

Advertising and Marketing Communication Policy & Guidelines

With Rockworth Public Company Limited's commitment to conducting business with transparency, integrity, and adherence to the principles of good corporate governance, the Company places great importance on its responsibility toward all stakeholders. The Company also recognizes the significant role of advertising and marketing communications as powerful tools that can influence society.

To ensure that operations in this area are conducted appropriately, transparently, and in alignment with ethical business practices, the Company has adopted the **AAT Code of Ethics** issued by the Advertising Association of Thailand as a framework. This serves as the guiding principle for effective and sustainable advertising and marketing communication practices within the organization.

Policy

- All advertising must be lawful, dignified, honest, and presented truthfully.
- Advertising must not conflict with moral standards or social norms. The creation of advertising content should reflect a strong sense of social responsibility and comply with commonly accepted principles of fair business competition.
- Advertising must not undermine public confidence in the integrity or credibility of advertising as a whole.

Guidelines

Definitions

The following general definitions apply throughout these Guidelines. Definitions relevant to specific sections or subsections will be provided within those respective parts. For the purpose of these Guidelines, the terms below shall have the following meanings:

“Advertising” or “Advertisement” Means any form of marketing communication delivered through media, typically in exchange for payment or other consideration of value.

“Children” Means individuals aged **12 years and under**. In accordance with the *ICC Toolkit: Marketing and Advertising to Children*, this age threshold is applied to rules governing marketing, advertising, and data collection involving children. Local laws in each country may define “children” differently.

“Consumer” Means any person who may reasonably be expected to be affected by marketing communications, including individuals, customers, organizations, and users of communication devices.

“Digital Interactive Media” Means all digital, interactive, and trackable media, channels, and technologies, including mobile devices, video, digital television, social media platforms, the Internet of Things (IoT), wearable digital devices, cross-device tracking, and related algorithmic data systems.

“Marketing Communications” Means advertising and all other forms of communication such as sales promotions, sponsorships, direct marketing, and digital marketing communications. This term should be interpreted broadly to include any communication produced directly by, or on behalf of, a marketer for the purpose of promoting a product or influencing consumer behavior.

“Mobile” Means mobile phones and wireless devices such as gaming devices, tablets, smartwatches, and other portable equipment through which users can communicate or interact, and which may require user authentication.

“Marketer” Means any individual or organization, including those engaged in advertising, sales promotion, and direct marketing, who produces or disseminates marketing communications (or acts on behalf of another party) for the purpose of promoting a product or influencing consumer behavior.

“Offer” Means any presentation or solicitation relating to the purchase or sale of goods or services.

“Personal Data” Means any information relating to an identifiable individual, excluding anonymous or pseudonymized data.

“Preference Service” Also known as a **Robinson List**, means a system for suppressing data of consumers who have indicated that they do not wish to receive direct or digital marketing communications without prior consent, regardless of the channel used.

“Product” Means anything that is the primary subject of advertising. This typically includes physical goods or services but is not limited to these categories. Where appropriate, these Guidelines may extend to intangible concepts or ideas.

“Research” Includes all forms of market research, attitudinal research, social research, and data analytics.

It refers to the systematic collection and analysis of information about individuals and organizations using statistical methods, analytical techniques, and social-science and behavioral-science methodologies.

This definition aligns with global standards established by the International Chamber of Commerce (ICC) and ESOMAR for market, opinion, social research, and data analytics.

“Teens” Means individuals aged **13 to 17 years**.

1. Basic Principles

Rockworth shall ensure that all actions related to marketing communications are lawful, appropriate, honest, and factually accurate.

The Company shall conduct all marketing communications with a proper sense of social and professional responsibility and in accordance with generally accepted principles of fair competition in the business sector.

Rockworth shall not engage in any form of communication that may undermine public confidence in marketing practices.

2. Social Responsibility

- Rockworth shall conduct marketing communications with respect for human dignity and shall not incite or condone any form of discrimination, including discrimination based on race or nationality, religion, gender, age, disability, or gender identity.
- Rockworth shall ensure that marketing communications do not exploit unfounded fears or take advantage of the misfortunes or suffering of others.
- Rockworth shall not encourage or condone violent, illegal, or antisocial behavior through marketing communications.
- Rockworth shall ensure that marketing communications do not exploit superstitious beliefs.

3. Decency

Rockworth shall ensure that marketing communications do not contain any message, audio, or visual element that violates generally accepted standards of decency applicable within each country or cultural context.

4. Honesty

Rockworth shall design marketing communications in a manner that does not misuse consumer trust or take advantage of consumers' lack of experience or knowledge.

The Company shall disclose relevant information that could affect consumer decision-making in a clear and timely manner that allows consumers to properly consider such information.

5. Truthfulness

Rockworth shall ensure that all marketing communications are truthful and not misleading. The Company shall not include any message, claim, audio, or visual element that could directly or

indirectly mislead consumers through omission, ambiguity, or exaggeration - particularly in the following areas:

- Presentation of material characteristics of goods that may influence purchase decisions, such as general features, composition, production methods, manufacturing dates, scope of use, performance and functionality, quantity, geographic origin, marketing origin, and environmental impact.
- Presentation of the value of goods and the full price payable by consumers.
- Communication of terms relating to delivery, availability of goods, product exchanges, returns, maintenance, and after-sales services.
- Communication of product guarantees.
- Communication of intellectual property rights such as patents, trademarks, designs, models, and trade names.
- Presentation of product standards that comply with relevant certification or quality benchmarks.
- Communication of certifications or awards received, including medals, recognitions, and certificates.
- Presentation of product-related benefits that contribute to charitable causes.

6. Substantiation

Rockworth shall ensure that all descriptions, claims, or illustrations relating to verifiable facts presented in marketing communications are capable of being substantiated.

Any explicit or implicit reference to endorsements, regardless of their level or type, must accurately reflect the actual degree of endorsement.

Rockworth shall ensure that such substantiation can be readily provided, with supporting evidence available without delay upon request by relevant regulatory or oversight authorities.

7. Identification and Transparency

Rockworth shall design marketing communications in a manner that enables consumers to clearly identify them, regardless of format or media type.

The Company shall present advertising - including native advertising appearing within news or editorial-style content - in a way that is immediately recognizable as advertising, and shall display appropriate disclosure statements where necessary.

Rockworth shall ensure that the true commercial intent of any marketing communication is transparent and not misleading.

Accordingly, the Company shall refrain from presenting sales-related communications disguised as other forms of content, such as market research, consumer opinion surveys, user-generated content, personal blogs or website articles, private social media posts, or personal product reviews.

8. Identity of the Marketer

Rockworth shall clearly and transparently identify the marketer.

Marketing communications shall include contact information that enables consumers to easily reach the marketer.

This requirement does not apply to communications whose sole purpose is to draw attention to a forthcoming communication (also known as teaser advertising).

9. Use of Technical/Scientific Data and Terminology

Rockworth shall ensure that marketing communications do not:

- Misuse technical or scientific data, such as incorrectly citing research results or misrepresenting content from scientific publications.
- Present statistics in a manner that exaggerates product claims.

- Use scientific terminology in a way that falsely implies that a product claim has been scientifically validated.

10. Use of “Free” and “Guarantee”

Rockworth shall use the term “free” (e.g., *free gift*, *free offer*) only when:

- The offer is entirely unconditional; or
- The only condition is payment of delivery charges that do not exceed the actual cost incurred by the marketer; or
- The product is provided free alongside the purchase of another item, and the price of that item has not been increased - in whole or in part - to compensate for the “free” item.

For free trials, free subscriptions, or similar offers that convert into paid services at the end of the trial period, Rockworth shall provide clear and easily understandable disclosure of all costs and conditions before consumers consent to the offer.

If the return of goods is required at the end of the trial period, Rockworth shall clearly specify who is responsible for any associated costs.

The Company shall ensure that the process for returning goods is as simple and convenient as possible, and if time limits apply, they shall be stated clearly.

(See also Section C12: Right of Withdrawal)

Rockworth shall ensure that marketing communications involving “guarantees” - whether legally binding warranties or non-binding guarantees - do not mislead consumers by implying protections beyond those required by law.

The Company shall clearly disclose all terms and conditions of guarantees, including the name and address of the guarantor, and shall present any limitations on consumer rights or legal remedies in a manner that is easy to understand and prominently displayed.

11. Comparisons

Rockworth shall design comparative marketing communications so that comparisons are not misleading and are consistent with the principles of fair competition.

Comparisons must be based on factual, verifiable evidence, and the Company shall avoid selective or unfair comparisons.

12. Denigration

Rockworth shall ensure that marketing communications do not disparage or demean any individual, group, company, organization, industry, profession, or product, nor should they incite ridicule or contempt.

13. Testimonials

Rockworth shall ensure that marketing communications do not include testimonials, endorsements, or supporting statements unless such endorsements are genuine, verifiable, and relevant to the product.

The Company shall not use outdated testimonials or endorsements that could mislead due to the passage of time.

Where endorsements are paid or incentivized, Rockworth shall ensure that such sponsorships are clearly disclosed if their nature might otherwise be misunderstood.

14. Portrayal or Imitation of Persons and References to Personal Property

Rockworth shall not portray or reference any individual - whether in private or public communication - without prior consent.

Similarly, the Company shall not portray or reference an individual's personal property in a way that implies endorsement of a product or organization without prior consent.

15. Exploitation of Goodwill

Rockworth shall not use the name, initials, symbols, or trademarks of any other company or organization without justified reason.

Marketing communications shall not unfairly take advantage of the goodwill of another company, individual, or organization through the use of names, brands, or other intellectual property, nor exploit goodwill derived from other marketing campaigns without prior consent.

16. Imitation

Rockworth shall ensure that its marketing communications do not imitate those of other marketers in any way that could mislead or confuse consumers. This includes, but is not limited to, the imitation of general layouts, slogans, visual imagery, music, or special sound techniques.

Where a marketer has developed a clearly recognizable marketing communication campaign in one or more countries, Rockworth shall refrain from imitating that campaign in other countries in which the originating marketer may reasonably be expected to expand its campaign within a reasonable period of time.

17. Safety and Health

Rockworth shall ensure that marketing communications do not, without justifiable educational or social purpose and in accordance with national standards, depict or describe behavior or situations that may involve danger or suggest disregard for safety or health.

The Company shall provide appropriate safety warnings and, where necessary, limitations of liability. Rockworth shall clearly communicate that children must be under adult supervision wherever the product or activity involves a safety risk.

Information accompanying products shall include appropriate and sufficiently detailed instructions for use, including any relevant health and safety information where required.

Rockworth shall ensure that health and safety warnings are clearly visible through the use of visuals, audio, text, or any combination thereof.

18. Children and Teens

18.1) General Principles

- Rockworth shall exercise special care in marketing communications that are directed to, or feature, children and teens.
- Rockworth shall ensure that such communications do not undermine positive social behavior, lifestyles, or attitudes.
- Rockworth shall not advertise products that are illegal for children or teens to purchase, or products that are inappropriate for them, in media where children and teens form a significant part of the audience.
- Rockworth shall not place marketing communications directed at children and teens in media whose content is inappropriate for them.

For specific rules regarding the protection of children's personal data, Rockworth shall refer to Section 19.

For other specific rules related to marketing communications involving children:

- For direct marketing and digital marketing communications, Rockworth shall refer to Section C, Article C7.
- For food and non-alcoholic beverages, Rockworth shall refer to the ICC Framework for Responsible Food and Beverage Marketing Communications.

18.2) Inexperience and Credulity of Children

Rockworth shall not exploit the inexperience or credulity of children, particularly in the following respects:

1. When demonstrating product qualities or usage, Rockworth shall ensure that marketing communications do not:
 - Understate the level of skill or age necessary for a child to assemble or use the product.
 - Exaggerate the size, value, characteristics, durability, or performance of the product.
 - Omit material information regarding the need for additional purchases (such as accessories or extra components in the same product line) that are required to achieve the results shown or described.

2. Rockworth may use imagination and fantasy in communications directed at both younger and older children; however, the Company shall not make it difficult for children to distinguish between reality and fiction.
3. Marketing communications addressed to children shall be presented in a way that makes it clear that they are marketing communications directed to them.

18.3) Avoidance of Harm

Rockworth shall ensure that marketing communications do not contain any statement or image that may cause physical, mental, or moral harm to children or teens.

The Company shall not depict children or teens in dangerous situations, engaging in harmful behavior toward themselves or others, or being encouraged to undertake risky or inappropriate behavior beyond their physical or emotional capacity as the target audience.

18.4) Social Values

Rockworth shall ensure that marketing communications do not suggest that the possession or use of a product will give a child or teen a physical, psychological, or social advantage over others, nor imply that the absence of such product will have the opposite effect.

The Company shall not undermine the legitimate role, authority, judgement, or preferences of parents, and shall take into account cultural and social values.

Rockworth shall not directly encourage children to pressure their parents or other adults to purchase products for them.

The Company shall ensure that price presentations do not mislead children about the actual value of products, for example by suggesting that they are trivial or easily affordable by all households.

Rockworth shall not suggest that products can be purchased immediately within the spending capacity of every family.

Where marketing communications invite children or teens to contact the marketer, Rockworth shall encourage them to seek permission from parents or other appropriate adults if costs are involved, including communication charges.

19. Data Protection and Privacy

When collecting personal data from individuals, Rockworth shall respect and protect privacy in accordance with applicable laws and regulations.

19.1) Collection of Data and Notice

When personal data is collected from consumers, Rockworth shall ensure that data subjects are informed of the purpose of the data collection and the possibility that such data may be transferred to third parties for their own marketing purposes.

Rockworth shall ensure that such third parties do not include agents or others providing technical or operational support services to the marketer, where those parties do not use or disclose personal data for any other purposes.

The Company shall inform customers at the time of data collection; where this is not possible, notification shall be provided as soon as reasonably practicable after collection.

19.2) Use of Data

Rockworth shall ensure that personal data:

- Is collected for legitimate and clearly specified purposes and used only for those purposes or other purposes compatible with them.
- Is collected in a manner that is adequate, relevant, and not excessive in relation to the purposes for which it is collected or further processed.
- Is accurate and kept up to date.
- Is retained no longer than necessary for the purposes for which it was collected or further processed.

19.3) Security of Processing

Rockworth shall implement appropriate security measures to protect sensitive data against unauthorized access or disclosure.

Where personal data is transferred to third parties, Rockworth shall ensure that such parties maintain an equivalent level of data security.

19.4) Children's Personal Data

- When personal data is collected from individuals known or believed to be children, Rockworth shall, where practicable, provide guidance to parents or legal guardians on protecting the child's privacy.
- Rockworth shall encourage children to obtain parental or guardian consent before providing personal data online and shall implement procedures to reasonably verify that such consent has been obtained.
- Rockworth shall ensure that the amount of personal data collected from children is no more than necessary for them to participate in the relevant activity and shall notify parents or legal guardians and obtain consent where appropriate.
- Rockworth shall not use personal data collected from children for marketing communications directed at the child, the parents, or other household members without prior consent from the parents.
- Rockworth shall disclose personal data relating to individuals known or believed to be children to third parties only after obtaining consent from a parent or legal guardian, or where such disclosure is legally authorised. These third parties shall not include agents or technical/operational support providers who do not use or disclose children's personal data for other purposes.
- For other provisions relating specifically to marketing communications with children in digital media, Rockworth shall refer to Section C, Article C7.

19.5) Privacy Policy

Rockworth shall maintain a Privacy Policy covering the collection of personal data related to marketing communication activities. This policy shall be easily accessible to consumers and shall clearly describe any data collection or analytics activities carried out, whether or not such practices are readily apparent to users.

In jurisdictions where no personal data protection laws exist, Rockworth shall adhere to recognised privacy principles, such as those set out in the ICC Privacy Toolkit.

19.6) Rights of the Consumer

Rockworth shall implement appropriate measures to ensure that consumers are aware of their rights, including the right to:

- Opt out of direct marketing lists.
- Opt out of interest-based (behavioral) advertising.
- Register with general direct preference services.
- Object to the transfer of their personal data to third parties for third-party marketing purposes.
- Request correction of inaccurate personal data.

Where a consumer has clearly expressed a wish not to receive marketing communications through a specific medium, Rockworth shall respect that preference.

The Company shall also put in place suitable measures to help consumers understand that access to certain content may be conditional upon the use of their personal data.

For additional rules relating to the use of digital media and consumer rights, Rockworth shall refer to Section C, Article C9.

19.7) Cross-border Transactions

Rockworth shall exercise particular care in protecting consumer data when personal data is transferred from the country in which it is collected to another country.

Where data analytics or processing is carried out in another jurisdiction, Rockworth shall implement appropriate procedures to ensure adequate security measures and adherence to the data protection principles set out in these Guidelines.

The Company recommends using model contractual clauses, such as those developed by the International Chamber of Commerce (ICC), to govern agreements between list owners and data processors or users in other countries.

19.8) Compliance with PDPA

Rockworth Public Company Limited shall strictly comply with the Personal Data Protection Act B.E. 2562 (PDPA).

The Company shall collect, use, and disclose personal data only to the extent necessary for legitimate business purposes and shall do so based on the prior consent of the data subject, except where otherwise permitted by law.

The Company shall establish internal measures to protect personal data, including the appointment of a Data Controller and Data Processor, who shall be responsible for overseeing compliance with applicable laws.

In the event of a personal data breach, the Company shall notify the Office of the Personal Data Protection Committee (PDPC) and affected data subjects as soon as practicable.

Rockworth shall refrain from any conduct that may constitute a violation of consumers' privacy rights, whether intentional or unintentional.

20. Transparency on Cost of Communication

Where consumers incur charges to access a message or to communicate with the marketer at a rate higher than the standard cost for that communication method (for example, a premium rate for online communication, connections, or telephone calls), Rockworth shall clearly disclose such costs. This may include, for example, indicating the cost per minute, cost per message, message or data rates may apply, or other wording that allows consumers to understand the applicable charges.

Where this information is provided online, Rockworth shall clearly state any charges that will be incurred when accessing specific online content or services and shall allow consumers a reasonable opportunity to disconnect or terminate the connection without incurring charges.

Where consumers must incur communication costs, Rockworth shall ensure that consumers are not kept waiting for an unreasonably long time in order to fulfil the purpose of the communication and shall not apply charges until the consumer actually begins to use the relevant service or function.

21. Unsolicited Products and Undisclosed Costs

Rockworth shall not use marketing communication practices that involve sending unsolicited products to consumers and subsequently requesting payment for such products, including any messages suggesting that the recipient is obliged to accept and pay for them.

The Company shall clearly and unambiguously communicate the terms and conditions of any marketing communication that prompts consumers to place orders and incur costs (such as subscriptions).

Rockworth shall not present such communications in a way that could be mistaken for an invoice, or create the impression that payment is already due.

For specific rules relating to respect for consumer rights, Rockworth shall refer to Section C, Article C8.

22. Environmental Behavior

Rockworth shall not condone or promote behavior that infringes environmental laws, regulations, or generally accepted standards of environmental responsibility.

The Company shall act in accordance with the principles set out in Section D: Environmental Claims in Marketing Communications when making environmental references in its marketing communications.

23. Responsibility

Rockworth shall ensure that the general rules on responsibility are technologically neutral and apply to all forms of marketing communications.

Certain rules on responsibility may be particularly relevant to specific activities or media, and these shall be set out in the sections dealing with those activities or media.

The marketer shall bear overall responsibility for the marketing communications relating to its products. Rockworth shall ensure that responsibility for compliance with these Guidelines extends to all parties involved in marketing activities, including market influencers, bloggers, vloggers, intermediary networks, data analytics companies, and advertising technology providers, as well as all parties involved in developing algorithms and using artificial intelligence (AI) for marketing communication purposes.

Rockworth shall require advertising agencies and professional service providers to exercise due care and rigour in preparing marketing communications and shall operate in a way that enables marketers to demonstrate compliance with these Guidelines.

Media entities that print, transmit, carry, or publish marketing communications shall also exercise care in accepting and presenting content to the public.

Employees of Rockworth and of any company or organization included among the above categories who are involved in planning, creating, producing, or disseminating marketing communications shall be considered responsible, in proportion to their roles, for ensuring that activities comply with these Guidelines.

Regardless of the nature of the marketing activity, or the media or technology used, Rockworth shall ensure that all parties involved recognize and uphold a shared responsibility and contribute to compliance within the scope of their respective roles.

These Guidelines shall apply to the content and form of all marketing communications, including user testimonials and audio or visual material originating from third-party sources. Rockworth shall ensure that the use of content or formats originating wholly or partly from other sources is not invoked as a justification for non-compliance with these Guidelines.

24. Effect of Subsequent Redress for Contravention

Rockworth shall ensure that any corrective action and/or compensation provided by those responsible for a breach of these Guidelines is appropriate.

However, such corrective action or redress shall not be used as a justification for the original contravention of these Guidelines.

25. Implementation

Rockworth shall support the recognition and implementation of these Guidelines and principles at national and international levels by relevant self-regulatory organizations at local, national, and regional levels.

The Company shall promote the application of these Guidelines by all organizations, companies, and individuals involved at any stage of the marketing communication process.

Rockworth shall encourage communicators, advertising agencies, publishers, media owners, and others in the marketing industry - including market influencers, bloggers, vloggers, intermediary networks, data analytics companies, advertising technology companies, and all parties involved in preparing algorithms for marketing purposes - to familiarise themselves with these Guidelines and with relevant local self-regulatory frameworks for advertising and marketing communications, as well as with self-regulatory decisions and case rulings.

Rockworth shall ensure that appropriate mechanisms are in place for consumers to lodge complaints and that consumers are aware of and able to use such complaint channels easily.

For further information on implementation by companies and organizations, Rockworth recommends referring to the ICC Guidance on Marketing and Advertising Self-regulation.

The ICC Marketing Codes and principles are reflected in advertising and marketing self-regulatory systems worldwide.

Rockworth shall ensure that complaints under these Guidelines are directed to the relevant self-regulatory organizations and the International Chamber of Commerce where appropriate.

Rockworth shall regularly review these Guidelines and principles, as well as their interpretation and application, in light of evolving methods, technologies, products, and issues.

Where revision of these Guidelines is sought, Rockworth recommends that specific cases be submitted to the ICC Commission on Marketing and Advertising for consideration.

26. Respect for Self-regulatory Decisions

Rockworth shall ensure that marketers, communicators, advertising agencies, publishers, media owners, and other relevant parties do not print, transmit, or publish any advertisement or marketing communication that a self-regulatory body has determined to be unacceptable.

Rockworth shall require that all contracts and agreements relating to advertising and marketing communications include provisions obliging signatories to comply with applicable self-regulatory rules and to respect self-regulatory decisions, and shall support the enforcement of such provisions.

In countries where no applicable self-regulatory system exists, Rockworth shall ensure that contracts and agreements relating to advertising and marketing communications include provisions requiring adherence to these ICC Marketing Communications Guidelines.

This Advertising and Marketing Communication Policy & Guidelines shall take effect on 10 November 2025.



(Mr. Chatchawal Pongsuthimanus)

Chairman

Rockworth Public Company Limited