

## ADVERTISING POLICIES

### SUMMARY

ROKT's referral marketing solutions allow Advertisers to directly connect with an ever-growing audience of consumers across the ROKT network.

Consumers who engage with ROKT should always have a positive trustworthy experience. As such all advertisements must adhere to our Advertising Policies.

These Policies explain what ROKT considers when evaluating ads that will be published on the ROKT network.

### Key things we consider

In short, ROKT wants consumer to have a positive and trustworthy experience when engaging with advertisers and have developed advertising policies to achieve this.

When consumer sees an Ad on the ROKT network, the Ad must include sufficient information to answer the following questions:

1. Who am I engaging with - which advertiser or brand?
2. What am I being offered - which service, product, discount or offer?
3. If I engage, what will happen next - will I receive a call, email newsletter or be directed to a website?

These policies are a guide only - ROKT reserves the right to exclude ads for any reason, in its discretion.

### Policy Areas

To comply with ROKT's Advertising Policies, advertisers must adhere to requirements across 4 key areas:

1. Transparent & Accurate Ads
2. Product Policy Compliance
3. Socially & Ethically Appropriate Ads
4. Industry Code & Regulatory Compliance

## SECTION 1: TRANSPARENT & ACCURATE ADS

Ads need to be transparent, truthful, accurate and up-to-date. Elements of this requirement are set out below.

### DON'Ts

Ads must not:

- Make fraudulent offers of goods or services or be false and/or misleading
- Contain advertisements for goods and/or services unavailable to consumers in the markets in which the Advertising occurs. For example, ads shown to consumers in the United States must be able to be redeemed by end users who reside in the United States
- Breach intellectual property laws (copyright, trade marks or other)
- Breach spam or privacy laws
- Violate any law or all or any legal rights of any person or entity in any jurisdiction
- Contain any misrepresentations or suggest that any entity has any approval or sponsorship of another entity that it does not have
- Include claims that are unsupported on follow up calls, follow up emails or landing pages that users are directed to
- Make unverifiable competitive claims, superlatives, offers, discounts, and pricing. For example: using “#1”, “Best” or “cheapest” unless verified by independent party on landing page

### DO's

Ads must:

#### 1. Adhere To Character Limits

Ad creatives must not exceed 140 characters in length. All calls to action in ads should be included within the character limit to ensure a clear and accurate user experience.

Ad creatives longer than this will have to be re-worded or split into multiple ads. Reasons for this

- Short, clear and concise ads perform better.
- Ad creatives this length can be shown on all devices i.e desktop, tablet, mobile.
- Standardising ad creatives will provide a more consistent user experience.

Example Ad Copy	Approval Decision
Join Company XYZ today! For every online survey you complete you'll be rewarded up to \$2, which you can exchange for gift vouchers & prizes. Sign up today!	Rejected - Ad creative is more than 140 characters.
Your chance to win a tablet when you shop with CompanyXYZ.com.au. Sign up today!	Approved - Ad creative is less than 140 characters.

**2. Include Advertiser’s own T&Cs/ Privacy Policy**

If T&Cs or a privacy policy are required to be included with an Ad, an Advertiser must provide ROKT with terms and conditions text. This will be included as a hyperlink below the ad creative which will open a lightbox with full terms or policies listed.

**3. Be Relevant, Clear & Accurate**

Ads should be relevant, clear and accurate and create clear expectations about what will happen next.

- When users see an ad, they should be able to understand what kind of offer, competition or subscription model they are engaging with. For example:

**In the case of a Phone Referral campaign, the Ad must:**

- Clearly identify that the user will be contacted by phone.
- Clearly convey the purpose of the phone call.

**In the case of an Email Referral campaign, the Ad must:**

- Clearly identify the user will be joining an email database/newsletter on an ongoing basis.
- Convey the content, benefit or purpose of the e-newsletter.

**In the case of a Traffic Referral campaign, the Ad must be clear that user is being driven to a website to find out more information.**

- Offers must directly relate to the content in follow up calls, follow up emails or on landing pages that users are directed to.
- Ads must be clear, state the offer and link to any applicable terms and conditions. Applicable terms and conditions themselves must be clear, accurate and complete.
- Where an Ad refers to a sweepstakes, competitions or games of chance:
  - Competitions must be up-to-date.
  - All competitions and ads for competitions must have a link to full terms and conditions which clearly include the start/end dates and permit numbers (exception is game of skill).
  - Ad campaigns for competitions must end on or before the competition end date.
  - Ad T&Cs must state that a consumer is being directed to a site to complete an extra step if not being entered directly into a competition.

Ad type	Example Ad Copy	Approval Decision
Email Referral	Get exclusive offers and the latest news from Company XYZ	Rejected - Not clear that the user is signing up to a newsletter
	Sign up to XYZ’s newsletter today for access to exclusive offers and the latest news	Approved - Clear that the user is signing up to a newsletter
Phone Referral	Looking for a competitive price on your health insurance? Company XYZ can help.	Rejected - Not clear that the user is going to receive a call
	Looking for a competitive price on your health insurance? Receive a call from XYZ to hear about our low costs and great customer benefits.	Approved - Clear that the user is going to receive a call

Ad type	Example Ad Copy	Approval Decision
Traffic Referral	Get the lowest prices from XYZ today, as part of our annual sale event!	Rejected - Not clear that the user is going to a website
	Get the lowest prices from XYZ today, as part of our annual sale event! Visit our site to find out more about our great discounts	Approved - Clear that the user is going to a website
Additional Ad Examples	Purchase a new phone for \$10 from Company XYZ.	Rejected - Not clear that the offer is tied with other conditions and not clear to the user as to what happens next.
	Get 4 cinema tickets for a dollar.	Rejected - Not clear that the offer is tied with other conditions and not clear to the user as to what happens next
	Visit our site & get a new phone for \$10 from Company XYZ when you sign up for a 12 month plan	Approved - Clear to the user what will happen next and clear the offer is tied to a subscription
	Sign up to our newsletter to get 4 cinema tickets for a dollar when you sign up to a monthly subscription.	Allowed - Ad states that the offer is in conjunction with other conditions.

**4. Adhere to Editorial Standards**

Ad creative should not use gimmicky punctuation or incorrect spelling or incorrect grammar. This includes, but is not limited to:

- **Bold** lettering
- Excessive use of exclamation marks!!!
- CAPITALISATION
- Excessive punctuation, symbols or characters (#, \$, ;-, !)
- Unnecessary repetition
- Incorrect spacing e.g. winaprize - no spacing, or w i n - spaces between letters within a word
- Non-standard spelling or grammar for the market being advertised in.

Capitalisation and special spacing may be allowed in specific circumstances, such as Trademarks and brand names, common abbreviations and acronyms where appropriate.

Example Ad Copy	Approval Decision
Receive a <b>\$25 Company XYZ</b> voucher to get you started and get e-newsletters on the most epic deals on the planet!	Rejected - Bolding of words in ad.
It's time to get ahead & look great with Company XYZ. We're giving away an amazing prize. Visit our website & enter.	Approved - Capitalisation for the brand name

Example Ad Copy	Approval Decision
Company XYZ makes it easy to compare a wide range of brands in one place! Select YES below to receive a call from a friendly Company XYZ rep.	Rejected - Unacceptable capitalisation in the word YES
Win win win a free balloon by signing up to Company XYZ's e-newsletter.	Rejected – Unnecessary repetition of word win.
Win a free balloon by signing up to Company XYZ e-newsletter	Approved – Unnecessary repetition eliminated

**5. Confirmation Emails Must Contain Only Factual Content**

‘Email nurtures’ are the email sent to end-users that confirm that a user has accepted a specific offer on the ROKT platform.

- Email nurture copy should only include ‘factual information’ and any directly related comment.
- Email nurture text should not include additional promotional material or content.
- Should not contain upsell or cross-sell of other materials

Example Ad Copy	Approval Decision
Original Offer: Receive a \$25 Company XYZ voucher to get you started with your knitting hobby when you visit our website	
Email nurture copy I: Here’s your \$25 Company XYZ voucher to get you started with knitting. The voucher expires in December 2014, and can only be redeemed online. Did you know you can also purchase homewares, clothing and shoes on our website? Check it out!	Rejected– Ad content includes that is not directly related to the transaction that has already occurred.
Email nurture copy II: Here’s your \$25 Company XYZ voucher to get you started with your knitting hobby. The voucher expires in December 2014, and can only be redeemed online.	Approved – Ad content only includes information about the transaction entered into and directly related comment.

**6. SMS’s Must Contain Only Factual Content’**

- SMS confirmations are the SMS sent to end-users that confirm that a user has accepted a specific offer on the ROKT platform.
- SMS nurture copy should only include ‘factual information’ and any directly related comment.
- SMS nurture text should not include additional promotional material or content.
- SMS nurture text should identify who is the sender of the message and should confirm the message is a one-off.

**7. Brand Interaction**

- All ads must clearly mention a brand.
- The brand must be identified in the text of any offer.
- Where logos are used, they must comply with the ROKT image policies (below)

**8. User Deception**

- All sweepstakes, competitions, or games of chance must have Terms & Conditions.
- Appropriate permits are required to run competitions in the market in which they are advertised.

**SECTION 2: PRODUCT POLICY**

ROKT reserves the right to refuse advertising for particular products. At this time we do not allow advertising for the products or services below. This is not an exhaustive list.

- Cigarettes
- Escort services
- Prescription products
- Pornography products
- Filesharing, spyware, shareware products
- Drug or drug paraphernalia
- Loan shark services

**SECTION 3: SOCIALLY & ETHICALLY APPROPRIATE ADS**

Ads must not be socially or ethically inappropriate. Elements of this requirement are set out below.

Ads must not:

- Include content which is illegal, discriminatory, abusive, insulting, threatening, offensive, obscene, harassing, racist, pornographic, lewd, child pornographic, pornographic in a way that is harmful to minors, defamatory, in breach of any confidence, or otherwise objectionable.
- Contain information regarding illegal drugs, political views, firearms, file sharing, spyware or shareware.
- Encourage crimes such as theft or fraud.
- Contain information that is otherwise objectionable to ROKT in its absolute discretion.

**SECTION 4: INDUSTRY CODE & REGULATORY COMPLIANCE**

Visitors to the ROKT platform expect that advertising displayed to them is reflective of the legal and regulatory consensus applicable to the market in which they live.

Elements of the requirement include that Ads must not:

- Contain any information that is contrary to any relevant industry code applicable to the subject matter being advertised in a particular market.
- Inappropriately relate to any financial, real estate, medical, pharmaceutical or any other matters that would require advertiser to hold any particular professional services licence, where the advertiser does not hold such a licence.