

**CODE OF ETHICS FOR ADVERTISING
 (“Code of Ethics”)
PT ELANG MAHKOTA TEKNOLOGI Tbk
 (“Company”, “our”, “we”)**

1. Introduction

Our group of companies operates various media and advertising platforms, including television, over-the-top platform, digital media, outdoor advertising, and others. Our business practices are grounded in values of integrity and respect for all parties involved.

Our Code of Ethics embodies this commitment, ensuring that we operate with honesty and in compliance with legal and ethical standards. This extends to our advertising and marketing communications, which are guided by the principles outlined in our Code of Ethics.

We are committed to upholding the Indonesia Advertising Council’s (*Dewan Periklanan Indonesia – “DPI”*) 2020 Amendment of Indonesia Advertising Ethics (*Etika Pariwisata Indonesia Amendemen 2020 - “EPI”*), which stipulates that advertisements and advertisers must be honest, truthful, and responsible.

Our advertising activities are conducted with the highest standards of honesty and accuracy. We also avoid any misrepresentation of the characteristics of our products or services and do not omit any information that could mislead the audience.

Our advertising activities are conducted in a responsible and sensitive manner, with particular attention paid to the impact on children and other vulnerable groups. We take great care to avoid any messaging that could exploit their inexperience or cause them any distress. Our commitment to these principles is shared by all directors, officers, and employees of the Company, and we are always open to feedback and criticism from our stakeholders.

2. Scope of Code of Ethic and Responsibilities

The Code of Ethics applies to all advertisements for the promotion of any form of goods and services.

The Code of Ethics sets standards of ethical conduct to be followed by all concerned with advertising related to the Company.

The responsibility for upholding this Code of Ethics lies with the advertiser, advertising practitioners or agencies.

- a. Advertisers are accountable for their advertising in its entirety.
- b. Advertising practitioners or agencies should take utmost care in preparing advertisements and should operate in a manner that allows advertisers to fulfil their obligations.

Individuals working within a firm, company, or institution that falls under any of the two categories above, and who participate in the planning, creation, publication, or

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transmission of an advertisement, bear a degree of responsibility that corresponds to their positions. They should ensure that the Code of Ethics rules are respected and should act accordingly.

3. Endorsement

This Code of Ethics is supported by the Board of Directors of the Company.

4. Interpretation

Due to the unique features of different advertising media such as television, outdoor advertising, email, internet, and online services, an advertisement that may be appropriate for one medium may not be appropriate for another. Thus, advertisements should be assessed based on their potential impact on customers, taking into account the medium used.

It is important to note that this Code of Ethics governs the entire content of an advertisement, encompassing all spoken and written words and numbers, visual elements, music, and sound effects.

This Code of Ethics shall be read in conjunction with EPI. Some of the contents in this Code of Ethics are cited from EPI and therefore the copyrights attached thereto belong to DPI.

5. Basic Principles

Advertisements and advertisers must be honest, truthful, and responsible; compete in a healthy manner; and not degrade religion, culture, country, and social groups, and not violate the law.

6. Comparisons

Direct comparisons can be made, but only with regard to technical aspects of the product and with appropriate criteria. If direct comparisons present research data, the methodology, sources, and timing of the research must be clearly disclosed. The use of the research data must have obtained approval or verification from the research organization.

Indirect comparisons must be based on criteria that do not mislead the audience.

Advertisements must not denigrate the competitor's product.

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7. Environmental

Advertisements must not display wastefulness, destruction, or other inappropriate treatment of natural resources and the environment. Environmental claims must be conveyed honestly, truthfully, and responsibly.

8. Pornography and Pornographic Actions

Advertisements must not exploit eroticism or sexuality in any form or manner.

9. Language and Non-Misinformation

Advertisements must be presented in a language that is easily understood and not misleading to the audience. Advertisements should not use superlative words such as "most," "number one," "top," and/or other words with similar meaning, unless accompanied by verifiable evidence.

The use of asterisks in advertisements must not be used to hide, mislead, or confuse the audience about the actual price or availability of the advertised product. The inclusion of prices for a product in an advertisement must not mislead the audience.

Advertisements must not abuse scientific terms and statistics to mislead the audiences.

10. Violence

Advertisements must not display violent scenes that stimulate, encourage, or give the impression of justifying violent actions.

11. Safety and Health

Advertisements may not display scenes that disregard safety aspects, especially if it is unrelated to the advertised product.

Advertisements for food products are recommended to include the nature, ingredients, quality, composition, and/or benefits, while taking into account the safety and health of humans.

12. Children and Young People

Advertisements aimed at children are encouraged to support their optimum growth and development for their general welfare, especially in aspects of education and health, both physically and psychologically.

Advertisements must be presented in a simple and clear manner, making it easily understood by children. Advertisements should strive to support the creation of a positive

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social and environmental behavior, such as friendship, tolerance, generosity, respect for others, and should not display things to the contrary, such as negative prejudices, stereotyping, or anything that may harm or damage the physical and mental well-being of children, or take advantage of their gullibility, lack of experience, or innocence.

Advertisements are not allowed to imply that the benefits of a product can affect changes in status, popularity, intelligence, success in sports activities, physical changes, and similar things.

Advertisements should not advocate, justify, or encourage incorrect behavior, such as:

- a. Opposing or disregarding the advice or suggestions of parents or elders.
- b. Displaying dangerous or violent scenes, even if packaged in the form of children's games.
- c. Using language or conversations inappropriate for children.
- d. Displaying scenes that exploit the pester power of children, with the aim of forcing parents to grant their children's requests for related products.
- e. Advocating an unhealthy diet or eating pattern.

Advertisements must not be disguised as program content or news editorial. Electronic media advertising that features a certain character or animation well known to children should not be shown immediately before, within, or immediately after programs featuring that character.

The use of hyperbole techniques is only allowed in animated advertising materials. The use of fantasy or imagination approaches should not be made in such a way as to encourage children to believe them as truths.

Advertisements offering promotional prizes for products aimed at child consumers should not emphasize the prize, potentially forcing children to buy the product for the prize.

Advertising products not aimed at children but aired during segments aimed at children must be displayed in a way that suits children's comprehension and imagination.

13. Religion and Culture

Advertisements are prohibited from exploiting religious rituals and other related matters. Advertisements must respect the cultural values of Indonesia.

14. Discrimination

Advertisements must not indicate discrimination based on ethnicity, gender, religion, or specific race.

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15. Cigarettes and Tobacco Products

Advertisements for cigarettes and tobacco products may not be placed in advertising media whose primary audience is under 21 years of age.

Cigarettes and tobacco products may only be advertised on television and online media from 9:30 pm to 5:00 am Western Indonesia Time.

Broadcasting of cigarette and tobacco product advertisements must comply with the following provisions:

- a. Not to stimulate or suggest that people start smoking.
- b. Not to depict or suggest that smoking is beneficial to health, or to direct the audience that smoking is not harmful to health.
- c. Not to demonstrate or reveal in the form of images and/or writing, cigarette packs or sticks, including other forms, that direct the audience to interpret them as cigarette packs or sticks, or people who are or will smoke.
- d. Not directed at, or featuring in images and/or writing, children, adolescents, or pregnant women.
- e. Not to indicate that the related product name is cigarettes.
- f. To include a warning about the dangers of smoking in accordance with legal provisions
- g. Shall not advertise or sponsor programs related to health issues.
- h. Shall not offer product samples.
- i. Shall not encourage additional cigarette purchases, such as discounts, direct gifts, lotteries, or quizzes related to product purchases.

16. Alcohol Products

Advertisements for alcoholic beverages (beverages with an ethanol content (C₂H₅OH) greater than or equal to 1% (one percent)) are prohibited from being advertised in any mass media.

17. Weapons, Ammunition, and Explosive Materials

Firearms and all tools made to harm or injure people, as well as ammunition and explosive materials, are not allowed to be advertised.

18. Gambling and Betting

All forms of gambling and betting are not allowed to be advertised, either explicitly or disguised.

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19. Rules Apply to Entirety of Advertisement

The rules stated in this Code of Ethics are applicable to the entirety of the advertisement. This includes any testimonials, statements, or visual presentations that come from other sources. The responsibility for complying with these rules covers the entire content and form of the advertisement. It is not an acceptable excuse for non-compliance to claim that the content or form comes from other sources, either wholly or partially.