Advertiser to Amazon Ads (e.g., total costs).
  - Number of times consumers have seen (e.g., impressions) or clicked on an ad.
  - Discounts received by the Advertiser (if applicable) including where Amazon Ads has provided credits as part of a promotion.
- (14) The invoices we sent to Advertisers also contained itemized charges that include their total cost (based on impressions or clicks), all billed fees from Amazon Ads by category, with adjustments and taxes. Some of our Advertisers also received all costs in advance of the ad campaign launch, for example, when our ads are sold on a fixed price basis using pre-negotiated rates. This is the case for Advertisers buying from Amazon Ads as part of our managed-service where we provided Advertisers with support in designing and executing their ad campaigns.



## **B. User experience for Advertisers implemented by 6 March 2024**

### **a. Overview**

- (16) To further meet obligations under Article 5(9) Amazon Ads introduced the following features:
1. Amazon Ads expanded its previously existing pricing reports and disclosures to include additional fees to ensure all “*fees paid*” to Amazon Ads by the Advertiser, “*including any deductions and surcharges*” are clear.
  2. Amazon Ads made an online Pricing Guide available for customers to confirm “*the metrics on which each of the prices, fees and remunerations are calculated.*”
  3. Pricing reports for ads (including ads sold through the Amazon DSP and Sponsored Display ads) that are served on the third-party-owned websites and apps of APS Publishers. This contains the “*the remuneration received by the Publisher*” for the Advertiser’s benefit (“**Pricing Transparency Reports**”), when we have appropriate authorization to share such information.
- (17) This Section provides an overview of the Pricing Transparency Reports with more specific information regarding Advertisers.
- (18) Pricing Transparency Reports. We provide free Pricing Transparency Reports that can be downloaded via online portals that Advertisers already used. These Pricing Transparency Reports are available to Advertisers that buy ads on third-party websites and apps from Amazon Ads and cover ads served to consumers in the European Union (“EU”). In these Pricing Transparency Reports, Amazon DSP Advertisers see net Publisher Earnings (explained in detail below) in respect of each of their ads placed, aggregated by daily totals. In order for us to disclose the amounts earned by Publisher in these Pricing Transparency Reports, we seek Publisher’s prior authorization (see **Section 2.1.2.i.B.e**) below).
- (19) Direct transactions. Amazon Ads provides Pricing Transparency Reports for direct transactions where Amazon Ads is the intermediary that invoices the Publisher, and the Advertiser directly and so has the ability to report price metrics accurately. To illustrate, the Pricing Transparency Reports provide the pricing information for ads on a third-party Publisher’s website bought by an Advertiser using the Amazon DSP, and where the Publisher sold that ad space via APS.
- (20) The Pricing Transparency Reports do not contain price metrics in relation to Publishers that do not use APS to sell their ad space or Advertisers who do not buy ad space directly from Amazon Ads. Amazon Ads nevertheless already provided limited information that it had access to in relation to two indirect transaction scenarios referred to below as: (i) third-party Ads sellers (“**Ads Sellers**”); and (ii) Transparent Ad Marketplace (“**TAM**”) and Unified Ad Marketplace (“**UAM**”).
- (21) Ads Sellers. Amazon Ads allows Advertisers using the Amazon DSP to access third-party inventory via Ads Sellers. Amazon Ads already provided Advertisers buying ads via the Amazon DSP with information about the price Amazon Ads paid to Ads Sellers. These Ads Sellers intermediate on behalf of Publishers that own the ad space sold via the Amazon DSP. These Publishers do not sell their ad space via APS, so Amazon Ads

does not know how much the Publisher earned in the sale of this ad space to the Amazon DSP.

- (22) TAM/UAM. APS has two programs known as UAM and TAM (described in detail below), through which an APS Publisher can programmatically offer its inventory to third-party Advertisers. Amazon Ads also already provided Publishers selling their ad space via APS with information about the winning bid amount, including for winning bids sent by third-party buyers and not the Amazon DSP. These Ads Sellers in turn facilitate ad sales to Advertisers. Because these Advertisers do not buy their ad space via Amazon DSP, Amazon Ads does not know how much the Advertiser was ultimately charged for the purchase of the ad space. For these transactions, Amazon Ads already disclosed to Publishers: (i) the winning bid amount from the relevant third-party buyer, and (ii) the transaction fee APS charges to the relevant Seller, which is deducted from the amount paid to the Publisher.
- (23) Authorized third parties. We now also provide Pricing Transparency Reports to any third party authorized by the Advertiser to receive their Pricing Transparency Reports. Third parties authorized by Advertisers to purchase ads via Amazon Ads' services are granted the same level of access to the Pricing Transparency Reports as Advertisers purchasing ads directly from Amazon Ads. Advertisers or their authorized third parties have the option to email the Pricing Transparency Reports from our online portals to any other authorized third parties.

***b. Metrics on which prices, fees and remunerations are calculated***

- (24) Amazon Ads made an online Pricing Guide available to Advertisers so that “*metrics on which prices, fees and remunerations are calculated*” are easily available in a centralized location. This Pricing Guide provides fee information and the basis on which fees are calculated across Amazon Ads. The Pricing Guide also provides information about the DMA Pricing Transparency Reports.

***c. Prices and fees paid by Advertiser for each ad service provided by Amazon Ads***

- (25) Prior to 6 March 2024, Amazon Ads already disclosed its fees to Advertisers, such as the Amazon DSP console fee which is a percentage-based fee we charge for use of the Amazon DSP, and other Amazon Ads fees like targeting fees as well as third-party fees. As part of our compliance efforts, we also started disclosing the portion of a fee that Amazon Ads retains on services that we provide together with third-party partners. For example, Amazon Ads provides an optional supply quality service which is available to Advertisers buying ads via the Amazon DSP. This supply quality service allows Advertisers to filter their ads on Publisher websites based on features like whether the page is appropriate for the brand. In order to offer this service, we subcontract with supply quality service providers. For enabling this service, Amazon Ads takes a share of the service fee paid by Advertisers. Amazon Ads launched changes to disclose to Advertisers the % fee retained by Amazon Ads for this supply quality service (rather than, as before, the all up cost for “*supply quality*” which included the third party’s service and Amazon Ads’ fee).

**d. Advertiser Pricing Transparency Reports: net remuneration received by the Publisher**

- (26) We make available the net remuneration received by the Publisher in Pricing Transparency Reports for Advertisers when buying through the Amazon DSP. The actual Pricing Transparency Reports show the Publishers’ full names where they have authorized us to show their name or otherwise, “*undisclosed*” where they have not. If the Publisher does not authorize the sharing of information, the Pricing Transparency Reports contain an aggregated amount, for each ad placement, along with the impression or click amounts which allow the Advertiser to calculate “*the daily average remuneration received by that Publisher*”.
- (27) The Pricing Transparency Reports for Advertisers contain the following metrics (shown in **Figure 3** below):
1. Publisher Earnings: the remuneration received by the Publisher, i.e., the net bid price received by the Publisher (“**Publisher Earnings**”) after Amazon Ads deducts any supply-side fees (e.g., 10% APS Publisher Transaction Fee). This net amount is a specific disclosure to Advertisers as part of the Pricing Transparency Report. Advertisers already received the price Amazon pays the Publisher with all fees included.
  2. Supply-side fees: the amount a Publisher pays Amazon Ads to sell space on their website or app, e.g., APS Publisher Transaction Fee. This total amount is a specific disclosure to Advertisers as part of the Pricing Transparency Report.
  3. Demand-side fees: the sum of any fees an Advertiser pays to use Amazon Ads and includes Amazon fees and third-party fees applied to campaigns, not including the bid amount.
  4. Advertiser Cost: the total amount an Advertiser pays for their campaigns. This includes all Amazon Ads fees and any third-party fees that Amazon bills to the Advertiser (“**Advertiser Cost**”).
  5. Impressions: the number of times the ad was served to consumers.
  6. Clicks: The number of times the ad was clicked by consumers.

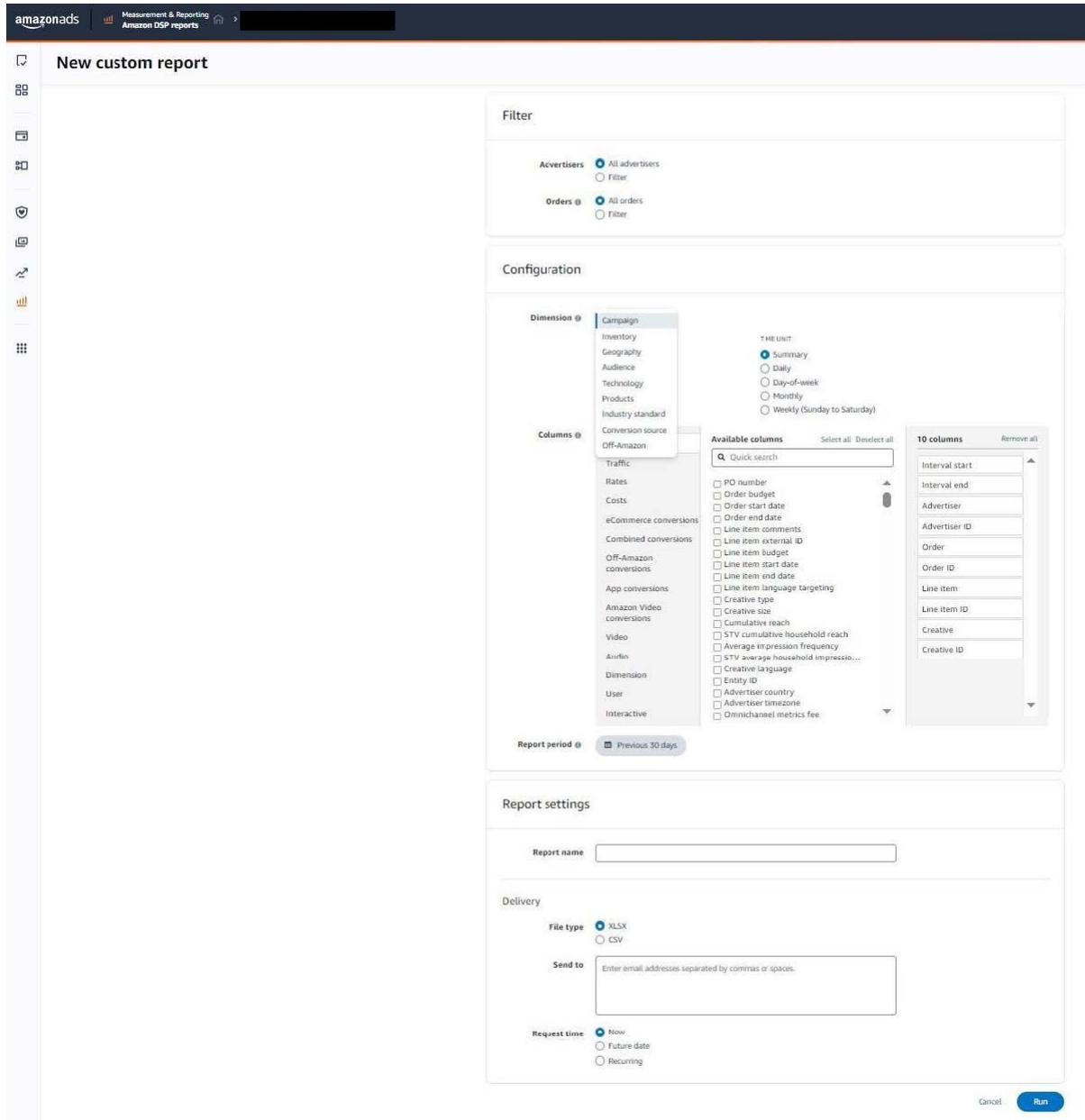
**Figure 3 – Anonymized Sample of an Advertiser Pricing Transparency Report**

Date	Publisher name	Currency	Publisher earnings	Supply-side fees	Demand-side fees	Total advertiser cost	Impressions	Click-throughs	Viewable impressions
2/26/2024	Undisclosed	EUR							
2/27/2024	Undisclosed	EUR							
2/28/2024	Undisclosed	EUR							
2/28/2024		EUR							
2/28/2024		EUR							

- (28) The Pricing Transparency Report can be downloaded by Advertisers within the Ads Console (including via Application Programming Interface (“**API**”), where available) (shown in **Figure 4** below). The Ads Console is an online interface that our Advertisers can access after they create an Amazon Ads account. Advertisers then use the Ads Console to create and design their ad campaigns as well as view reports about those

campaigns. Advertisers automatically have access to the Pricing Transparency Reports in the “Report Center” section of the Ads Console, without any additional requirements or checks.

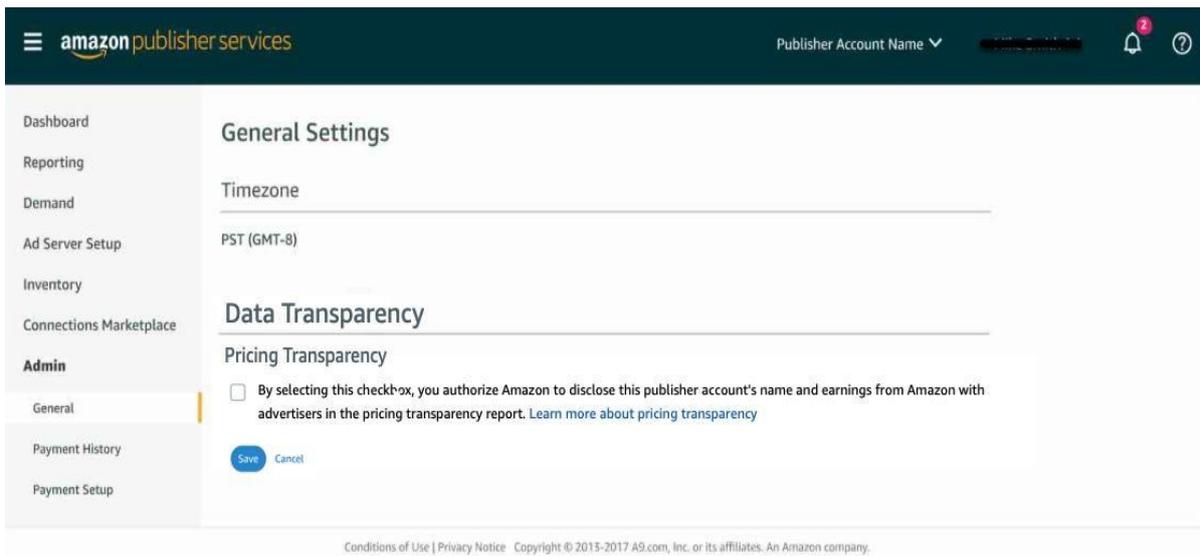
**Figure 4 – Advertiser experience to generate a Report**



**e. Publisher authorization experience implemented by 6 March 2024**

- (29) Amazon Ads has designed a page through which to obtain authorization from Publishers (via their elected admin user). If a Publisher provides their express authorization, their name and relevant pricing information will be included in Pricing Transparency Reports. This allows opt-in authorization from Publishers to disclose Publisher Earnings to Advertisers. The illustrative user experience for this authorization is set out in **Figure 5** below.

**Figure 5 – Publisher authorization CX (APS)**



- (30) If a Publisher does not authorize sharing Publisher Earnings with Advertisers, Amazon Ads will provide the daily average remuneration received by that Publisher at the daily aggregated level. In this case, aggregate impressions metrics are in a single row called “undisclosed” within the Pricing Transparency Reports as shown in **Figure 6** below.

**Figure 6 – Anonymized sample Advertiser Pricing Transparency Report**

Date	Publisher name	Currency	Publisher earnings	Supply-side fees	Demand-side fees	Total advertiser cost	Impressions	Click-throughs	Viewable impressions
2/26/2024	Undisclosed	EUR							
2/27/2024	Undisclosed	EUR							
2/28/2024	Undisclosed	EUR							

- ii) **specific information (including, if applicable, data points, visual illustrations and recorded demos<sup>3</sup>) for each measure implemented in the context of Regulation (EU) 2022/1925, regarding:**
- a) **the relevant situation prior to the implementation of the measure and how the newly introduced measure ensures compliance with the obligations laid down in Articles 5 to 7 of Regulation (EU) 2022/1925;**
- (31) The previously existing pricing transparency solutions which Amazon Ads made available to Advertisers prior to 6 March 2024 are described under **Section 2.1.2.i.A** above. Prior to 6 March 2024, Advertisers who bought ads from Amazon Ads had real-time and free of charge access to reports that provided metrics for Advertisers to see pricing information about the ads that we delivered. These features already addressed the Article 5(9)(a) requirements of disclosing to the Advertiser “*the price and fees paid by that advertiser*”. The invoices we sent to Advertisers also contained itemized charges that included their total cost (based on impressions or clicks), all billed fees from Amazon Ads by category, with adjustments and taxes.

<sup>3</sup> For example, this may be particularly relevant to illustrate changes impacting user journeys.

(32) **Section 2.1.2.i.B** above describes solutions which were implemented to ensure compliance with obligations laid down in Article 5(9). These features include:

1. expanding the previously existing pricing reports and disclosures to include additional fees to ensure all “*fees paid*” to Amazon Ads by the Advertiser, “*including any deductions and surcharges*” are clear,
2. making available an online Pricing Guide, for Advertisers to confirm “*the metrics on which each of the prices, fees and remunerations are calculated*”, and
3. introducing new Pricing Transparency Reports for ads served on the third-party-owned websites and apps of APS Publishers which include “*the remuneration received by the Publisher*” when we have appropriate authorization to share such information.

**b) when the measure was implemented;**

(33) The compliance measures described in **Section 2.1.2.i)** above, were implemented before 6 March 2024.

**c) the scope of the measure in terms of the products/services/devices covered;**

(34) The scope of the measures ensuring Amazon’s compliance with Article 5(9) is described in **Section 2.1.2.i)** above.

**d) the geographic scope of the measure (e.g., if the implementation of the measure extends beyond the EEA, please specify);**

(35) Amazon has implemented the measures to comply with Article 5(9) in the EU.

**e) any technical/engineering changes that were made in connection with the implementation of the measure concerned (e.g., on data flows and internal data usage policies, security aspects, tracking of new metrics, Application Programming Interfaces (APIs), operation system (OS) functionalities, parameters of ranking algorithms and methodologies used to rank, classify or make results more prominent, or parameters of online advertising auctions);**

(36) The technical changes made in connection with the implementation of the measures implemented post-designation to comply with Article 5(9) are described under **Section 2.1.2.i.B** above.

**f) any changes to the customer experience made in connection with the implementation of the measure concerned (e.g., changes in the customer interface, choice screens,<sup>4</sup> consent**

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<sup>4</sup> For instance, the specific design of the choice screen, what information is prompted to the users in the choice screen, including the consequences of making a selection; the users to which the choice screen is shown and when.

**forms,<sup>5</sup> warning messages, system updates, functionalities available, or customer journey to access functionalities<sup>6</sup>);**

(37) The new customer facing features introduced in connection with the implementation of the new measures to comply with Article 5(9) are described under **Section 2.1.2.i.B.e** above.

**g) any changes to (i) the remuneration flows in connection with the use of the Undertaking's core platform service (e.g., fee structure, level of the fees, revenue share for the relevant service(s), introduction of new fees, provisions and practices related to the business users' pricing policy, other remuneration flows between the Undertaking and the business users or end users, as applicable) and (ii) the other terms and conditions provided to end users and business users (or individually negotiated agreements with business and/or end users), or where applicable, changes to existing terms and conditions, required by the implementation of the measure concerned (e.g., privacy policy, conditions for access and interoperability and any other relevant clauses);**

(38) The solutions implemented to comply with Article 5(9) are available to Advertisers free of charge. Amazon has maintained the remuneration flows in connection with the use of Amazon Ad's online advertising services in the Article 5(9) context.

**h) any other relevant changes made in connection with the implementation of the measure concerned not covered by points e) to g) above;**

(39) All relevant changes made in connection with the implementation of the new measures to comply with Article 5(9) are described in the above Sections.

**i) any consultation<sup>7</sup> with end users, business users and/or any interested parties that has been carried out in the context of (i) the elaboration of the measure and/or (ii) the implementation of the measure, and how the input of these consulted parties has been taken into account. Provide a list of end users, business users and/or any interested parties consulted in this context and a high-level description of the topic of the consultation with those users/parties;**

(40) Amazon Ads has tested the features internally and previewed the Pricing Transparency Reports and related user experience with a select group of Advertisers. The main purpose of the engagement exercise was to obtain structured feedback from a set of representative EU customers on our proposed compliance measures for these DMA obligations. We included questions about how the customer perceived the usefulness of

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<sup>5</sup> This applies to all types of consent required under Regulation (EU) 2022/1925, regardless of whether this is via a "form" or any other format.

<sup>6</sup> The Undertaking must provide a click-by-click description of the end user's interaction with the user interface. The Undertaking may submit visual illustrations and/or recorded demos.

<sup>7</sup> This information should include a description of the methodology for the consultation.

the solution and invited commentary on components or features those customers thought could be improved.

(41) We have engaged with publishers, agencies, and an advertiser in relation to pricing transparency.

**j) any involvement of external consultants in the elaboration of the measure, including a description of the consultants' mission, whether they are independent from the Undertaking, a description of both their output and the methodology used to reach that output and, if applicable, an explanation of the reasons why the recommendations made by the external consultants were not followed;**

(42) None.

**k) any alternative measures whose feasibility or implications has been assessed and the reasons for not choosing them and, in particular, where relevant (e.g., interoperability), the results of the evaluation of existing open standards and/or state of the art implementations and the reasons for not choosing them;**

(43) Amazon Ads considered, as an alternative compliance measure, the introduction of a dashboard that would provide only average pricing metrics across all of Amazon Ad products. Another alternative option considered was the inclusion of certain pricing transparency metrics in the DMA Clean Room which was developed to enhance our compliance with obligations under Article 6(8). Amazon Ads ultimately decided to not pursue this option because the Ads Console was better and more direct for customers.

**l) any action taken to inform end users and/or business users of the measure, their feedback; and any changes to the measure implemented on the basis of this feedback;**

(44) Since we added the Pricing Transparency Reports to the location where Advertisers already accessed pricing information and reports, these were discoverable without widespread announcements. In addition, Amazon product teams provided internal release notes and informal training sessions to account managers and sales teams to support Advertisers.

(45) On 31 January 2024, Amazon Ads published a blogpost<sup>8</sup> regarding Amazon Ads' compliance with the DMA, informing Advertisers and Publishers about upcoming changes introduced as of 6 March 2024 to comply with the DMA. On 7 March 2024, Amazon published posts and related materials on Amazon webpages<sup>9</sup> to inform end users and third parties about the DMA changes, including on Article 5(9). In addition, Amazon's representatives participated in the public DMA compliance workshop organized by the Commission and presented Amazon's compliance solution in relation to Article 5(9).

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<sup>8</sup> See blogpost titled *Amazon Ads and the Digital Markets Act*, <https://advertising.amazon.com/en-us/blog/amazon-ads-and-the-digital-markets-act>.

<sup>9</sup> See blogpost titled *Amazon Ads and the Digital Markets Act*, <https://advertising.amazon.com/en-us/blog/amazon-ads-and-the-digital-markets-act>.

(46) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(9) is described under **Section 2.1.2.ii.i)** above.

**m) where applicable, the interaction with measures the Undertaking has implemented to ensure compliance with other obligations under Regulation (EU) 2022/1925;**

(47) The Article 5(9) obligation to provide pricing information to Advertisers corresponds to the Article 5(10) obligation requiring Amazon Ads to provide the same to Publishers. In light of the closely related nature of these two provisions, Amazon Ads developed the Pricing Transparency Reports by taking into account its obligations under both of these provisions.

**n) where applicable, all actions taken to protect integrity, security or privacy (e.g., data access, data retention policies) pursuant to the relevant provisions in Regulation (EU) 2022/1925 and why these measures are strictly necessary and justified and there are no less restrictive means to achieve these goals;**

(48) All Publishers that do not provide their authorization are shown to Advertisers in an “undisclosed” row within the Pricing Transparency Report for a particular day. This ensures the requirement to obtain and honor Publisher consent is applied in a way that protects the Publisher’s decision not to disclose their name or pricing information.

**o) any type of market analysis or testing (in particular A/B testing<sup>10</sup>), business user surveys or consumer surveys or end user consent rates,<sup>11</sup> that have been carried out to estimate the expected impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>12</sup>**

(49) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(9) is described under **Section 2.1.2.ii.i)** above.

**p) any type of market analysis or testing (in particular A/B testing), business user surveys or consumer surveys or end user consent rates, that have been or are expected to be carried out to evaluate the actual impact or evolution of the impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>13</sup>**

(50) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(9) is described under **Section 2.1.2.ii.i)** above.

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<sup>10</sup> A/B testing is an experiment where the audience is randomly split to test a number of variations of a measure and determine which performs better. A/B testing and consumer surveys may be particularly well-suited to demonstrate: (i) compliance with obligations which include a change to an end-user interface and (ii) the absence of dark patterns, which could jeopardize the effectiveness of the proposed measure.

<sup>11</sup> End user consent rates refer to the percentage of end users who provided consent to the data processing for which end user consent is required under Regulation (EU) 2022/1925 (for instance Articles 5(2) and 6(10)).

<sup>12</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

<sup>13</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

**q) a set of indicators which allow or will allow based on their future evolution the assessment of whether the measures implemented by the Undertaking to ensure compliance are ‘effective in achieving the objectives of this Regulation and of the relevant obligation’, as required by Article 8 of Regulation (EU) 2022/1925, including an explanation why the Undertaking considers these indicators to be the most suitable;**

(51) According to Recital 45, the legislative objective of Articles 5(9) and 5(10) is to increase the transparency of the conditions under which designated companies provide online advertising services to their business users (i.e., Advertisers and Publishers) by providing business users with additional information and knowledge about the conditions of the online advertising services they purchase.

(52) Prior to 6 March 2024, Amazon Ads already provided Advertisers and Publishers with access to detailed pricing information. Amazon Ads enhanced its existing reports and introduced new features, allowing business users to access the pricing information specified in Articles 5(9) and 5(10). By design, Amazon Ads’ DMA ad pricing transparency compliance solution meets the legislative objective of the DMA and ensures that the conditions under which business users purchase online advertising services from Amazon Ads are transparent.

**r) any relevant data<sup>14</sup> which can inform whether the measure is or will be effective in achieving the objectives of Regulation (EU) 2022/1925, such as, depending on the circumstances, data on the evolution of the number of active end users and active business users for the relevant core platform service and, for each relevant obligation, the interaction of end users with choice screens and consent forms, the amount of in-app purchases, the number of pre-installed defaults as well as yearly revenues from payments related to those pre-installed defaults, counts of end users who switch, counts of business users who obtain data access, etc. Provide an exact definition of the terms used and a detailed calculation explanation;**

(53) As noted in **Section 2.1.2.ii.q)** above, Amazon Ads’ DMA ad pricing transparency compliance solution achieves the legislative objective of the DMA by design. Amazon provides below data which sets out the relevant downloads of the Pricing Transparency Reports and customer uptake of our compliance solution.

(54) Between 1 January and 31 December 2025, the Pricing Transparency Reports were downloaded [Confidential] times by Advertisers (or their authorized third parties).

(55) As explained in **Section 2.1.2.i.B.e)** above, Publishers use our identity and access management solution to grant authorized third parties’ access to their Amazon Ads account. Between 1 January and 31 December 2025, [Confidential] Publishers (or their authorized third parties) provided consent on the APS Portal for disclosing the

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<sup>14</sup> Reported on a sufficiently disaggregated basis to be informative (for example, by reference to each business user) and, if applicable, per type of device.

Publisher's account name and earnings from Amazon Ads with Advertisers in the Pricing Transparency Report.

- s) **any internal systems and tools used to monitor the effectiveness of the measure and the output of such internal systems and tools;**
- (56) Please refer to **Section 2.1.3** below for a description of the internal assessment conducted in relation to the ads pricing transparency compliance solution.
- t) **where applicable, when compliance requires granting third parties (e.g., business users), access to data, interfaces or other technical features of the service: describe the procedure for third parties to obtain such access (including how third parties will be informed of this possibility), the scope (including terms and conditions attached to the access), the format, and the frequency (e.g., real time) and any other relevant information (e.g., whether the shared data/interface or other technical feature can be independently audited, data access policies, data retention policies and measures to enable secure data access).**
- (57) The interfaces and procedure for Advertisers to obtain access to data made available under Article 5(9) are described in under **Section 2.1.2.i.B** above.

**2.1.3 A detailed explanation of how the Undertaking has assessed compliance with the obligation, including whether any assessment projects, such as external or internal audits have been carried out. For all such assessment projects, provide information about the identity and the role of the people involved and whether they are independent from the Undertaking, the assessment methodology and timeline for the relevant assessment project, and any output (e.g., audit reports or compliance plans).**

- (58) Amazon Ads undertook an internal data assessment to evaluate the customer uptake of our DMA ads transparency compliance solution. Amazon provides the data collected in the course of this exercise in **Section 2.1.2.ii.r)** above.
- (59) Amazon Ads instructed an external advisor to conduct an independent control assessment in relation to Amazon Ad's regulatory obligations and the corresponding compliance measures.
- (60) The control assessment was conducted from January 2024 through May 2024, and covered Articles 5(9), 5(10), 6(5), 6(8), 6(9), 6(2) 6(10), and 11.
- (61) Control assessment work performed by an external advisor included reviewing process workflows (visual aid of the control environment), control narratives (describes what are the controls), and obtaining sample evidence to understand the control environment.

**2.1.4 A list and description of any reports prepared by the head of the compliance function for the management body of the Undertaking in relation to Regulation (EU) 2022/1925 and, in particular, on risks of non-compliance within the meaning of Article 28(4) of Regulation (EU)**

**2022/1925 and of the management body’s replies to those reports, including a list and description of the measures taken in response to those reports.**

(62) The head of the DMA compliance function (“**DCF**”) provides periodic progress updates to the Board of Managers of AEC (“**Board**”). Since 6 March 2024, there have been [Confidential] updates to the Board. The Board acknowledged these updates.

**2.1.5 A list and a summary of any feedback (e.g., complaints) of the Undertaking’s business users established in the Union or end users established or located in the Union concerning the Undertaking’s compliance with the obligations. Where this feedback exceeds ten (10) instances, please group them to the extent possible (e.g., per topic). Please also provide an explanation of any action that the Undertaking has taken based on this feedback.<sup>15</sup>**

(63) Amazon has received a few questionnaires from business users. This feedback did not concern Amazon Ads’ compliance solutions but informed us of their expectations regarding DMA compliance. In response to these queries, we pointed these customers to relevant data, reports and features covered by the ad transparency obligations.

**Regarding Article 5(10)**

**2.1.1 The following statement confirming compliance with the obligation in line with Article 8(1) of Regulation (EU) 2022/1925: ‘[Name of the Undertaking] confirms that as of [DATE] it has ensured compliance with the obligation laid down in Article [reference to the Digital Markets Act’s Article/paragraph specifying the obligation] of Regulation (EU) 2022/1925.’**

(64) Amazon confirms that from 6 March 2024, it complied with the obligations laid down in Article 5(10) for Amazon Ads.

**2.1.2 An exhaustive explanation of how the Undertaking complies with the obligation, including any supporting data<sup>16</sup> and internal documents. Please provide a detailed description of any measures that ensure such compliance, indicating whether such measures were already in place pre-designation or if they were implemented post-designation.**

**The description of all the above-mentioned measures must enable the Commission to verify whether the Undertaking has demonstrated compliance pursuant to Article 8(1) of Regulation (EU) 2022/1925 and should, at a minimum, include:**

**i) an explanation on how the Undertaking complies with the obligation based on all measures that were already in place pre-**

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<sup>15</sup> The Undertaking should ask about and respect the decision of the company submitting feedback to preserve the anonymity of its submission or to keep certain parts confidential. The Undertaking should inform the Commission of any such anonymity or confidentiality requests. In any case, the Undertaking should describe any actions taken based on the relevant feedback in a non-confidential form.

<sup>16</sup> The Undertaking shall have any underlying raw data ready to be made available to the Commission in the event the Commissions requests this raw data.

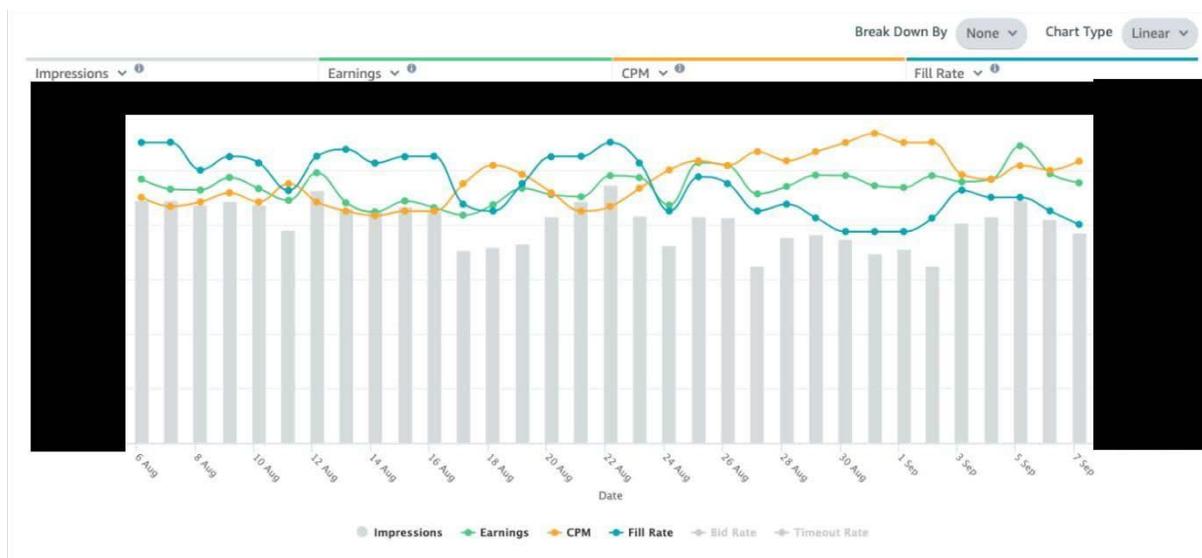
**designation or that the Undertaking has implemented post-designation, and**

- (65) Article 5(10) requires Amazon Ads to provide Publishers (and their authorized third parties) with “*free of charge information on a daily basis*” about: (a) the fees paid, and the remuneration earned by that Publisher; (b) the amounts Advertisers pay for ads placed on that Publisher’s website or app; and (c) the metrics on which such fees and remuneration are based. Publishers that use APS already had access to a number of reports prior to 6 March 2024. These reports are designed to enable Publishers to monitor the performance and earnings for ads shown on their websites and apps. Publishers also already received itemized invoices containing their earnings (**Section 2.1.2.i.A** below).
- (66) **Section 2.1.2.i.B** below details how Amazon Ads strengthened its pricing transparency for customers by expanding its existing pricing report functionality to disclose fees with additional granularity. Amazon Ads made a Pricing Guide available for Publishers to explain fee metrics. Amazon Ads also provides DMA-specific reports for Amazon Ads shown on third-party websites/apps.

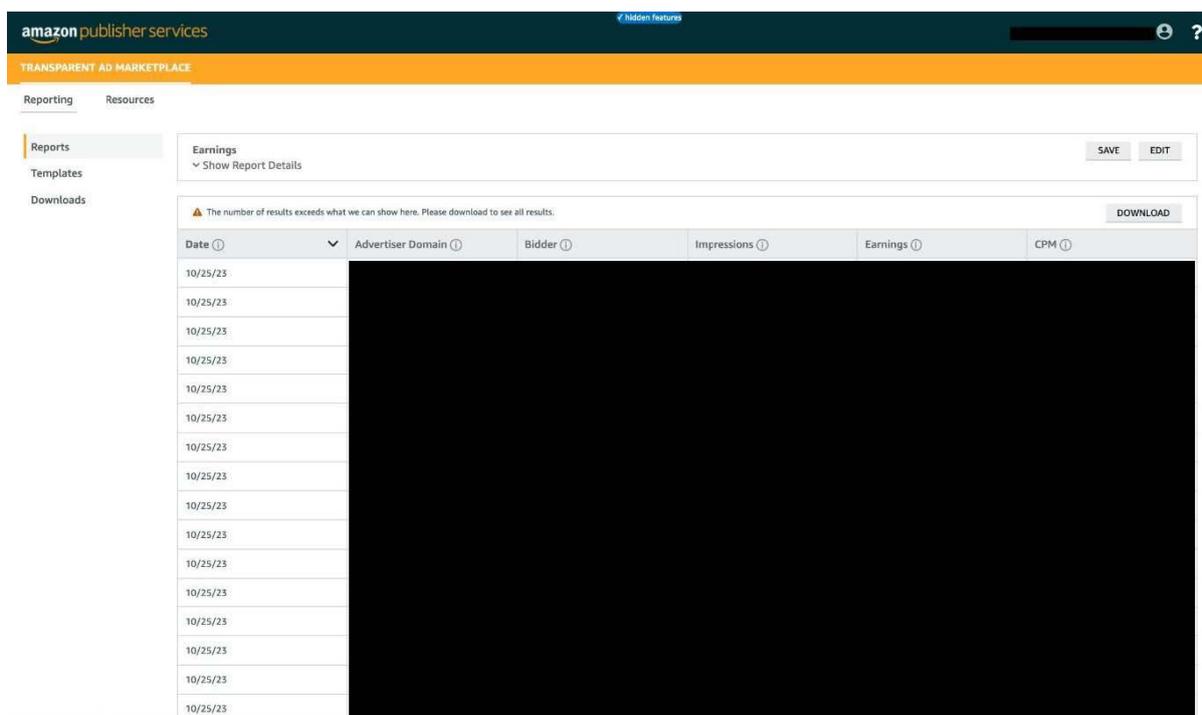
***A. Previously existing pricing transparency for Publishers***

- (67) Prior to 6 March 2024, Publishers who used APS already had free of charge access to a number of reports with analytical data so that they could monitor the success and earnings for ads shown on their websites and apps. These features already addressed the Article 5(10)(a) requirements of disclosing “*the remuneration received and the fees paid*” by that Publisher. Amazon Ads provided Publishers with access to detailed pricing information, including:
- The bid price that the Advertiser has communicated they will pay for the ad not including additional Amazon or third-party fees.
  - Estimated earnings of the Publisher along with bid details (including Advertiser Domain and the name of the Bidder that has placed the bid).
  - All itemized fee amounts that the Publisher pays to Amazon Ads in order for us to sell inventory on their website or app.
  - Number of times consumers have seen (e.g., impressions) or clicked on an ad.
- (68) Our invoices also already contained the remuneration received by the Publisher for the sale of space on their website or app, any itemized fees they incur after the auction, with adjustments and taxes. Some of our Publisher services use pre-negotiated rate cards, so that Publishers received details of what they will be paid ahead of a campaign running on their website or app. Publishers also monetize their media through companies other than APS and Amazon Ads is not able to provide accurate reporting in respect of those ad impressions.
- (69) **Figure 7** and **Figure 8** below are examples of the reports covering pricing information previously available to APS Publishers. Publishers were able to view the company that was bidding on ads (“**Bidder**”) and the impressions and earnings from each Bidder.

**Figure 7 – APS earnings report**



**Figure 8 – APS earnings report**



**B. User experience for Publishers implemented by 6 March 2024**

**a. Overview**

(70) To further meet obligations under Article 5(10) Amazon Ads introduced the following features:

1. Amazon Ads expanded its previously existing pricing reports and disclosures to include additional fees to ensure all “fees paid” to Amazon Ads by the Publisher, “including any deductions and surcharges” are clear.

2. Amazon Ads made an online Pricing Guide available for customers to confirm “*the metrics on which each of the prices, fees and remunerations are calculated.*”
  3. Pricing reports for ads (including ads sold through the Amazon DSP and Sponsored Display ads) that are served on the third-party-owned websites and apps of APS Publishers. This contains the “*price paid by the Advertiser*” for the Publisher’s benefit (the Pricing Transparency Reports), when we have appropriate authorization to share such information.
- (71) This Section provides an overview of the Pricing Transparency Reports with more specific information regarding Publishers.
- (72) Pricing Transparency Reports. We provide free Pricing Transparency Reports that can be downloaded via online portals that Publishers already used. These Pricing Transparency Reports are available to Publishers that place these ads on their websites or apps via APS and cover ads served to consumers in the EU. In these Pricing Transparency Reports, APS Publishers see total Advertiser Costs (explained in detail below) in respect of each of their ads placed, aggregated by daily totals. In order for us to disclose the amounts paid by Advertisers in these Pricing Transparency Reports, we seek Advertiser’s prior authorization (see **Section 2.1.2.i.B.e**) below).
- (73) Direct transactions. Amazon Ads provides Pricing Transparency Reports for direct transactions where Amazon Ads is the intermediary that invoices the Publisher, and the Advertiser directly and so has the ability to report price metrics accurately. To illustrate, the Pricing Transparency Reports provide the pricing information for ads on a third-party Publisher’s website bought by an Advertiser using the Amazon DSP, and where the Publisher sold that ad space via APS.
- (74) The Pricing Transparency Reports do not contain price metrics in relation to Publishers that do not use APS to sell their ad space or Advertisers who do not buy ad space directly from Amazon Ads. Amazon Ads nevertheless already provided limited information that it had access to in relation to two indirect transaction scenarios referred to below as: (i) Ads Sellers; and (ii) TAM and UAM.
- (75) Ads Sellers. Amazon Ads allows Advertisers using the Amazon DSP to access third-party inventory via Ads Sellers. Amazon Ads already provided Advertisers buying ads via the Amazon DSP with information about the price Amazon Ads paid to Ads Sellers. These Ads Sellers intermediate on behalf of Publishers that own the ad space sold via the Amazon DSP. These Publishers do not sell their ad space via APS, so Amazon Ads does not know how much the Publisher earned in the sale of this ad space to the Amazon DSP.
- (76) TAM/UAM. APS has two programs known as UAM and TAM (described in detail below), through which an APS Publisher can programmatically offer its inventory to third-party Advertisers. Amazon Ads also already provided Publishers selling their ad space via APS with information about the winning bid amount, including for winning bids sent by third-party buyers and not the Amazon DSP. These Ads Sellers in turn facilitate ad sales to Advertisers. Because these Advertisers do not buy their ad space via Amazon DSP, Amazon Ads does not know how much the Advertiser was ultimately charged for the purchase of the ad space. For these transactions, Amazon Ads already disclosed to Publishers: (i) the winning bid amount from the relevant third-party buyer,

and (ii) the transaction fee APS charges to the relevant third-party seller, which is deducted from the amount paid to the Publisher.

- (77) Authorized third parties. We now also provide Pricing Transparency Reports to any third party authorized by the Publisher to receive their Pricing Transparency Reports. Publishers or their authorized third parties have the option to email the Pricing Transparency Reports from our online portals to any other authorized third parties.

***b. Metrics on which prices, fees and remunerations are calculated***

- (78) Amazon Ads made an online Pricing Guide available to Publishers so that “*metrics on which prices, fees and remunerations are calculated*” are easily available in a centralized location. This Pricing Guide provides fee information and the basis on which fees are calculated across Amazon Ads. The Pricing Guide also provides information about the DMA Pricing Transparency Reports.

***c. Remuneration received and the fees paid by Publisher for each ad service provided by Amazon Ads***

- (79) Prior to 6 March 2024, APS already provided Publishers with access to two different types of Advertisers (detailed below) and where Amazon Ads takes a fee for these APS services from Publishers, these fees are disclosed to Publishers.

- (80) Amazon DSP Advertisers. Amazon DSP Advertisers can have their ads placed on APS Publisher websites or apps and Amazon Ads withholds a 10% APS Publisher Transaction Fee from Publishers. For example, APS submits an open auction bid for the Publisher who intends to sell ad space on its website or app. Amazon DSP wins the auction. APS will return a bid price to the Publisher minus this fee. The Pricing Transparency Report includes these fees in the supply-side fees column. Amazon Ads APS reports show the APS Publisher Transaction Fee received by Amazon Ads when an APS Publisher sells inventory to an Amazon DSP Advertiser.

- (81) Third-party Advertisers. APS has two third-party programmatic buying programs where fees are charged: TAM and UAM. TAM is when Publishers using APS and third-party Bidders (e.g., non-Amazon demand side platforms) have a direct contract and billing relationship, and Amazon Ads charges the third-party Bidder a percentage fee after the transaction. These fees are available in the APS Portal. This is an interface that only APS Publishers can access after account creation. These Publishers use this APS Portal to make their websites or apps available for ads to be placed on them, restrict certain Advertisers and view reports about ads on their websites and apps. With UAM, Amazon Ads handles payment reconciliation (so that Publishers do not need to have a direct contract with third-party buyers), and Amazon Ads deducts a percentage fee from the amount to be paid to the Publisher (i.e., UAM Fee). Amazon Ads’ APS reports show the UAM fee to Publishers.

***d. Publisher Pricing Transparency Reports: price paid by the Advertiser***

- (82) We make available the price paid by Advertisers buying through the Amazon DSP, including any deductions and surcharges. The actual Pricing Transparency Reports show the Advertiser’s full names where they have authorized this or otherwise, “*undisclosed*” where they have not.

(83) The Reports for Publishers contain the following metrics (as shown in **Figure 9** below):

1. Advertiser Costs: the bid price is paid by the Advertiser, including Amazon Ads’ own fees and third-party fees. This gives Publishers the total amount that the Advertiser paid with all costs, e.g., inclusive of the supply cost, Amazon DSP console fee, and other amounts payable to Amazon to help serve advertiser’s ads. This is a specific disclosure to Publishers, as part of the Pricing Transparency Report. Prior to the release of the Pricing Transparency Reports, Publishers only received the bid price and Publisher fees, but did not have visibility to the Advertiser fees.
2. Demand-side fees: the sum of any fees an Advertiser pays to use Amazon Ads, including Amazon Ads’ fees and third-party fees. This is a new disclosure to Publishers.
3. Supply-side fees: the amount a Publisher pays Amazon Ads to sell space on its website and apps. An example is the 10% APS Publisher Transaction Fee.
4. Impressions: the number of times the ad was served to consumers.
5. Clicks: the number of times the ad was clicked by consumers.
6. Publisher Earnings: the net payment a publisher receives from Amazon Ads for serving ads on their supply.

**Figure 9 – Anonymized sample of a Publisher Pricing Transparency Report**

Date	Advertiser Name	Impressions	Publisher Earnings	Supply-side Fees	Clicks	Total Advertiser Cost	Demand-Side Fees	Viewable Impressions
2/26/2024	Undisclosed							
2/27/2024	Undisclosed							
2/27/2024								
2/27/2024								
2/28/2024	Undisclosed							
2/28/2024								

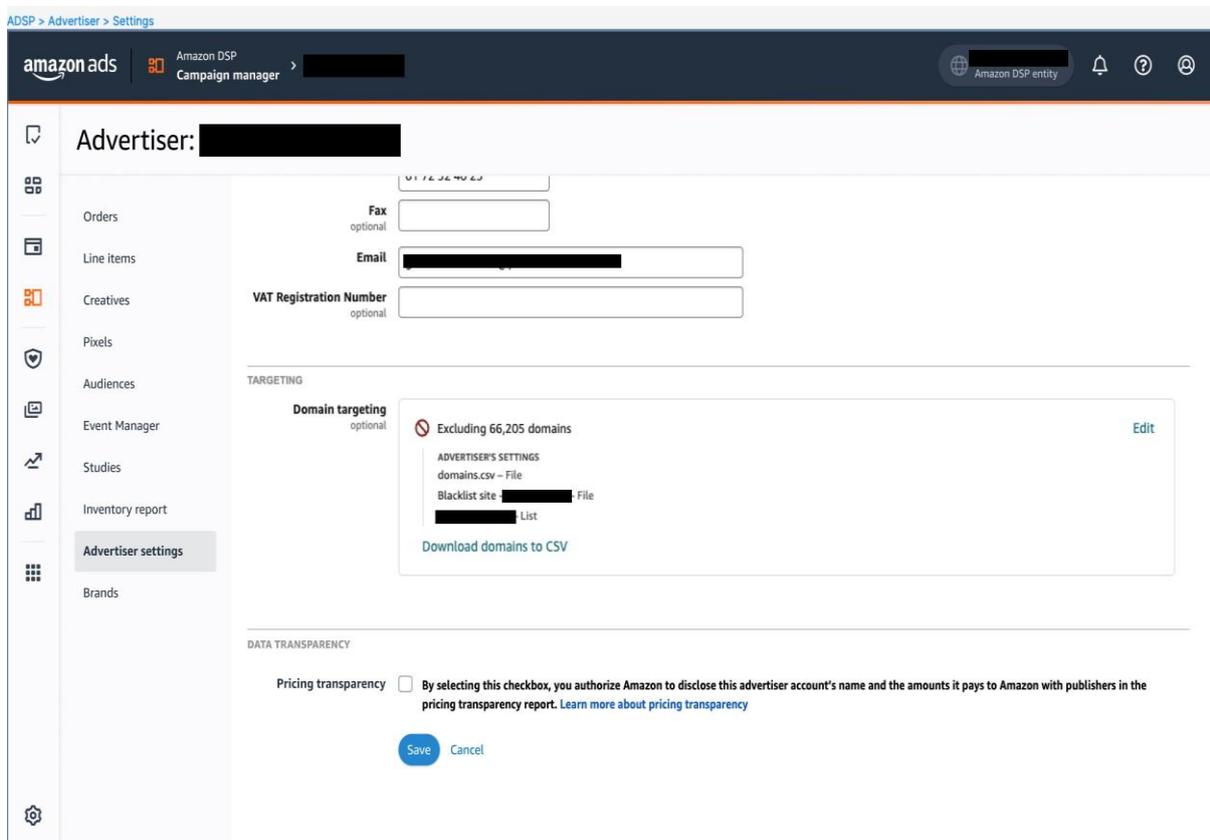
(84) The Pricing Transparency Report is available for Publishers within the APS Portal. The Report data is displayed within the APS Portal interface and there is also the option for Publishers to download the Report. Publishers automatically have access to the Pricing Transparency Reports in the report section of the APS Portal, without any additional requirements or checks.

*e. Advertiser authorization experience implemented by 6 March 2024*

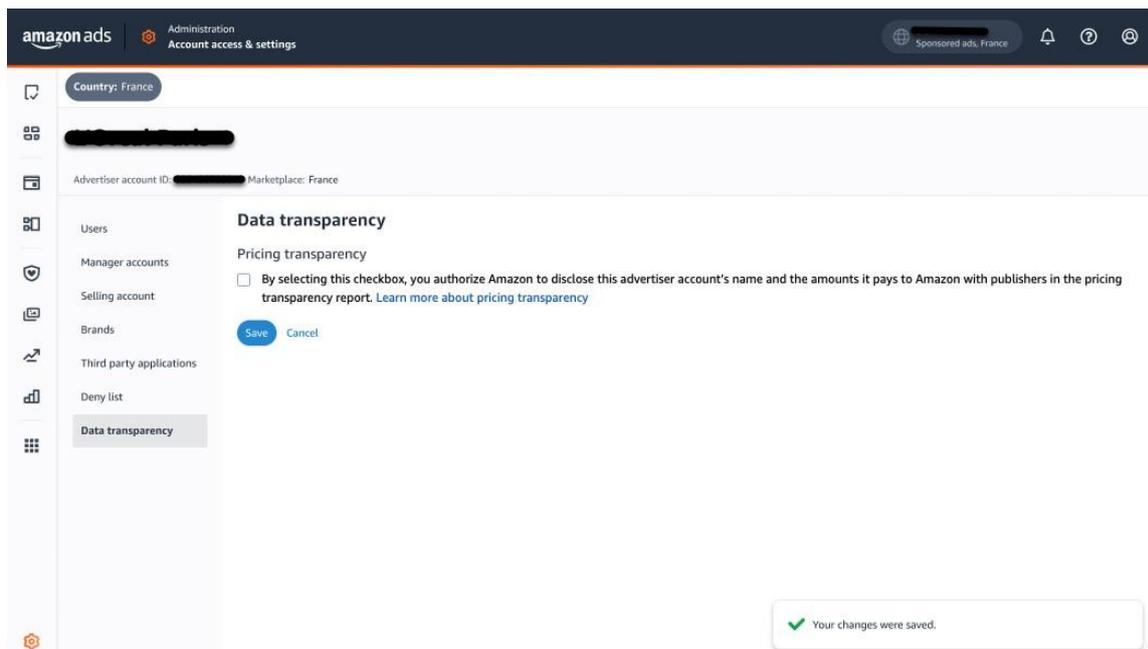
(85) Amazon Ads has designed a page through which to obtain express authorization from Advertisers (via their elected admin user). If an Advertiser provides their express authorization, their name and relevant pricing information will be included in Pricing Transparency Reports. This allows opt-in authorization from Advertisers to disclose the Advertiser Costs to Publishers. The illustrative user experience for this authorization is set out in the figures below. For Advertisers using our managed-service where Amazon Ads provides an end-to-end service in designing and executing campaigns, Advertisers did not readily access the Ads Console. These Advertisers: (i) are able to advise Amazon Ads separately if they want to authorize Amazon Ads to share Advertiser Costs

with Publishers; and (ii) are sent Pricing Transparency Reports by Amazon Ads upon request.

**Figure 10 – Advertiser authorization CX (Amazon DSP)**



**Figure 11 – Sponsored Display Advertiser authorization CX (Ad Console)**



- (86) If an Advertiser does not authorize sharing Advertiser Costs with Publishers, we will instead provide the daily average price paid by that Advertiser. In this case, aggregate impressions metrics are in a single row called “undisclosed” within the Pricing Transparency Reports as shown in **Figure 12** below.

**Figure 12 – Anonymized sample Publisher Transparency Report**

Date	Advertiser Name	Impressions	Publisher Earnings	Supply-side Fees	Clicks	Total Advertiser Cost	Demand-Side Fees	Viewable Impressions
2/26/2024	Undisclosed							
2/27/2024	Undisclosed							

- ii) **specific information (including, if applicable, data points, visual illustrations and recorded demos<sup>17</sup>) for each measure implemented in the context of Regulation (EU) 2022/1925, regarding:**

- a) **the relevant situation prior to the implementation of the measure and how the newly introduced measure ensures compliance with the obligations laid down in Articles 5 to 7 of Regulation (EU) 2022/1925;**

- (87) The previously existing pricing transparency solutions which Amazon Ads made available to Publishers prior to 6 March 2024 are described under **Section 2.1.2.i.A** above. Prior to 6 March 2024, Amazon Ads already provided Publishers with access to detailed pricing information. Publishers who used APS already had access to a number of reports with analytical data so that they could monitor the success and earnings for ads shown on their websites and apps. These features already addressed the Article 5(10)(a) requirements of disclosing “the remuneration received, and the fees paid” by that Publisher. Our invoices also already contained the remuneration received by the Publisher for the sale of space on their website or app, any itemized fees they incur after the auction, with adjustments and taxes.

- (88) **Section 2.1.2.i.B** above describes solutions which were implemented to ensure compliance with obligations laid down in Article 5(10). These features include:

- expanding the previously existing pricing reports and disclosures to include additional fees to ensure all “*fees paid*” to Amazon Ads by the Publisher, “*including any deductions and surcharges*” are clear,
- making available an online Pricing Guide, for Advertisers to confirm “*the metrics on which each of the prices, fees and remunerations are calculated*”, and
- introducing new Pricing Transparency Reports for ads served on the third-party-owned websites and apps of APS Publishers which include the “*price paid by the Advertiser*” for when we have appropriate authorization to share such information.

- b) **when the measure was implemented;**

- (89) The compliance measures described in **Section 2.1.2.i)** above, were implemented before 6 March 2024.

<sup>17</sup> For example, this may be particularly relevant to illustrate changes impacting user journeys.

- c) **the scope of the measure in terms of the products/services/devices covered;**
- (90) The scope of the measures ensuring Amazon’s compliance with Article 5(10) is described in **Section 2.1.2.i)** above.
- d) **the geographic scope of the measure (e.g., if the implementation of the measure extends beyond the EEA, please specify);**
- (91) Amazon has implemented the measures to comply with Article 5(10) in the EU.
- e) **any technical/engineering changes that were made in connection with the implementation of the measure concerned (e.g., on data flows and internal data usage policies, security aspects, tracking of new metrics, Application Programming Interfaces (APIs), operation system (OS) functionalities, parameters of ranking algorithms and methodologies used to rank, classify or make results more prominent, or parameters of online advertising auctions);**
- (92) The technical changes made in connection with the implementation of the measures implemented post-designation to comply with Article 5(10) are described in **Section 2.1.2.i.B** above.
- f) **any changes to the customer experience made in connection with the implementation of the measure concerned (e.g., changes in the customer interface, choice screens,<sup>18</sup> consent forms,<sup>19</sup> warning messages, system updates, functionalities available, or customer journey to access functionalities<sup>20</sup>);**
- (93) The customer facing features introduced in connection with the implementation of the new measures implemented post-designation to comply with Article 5(10) are described in **Section 2.1.2.i.B** above.
- g) **any changes to (i) the remuneration flows in connection with the use of the Undertaking’s core platform service (e.g., fee structure, level of the fees, revenue share for the relevant service(s), introduction of new fees, provisions and practices related to the business users’ pricing policy, other remuneration flows between the Undertaking and the business users or end users, as applicable) and (ii) the other terms and conditions provided to end users and business users (or individually negotiated agreements with business and/or end users), or where applicable, changes to existing terms and conditions, required by the implementation of the measure concerned (e.g.,**

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<sup>18</sup> For instance, the specific design of the choice screen, what information is prompted to the users in the choice screen, including the consequences of making a selection; the users to which the choice screen is shown and when.

<sup>19</sup> This applies to all types of consent required under Regulation (EU) 2022/1925, regardless of whether this is via a “form” or any other format.

<sup>20</sup> The Undertaking must provide a click-by-click description of the end user’s interaction with the user interface. The Undertaking may submit visual illustrations and/or recorded demos.

**privacy policy, conditions for access and interoperability and any other relevant clauses);**

- (94) The solutions implemented to comply with Article 5(10) are available to Publishers free of charge.
- h) any other relevant changes made in connection with the implementation of the measure concerned not covered by points e) to g) above;**
- (95) All relevant changes made in connection with the implementation of the new measures to comply with Article 5(10) are described in the above Sections.
- i) any consultation<sup>21</sup> with end users, business users and/or any interested parties that has been carried out in the context of (i) the elaboration of the measure and/or (ii) the implementation of the measure, and how the input of these consulted parties has been taken into account. Provide a list of end users, business users and/or any interested parties consulted in this context and a high-level description of the topic of the consultation with those users/parties;**
- (96) Amazon Ads has tested the features internally and previewed the Pricing Transparency Reports and related user experience with a select group of Publishers. The main purpose of the engagement exercise was to obtain structured feedback from a set of representative EU customers on our proposed compliance measures for these DMA obligations. We included questions about how the customer perceived the usefulness of the solution and invited commentary on components or features those customers thought could be improved.
- (97) We have engaged with publishers, agencies, and an advertiser in relation to pricing transparency.
- j) any involvement of external consultants in the elaboration of the measure, including a description of the consultants' mission, whether they are independent from the Undertaking, a description of both their output and the methodology used to reach that output and, if applicable, an explanation of the reasons why the recommendations made by the external consultants were not followed;**
- (98) None.
- k) any alternative measures whose feasibility or implications has been assessed and the reasons for not choosing them and, in particular, where relevant (e.g., interoperability), the results of the evaluation of existing open standards and/or state of the art implementations and the reasons for not choosing them;**
- (99) Amazon Ads considered, as an alternative compliance measure, the introduction of a dashboard that would provide only average pricing metrics across all of Amazon Ad

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<sup>21</sup> This information should include a description of the methodology for the consultation.

products. Following engagement with several Amazon teams (e.g., sales and product teams), this option was not pursued further including as it would not have provided granular or bespoke data for Publishers. Another alternative option considered was the inclusion of certain pricing transparency metrics in a clean room environment (“**DMA Clean Room**”) which was developed to enhance our compliance with obligations under Article 6(8). Amazon Ads ultimately decided to not pursue this option because the APS Portal was better and more direct for Publishers.

**l) any action taken to inform end users and/or business users of the measure, their feedback; and any changes to the measure implemented on the basis of this feedback;**

(100) Since we added the Pricing Transparency Reports to the location where Publishers already accessed pricing information and reports, these were discoverable without widespread announcements. In February 2024, Amazon Ads also sent a communication to Publishers, informing them of new ads transparency features. The communication informed Publishers about the new Pricing Transparency Report and the means to access the new report.

(101) On 31 January 2024, Amazon Ads published a blogpost<sup>22</sup> regarding Amazon Ads’ compliance with the DMA, informing Advertisers and Publishers about upcoming changes introduced as of 6 March 2024 to comply with Articles 5(9), 5(10) and 6(8). On 7 March 2024, Amazon published posts and related materials on Amazon webpages<sup>23</sup> to inform end users and third parties about the DMA changes, including on Article 5(10).

(102) In addition, Amazon’s representatives participated in the public DMA compliance workshop organized by the Commission and presented Amazon’s compliance solution in relation to Article 5(10).

(103) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(10) is described under **Section 2.1.2.ii.i)** above.

**m) where applicable, the interaction with measures the Undertaking has implemented to ensure compliance with other obligations under Regulation (EU) 2022/1925;**

(104) The Article 5(10) obligation to provide pricing information to Publishers corresponds to the Article 5(9) obligation requiring Amazon Ads to provide the same to Advertisers. In light of the closely related nature of these two provisions, Amazon Ads developed the Pricing Transparency Reports by taking into account its obligations under both of these provisions.

**n) where applicable, all actions taken to protect integrity, security or privacy (e.g., data access, data retention policies) pursuant to the relevant provisions in Regulation (EU) 2022/1925 and why**

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<sup>22</sup> See blogpost titled *Amazon Ads and the Digital Markets Act*, <https://advertising.amazon.com/en-us/blog/amazon-ads-and-the-digital-markets-act>.

<sup>23</sup> See blogpost titled *Amazon and the Digital Markets Act*, <https://www.aboutamazon.eu/news/policy/amazon-and-the-digital-markets-act>.

**these measures are strictly necessary and justified and there are no less restrictive means to achieve these goals;**

(105) All Advertisers that do not provide their authorization are shown to Publishers in an “undisclosed” row within the Pricing Transparency Report for a particular day. This ensures the requirement to obtain and honor Advertiser consent is applied in a way that protects the Advertiser’s decision not to disclose their name or pricing information.

**o) any type of market analysis or testing (in particular A/B testing<sup>24</sup>), business user surveys or consumer surveys or end user consent rates,<sup>25</sup> that have been carried out to estimate the expected impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>26</sup>**

(106) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(10) is described under **Section 2.1.2.ii.i)** above.

**p) any type of market analysis or testing (in particular A/B testing), business user surveys or consumer surveys or end user consent rates, that have been or are expected to be carried out to evaluate the actual impact or evolution of the impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>27</sup>**

(107) The customer engagement with representative EU customers on our proposed compliance measures for Article 5(10) is described under **Section 2.1.2.ii.i)** above.

**q) a set of indicators which allow or will allow based on their future evolution the assessment of whether the measures implemented by the Undertaking to ensure compliance are ‘effective in achieving the objectives of this Regulation and of the relevant obligation’, as required by Article 8 of Regulation (EU) 2022/1925, including an explanation why the Undertaking considers these indicators to be the most suitable;**

(108) According to Recital 45, the legislative objective of Articles 5(9) and 5(10) is to increase the transparency of the conditions under which designated companies provide online advertising services to their business users (i.e., Advertisers and Publishers) by providing business users with additional information and knowledge about the conditions of the online advertising services they purchase.

(109) Prior to 6 March 2024, Amazon Ads already provided Advertisers and Publishers with access to detailed pricing information. To further meet the DMA requirements, Amazon Ads enhanced its existing reports and introduced new features, allowing business users

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<sup>24</sup> A/B testing is an experiment where the audience is randomly split to test a number of variations of a measure and determine which performs better. A/B testing and consumer surveys may be particularly well-suited to demonstrate: (i) compliance with obligations which include a change to an end-user interface and (ii) the absence of dark patterns, which could jeopardize the effectiveness of the proposed measure.

<sup>25</sup> End user consent rates refer to the percentage of end users who provided consent to the data processing for which end user consent is required under Regulation (EU) 2022/1925 (for instance Articles 5(2) and 6(10)).

<sup>26</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

<sup>27</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

to access the pricing information specified in Articles 5(9) and 5(10). By design, Amazon Ads' DMA ad pricing transparency compliance solution meets the legislative objective of the DMA and ensures that the conditions under which business users purchase online advertising services from Amazon Ads are transparent.

- r) **any relevant data<sup>28</sup> which can inform whether the measure is or will be effective in achieving the objectives of Regulation (EU) 2022/1925, such as, depending on the circumstances, data on the evolution of the number of active end users and active business users for the relevant core platform service and, for each relevant obligation, the interaction of end users with choice screens and consent forms, the amount of in-app purchases, the number of pre-installed defaults as well as yearly revenues from payments related to those pre-installed defaults, counts of end users who switch, counts of business users who obtain data access, etc. Provide an exact definition of the terms used and a detailed calculation explanation;**

(110) As noted in **Section 2.1.2.ii.q)** above, Amazon Ads' DMA ad pricing transparency compliance solution achieves the legislative objective of the DMA by design. Amazon provides below data which sets out the relevant downloads of the Pricing Transparency Reports and customer uptake of our compliance solution.

(111) Between 1 January and 31 December 2025, the Pricing Transparency Reports were downloaded [Confidential] times by Publishers (or their authorized third parties).

(112) As explained in **Section 2.1.2.i.B** above, Advertisers and Publishers use our identity and access management solution to grant authorized third parties' access to their Amazon Ads account. Between 1 January and 31 December 2025, [Confidential] Advertisers (or their authorized third parties) provided consent on the Amazon DSP campaign manager within the Ad Console for disclosing the Advertiser's account name and amounts it pays Amazon Ads with Publishers in the Pricing Transparency Report.

- s) **any internal systems and tools used to monitor the effectiveness of the measure and the output of such internal systems and tools;**

(113) Please refer to **Section 2.1.3** below for a description of the internal assessment conducted in relation to the ads pricing transparency compliance solution.

- t) **where applicable, when compliance requires granting third parties (e.g., business users), access to data, interfaces or other technical features of the service: describe the procedure for third parties to obtain such access (including how third parties will be informed of this possibility), the scope (including terms and conditions attached to the access), the format, and the frequency (e.g., real time) and any other relevant information (e.g., whether the shared data/interface or other technical**

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<sup>28</sup> Reported on a sufficiently disaggregated basis to be informative (for example, by reference to each business user) and, if applicable, per type of device.

**feature can be independently audited, data access policies, data retention policies and measures to enable secure data access).**

(114) The interfaces and procedure for Advertisers and Publishers to obtain access to data made available under Article 5(10) are described in **Section 2.1.2.i.B** above.

**2.1.3 A detailed explanation of how the Undertaking has assessed compliance with the obligation, including whether any assessment projects, such as external or internal audits have been carried out. For all such assessment projects, provide information about the identity and the role of the people involved and whether they are independent from the Undertaking, the assessment methodology and timeline for the relevant assessment project, and any output (e.g., audit reports or compliance plans).**

(115) Amazon Ads undertook an internal data assessment to evaluate the customer uptake of our DMA ads transparency compliance solution. Amazon provides the data collected in the course of this exercise in **Section 2.1.2.ii.r)** above.

(116) Amazon Ads instructed an external advisor to conduct an independent control assessment in relation to Amazon Ad's regulatory obligations and the corresponding compliance measures.

(117) The control assessment was conducted from January 2024 through May 2024, and covered Articles 5(9), 5(10), 6(5), 6(8), 6(9), 6(2) 6(10), and 11.

(118) Control assessment work performed by an external advisor included reviewing process workflows (visual aid of the control environment), control narratives (describes what are the controls), and obtaining sample evidence to understand the control environment.

**2.1.4 A list and description of any reports prepared by the head of the compliance function for the management body of the Undertaking in relation to Regulation (EU) 2022/1925 and, in particular, on risks of non-compliance within the meaning of Article 28(4) of Regulation (EU) 2022/1925 and of the management body's replies to those reports, including a list and description of the measures taken in response to those reports.**

(119) The head of the DCF provides periodic progress updates to the Board. Since 6 March 2024, there have been [Confidential] updates to the Board. The Board acknowledged these updates.

**2.1.5 A list and a summary of any feedback (e.g., complaints) of the Undertaking's business users established in the Union or end users established or located in the Union concerning the Undertaking's compliance with the obligations. Where this feedback exceeds ten (10) instances, please group them to the extent possible (e.g., per topic). Please**

**also provide an explanation of any action that the Undertaking has taken based on this feedback.<sup>29</sup>**

- (120) Amazon has received a few questionnaires from business users. This feedback did not concern Amazon Ads' compliance solutions but informed us of their expectations regarding DMA compliance. In response to these queries, we pointed these counterparties to relevant data, reports and features covered by the ad transparency obligations.

### **Regarding Article 6(2)**

- (121) Please refer to the Article 6(2) chapter in the Compliance Report.

### **Regarding Article 6(8)**

**2.1.1 The following statement confirming compliance with the obligation in line with Article 8(1) of Regulation (EU) 2022/1925: '*[Name of the Undertaking] confirms that as of [DATE] it has ensured compliance with the obligation laid down in Article [reference to the Digital Markets Act's Article/paragraph specifying the obligation] of Regulation (EU) 2022/1925.*'**

- (122) Amazon confirms that from 6 March 2024, it complied with the obligations laid down in Article 6(8) for Amazon Ads.

**2.1.2 An exhaustive explanation of how the Undertaking complies with the obligation, including any supporting data<sup>30</sup> and internal documents. Please provide a detailed description of any measures that ensure such compliance, indicating whether such measures were already in place pre-designation or if they were implemented post-designation.**

**The description of all the above-mentioned measures must enable the Commission to verify whether the Undertaking has demonstrated compliance pursuant to Article 8(1) of Regulation (EU) 2022/1925 and should, at a minimum, include:**

- i) an explanation on how the Undertaking complies with the obligation based on all measures that were already in place pre-designation or that the Undertaking has implemented post-designation, and**

- (123) Article 6(8) requires Amazon Ads to provide free of charge access to its performance measurement tools and the data necessary for Advertisers and Publishers (as well as their authorized third parties) to carry out their own independent verification of their online ads.

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<sup>29</sup> The Undertaking should ask about and respect the decision of the company submitting feedback to preserve the anonymity of its submission or to keep certain parts confidential. The Undertaking should inform the Commission of any such anonymity or confidentiality requests. In any case, the Undertaking should describe any actions taken based on the relevant feedback in a non-confidential form.

<sup>30</sup> The Undertaking shall have any underlying raw data ready to be made available to the Commission in the event the Commissions requests this raw data.

- (124) Prior to 6 March 2024, Amazon Ads already provided Advertisers and Publishers with access to aggregated data and extensive online reporting to review ad performance, with each ad type having its own reporting capabilities. Amazon Ads considers that the reporting for Publishers previously in place already met the DMA performance transparency requirements (**Section 2.1.2.i.A.a** and **Section 2.1.2.A.b** below).
- (125) Amazon Ads has introduced further compliance measures to enhance performance transparency for Advertisers. Amazon Ads launched a DMA Clean Room for Advertisers to access performance data about their ad campaigns (**Section 2.1.2.i.B** below). The DMA Clean Room provides tools for independent verification by Advertisers who are able to run their own queries on Amazon Ads data to understand the success and impact of their ad campaigns.

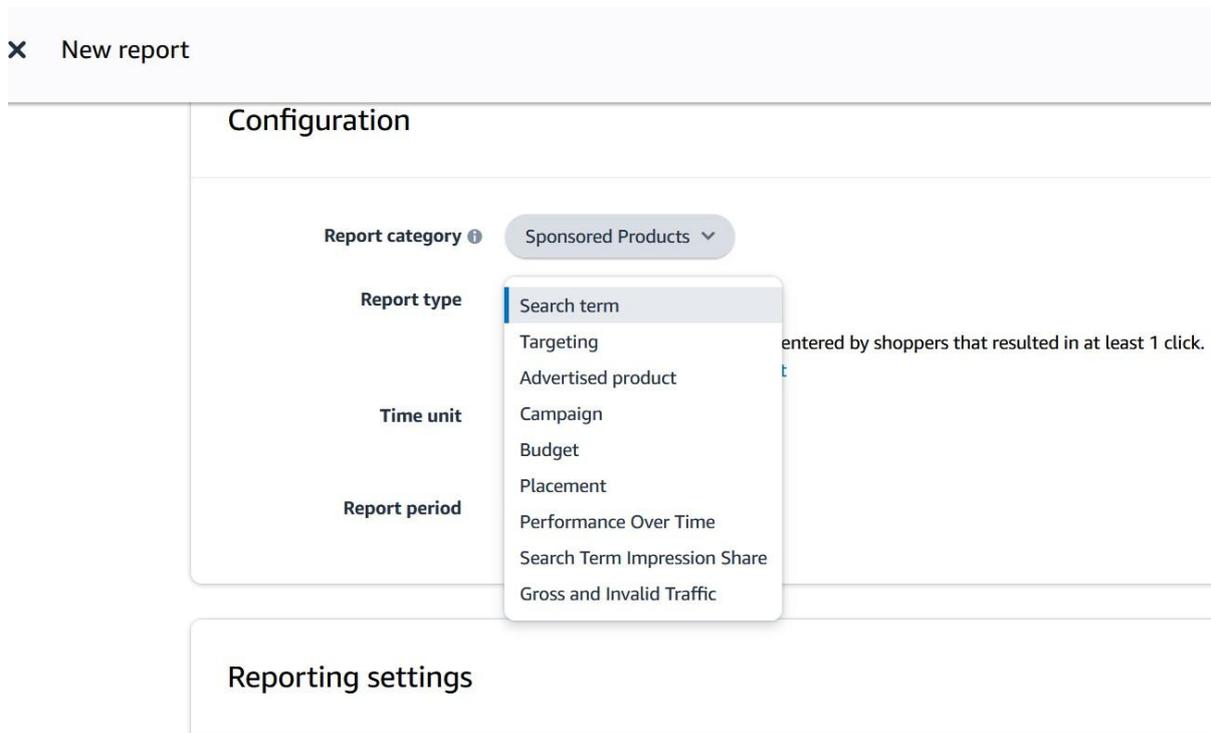
**A. Previously existing performance transparency for Advertisers**

- (126) Prior to 6 March 2024, Amazon Ads already provided Advertisers with access to extensive reporting in order to review performance of the ads they buy from us, with each ad product having its own specific reporting and tools in place. These features addressed the requirement to provide “*access to the performance measuring tools*” and the data necessary for Advertisers “*to carry out their own independent verification.*” Amazon Ads already provided Advertisers with daily, near-real time access to aggregated information on how often their ads is served to consumers (i.e., impressions) or clicked by consumers.

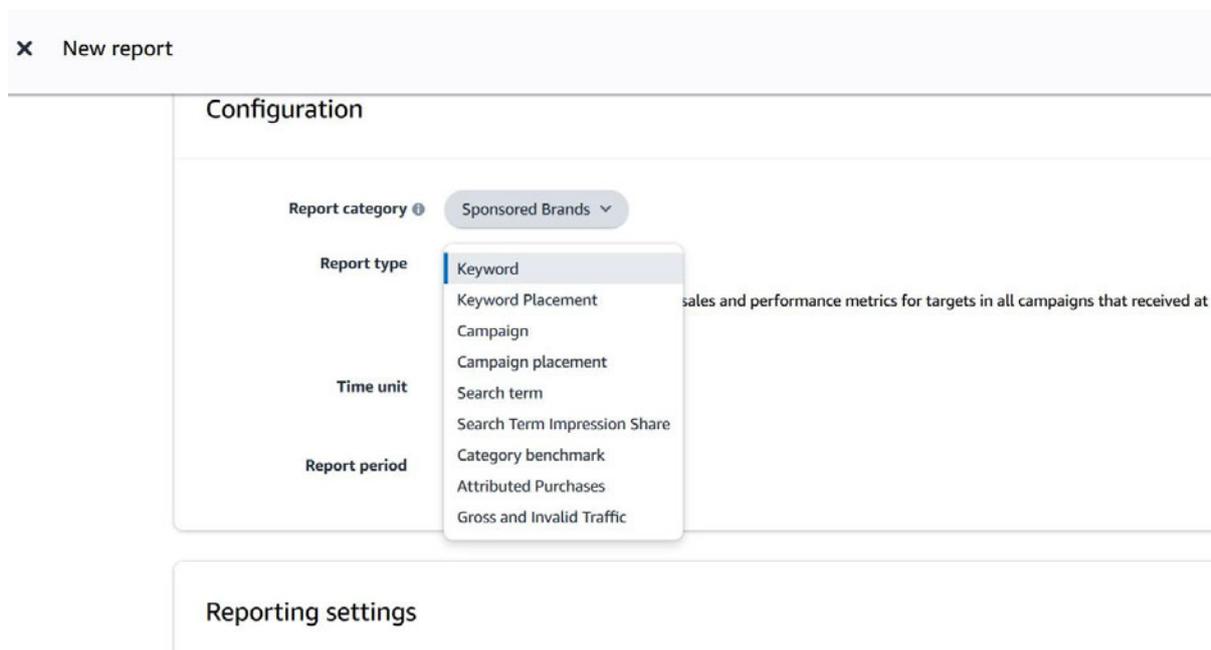
**a. Sponsored Ads**

- (127) By way of example, Advertisers purchasing Sponsored Ads already have access to multiple forms of reporting to assesses ad performance, including:
- Campaign report: this report provides insights across different placement types and identifies campaigns that could benefit from a bid adjustment.
  - Targeting report: this report gives sales and performance metrics for the keywords Advertisers have selected by product and product categories for any ads campaigns that received at least one impression.
  - Advertised product report: this report gives sales and performance insights for advertised products that served at least one impression.
- (128) We have provided examples of the Sponsored Ads reporting interfaces in **Figure 13–Figure 15** below. **Figure 16** is an example of a report.

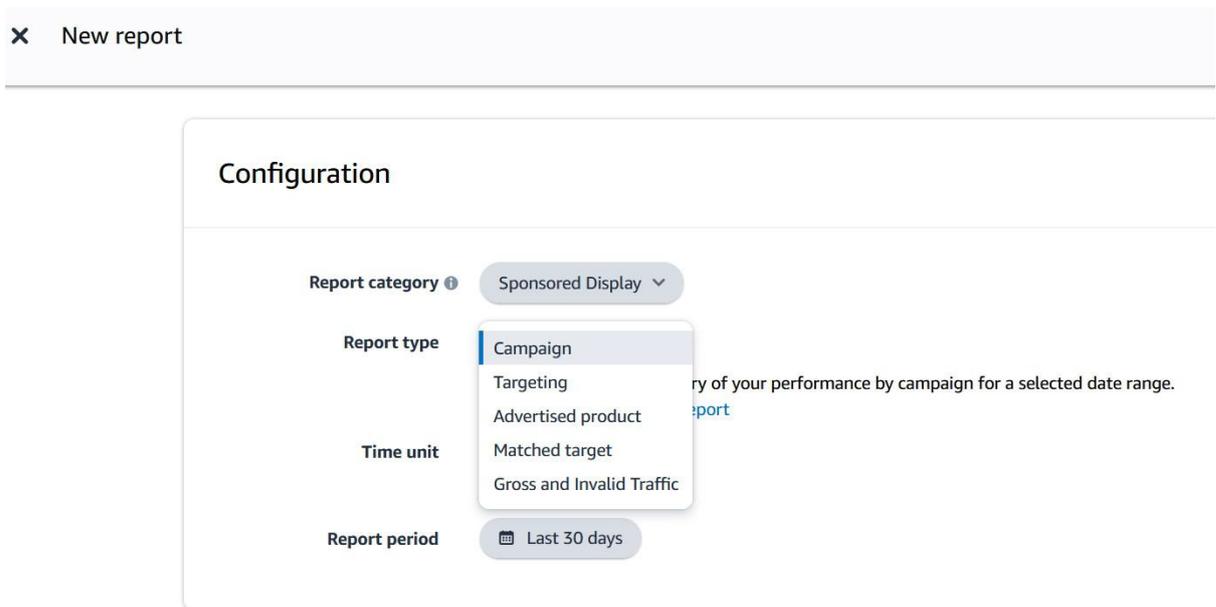
**Figure 13 – Sponsored Product reporting interface**



**Figure 14 – Sponsored Brand reporting interface**



**Figure 15 – Sponsored Display reporting interface**



**Figure 16 – Sponsored Ads campaign report**

Currency	Campaign Name	Cost Type	Impressions	Viewable Impressions	Clicks	Click-Thru Rate (CTR)	View-Through Rate (VTR)	Click-Through Rate for Views (vCTR)	Video First Quartile Views	Video Midpoint Views	Video Third Quartile Views	Video Complete Views	Video Unmutes	5 Second Views	5 Second View Rate
EUR															
EUR															
EUR															
EUR															

**b. Ads sold via the Amazon DSP**

(129) Advertisers buying via the Amazon DSP can obtain reports containing over [Confidential] metrics through the Amazon Ads Console. Advertisers can make a one-time request for these reports or set up a recurring cadence for reports. **Figure 17** shows the Amazon DSP reporting interface, and an example report in respect of ads sold via Amazon DSP is shown in **Figure 18**.

Figure 17 – Amazon DSP reporting interface

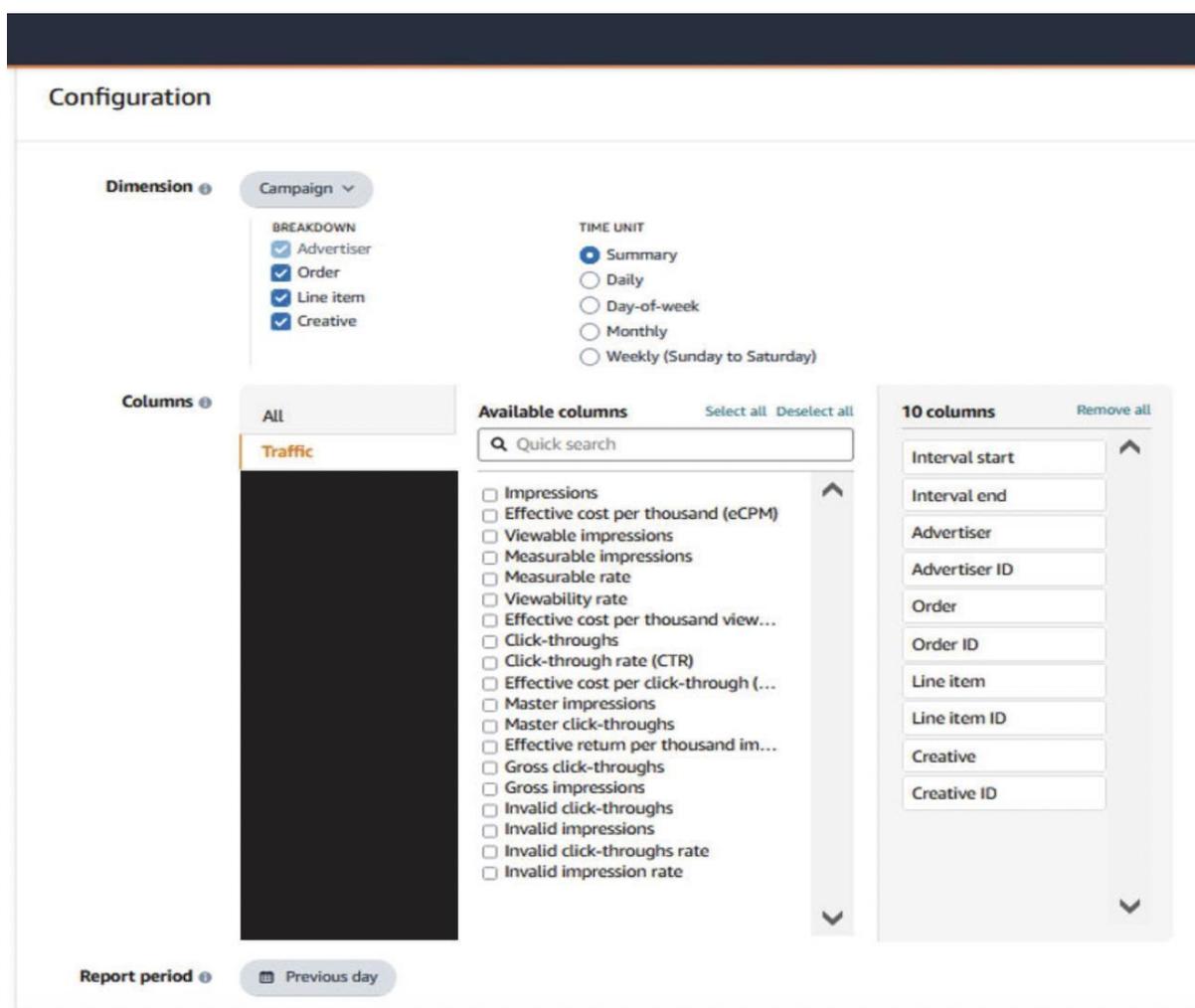


Figure 18 – Amazon DSP traffic report

Interval start	Interval end	Advertiser	Advertiser ID	Order	Order ID	Line item	Line item ID	Creative	Creative ID
Nov 07, 2023	Nov 07, 2023	[ES] Test1	576947537534034240	!Test1	594222057065995632	Testline1	587179478583924718	CreativeTest1	582883556501963372
Nov 07, 2023	Nov 07, 2023	[ES] Test2	576947537534034240	!Test2	594222057065995632	Testline2	591832872207797820	CreativeTest2	582883556501963372
Nov 07, 2023	Nov 07, 2023	[ES] Test3	583981698220782432	!Test3	591503547508796533	Testline3	589296665221580156	CreativeTest3	587815941124055474
Nov 07, 2023	Nov 07, 2023	[ES] Test4	581963062387128841	!Test4	589415307790706978	Testline4	592795822969379617	CreativeTest4	586359642894177245
Viewable impressions	Measurable impressions	Measurable rate	Viewability rate	CTR	eCPC	eRPM	Total eRPM	Gross click-throughs	Gross impressions
140	798	89.3617%	17.5439%	0.0000%		0.00 €	0.00 €	0	893
21	134	93.0556%	15.6716%	0.0000%		0.00 €	0.00 €	0	148
2420	2858	93.8280%	84.6746%	0.0985%		£1.25	£0.00	11	3050
51	70	93.3333%	72.8571%	0.0000%		£0.00	£0.00	0	75
Invalid click-throughs	Invalid impressions	Invalid click-throughs rate	Invalid impression rate	eCPM					
0	0		0.0000%	0.41 €					
0	4		2.7027%	2.58 €					
8	4	72.7273%	0.1311%	£1.24					
0	0		0.0000%	£1.55					

(130) Advertisers buying Sponsored Ads or other ads via the Amazon DSP can also use our Amazon Attribution and Amazon Marketing Cloud services to measure the effectiveness of their ad campaigns. This enables Advertisers to run custom audience and campaign analytics, using their own data and third-party data, all in a privacy-safe

manner. Advertisers use the aggregate consumer insights generated from these analytics to develop better informed marketing and sales strategies for their products.

### B. Previously existing performance transparency for Publishers

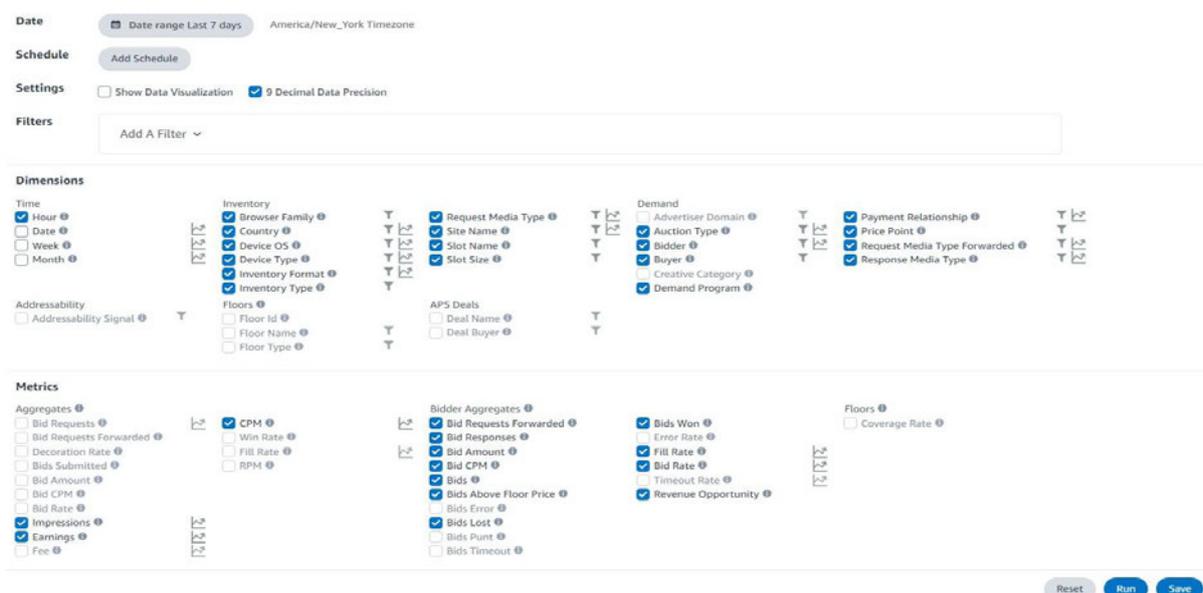
(131) Prior to 6 March 2024, Amazon Ads already provided free of charge daily and hourly aggregate data to Publishers and their authorized third parties in the APS Portal including via APIs. Publishers also had access to log level data from their third-party Publisher ad servers, as an additional source of verification against the data provided by Amazon Ads. Through the APS Portal, Publishers can access bid information and impression data (the basis for which they are paid) to compare against their own ad server reporting. Publishers are also required by contract with Amazon Ads to verify their performance in APS against their third-party ad server. As a result of all Amazon Ads already had in place for its Publisher customers, verification can be achieved using previously existing features and data.

(132) Specifically, Publishers and their authorized third parties were already able to:

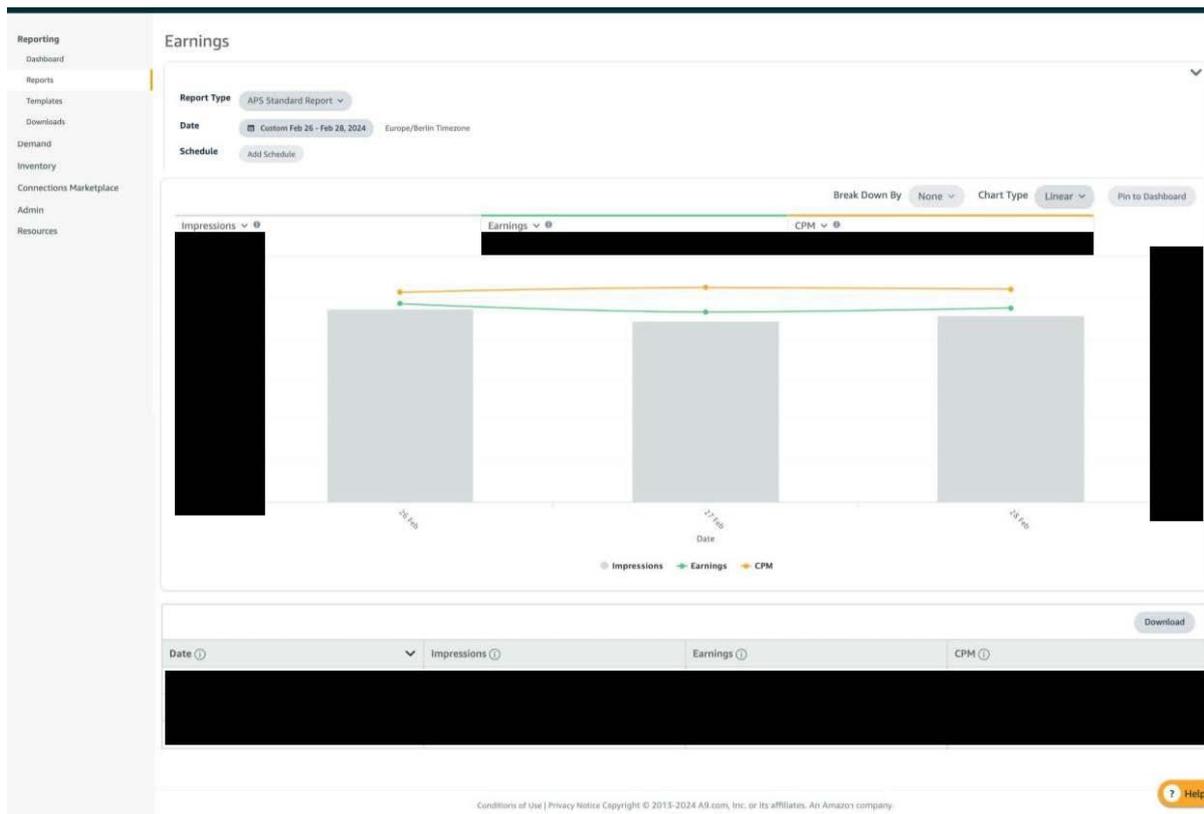
- View, save, and share ad inventory data (e.g., bids lost, bids won, bids submitted, win rate, fill rate) for their third-party Publisher locations available at ad type (e.g., video, audio, display) and slot level (e.g., ad placement on the website).
- Run and download .csv reports from the APS Portal, using tools and software like Excel to better understand the data provided in the reports. Publishers may also schedule reports to an Amazon Web Services location (known as an S3 bucket), where they can use tools to export and explore the ad inventory data.

(133) **Figure 19** shows the APS Portal reporting interface and categories of reports that are available to Publishers, and **Figure 20** and **Figure 21** are example APS reports.

**Figure 19 – APS Portal reporting interface**



**Figure 20 – APS earnings report**



**Figure 21 – APS Ads inventory data download (customized report)**

Advertiser Family	Country	Device OS	Device Type	Inventory Format	Inventory Type	Placement/Order Type	Site Name	Deal Name	Buyer	Advertiser Program	Payment Relationship	Price Point	Placement Media Type	Response Media Type	Impressions	Earnings	CPM	Bid Amounts Forwarded	Bid Amounts	Bid Amount	Bid CPM	Bid	Bid Above Floor Price	Bid Loss	Bid Won	Fill Rate	Bid Rate	Revenue Opportunity	
Chrome	Mobile	US	Android	Phone	Unknown	Web	Display	testsite	story-ad-2	Buyer1	TAM	TAM	3.35	Display	Display	5	0.0169	3.374	315	315	0.501489	1.592029	315	315	297	48	1.5873	100	0.1608
Chrome	Mobile	US	Mac	PC	Unknown	Web	Display	testsite	story-ad-4	Buyer2	TAM	TAM	1.2	Display	Unknown	0	0	0	437	0	0	0	0	0	0	0	0	0	
Edge	Mobile	US	Windows	PC	Unknown	Web	Display	testsite	story-ad-8	Buyer3	TAM	TAM	6	Display	Display	0	0	0	13	13	0.037183	2.860231	13	11	12	1	0	100	0.006

(134) Amazon Ads considers that the reporting and tools for Publishers available before 6 March 2024 already meet the DMA performance transparency requirements. The incremental compliance measures described below focus on Advertisers’ transparency needs.

**C. User experience for Advertisers implemented by 6 March 2024**

**a. Overview**

(135) Amazon Ads provides additional performance information and tools to Advertisers as well as their authorized third parties. For the purposes of complying with Article 6(8), Amazon Ads launched the DMA Clean Room that is made available to Advertisers. The DMA Clean Room provides tools for independent verification by enabling Advertisers and their authorized third parties to run queries on the data made accessible via the DMA Clean Room.

**b. Type of performance data**

(136) In the DMA Clean Room, Advertisers can produce reports to verify that what that Advertiser paid for is actually delivered. Amazon Ads charges Advertisers based on

consumer ad clicks and impressions. Advertisers are able to access the following categories of data in the DMA Clean Room (with privacy aggregation thresholds):

- Ad viewability: this represents the number of times an ad was counted as “viewable”. An ad is counted as “viewable” when at least 50% of the ad shows on screen for one second or longer. For the viewability of audio and video ads, Amazon Ads provides start, progress, and complete rates. An ad needs to be viewable in order for a click or impression to occur.
- Ad clicks: this represents the number of times the ad was clicked. A traffic quality filter removes the potentially fraudulent, non-human, and other illegitimate clicks. This data is relevant to billable performance where the Advertiser is billed on a cost per click (“CPC”) basis e.g., for Sponsored Products.
- Ad impressions: this represents the number of times the ad was displayed. A traffic quality filter removes the potentially fraudulent, non-human, and other illegitimate impressions. This data is relevant to billable performance where the Advertiser is billed on a Cost Per Mille (“CPM”) basis.
- Invalid traffic: this represents ad viewability, clicks, and impressions that were removed by Amazon Ads’ traffic quality filter. This includes potentially fraudulent, non-human, and other illegitimate traffic. Advertisers are not billed for invalid traffic. We include an “invalid” flag against illegitimate ad clicks and impressions in the DMA Clean Room.

### *c. DMA Clean Room*

(137) The DMA Clean Room has been built as a stand-alone, privacy-safe solution. Advertisers can use the DMA Clean Room to achieve the following:

- Produce reporting and analytics on ad performance data. The DMA Clean Room provides access to event-grain traffic data (e.g., clicks and impressions with aggregation thresholds). Additional data points are provided for audio and video ads for audio/video quartile views and audio/video complete views. This data is available for ads served by Amazon DSP as well as Sponsored Ads.
- Data is available in subject area specific data views (e.g., Amazon DSP Impressions, Amazon DSP Invalid Impressions). Standard SQL queries can be written to analyze the data in each of these views. These SQL queries are executed via an API call to the DMA Clean Room. The Advertiser receives a .csv report where they can use tools like Excel to better understand the data.
- Advertisers are able to invite authorized third parties of their choice to use the DMA Clean Room on their behalf or share the results of DMA Clean Room ad performance reports with third parties.

(138) Advertisers are able to develop and run their own queries within defined parameters and generate reporting over all the data made available in the DMA Clean Room. For example, an Advertiser could run a query for gross impressions for a specific campaign measured during a specific time period. In this example, the DMA Clean Room counts the total number of impressions by ad campaign using measurement dimensions for the

ad traffic that the Advertiser would find in any of the other reporting surfaces they use. The Advertiser can use this report to confirm if the amount they paid for an ad matches the number of valid clicks or impressions served.

- (139) Similar queries can be written to count ad clicks and viewability, measure or calculate the value of the number of ad click-throughs relative to the number of impressions (“CTR”) to further analyze the performance of their ads. By way of another example, an Advertiser could run a query for invalid ad clicks, or invalid impressions. This report enables the Advertiser or their authorized third party (including a verification vendor) to review the invalid traffic decisions from Amazon Ads.
- (140) Using this data, Advertisers can compute aggregates to compare them against other reporting (including billing) data for the same campaign they have access to from Amazon Ads or other ad services.

**d. Experience for accessing the performance data**

- (141) Advertisers have access to the DMA Clean Room API in addition to previously existing reporting. Any Advertiser with reporting access to one or more of our ad serving products is able to call the API and receive a .csv file in relation to their ad campaigns. In order to be eligible to receive the file, the requestor must: (i) be an authenticated user; (ii) be authorized for access to the Advertiser account they would like to run performance reporting on; and (iii) have ads served to consumers in the EU. If their request passes these eligibility checks, then the API will return relevant results in a report. This API report has detailed information on all public views including a data dictionary and example queries so that Advertisers can easily work with the DMA Clean Room API. **Figure 22** below shows an example of such a report containing performance events, e.g., aggregate consumer clicks and impressions. This sample report has been manually formatted for this document for ease of review. Advertisers can query data views to build their own customized reports on the event-grain data.

**Figure 22 – DMA Clean Room Report**

Sample Report - Sponsored Ads - Valid Traffic 30 min window						
Advertiser ID	Campaign ID	Valid Clicks	Valid Impressions	Valid Views	Start Date Time	End Date Time
ADTest123	CTest123-XYZ	1451	13411	10123	10/19/2023 17:21	10/19/2023 17:51
Sample Report - Sponsored Ads - Invalid Traffic 60 min window						
Advertiser ID	Campaign ID	Invalid Clicks	Invalid Impressions	Invalid Views	Start Date Time	End Date Time
ADTest204	CTest204-ABC	28	124	35	10/19/2023 17:21	10/20/2023 17:51
Sample Report – Amazon DSP – Valid Clicks for multiple campaigns 30 min window						
Advertiser ID	Campaign ID	Valid Clicks	Start Date Time	End Date Time		
DSPTest123	CTest304-ABD	23	10/19/2023 17:21	10/19/2023 17:51		
DSPTest123	CTest305-ABD	21	10/19/2023 17:21	10/19/2023 17:51		
Sample Report – Amazon DSP – Invalid Impressions for multiple campaigns 1 day window						
Advertiser ID	Campaign ID	Invalid Impressions	Start Date Time	End Date Time		
DSPTest123	DTest304-ABD	12	10/19/2023 17:21	10/20/2023 17:51		
DSPTest123	DTest305-ABD	5	10/19/2023 17:21	10/20/2023 17:51		

*e. New invalid traffic verification feature in the DMA Clean Room*

- (142) To further enhance the customer experience, Amazon Ads launched a new third-party invalid traffic (“IVT”) feature in the DMA Clean Room on 13 November 2024. This new feature allows Advertisers to directly engage with third-party vendors, to compare the data points that the third-party measurement vendor deems to indicate invalid traffic against the equivalent IVT data Amazon Ads provides access to through the DMA Clean Room. This new solution serves as an additional source of verification against the data provided by Amazon Ads.
- ii) **specific information (including, if applicable, data points, visual illustrations and recorded demos<sup>31</sup>) for each measure implemented in the context of Regulation (EU) 2022/1925, regarding:**
- a) **the relevant situation prior to the implementation of the measure and how the newly introduced measure ensures compliance with the obligations laid down in Articles 5 to 7 of Regulation (EU) 2022/1925;**
- (143) The previously existing performance transparency solutions which Amazon Ads made available to Advertisers and Publishers prior to 6 March 2024 are described under **Section 2.1.2.i.A** and **Section 2.1.2.i.B** above.
- (144) Prior to 6 March 2024, Amazon Ads already provided Advertisers with access to extensive reporting in order to review performance of the ads they buy from us, with each ad product having its own specific reporting and tools in place. These features addressed the requirement to provide “*access to the performance measuring tools*” and the data necessary for Advertisers “*to carry out their own independent verification.*” Amazon Ads already provided Advertisers with daily, near-real time access to aggregated information on how often their ads is served to consumers (i.e., impressions) or clicked by consumers.
- (145) Prior to 6 March 2024, Amazon Ads already provided daily and hourly aggregate data to Publishers and their authorized third parties in the APS Portal including via APIs. Publishers also had access to log level data from their third-party Publisher ad servers, as an additional source of verification against the data provided by Amazon Ads. Through the APS Portal, Publishers can access bid information and impression data (the basis for which they are paid) to compare against their own ad server reporting. Publishers are also required by contract with Amazon Ads to verify their performance in APS against their third-party ad server. As a result of all Amazon Ads already had in place for its Publisher customers, verification can be achieved using previously existing features and data.
- (146) Specifically, Publishers and their authorized third parties were already able to:
- View, save, and share ad inventory data (e.g., bids lost, bids won, bids submitted, win rate, fill rate) for their 3P Publisher locations available at ad type (e.g., video, audio, display) and slot level (e.g., ad placement on the website).

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<sup>31</sup> For example, this may be particularly relevant to illustrate changes impacting user journeys.

- Run and download .csv reports from the APS Portal, using tools and software like Excel to better understand the data provided in the reports. Publishers may also schedule reports to an Amazon Web Services location (known as an S3 bucket), where they can use tools to export and explore the ad inventory data.

(147) Amazon Ads considers that the pre-existing reporting and tools for Publishers meet the DMA performance transparency requirements. The incremental compliance measures described below focus on Advertisers' transparency needs. For the purposes of complying with Article 6(8), Amazon Ads launched the DMA Clean Room that is being made available to Advertisers. The DMA Clean Room provides tools for independent verification by enabling Advertisers and their authorized third parties to run queries on the data made accessible via the DMA Clean Room. The DMA Clean Room is described in further detail in **Section 2.1.2.i.C** above.

**b) when the measure was implemented;**

(148) The compliance measures described in **Section 2.1.2.i)** above, were implemented before 6 March 2024.

**c) the scope of the measure in terms of the products/services/devices covered;**

(149) The scope of the measures ensuring Amazon Ads' compliance with Article 6(8) is described in **Sections 2.1.2.i.A, B and C** above.

**d) the geographic scope of the measure (e.g., if the implementation of the measure extends beyond the EEA, please specify);**

(150) Amazon has implemented the measures to comply with Article 6(8) in the EU.

**e) any technical/engineering changes that were made in connection with the implementation of the measure concerned (e.g., on data flows and internal data usage policies, security aspects, tracking of new metrics, Application Programming Interfaces (APIs), operation system (OS) functionalities, parameters of ranking algorithms and methodologies used to rank, classify or make results more prominent, or parameters of online advertising auctions);**

(151) The technical changes made in connection with the implementation of the measures implemented post-designation to enhance our compliance with the obligations in Article 6(8) are described in **Section 2.1.2.i.C** above.

**f) any changes to the customer experience made in connection with the implementation of the measure concerned (e.g., changes in the customer interface, choice screens,<sup>32</sup> consent**

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<sup>32</sup> For instance, the specific design of the choice screen, what information is prompted to the users in the choice screen, including the consequences of making a selection; the users to which the choice screen is shown and when.

**forms,<sup>33</sup> warning messages, system updates, functionalities available, or customer journey to access functionalities<sup>34</sup>;**

(152) The customer facing features introduced in connection with the implementation of the measures to comply with Article 6(8) are described in **Section 2.1.2.ii** above.

**g) any changes to (i) the remuneration flows in connection with the use of the Undertaking's core platform service (e.g., fee structure, level of the fees, revenue share for the relevant service(s), introduction of new fees, provisions and practices related to the business users' pricing policy, other remuneration flows between the Undertaking and the business users or end users, as applicable) and (ii) the other terms and conditions provided to end users and business users (or individually negotiated agreements with business and/or end users), or where applicable, changes to existing terms and conditions, required by the implementation of the measure concerned (e.g., privacy policy, conditions for access and interoperability and any other relevant clauses);**

(153) The solutions implemented and provided by Amazon Ads to comply with Article 6(8) are available to Advertisers and Publishers to access free of charge. Amazon has maintained remuneration flows in connection with the use of Amazon Ad's online advertising services in the Article 6(8) context.

**h) any other relevant changes made in connection with the implementation of the measure concerned not covered by points e) to g) above;**

(154) All relevant changes made in connection with the implementation of the new measures to comply with Article 6(8) are described in the above Sections.

**i) any consultation<sup>35</sup> with end users, business users and/or any interested parties that has been carried out in the context of (i) the elaboration of the measure and/or (ii) the implementation of the measure, and how the input of these consulted parties has been taken into account. Provide a list of end users, business users and/or any interested parties consulted in this context and a high-level description of the topic of the consultation with those users/parties;**

(155) Amazon Ads has reviewed the data attributes to be made available via the DMA Clean Room by benchmarking against solutions provided by comparable service providers.

(156) Amazon Ads tested the features internally and previewed the DMA Clean Room API and related functionality with a select group of Advertisers. The main purpose of the engagement exercise was to obtain structured feedback from a set of representative EU

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<sup>33</sup> This applies to all types of consent required under Regulation (EU) 2022/1925, regardless of whether this is via a "form" or any other format.

<sup>34</sup> The Undertaking must provide a click-by-click description of the end user's interaction with the user interface. The Undertaking may submit visual illustrations and/or recorded demos.

<sup>35</sup> This information should include a description of the methodology for the consultation.

customers on our proposed compliance measures for these DMA obligations. We included questions about how the customer perceived the usefulness of the solution and invited commentary on components or features those customers thought could be improved.

- j) any involvement of external consultants in the elaboration of the measure, including a description of the consultants' mission, whether they are independent from the Undertaking, a description of both their output and the methodology used to reach that output and, if applicable, an explanation of the reasons why the recommendations made by the external consultants were not followed;**

(157) None.

- k) any alternative measures whose feasibility or implications has been assessed and the reasons for not choosing them and, in particular, where relevant (e.g., interoperability), the results of the evaluation of existing open standards and/or state of the art implementations and the reasons for not choosing them;**

(158) None.

- l) any action taken to inform end users and/or business users of the measure, their feedback; and any changes to the measure implemented on the basis of this feedback;**

(159) On 31 January 2024, Amazon Ads published a blogpost<sup>36</sup> regarding Amazon Ads' compliance with the DMA, informing Advertisers and Publishers about upcoming changes introduced as of 6 March 2024 to comply with Articles 5(9), 5(10) and 6(8). On 7 March 2024, Amazon published posts and related materials on Amazon webpages<sup>37</sup> to inform end users and third parties about the DMA changes, including on Article 6(8). In addition, Amazon's representatives participated in the public DMA compliance workshop organized by the Commission and presented Amazon's compliance solution in relation to Article 6(8).

(160) The customer engagement with representative EU customers on our proposed compliance measures for Article 6(8) is described under **Section 2.1.2.ii.i)** above.

- m) where applicable, the interaction with measures the Undertaking has implemented to ensure compliance with other obligations under Regulation (EU) 2022/1925;**

(161) Not applicable.

- n) where applicable, all actions taken to protect integrity, security or privacy (e.g., data access, data retention policies) pursuant to the relevant provisions in Regulation (EU) 2022/1925 and why**

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<sup>36</sup> See blogpost titled *Amazon Ads and the Digital Markets Act*, available at: <https://advertising.amazon.com/en-us/blog/amazon-ads-and-the-digital-markets-act>.

<sup>37</sup> See blogpost titled *Amazon and the Digital Markets Act*, available at <https://www.aboutamazon.eu/news/policy/amazon-and-the-digital-markets-act>.

**these measures are strictly necessary and justified and there are no less restrictive means to achieve these goals;**

(162) Amazon uses privacy aggregation rules to protect our customers' privacy and to prevent bad actors from being able to understand how our invalid traffic detection works ("reverse engineering"). Our compliance solution is designed in a way that does not include pricing data at the view/click/impression level as this could allow bad actors to reverse engineer our proprietary invalid traffic techniques and increase the risk of data leakage and abuse.

**o) any type of market analysis or testing (in particular A/B testing<sup>38</sup>), business user surveys or consumer surveys or end user consent rates,<sup>39</sup> that have been carried out to estimate the expected impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>40</sup>**

(163) The customer engagement with representative EU customers on our proposed compliance measures for Article 6(8) is described under **Section 2.1.2.ii.i)** above.

**p) any type of market analysis or testing (in particular A/B testing), business user surveys or consumer surveys or end user consent rates, that have been or are expected to be carried out to evaluate the actual impact or evolution of the impact of the measure on the objectives of Regulation (EU) 2022/1925;<sup>41</sup>**

(164) The customer engagement with representative EU customers on our proposed compliance measures for Article 6(8) is described under **Section 2.1.2.ii.i)** above.

**q) a set of indicators which allow or will allow based on their future evolution the assessment of whether the measures implemented by the Undertaking to ensure compliance are 'effective in achieving the objectives of this Regulation and of the relevant obligation', as required by Article 8 of Regulation (EU) 2022/1925, including an explanation why the Undertaking considers these indicators to be the most suitable;**

(165) According to Recital 58, the legislative objective of Article 6(8) is to increase the transparency of the conditions under which designated companies provide online advertising services to their business users (i.e., Advertisers and Publishers) by providing business users with additional information about the effect of a given advertisement. By providing business users, and their authorized third parties, with performance measuring tools and data to carry out their own independent verification

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<sup>38</sup> A/B testing is an experiment where the audience is randomly split to test a number of variations of a measure and determine which performs better. A/B testing and consumer surveys may be particularly well-suited to demonstrate: (i) compliance with obligations which include a change to an end-user interface and (ii) the absence of dark patterns, which could jeopardize the effectiveness of the proposed measure.

<sup>39</sup> End user consent rates refer to the percentage of end users who provided consent to the data processing for which end user consent is required under Regulation (EU) 2022/1925 (for instance Articles 5(2) and 6(10)).

<sup>40</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

<sup>41</sup> The full methodology for any analysis, testing or survey shall be included in the Compliance Report.

of the provision of the relevant online advertising services, the DMA aims to increase transparency for business users, further enhance fairness, and promote contestability of online advertising services.

(166) Prior to 6 March 2024, Amazon Ads already provided Advertisers and Publishers with reporting and tools, enabling them to review performance of Amazon Ads' provision of the relevant online advertising services. To further meet the DMA requirements in relation to Advertisers, Amazon Ads launched the DMA Clean Room. By design, Amazon Ads' existing reporting and tools, and specific solutions developed to ensure compliance with the DMA ad performance transparency obligations, meet the legislative objective of the DMA. Our ad performance transparency solutions enable our business users to evaluate the effect of a given advertisement and ensure that the conditions under which we provide online advertising services to business users are transparent.

- r) **any relevant data<sup>42</sup> which can inform whether the measure is or will be effective in achieving the objectives of Regulation (EU) 2022/1925, such as, depending on the circumstances, data on the evolution of the number of active end users and active business users for the relevant core platform service and, for each relevant obligation, the interaction of end users with choice screens and consent forms, the amount of in-app purchases, the number of pre-installed defaults as well as yearly revenues from payments related to those pre-installed defaults, counts of end users who switch, counts of business users who obtain data access, etc. Provide an exact definition of the terms used and a detailed calculation explanation;**

(167) As noted in **Section 2.1.2.ii.q)** above, Amazon Ads' DMA ad performance transparency compliance solution achieves the legislative objective of the DMA by design. Amazon provides below data which sets out the customer uptake of our compliance solution.

(168) As explained in **Section 2.1.2.ii)** above, Amazon Ads already provided Advertisers and Publishers with access to aggregated data and extensive online reporting to review ad performance, with each ad type having its own reporting capabilities. Advertisers and their authorized third parties can now also use the DMA Clean Room for independent verification. The below sets out the relevant access by Advertisers and Publishers:

- Between 1 January and 31 December 2025, [Confidential] requests were made to the Traffic Events API (through which the DMA Clean Room data sets are accessed) by Advertisers (or their authorized third parties). Multiple requests may be made by the same Advertiser (or their authorized third parties); and
- Between 1 January and 31 December 2025, the following number of Publishers (or their authorized third parties) ran reports using the APS standard reporting on performance transparency. The following numbers relate to unique Publishers each month and do not include multiple reports run by the same Publisher (or their authorized third parties): January ([Confidential]), February ([Confidential]),

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<sup>42</sup> Reported on a sufficiently disaggregated basis to be informative (for example, by reference to each business user) and, if applicable, per type of device.

March ([Confidential]), April ([Confidential]), May ([Confidential]), June ([Confidential]), July ([Confidential]), August ([Confidential]), September ([Confidential]), October ([Confidential]), November ([Confidential]) and December ([Confidential]).

- s) **any internal systems and tools used to monitor the effectiveness of the measure and the output of such internal systems and tools;**

(169) Please refer to **Section 2.1.3** below for a description of the internal assessment conducted in relation to the ads pricing transparency compliance solution.

- t) **where applicable, when compliance requires granting third parties (e.g., business users), access to data, interfaces or other technical features of the service: describe the procedure for third parties to obtain such access (including how third parties will be informed of this possibility), the scope (including terms and conditions attached to the access), the format, and the frequency (e.g., real time) and any other relevant information (e.g., whether the shared data/interface or other technical feature can be independently audited, data access policies, data retention policies and measures to enable secure data access).**

(170) The interfaces and procedure for Advertisers and Publishers to obtain access to data made available under Article 6(8) are described in **Section 2.1.2.ii)** above.

**2.1.3 A detailed explanation of how the Undertaking has assessed compliance with the obligation, including whether any assessment projects, such as external or internal audits have been carried out. For all such assessment projects, provide information about the identity and the role of the people involved and whether they are independent from the Undertaking, the assessment methodology and timeline for the relevant assessment project, and any output (e.g., audit reports or compliance plans).**

(171) Amazon Ads undertook an internal data assessment to evaluate the customer uptake of our DMA ads transparency compliance solution. Amazon provides the data collected in the course of this exercise in **Section 2.1.2.ii.r)** above.

(172) Amazon Ads instructed an external advisor to conduct an independent control assessment in relation to Amazon Ad's regulatory obligations and the corresponding compliance measures.

(173) The control assessment was conducted from January 2024 through May 2024, and covered Articles 5(9), 5(10), 6(5), 6(8), 6(9), 6(2) 6(10), and 11.

(174) Control assessment work performed by an external advisor included reviewing process workflows (visual aid of the control environment), control narratives (describes what are the controls), and obtaining sample evidence to understand the control environment.

**2.1.4 A list and description of any reports prepared by the head of the compliance function for the management body of the Undertaking in relation to Regulation (EU) 2022/1925 and, in particular, on risks of non-**

**compliance within the meaning of Article 28(4) of Regulation (EU) 2022/1925 and of the management body’s replies to those reports, including a list and description of the measures taken in response to those reports.**

(175) The head of the DCF provides periodic progress updates to the Board. Since 6 March 2024, there have been [Confidential] updates to the Board. The Board acknowledged these updates.

**2.1.5 A list and a summary of any feedback (e.g., complaints) of the Undertaking’s business users established in the Union or end users established or located in the Union concerning the Undertaking’s compliance with the obligations. Where this feedback exceeds ten (10) instances, please group them to the extent possible (e.g., per topic). Please also provide an explanation of any action that the Undertaking has taken based on this feedback.<sup>43</sup>**

(176) Amazon has received a few questionnaires from business users. This feedback did not concern Amazon Ads’ compliance solutions but informed us of their expectations regarding DMA compliance. In response to these queries, we pointed these counterparties to relevant data, reports and features covered by the ad transparency obligations.

#### **Regarding Article 6(9)**

(177) Please refer to the Article 6(9) chapter in the Compliance Report.

#### **Regarding Article 6(10)**

(178) Please refer to the Article 6(10) chapter in the Compliance Report.

#### **Regarding Article 6(13)**

(179) Please refer to the Article 6(13) chapter in the Compliance Report.

**2.2 A list of the Undertaking’s core platform service’s top fifteen (15) business users per core platform service based on revenues established in the EEA for the last year, as defined in Article 2, point (21) of and in the Annex to Regulation (EU) 2022/1925, and, for these business users provide: the name, address, telephone number and e-mail address of the head of their legal department (or other person exercising similar functions; and in cases where there is no such person, the chief executive officer).<sup>44</sup> If revenues are not available or do not represent a suitable measure, please provide a list of top business users based on an alternative relevant proxy and explain why it is the most relevant one to assess the importance of business users for the specific core platform service.**

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<sup>43</sup> The Undertaking should ask about and respect the decision of the company submitting feedback to preserve the anonymity of its submission or to keep certain parts confidential. The Undertaking should inform the Commission of any such anonymity or confidentiality requests. In any case, the Undertaking should describe any actions taken based on the relevant feedback in a non-confidential form.

<sup>44</sup> Please use the “eRFI contact details template” on the DMA website: [https://digital-markets-act.ec.europa.eu/about-dma/practical-information\\_en#templates](https://digital-markets-act.ec.europa.eu/about-dma/practical-information_en#templates).

(180) The list and contact details of Amazon Ads' top fifteen business users were submitted to the Commission.

**2.3 If applicable, the reasons why the Undertaking considers that a specific obligation laid down in Articles 5 to 7 of Regulation (EU) 2022/1925 cannot by nature apply to the Undertaking's relevant core platform service (i.e., because it is clear from the text of Regulation (EU) 2022/1925 that a specific obligation does not apply to a core platform service). For the avoidance of doubt, this section does not cover situations governed by Articles 9 or 10 of Regulation (EU) 2022/1925.**

(181) The non-applicable provisions to Amazon Ads are Articles 5(3), 5(4), 5(5), 5(7), 6(3), 6(4), 6(6), 6(7), 6(11), 6(12) and 7.

(182) **Article 5(3)** only applies to online intermediation core platform services ("CPSs") and therefore does not apply to Amazon Ads, an online advertising CPS.

(183) **Article 5(4)** requires covered providers of CPSs (or "**covered companies**") to allow business users, free of charge, to communicate and promote offers, including under different conditions, to end users acquired via their CPSs or through other channels, and to conclude contracts with those end users, regardless of whether, for that purpose, they use the CPSs of the covered company. Recital 40 explains that this provision applies to the promotion of offers, including through a software application of the business user, and any form of communication and conclusion of contracts between business users and end users.

(184) Amazon Ads is not a distribution channel through which business users can conclude contracts with end users. As such, Article 5(4) does not apply to Amazon Ads.

(185) **Article 5(5)** requires covered companies to allow end users to access and use, through their CPSs, content, subscriptions, features or other items by using the software application of a business user.

(186) Since this provision refers to the end users' access to content "*by using the software application of a business user*", it does not apply to our Amazon Ads. Amazon Ads in fact does not host or give in any way access to business users' software applications.

(187) **Article 5(7)** applies to the use of specified linked and supporting services to a CPS. Advertising services are not included in the list of specified linked and supporting services, nor are any of these specified services used by business users or end users "*in the context of services provided by the business users*" to their own customers using the services provided by Amazon Ads. Thus, Article 5(7) does not apply to Amazon Ads.

(188) **Article 6(3)** expressly applies to an exhaustive list of CPSs, i.e., designated operating systems, virtual assistants, and web browsers, and therefore does not apply to Amazon Ads, an online advertising CPS.

(189) **Article 6(4)** applies to designated operating system CPSs. The provision does not apply to Amazon Ads because Amazon Ads is not an operating system. In addition, Amazon Ads cannot give access to third-party software applications or app stores, nor can it "*prevent the downloaded third-party software applications or software applications stores from prompting end users*" or enable end users to set the downloaded third-party applications or app stores as their default.

- (190) **Article 6(5)** does not apply to Amazon Ads because the provision only applies to a predefined list of CPSs pursuant to Article 2(2): online intermediation services, online social networking services, video-sharing platform services, virtual assistants, and online search engines.
- (191) **Article 6(6)** prohibits covered companies from restricting the ability of end users to switch between, and subscribe to, different software applications and services that are accessed using a covered company's CPS, including the choice of internet access services for end users.
- (192) **Article 6(6)** does not apply to Amazon Ads because there is no third-party software application that is accessed using Amazon Ads.
- (193) **Article 6(7)** applies to designated operating system and virtual assistant CPSs, and therefore does not apply to Amazon Ads.
- (194) **Article 6(11)** expressly applies to designated online search engine CPSs. Article 6(11) does not apply to online advertising CPSs and is therefore not applicable to Amazon Ads.
- (195) **Article 6(12)** specifically applies to designated online search engine and online social networking service CPSs, as well as software application stores, Article 6(12) does not apply to Amazon Ads, an online advertising CPS.
- (196) **Article 7** exclusively applies to designated number-independent interpersonal communications service CPSs, and therefore does not apply to Amazon Ads.

## DECLARATION

Amazon.com, Inc., as a designated company, declares that, to the best of its knowledge and belief, the information given in this submission is true, correct, and complete, that all estimates are identified as such and are its best estimates of the underlying facts, and that all the opinions expressed are sincere.

**Date:** 5 March 2026

DocuSigned by:  
[Confidential] \_\_\_\_\_

**Name:** [Confidential]

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