

Annex 1 - Site Reputation Abuse Policy

I. Introduction and Summary

1. This Annex supplements Google's response to the Competition and Markets Authority (**CMA**) consultation of 28 January 2026 (**Consultation**) on the proposed conduct requirement (**CR**) in relation to fair ranking. It responds specifically to paragraph 1.17(a) of the Consultation, in relation to Google's enforcement of its Site Reputation Abuse Policy (**SRAP**).
2. The Consultation notes that following the introduction of the SRAP and a subsequent update, some publishers experienced significant traffic reduction and corresponding revenue loss and suggests that some of Google's policy changes are made without due regard to the wider impacts these could have on other markets.
3. Site reputation abuse is a ranking manipulation tactic where unrelated content is hosted on a high-reputation site to unfairly benefit from the host's high quality signals, leading to distorted search rankings.
4. This practice harms genuine sites that do not engage in site reputation abuse and diminishes user experience. Thousands of complaints from users and genuine site owners—who lose traffic to sites that manipulate Google's ranking—underscore the problem's severity. Those engaging in the practice openly acknowledge that they are exploiting Google's ranking for passive, search-driven income.
5. The SRAP is a legitimate, proportionate, non-discriminatory, and transparent response to this abuse. In a nutshell, the SRAP works to preserve a level playing field so that sites can be ranked equally on the merits – sites that engage in site reputation abuse should not receive an unmerited and artificial boost. The SRAP applies equally to all sites and content, does not restrict legitimate promotional arrangements, and applies surgical demotions only to the offending subdomains, leaving the host site unaffected.
6. Some revenue loss for sites engaging in site reputation abuse is a natural, justified consequence of ending a manipulative practice that relies on buying a ranking boost, which contradicts Google's ranking principle of merit-based ranking.
7. The remainder of this Annex expands on these points. **Section II** provides context on how Search ranking works and an overview of spam issues on Search. **Section III** describes the spam practice of site reputation abuse. **Section IV** discusses how site reputation abuse harms end users and business users. **Section V** explains how the SRAP works. **Section VI** provides an overview of the impacts of SRAP, including positive

feedback received from stakeholders. **Section VII** explains how SRAP is entirely consistent with the CMA's fair ranking CR. **Section VIII** concludes.

II. Background on Search ranking and spam

8. Google's search ranking system aims to provide helpful, relevant and high-quality results by using various signals, such as text on a page or link relationships, as proxies for quality.
9. Google's ranking signals are, however, vulnerable to manipulation. For example, websites can buy links to artificially inflate their PageRank score. Such ranking manipulation creates an unfair advantage for deceptive sites, diminishes the quality of search results and undermines user trust.
10. Google has thus developed spam policies to combat various forms of ranking manipulation, though new forms of spam continually emerge. In 2024, Google added various policies on new spam tactics, including a policy to combat site reputation abuse.

III. Site reputation abuse

11. Google also uses the overall reputation of a site, applied to all pages on the site on a site wide basis, rather than individual-page basis, as a quality ranking signal. The intuition behind site wide signals is that, if a given site is in general of high quality, then any given page on that site—including new pages—will also be of high quality. The operation of this signal is that for a given query, and all else being equal, the same content on a site with a high reputation will rank higher than it would on a site with a lower site reputation.
12. Site reputation abuse is a tactic where content from one site is hosted on a different, unrelated site to artificially benefit from the host site's higher reputation. This makes the hosted content appear to be part of the high-reputation host site, allowing it to benefit from quality signals it has not earned on its own merits. This practice is an advanced form of ranking manipulation, similar to link buying, where a site attempts to manipulate its ranking by acquiring another site's reputation.
13. As Microsoft Bing explained the practice back in 2019: *"we heard concerns from the SEO community around the growing practice of hosting third-party content or letting a third party operate a designated subdomain or subfolder, generally in exchange for compensation"; "the intent was clearly to benefit from site-level signals, even though the content on the subdomain had very little to do with the content on the rest of the domain"; "the practice equates to buying ranking signals, which is not much different from buying links."*¹

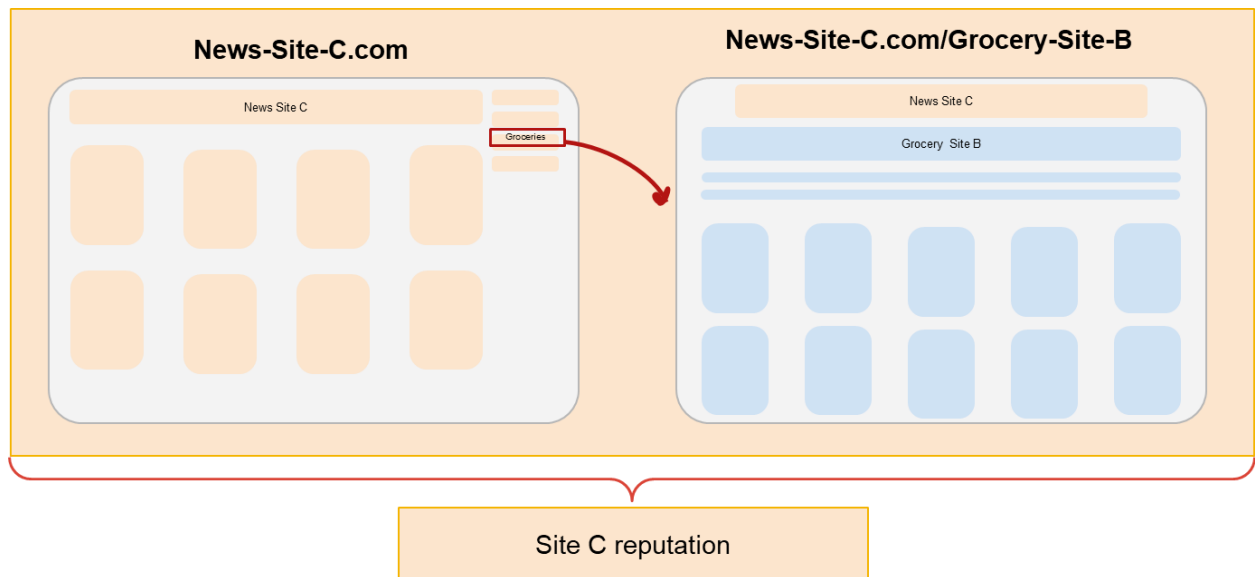
¹ Microsoft Bing Blog, [Some Thoughts on Website Boundaries](#) (4 November 2019).

14. An illustrative example of how site reputation abuse works is included below.

a. The following three sites have their own site reputation.



b. Then, Grocery Site B seeks to manipulate Google's site reputation signals via a hosting arrangement.



c. The result is that search rankings are distorted. For grocery queries, Site B content, leveraging Site C's reputation, outranks Site A, harming Site A and users. Site B's content is also duplicated on the SERP, harming users.

Ranking prior to abuse



Ranking after abuse



IV. Why is site reputation abuse a problem?

15. The result of site reputation abuse is lose-lose for users and genuine sites:
 - a. it harms sites with quality content, who rank lower in Google's results than they deserve;
 - b. users do not obtain search results that reflect the real merits of different sites;
 - c. it leads to unhelpful duplication of content in search results, with identical content appearing on host sites and standalone sites; and
 - d. Google's reputation for showing high-quality results suffers.
16. The harms of site reputation abuse are well-documented, and users have made their frustration with the practice, and its effect on the user experience on Search, known to

Google. Prior to introducing its SRAP in March 2024, **Google received over 1,000 user complaints relating to site reputation abuse.** Users complained that:²

- a. Parasite SEOs were using the “*authority*” of the host website to “take the number 1 spot on Google,” which was labelled as “*highly deceptive*”.
 - b. These subdomains were “*not only manipulating search results, but [G]oogle discover feeds as well.*”
 - c. This resulted in “*media websites [...] publishing low quality content and getting high ranks in organic SERPs.*”
 - d. The conduct was part of a “*parasite SEO strategy to make money by easily ranking with paid articles.*”
17. Site owners not engaging in site reputation abuse have also been vocal about how the practice harms their sites. For example:
- a. Torsten Latussek, founder and managing director at coupons site Coupons4u, noted that Coupons4u suffered a decrease in visibility and traffic “*due to the sheer mass of white-label co-ops with media brands.*”³ Smaller coupon providers like Coupons4u are unable to compete with the reach of a news outlet with a reputable domain, making it “*pretty much impossible*” to build a standalone coupon business.⁴
 - b. Thilo Röscheisen, founder and CEO of test portal Allesbeste.de, noted that “*The success of white-label offers like Vergleich.Bild.de [compare.bild.de] and Stern.de/Vergleich [stern.de/compare] is based on thin SEO content without any actual added value for the reader.*” These are coupon subdomains hosted on publisher websites. He further noted that it is “*problematic when a thin content offer gets the highest page rankings solely through the domain authority of the host page, because it would otherwise never be ranked that high due to its lack of quality.*”⁵ These anecdotes highlight the issues that site reputation abuse causes for site owners, including lower rankings on the SERP.

² Google has a mechanism allowing users to report instances of spam on Google Search. Google collects and reviews these reports. User reports on site reputation abuse informed Google’s SRAP.

³ See OMR Daily, [Where do you stand on the big white label affiliate controversy? Good, bad or does it matter?](#), 13 September 2019.

⁴ *Ibid.*

⁵ *Ibid.*

- c. Armelle Guillet, Senior Marketing Director at VoucherCodes.co.uk, explained that *“Since 2018, there’s been a 10% rise in the number of consumers who’ve encountered a non-working discount code so it’s time Google started backing sites who are working hard to provide quality content.”*⁶
- 18. The sites engaging in site reputation abuse know that what they are doing amounts to ranking manipulation, and they know how lucrative it can be. Simon Hastings—co-founder of UK-based The Savings Group, a commerce and affiliate marketing platform—boasted that his business had helped publishers:

*“...generate passive income by essentially leveraging the domain authority they already had. Publishers have very strong domain authority as a result of the trusted nature of their sites and the number of backlinks on to their sites. So, typically when you roll out a white label, coupon proposition or any other products, those propositions quickly start to rank highly for brand plus coupon searches in Google. ... [A] lot of what we do on the coupon side of things is very much driven by search activity – somebody putting in a search for a brand plus a coupon and then getting a bunch of results and then coming to one of our partners because of the authority that they’ve built up over the years”.*⁷
- 19. This admission in a public forum helps place publisher complaints in context: publishers are seeking regulatory intervention to help them continue to monetise by undermining and manipulating rankings on Search to the detriment of the quality and relevance of search results. They are doing this in numerous fora including before the EC, even after practically identical claims were dismissed before the German courts.
- 20. The evidence in the public domain as well as that collected by Google clearly highlights the harms arising from site reputation abuse.

V. How does the SRAP work?

- 21. The SRAP, introduced in March 2024, is a legitimate and proportionate response to site reputation abuse. The policy's goal is to preserve a level-playing field for websites and protect the quality of Google's search results for users. The SRAP operates as follows:
 - a. **The SRAP applies equally to all sites; it is not a judgement about the quality or desirability of the hosted content.** The SRAP applies equally to all hosting of third-party content that takes place to manipulate Google’s ranking, regardless of what type of content it is, e.g. coupons, offers for shoes, fashion shops, pages about casinos or anything else. In practice, the most common

⁶ Hello Partner, [Publishers React to the Site Reputation Abuse Update](#) (8 May 2024).

⁷ See FIPP, [Simon Hutson of The Savings Group on finding ways of boosting revenue for publishers](#), 23 August 2023.

issue Google sees relates to coupon sites partnering with news publishers, but there is nothing in the policy that is specific to either coupons or news. The CMA notes in the Consultation that “Standalone coupon sites were unaffected by the policy.”⁸ This further proves the points that the SRAP applies equally to all sites and all content. The fact that standalone coupon sites were not affected is not indicative of any discrimination, but rather, the fact that these sites were not engaging in ranking manipulation. Coupon content will not be affected in circumstances where there is no spam issue to be solved and the content is ranking on the merits.

- b. **The SRAP does not preclude publishers from monetising their site via promotional arrangements.** The SRAP does not penalise a particular business model and does not preclude publishers from monetising their site via promotional arrangements that involve hosting third-party content and promoting it to their users. Likewise, sites can monetise their sites with advertising or advertorials. The SRAP is targeted specifically at the abusive behaviour of ranking manipulation. It does *not* prevent sites from getting paid for promoting third-party content.
- c. **Any demotion applies only to the part of the site hosting third-party content.** The SRAP operates by making surgical demotions only of subdomains of sites hosting third-party content; it does not demote or affect the ranking of the host site. And no content is removed outright from Search results. Google does not take or threaten action against the hosting site or content originating from the news publisher directly.
- d. **The SRAP is transparent.** Google ensures transparency by clearly explaining the policy and notifying enforcement actions via Search Console, where they are subject to review. Google has published the SRAP, and extensive information on how to comply on Google Search Central.⁹

VI. Impacts of enforcement of the SRAP

- 22. **The SRAP has received positive feedback from stakeholders.** For example, product review site HouseFresh experienced a marked decline in traffic in late 2023, being consistently outranked by sites engaging in site reputation abuse.¹⁰ HouseFresh’s rankings and traffic recovered when Google began enforcing the SRAP and it could

⁸ Fair Ranking Consultation, para 1.17(a).

⁹ See Google for Developers, [Spam Policies for Google Web Search](#).

¹⁰ See LinkedIn, [After the very rancorous online debate, it looks like HouseFresh more than made their recovery post-HCU decimation](#), 8 October 2024.

then be ranked fairly on its merits. The enforcement of the SRAP successfully leveled the playing field in the product review segment. By acting against sites who were manipulating Search rankings, Google ensured the high-quality content from HouseFresh regained the rankings it deserves, while also providing high-quality and helpful search results for users.¹¹

23. SEO industry commentators have also noted the positive impacts of enforcement action under the SRAP. These include increased opportunities for smaller publishers and independent content creators to rank highly on the SERP, at the expense of big players who, pre-SRAP, dominated results with off-topic and low-quality content.¹² The SERP has also reversed a “[distortion] of the ranking landscape” through a reinforcement of editorial control: with the SRAP, publishers must now ensure that content hosted on their sites is *“genuinely useful and relevant to the site’s core business, to avoid compromising user experience.”*¹³
24. **Impacts on publisher revenue as a result of enforcement of the SRAP do not make it inherently unfair.** The concerns identified by the CMA around the SRAP’s impact on publisher revenue and its assertion that Google has not sufficiently taken into account the impact of the policy on market participants¹⁴ are misconceived. In particular, the CMA notes that Google’s SRAP has led to a *“significant traffic reduction and corresponding revenue loss”*.¹⁵
25. Google takes great care in giving site owners notice of policy changes, providing detailed guidance and clarity in how to comply with spam policies and also making its Webspam team available to help site owners troubleshoot spam issues. All of these efforts are designed to minimise disruption for site owners while still ensuring that Google has the tools to safeguard the quality of Search for the benefit of users and site owners.
26. The purpose of the policy is not to harm publishers and their monetisation opportunities. However, it is a cornerstone of Google’s organic ranking principles that sites cannot buy better ranking. Ranking is based on quality and relevance to the user’s query, and the only way to get a better ranking on Search is to improve on one or both of these metrics. This is what makes ranking on Search fair for all site owners. Indeed,

¹¹ HouseFresh can be contacted via the following contact page: [Get in touch with HouseFresh](#).

¹² See [Is Parasite SEO Dead? Understanding Google's Crackdown on Site Reputation Abuse](#), Edd Dawson, 27 November 2024.

¹³ See SEO Zoom, [Site reputation abuse: Google's anti-spam rule](#), 21 November 2024.

¹⁴ Fair Ranking Consultation, para 1.17(a).

¹⁵ *Ibid.*

the EU P2B Regulation recognises that the ability of search engines “to act against bad faith manipulation of ranking by third parties, including in the interest of consumers, should [...] not be impaired”.¹⁶ The practice of site reputation abuse offends this principle: sites attempt to buy a higher rank in Google’s organic ranking by acquiring space on a reputable site, and end up ranking higher than other sites not engaging in this kind of ranking abuse. It is a natural consequence that, in preventing parties from buying more favourable ranking from reputable host sites (e.g. news publisher sites) the host sites will no longer be able to monetise from selling their reputation to those seeking an unmerited ranking boost. The mere fact that host sites lose revenue does not render the enforcement of the SRAP unfair, particularly when the method of monetisation host sites are engaging in is illegitimate and based on manipulation of search engine ranking algorithms.

27. Google also notes that other search engines, such as Bing, have a similar spam policy,¹⁷ indicating the truly harmful nature of site reputation abuse.

VII. The SRAP is entirely consistent with the proposed Fair Ranking CR

28. The CMA’s proposed Fair Ranking CR comprises three components: (i) non-discrimination and objectivity, (ii) transparency and (iii) non-distortion and complaints. The SRAP is consistent with each of these.
29. **Non-discrimination and objectivity.** The SRAP is non-discriminatory: it applies to all sites in the same way, irrespective of the content at issue. If anything, the SRAP exists to promote and maintain fairness in ranking. The SRAP seeks to ensure that like content is ranked in a non-discriminatory manner based on its merits. It acts solely to prevent third-party content hosted on the publisher subdomain getting an artificial boost over its rival, from a site reputation that it does not deserve.
30. Discrimination arises when similar things are treated differently or different things are treated in the same way, and there are no legitimate reasons for the different treatment.¹⁸ Here, the hosted site (Site A) is artificially boosting its ranking by passing itself off as part of the hosting site (Site C) and exploiting that site’s reputation. By contrast, a standalone competitor of the hosted site (Site B) is ranked based on its own

¹⁶ Recital 27 of Regulation (EU) 2019/1150 on promoting fairness and transparency for business users of online intermediation services. See also *Commission*, “Guidelines on transparency of rankings under Regulation (EU) 2019/1150 of the European Parliament and of the Council”, para. 83: Providers can “act to address bad faith manipulation of ranking by third parties, including the risk of deception of consumers”.

¹⁷ See [Bing Webmaster Guidelines](#).

¹⁸ *Ghaidan v Godin-Mendoza* [2004] UKHL 30, para 9.

merits. Site A and Site B are of the same kind, but they are not in the same situation. Site A is artificially boosting its ranking so that it is not being ranked on its own merits, while Site B is not engaged in manipulation so that it is being ranked on its own merits. The SRAP seeks to undo this distortion so that both Site A and Site B are ranked on their merits.

31. This is the opposite of discrimination. The SRAP ensures that all sites of the same type are ranked in the same way based on their own merits, rather than some being ranked based on the reputation of an unrelated site. It also operates in a targeted manner to ensure that only those parts of a hosting site C that seek to manipulate ranking are affected: the hosting site C with its own content is not affected by the SRAP.
32. **Transparency and Complaints.** Google has published the SRAP, and extensive information on how to comply on Google Search Central.¹⁹ Any enforcement of the SRAP is notified to site owners via Search Console. Google introduced its SRAP in March 2024, and announced the new policy via a blog post.²⁰ Google gave sites a two-month grace period to prepare and adapt to the new policy. Google transparently refined the SRAP over time, introducing amendments to the policy in November 2024 and January 2025, with accompanying blog posts and summaries of pertinent changes.²¹ The SRAP clearly explains what is meant by site reputation abuse, and provides practical examples of how the policy would be applied in different scenarios. The policy also links to other webpages that provide suggestions on how to remedy any violations of the policy.²² If enforcement action is taken under the SRAP, site owners are notified via Search Console, and are able to appeal via a spam consideration request.²³
33. **Non-distortion.** The SRAP does not seek to penalise a particular business model. It is content-agnostic and does not preclude publishers from monetising their sites; and it does not demote the hosting site as a whole. However, Google needs to be able to combat ranking manipulation. Preventing parties from buying their ranking will inevitably result in host sites losing revenue, due to being unable to ‘sell’ an unmerited ranking boost. However, this loss of revenue for host sites does not make the enforcement of the SRAP unfair, particularly as monetising via ranking manipulation is not legitimate.

¹⁹ See [Spam Policies for Google Web Search | Google Search Central | Documentation | Google for Developers](#).

²⁰ See Google, [Google Search: New updates to address spam and low-quality results](#), 5 March 2024.

²¹ See Google for Developers, [Updating our site reputation abuse policy](#), 19 November 2024.

²² See Search Console Help, [Manual Actions report](#).

²³ *Ibid.*

VIII. Conclusion

34. The SRAP is non-discriminatory, fair, and transparent and reflects Google's long-standing, publicly-stated position that sites may not pay to increase their organic ranking. It therefore serves a critical role to ensure that all sites are ranked fairly based on their relevance and quality. It preserves a level playing field and protects the quality of Google's results for users.