

The background of the entire page is a photograph of a large industrial facility, likely a cement plant. It features several tall, grey concrete silos, large metal pipes, and complex scaffolding. The sky is clear and blue. In the foreground, there are green trees and a paved area. A large, solid green rectangular box is overlaid on the lower half of the image, containing the title and company name.

# **CODE OF BUSINESS CONDUCT**

PT Solusi Bangun Indonesia Tbk ("Perusahaan")







# **FOREWORD OF THE PRESIDENT COMMISSIONER AND PRESIDENT DIRECTOR**

The Company, Subsidiary Companies, and affiliations are committed to conducting their business by prioritizing the implementation of Occupational Health and Safety (OHS) and Environmental Protection, in full compliance with the applicable laws and regulations and conformity to the highest ethical standards.

All Company Personnel must comply with the Integrity Pact as well as the spirit of the Code of Business Conduct. Managers have the additional responsibility for fostering a culture in which compliance with policies and laws of the Company lie at the core of our business activities. Adherence to the highest level of ethical and legal standards in all our business activities is fundamental to the future success of the Company and the Company Personnel.

This Code of Business Conduct will be made available on the Company's website at: <https://solusibangunindonesia.com/>



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# 01

## INTRODUCTION







## 1.1 Background

Committed to conducting business activities that prioritize the implementation of Occupational Health & Safety and Environmental Protection in order to develop long-term corporate value and advocate the government programs to address bribery, the Company has collated and established this Code of Business Conduct for all Company Personnel, outlined in the Code of Business Conduct document.

This Code of Business Conduct is part of the implementation of the Company's Good Corporate Governance ("GCG") which has been written in accordance with the applicable laws and regulations, Company's Articles of Association, GCG policies, regulations pertinent to the Company, and best practices.

In addition, this Code of Business Conduct embodies the commitment of the Company's code of business conduct and the code of conduct of each Company Personnel, which have been prepared to influ-

ence, form, regulate, and carry out behavior pertinent to the principles of ethical sensibility, ethical reasoning, and ethical conduct, which will produce consistent results in accordance with the Company's work culture to achieve its vision and missions.

This Code of Business Conduct has been prepared to align with similar policies outlined by PT Semen Indonesia (Persero) Tbk ("SIG") as well to improve the previously established policies in the Company.

The Company will commence implementation of the ISO 37001-based Anti-Bribery Management System that is expected to:

1. Prevent, detect, and address risk of bribery,
2. Increase international recognition,
3. Promotes trust and confidence,
4. Reduce costs,
5. Prevent conflicts of interest, and
6. Promote anti-bribery culture

This Code of Business Conduct is a measure to provide guidelines for all Company Personnel to benefit from implementing the Anti-Bribery Management System.



## 1.2

# Company's Vision, Mission, and Core Values and Corporate Culture

### Company's Vision

Be the Largest  
Construction Materials  
Solutions Provider  
in The Region



### Company's Mission

1. Be oriented towards customer satisfaction in every business initiative.
2. Implement the best standards to establish quality assurance.
3. Focus on creating sustainable environmental protection and social responsibility.
4. Deliver the best added value for all stakeholders.
5. Position human resources at the core of the Company's development.



### Company's Culture

**AKHLAK**

#### **Trust**

We hold fast the trust bestowed upon us.

#### **Competent**

We pursue continuous learning and enhancing of our capabilities.

#### **Harmonious**

We show mutual compassion and respect diversity.

#### **Loyal**

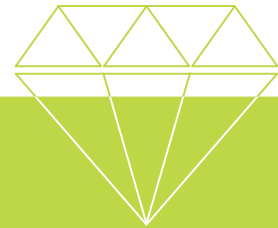
We are dedicated and uphold the interest of the Nation and the State.

#### **Adaptive**

We nurture innovation and enthusiasm in driving or facing changes.

#### **Collaborative**

We build synergistic collaboration.







## 1.3 Purpose and Objectives

### 1.3.1 Purpose of the Code of Business Conduct

1. To serve as the practical guide for Company Personnel, Subsidiary Companies, and other stakeholders in conducting daily interaction with all parties, and as the base thought in the decision-making process.
2. To be the best standards of conduct for Company Personnel, premised upon the principles of Good Corporate Governance ("GCG") in order to encourage the establishment of Company culture that meets expectations, which will directly or indirectly increase corporate value.
3. To shape the character of Company Personnel to be responsible and ethical in their interactions with fellow Company Personnel or parties outside of the Company.
4. To create a healthy and safe atmosphere in the Company environment and to minimize the likelihood of misappropriation and accidents at work.
5. To establish harmonious, synergistic, and mutually beneficial relationships between stakeholders and Company.
6. To serve as one of the guides for managing and increasing Company value which will ultimately enhance the Company's corporate image.
7. To serve as one of the guides for implementing the Company's principles of sustainability.
8. To demonstrate respect towards the principles of Business and Human Rights.

### 1.3.2 Objectives of the Code of Business Conduct



#### Shareholders

Reinforce the confidence and certainty to the shareholders that the Company is managed in an efficient, transparent, accountable, and fair manner in adherence to the GCG principles in order to achieve the development and accomplishment of profitable levels as expected by the shareholders while consistently attending to the interests of the Company and other stakeholders.

**Company**

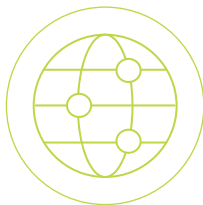
1. Drive the business activities of the Company to be more efficient and effective by conforming to the standards of business ethics towards the customers, community, government, and other stakeholders.
2. Foster a positive work environment within the Company to achieve professional and productive behavior.
3. Build commitment to conducting business in a particular manner and behavior towards creating a healthy and safe environment for all stakeholders (personnel, contractors, community, and consumers).
4. Ensure certainty and protection to the stakeholders in their relationship with the Company in a manner that increases corporate value in order to guarantee the Company's business long-term success and sustainability

**Board of Commissioners, Directors, and Employees  
(Company Personnel)**

1. Provide guidance and directions for the Board of Commissioners, Directors, and Employees regarding the prescribed, mandatory, and prohibited behaviors set forth by the Company.
2. Create a work environment that upholds moral and ethical values to amplify the overall performance and productivity of the Board of Commissioners, Directors, and Employees.

**Business Partners**

Create a harmonious relationship by positioning business partners as the Company's strategic partners to establish a more efficient and effective partnerships built upon professionalism, transparency, and fairness.

**Community and Other Related Parties**

Nurture harmonious, synergistic, and mutually beneficial relationships with the Company, which ultimately creates socio-economic welfare for the community and other related parties.

## 1.4 Scope



This Code of Business Conduct regulates matters for which the Company, Company Personnel, Subsidiary Companies and their affiliations, and other parties involved in Company activities are responsible, including:

### **Company Business Ethics**

Company Business Ethics provides explanations on how the Company, as a business entity, conducts its interactions, behavior, ethical conduct, and actions in a manner that balance the interests of the

Company and those of stakeholders by adhering to GCG principles.

### **Company Code of Conduct/Corporate Conduct**

Company Code of Conduct provides explanations on how the Company Personnel in their relations, behavior, ethical conduct, and actions must conform to the applicable principles and regulations.

### **Implementation of Code of Business Conduct**

Provides explanations concerning the effective and thorough implementation of the Code of Business Conduct, its dissemination, and the reporting and handling of violations as well as enforcing sanctions; all of which apply to all Company Personnel and stakeholders.



## 1.5

# Glossary

1. **Conflict of Interest** is a situation in which a conflict occurs between the economic interests of the Company and the personal interests of shareholders, members of the Board of Commissioners and Directors, as well as Company employees. Conflict of Interest may also refer to a situation when the interests of business, financial, family, political or related personnel influence people's decisions in performing their duties for the organization.
2. **The Board of Commissioners** is an organ of the Company in charge of supervising and providing advice to the Board of Directors in performing the Company's management activities. The Board of Commissioners includes the entire members of the Board of Commissioners as a united organ (Board). The Board of Commissioners and the Committees/Supporting Organs under the Board of Commissioners are also referred to as the Steering Committee.
3. **The Board of Directors** is the organ of the Company in charge of managing Company affairs related to the Company's interests and objectives, as well as representing the Company both in and out of the court. The Board of Directors includes the entire members of the Board of Directors as a united organ (Board). It is also known as top management, namely a person or group of people who holds the highest authority of the organization to provide directions and control the organization.
4. **Donations** are charity and/or gifts from the Company that include but not limited to the Board of Commissioners, Directors and/or Employees to other parties. Donations may include – among others – cash, securities, consumer durables, commissions, rebates (discounts), price concessions, personal necessities, gifts, and interest-free loans in accordance with the applicable CSR Policies and Procedures, Sponsorships, and Donations in the Company. Donations may be perceived by third parties (business competitors, press, attorneys, or judges) as a means of bribery committed by both the giver and receiver although this may not be necessarily the case.
5. **Good Corporate Governance (GCG)** are the underlying principles of the processes and mechanisms of managing the Company based on the laws and regulations as well as business ethics.







6. **Gratification** is an umbrella term for gifts that include the provision of money, goods, discounts, commissions, interest-free loans, travel tickets, accommodation facilities, tourist package, free medical treatment, and other facilities, as well as using/extending benefits for relatives, charitable giving, excessive hospitality, political donations, and using business partners. The gratifications refer to those that are received both domestically and abroad by means of either electronic channels or non-electronic methods.

7. **Gifts or Rewards** refer to any gifts from a party to Company Personnel or vice versa, that are given due to the power or authority of the corresponding parties, or by which one party may perceive to be correlated with the position and authority of the other party. Gifts or rewards may include, but not limited to: cash, bonds, cashable vouchers, goods, commissions, rebates (discounts), price concessions, personal necessities, facilities owned by suppliers or customers, gift baskets, food, and interest-free loans.

8. **Information** refers to important and relevant information or facts regarding events, incidents, or facts that may affect stock prices on the Stock Exchange in which the stocks are listed, and/or the decisions of

investors, potential investors, or other interested parties. Such material information or facts include, among others:

- a. Mergers, acquisitions, consolidations, or joint ventures;
- b. Stock splits or stock dividends;
- c. Extraordinary income/earnings and dividends;
- d. Gain or loss of important contracts;
- e. Significant new products or inventions;
- f. Changes regarding the Company's fiscal year; and



g. Changes in control or significant changes in management; provided that the information may affect the stock prices and/or decisions made by investors, potential investors, or other parties interested in the information or facts.

9. **Insider Information** refers to insider-owned material information that is not made available to the public and is related to transactions occurring between the Company and other Companies, including transactions on stocks of other Companies that will be made by the Company.

10. **Company Personnel** encompass the entire Board of Commissioners, Supporting Organs of the Board of Commissioners, Board of Directors, and Employees of the Company.

11. **Employees** refer to the employees of the Company.

12. **Insiders are**

- a. Board of Commissioners, Board of Directors, or Company Employees;
- b. Company's shareholders;
- c. Individuals who due to their position, profession, or business relation with the



Company are able to collect insider information; or

- d. Any parties who within the last 6 (six) months have ceased to be parties as referred to in item a, item b, or item c above.

13. **Stakeholders** refer to parties that have an interest in the Company. Stakeholders may also be understood as people or organizations that can influence or be influenced by a company's decision or activities.

15. **Company** is PT Solusi Bangun Indonesia Tbk along with its existing and future subsidiaries and affiliated companies, either individually or collectively in accordance with their relevance, as follows:

- a. PT Solusi Bangun Beton
- b. PT Solusi Bangun Andalas
- c. PT Pendawa Lestari Perkasa
- d. PT Readymix Concrete Indonesia
- e. PT Aroma Cipta Anugrahtama
- f. PT Aroma Sejahtera Indonesia
- g. PT Ciptanugrah Indonesia
- h. PT SBI Bangun Nusantara

16. **Trade Secret/Confidential Information** refers to information in any form and/or any media that is unknown to the public in the field of technology and/or business, is of

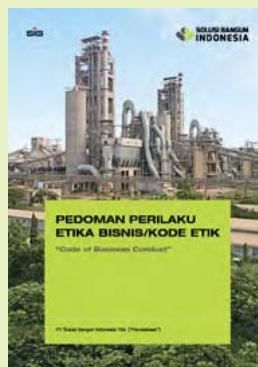
economic value due to its usefulness in business activities, and of which confidentiality is maintained by the holder of the trade secret/confidential information.

17. **The Company's Electronic Communication System** refers to the Company assets in the forms of devices and procedures of utilizing electronic information.

18. **SIG** is the corporate brand of PT Semen Indonesia (Persero) Tbk that includes PT Semen Indonesia (Persero) Tbk and all consolidated subsidiaries/affiliates.

19. **Electronic Information** is one or a set of electronic data that include, but not limited to: texts, sounds/audio, images, maps, designs, photographs, electronic data interchange (EDI), electronic mails, telegrams, telex, telecopy or the like, letters, signs, numbers, access codes, symbols, or processed perforations that carry meaning or can be understood by people who are capable of understanding the meaning.

14. **This Code of Business Conduct** is a set of commitments that contains the Company's business ethics and code of conduct of each Company Personnel that have been prepared to influence, shape, regulate, and adjust the behavior of the corresponding targets based on the principles of ethical sensibility, ethical reasoning, and ethical conduct in accordance with GCG principles.





20. **Bribery** refers to a situation in which any individual receives something or a promise despite being aware or suspicious that the gift or promise is intended to prompt them to do or not do a particular action while performing their duties which contradicts their authority or responsibility relating to public interests. A bribe may also be defined as an act of offering, promising, giving, receiving, or asking for undue benefits of any value (in monetary or non-monetary form), either directly or indirectly regardless of the location, which constitutes violation of rules and regulations, as a means of prompting or gifting the individuals to commit or refrain from performing a part(s) of their duties.

21. **Violation Reporting Management Team (VRMT)**

refers to a People (Group) who carry the responsibility and authority to manage violation reporting made by Company Personnel.

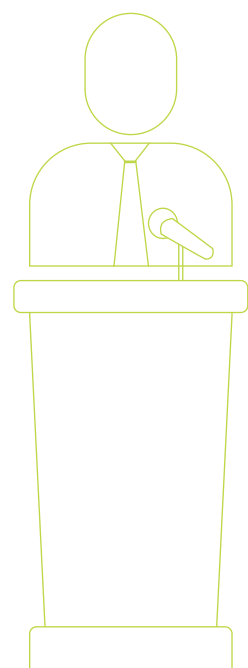
22. **Business Partner** is an external party where the organization has or plans to establish some form of business relationship including customers, clients, joint ventures, joint business partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, external suppliers/vendors/providers, advisors, agents, distributors, representatives, intermediaries and investors.

23. **Public Officials** are people who serve in a legislative,

administrative, or judicial office through appointment, election, or replacement, or any people performing public functions that include public agencies or business entities, or officials or agents of domestic or international organizations, or public official candidates.

24. **Third Party** is a person or entity that is independent from the organization, in which all business partners are third parties but not all third parties are business partners.

25. **Due Diligence** refers to the process of further examining the characteristics and extent of bribery risk and assists the organization in making decisions concerning specific transactions, projects, activities, business partners, and personnel.





# 1.6

## Legal Basis and Relevant References

### 1.6.1

#### Company Regulations

1. Company's Articles of Association;
2. Collective Labor Agreement between the Board of Directors and the Company's Labor Union;
3. Guidelines for the Violation Reporting System (whistle-blowing system);
4. Regulations, Policies, and Decrees applicable in the Company.

### 1.6.2

#### Legislation in the Republic of Indonesia

1. The 1945 Constitution of the Republic of Indonesia.
2. Law No. 11 of 1980 on the Crime of Bribery.
3. Law No. 28 of 1999 on the Implementation of State Governance that is Free of Corruption, Collusion, and Nepotism.
4. Law No. 31 of 1999 on Eradication of Criminal Acts of Corruption.

5. Law No.20 of 2001 on Amendment to Law No. 51 of 1999 on Eradication of Criminal Acts of Corruption.
6. Law No. 11 of 2008 on Electronic Information and Transactions.
7. Law No. 19 of 2016 on Amendments to Law No. 11 of 2008 on Electronic Information and Transactions.
8. Law No. 1 of 1970 on Occupational Safety.

### 1.6.3

#### Relevant Foreign Laws and Regulations

1. Decree No. 59/2019/ND-CP (the New Regulations), Vietnam's new Anti-Corruption Law (Law No. 56/2018/QH14).
2. OECD Convention on combating Bribery of Foreign Public Official in International Business Transaction (OECD Convention 1999).
3. UNITED NATIONS CONVENTION AGAINST CORRUPTION (UNCAC) 2005.
4. Foreign Corruption Act (FCPA).
5. United Kingdom Bribery Act (UKBA).
6. ISO 26000 on Social Responsibility.
7. United Nations Guiding Principles on Business and Human Rights (UNGPs) 2011.







“

“In fulfilling its vision and missions, the Company implements various improvements at all times to enhance performance, by increasing asset growth, business development, improving product quality, net profit, maintaining potential markets, increasing market share, increasing customer satisfaction and providing added value to society.”

”



## 1.7 General Policy



As a public company, the Company is responsible for meeting the expectations of shareholders and stakeholders. The Company is managed professionally by maintaining and fostering relationships with all stakeholders in accordance with business ethical standards at all times. In carrying out these responsibilities, the Company consistently implements the GCG guidelines, which are supported by business ethics and code of conduct as outlined in the Code of Business Conduct.

In fulfilling its vision and mission, the Company continuously carries out various improvements to enhance performance, by increasing asset growth, business development, improving product quality, net profit, maintaining potential markets, increasing market share, and increasing customer satisfaction and providing added value to society. This increase must be balanced with the abilities of competent human resources in accordance with their respective fields. The Company conducts

business in a manner and behavior that leads to the creation of a healthy and safe environment for all stakeholders, including employees, contractors, communities, and consumers.





## 1.8 Anti-Bribery Policy

As the largest building material solutions company in the region, the Company is committed to conducting business in compliance with applicable laws and regulations regarding bribery and corruption and in accordance with the highest ethical standards by:

1. Prohibiting bribery and corruption by:
  - a. prohibiting Company Personnel and third parties who work for and on behalf of the Company from giving enticements, promises, or giving something to public officials, business partners, and other third parties within the scope of the work;
  - b. prohibiting Company Personnel within the Company's scope of work from requesting and/or receiving gifts from individuals or organizations related to their duties in the Company;
2. Encouraging increased regard for good faith, or on the basis of reasonable belief

without fear of reprisal.

3. Establishing the authority and independence of the anti-bribery compliance function.
4. Meet the requirements of the Anti-Bribery Management System and implement continuous improvement.
5. Prohibiting the imposition of

punishment or retaliation against whistleblowers due to their regard for the anti-bribery management system.

The Company is committed to monitoring this policy. The consequences of non-compliance with this policy may result in actions in the form of disciplinary penalties, civil and/or criminal punishment in accordance with the provisions of the applicable laws.



# 02

## **BUSINESS CONDUCT/ETHICS**







## 2.1 Relationships with Shareholders

The Company is committed to respect and guarantee at all times that the shareholders' rights, in accordance with the Company's Article of Association, decisions made in the General Meeting of Shareholders (GMS), and other applicable regulations, can be sufficiently fulfilled in a fair, transparent, punctual, and smooth manner. To ensure good relationships with shareholders and comply with the applicable laws and regulations, the Company has established the following policies:

1. Provide the shareholders with complete and accurate material information on the Company in accordance with the applicable laws and regulations.
2. Design the GMS mechanism that allows each shareholder to be able to be present in the GMS and give vote in accordance with the applicable laws and regulations.
3. Guarantee that each shareholder has their rights fulfilled in accordance with the Company's

Article of Association, all the decisions made in a legitimate manner in the GMS, and the applicable laws and regulations.

4. Each shareholder must fulfill their obligations and perform their responsibilities in accordance with the Company's Article of Association and the applicable laws and regulations.





## 2.2

### Relationships with Employees

The Company considers Employees as paramount and most valuable assets. Hence, the Company uses the Active OHS Management approach to prevent occupational-related accidents and diseases by

providing a safe workplace and work system, required safety equipment, and training on OHS procedures for employees. The Company will provide the Employees with an adequate and safe work environment,





protect them from all kinds of potential occupational safety and health hazards, and provide them with the right to freedom of association in accordance with the applicable regulations. The Company implements the human resource management system based on the values of openness, fairness, and biased-free due to diverse ethnicities, origins, genders, and places of birth as well as matters that are not associated with the Employees' performance.

The policies and the procedures of human resource management, such as recruitment (hiring), promotion, demotion, job transfer, rewards, and punishments, and the implementation of education and training for Employees will be consistently conducted in accordance with the applicable regulations. The Company is committed to provide a fair/non-discriminative and harassment-free work environment, and not to employ Employees that are underaged

children/child labor and avoid forced labor. The Company also guarantees the non-existence of threats and violence in the workplace. Employees who are involved in actions of threats or violence will be subject to disciplinary action or a lawsuit. Conforming to the abovementioned, the Company also expects all Employees to be proactive and participate in improving their productivity through a dynamic, harmonious, and balanced relationship between the Company and the Employees.

To perform these ethics, the Company:

1. Considers the Employees as a strategic partner in achieving the Company's goals by prioritizing Occupational Health and Safety (OHS).
2. Respects and performs the rights and obligations between the Company and the Employees in accordance with the Collective Labor Agreement (CLA), Company Regulations, and/or the applicable laws and regulations.
3. Provides a space for the Employees to express their constructive thoughts/opinions.
4. Motivates and supports the Employees to improve and develop relevant knowledge and skills.
5. Respects the Employees' rights in relation to their membership of labor union.
6. Performs the business relationships in accordance with the applicable ethical values and norms.
7. Shows appreciation to outstanding Employees and imposes strict punishments to any form of violation committed by the Employees.



## 2.3 Relationships with Customers

The Company strives to be the top choice for its customers. The Company prioritizes customer satisfaction and trust by making efforts to build a relationship and provide its customers with high-quality, excellent services and innovative solutions. The Company will interact with its customers directly to identify the customers' needs and provide services based on those needs.

The Company prioritizes customer satisfaction and trust by:

1. Ensuring the products and services traded by the Company are in accordance with the existing agreements and have been subjected to the quality and environmental management systems.
2. Ensuring all business agreements with customers are performed in a fair manner based on equality and a professional attitude.
3. Continuously conduct promotions in a fair, reasonable, honest, and non-misleading manner in accordance with the applicable norms.
4. Providing and managing the communication media with customers and leads to allow the customers file complaints, provide feedback, and follow them up in a convenient way.
5. Conducting surveys or measuring customer satisfaction regularly to determine the extent of the customer satisfaction index in interacting with the Company.





## 2.4 Relationships with Suppliers

The Company consistently maintains the relationship and collaboration with its supplier/partners based on professionalism, equality, trust, and mutual respect. The Company communicates effectively with the suppliers, including following up on complaints and objections. The communication is conducted in an honest and effective way by protecting confidential data and information. The Company has established cooperation with providers of goods/services by implementing the following rules:

1. Implementing the procurement of goods/-services in a fair and transparent manner in accordance with the internal regulation of goods/services procurement set forth by the Company based on the applicable regulations.
2. Ensuring that the Company's business activities are conducted in accordance with the laws and regulations on the Prohibition of Monopolistic Practices and Unfair Business Competition in Indonesia.
3. Giving equal opportunity to all suppliers and prospective suppliers.
4. Fulfilling suppliers' rights in accordance with the existing agreement.
5. Respecting the suppliers as an independent relationship free of coercion, corruption, collusion, Conflicts of Interest, and nepotism.
6. Maintaining good relationships with suppliers who possess strong track records and imposing penalties on suppliers who commit violations.
7. Conducting surveys or measuring supplier satisfaction regularly to determine the extent of the supplier satisfaction index in interacting with the Company.
8. Ensuring the suppliers do not employ under-aged children (child labor) and forced labor.
9. Seeking, gaining, and using information must be conducted in compliance with the applicable laws and regulations.





## 2.5 Relationships with Competitors

The company regards and places competitors as drivers to encourage continuous self-improvement to be able to compete in the industry. The Company upholds business ethics and promotes a healthy and fair competition with the competitors.

### **The main principles the Company follows in encouraging a healthy business competition include:**

1. Maintain good relationships and respect the existence of competitors.
2. Create innovations as the business develops and becomes more competitive and open.
3. Promote products, services, and price excellence.
4. Position other Companies as benchmarks to improve the Company's performance.
5. Avoid unfair business relationships and collaborations and avoid providing certain parties with benefits, and thus having to sacrifice consumers' interest.
6. Demonstrate a healthy and competitive ethical behavior in accordance with the applicable laws and regulations.
7. Conduct market research to gauge competitors' positions.



## 2.6 Relationships with Creditors



The Company builds relationships with creditors based on commitment, trust, honesty, and mutual respect, and provides equal opportunity to creditors. The Company constantly maintains its reputation while using funds sourced from creditors. The principles emphasized in the relationships with creditors are as follows:

1. Provide actual, accurate, and reliable information to creditors and prospective creditors.
2. Select creditors based on accountable credibility and bona fides.
3. Analyze the risks and advantages prior to entering a partnership agreement.
4. Accept loans bound through legal agreements with agreement clauses therein that uphold fairness.
5. Fulfill the creditors' rights in accordance with the written agreement and endeavor to provide an optimal rate of return to maintain the creditors' trust.
6. Disclose information on fund appropriations to increase the creditors' trust.



## 2.7 Relationships with Investors

The Company realizes that investors' trust is inextricably linked to the achievement of the Company's goals. In interacting with investors, the Company promotes the business interest and increases the added value for the Company.



**The principles emphasized in the relationship with investors are as follows:**

1. Provide accessible information for investors or prospective investors accurately in accordance with the information needs and the applicable regulations.
2. Treat or provide equal opportunities to prospective investors to collaborate and invest in the Company.
3. Select investors based on their accountable track records.
4. Explore business opportunities with investors to boost Company growth.



## 2.8

# Relationships with Business Partners

The relationships with business partners and prospective business partners are built professionally and equally, and are mutually beneficial by complying with the following principles:

1. Verify the credibility and reputation of prospective business partners prior to entering a business agreement.
2. Disclose material and relevant information in accordance with the needs of the business partnership while protecting information confidentiality.
3. Show respect and mutual trust, and nurture a sense of fellowship with business partners.
4. Fulfill the partners' rights as stipulated in the written business agreement.
5. Develop intensive communication with business partners to seek the best solution to enhance performance.
6. Collaborate independently, free of coercion, corruption, collusion, nepotism, and Conflicts of Interest.





## 2.9 Relationships with Mass Media

Mass media are business partners in conveying information on the Company and therefore providing information on the Company to the mass media should be conducted in a transparent and responsible manner.

The Company believes that building and developing media relations can help improve the Company's corporate image, reputation, trust, and achieve the Company's goals. Therefore, the Company strives to provide the public with accurate and accountable information at all times. The principles observed in the relationships with mass media are as follows:

1. Position the mass media as colleagues by promoting relationships on an openness and mutual respect basis and therefore the Company will strive to provide relevant and accurate information at all times based on the Company's applicable regulations and not to violate the journalist code of ethics.
2. Delivery of information to the media, primarily material information, should be published information (public information), as elaborated in the Company's internal policy.
3. Company Personnel who may deliver the information to the mass media are individuals who have been granted approval or appointed by the management or other authorized parties as provided herein the Company's communication policy.
4. Receive inputs delivered by the mass media by means of the appropriate journalistic process and consider them as feedback to improve the Company's corporate image.
5. Treat the media personnel reasonably to create an improved the Company's corporate image.
6. Accept and follow up constructive criticisms delivered through mass media by taking the Company's best interest into account.





## 2.10 Relationships with the Government

### 2.10.1

#### General Principles

The Company is committed to develop and maintain a good relationship and effective communication with the central and local governments. The Company adheres to moral and ethical business principles that are subject to and comply with the business regulations and is committed to complying with the applicable laws and regulations. Each relationship with government officials should be maintained as a fair relationship and avoid collusions and fraudulent activities. The Company undertakes positively impactful business with added value to the economic growth, both directly and indirectly, at all times. The Company will always support government programs by following the principle of mutual benefit.

#### **The general principles implemented in the relationship with the government are as follows:**

1. Comply with the laws and regulations issued by both the central government and local governments.
2. Support government programs pertaining to the Company's social responsibility.
3. Comply with obligations to the government in accordance with the applicable laws and regulations.

The principles above include, but are not limited to, any interaction between the Company Personnel and the Government Officials regarding any specific goals. All interactions must be conducted with integrity, honesty, transparency, and profession-

alism. All contacts and communications must be open and transparent with clear goals and proper documentation.

### 2.10.2

#### Special Principles

1. Interaction with Civil Servants or State Officials or Public Officials

During religious holidays and other holiday celebrations, Company Personnel are prohibited from providing services or request, give, and receive gratifications pertaining to the position or against the obligations or tasks as Civil Servants or State Officials or Public Officials as these acts may result in conflicts of interest, are against the Code of Business Conduct Guidelines and pose the risk of the Company being imposed to criminal penalties.



If the Company Personnel receives gratifications pertaining to their position which are against their obligations and tasks, they are required to report to the Company no later than 30 days since the date of receiving the gratifications.

## 2. Contact with authorized parties and organizations

Each activity requiring costs pertaining to gifts or rewards on behalf of the Company requires prior approval from the management.

## 3. Accurate Information

Company Personnel who have been granted approvals or appointed by the management of other authorized parties must ensure that all communication and information are accurate and clear. Company Personnel are prohibited from intentionally providing misleading information.

## 4. Lobbying

The Company strives to maintain a healthy and transparent relationship with the government in the location where the Company runs its business by communicating their perspectives and concerns to State Officials and policymakers.

Company Personnel must request prior approval from the Legal, Compliance & Corporate Secretary ("LCCS") Group Function to ensure the compliance with local regulations on this issue. In the event of any discrepancies between local regulations and this Code of Business Conduct Guidelines, the more stringent regulations must be adhered while still respecting to the other regulations.

Third Parties associated with the Company are prohibited from conducting any activities on behalf of the Company with the intention to undertake lobbying or hire a pressure group or external consultant to carry out the task, unless they have obtained written consent from the Company to perform the task.







“

“The Company undertakes positively impactful business with added value to the economic growth, both directly and indirectly, at all times.”

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## 2.11 Relationships with the Community

The Company is committed to being considerate towards the condition of the community of the location in which the Company operates, as good relationships and the development of the surrounding community are the fundamentals for the Company's long-term success. The Company strives to maintain and improve harmonious relationships between the Company and the surrounding community. The Company shall at all times avoid actions that lead to community discrimination based on ethnicity, religion, race, and between groups.

### A number of matters that are emphasized in relationships with the community include:

1. Respect local cultural values and be considerate towards the environment in which the Company operates.
2. Conduct Corporate Social Responsibility Programs through community involvement and development (Community Involvement and Development or abbreviated as "CID") and being part of a considerate community through contributions in educational activities, economic independence, nature conservation, health and culture and humanity, and encouraging active participation of Company Personnel in social activities.
3. Establish and maintain open and respectful communication with various elements of society.
4. Disseminate information to the public about the Company's activities and relevant Company policies.
5. Prohibit Company Personnel from making commitments or giving promises to the public beyond their authority.







## 2.12

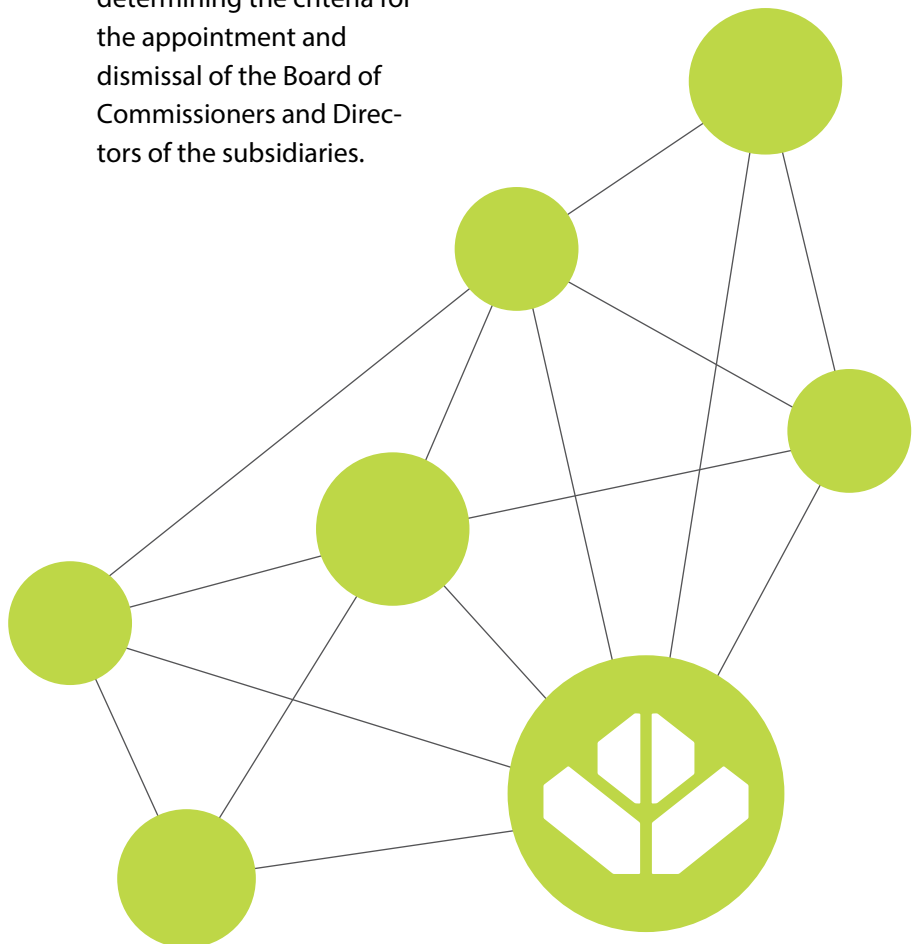
# Relationships with Subsidiaries and Affiliated Companies

In managing and dealing with subsidiaries and joint ventures, the Company adheres to GCG principles and applicable laws and regulations. The Company maintains good relationships with its subsidiaries and joint ventures at all times in an effort to build synergies and improve the corporate image of the Company and its business groups. The main principles the Company implements in relation to its relationships with subsidiaries are:

1. Conduct relationships with subsidiaries that are implemented within the framework of a fair and mutually beneficial business relationship.
2. Promote the principle of independence in the operational activities of

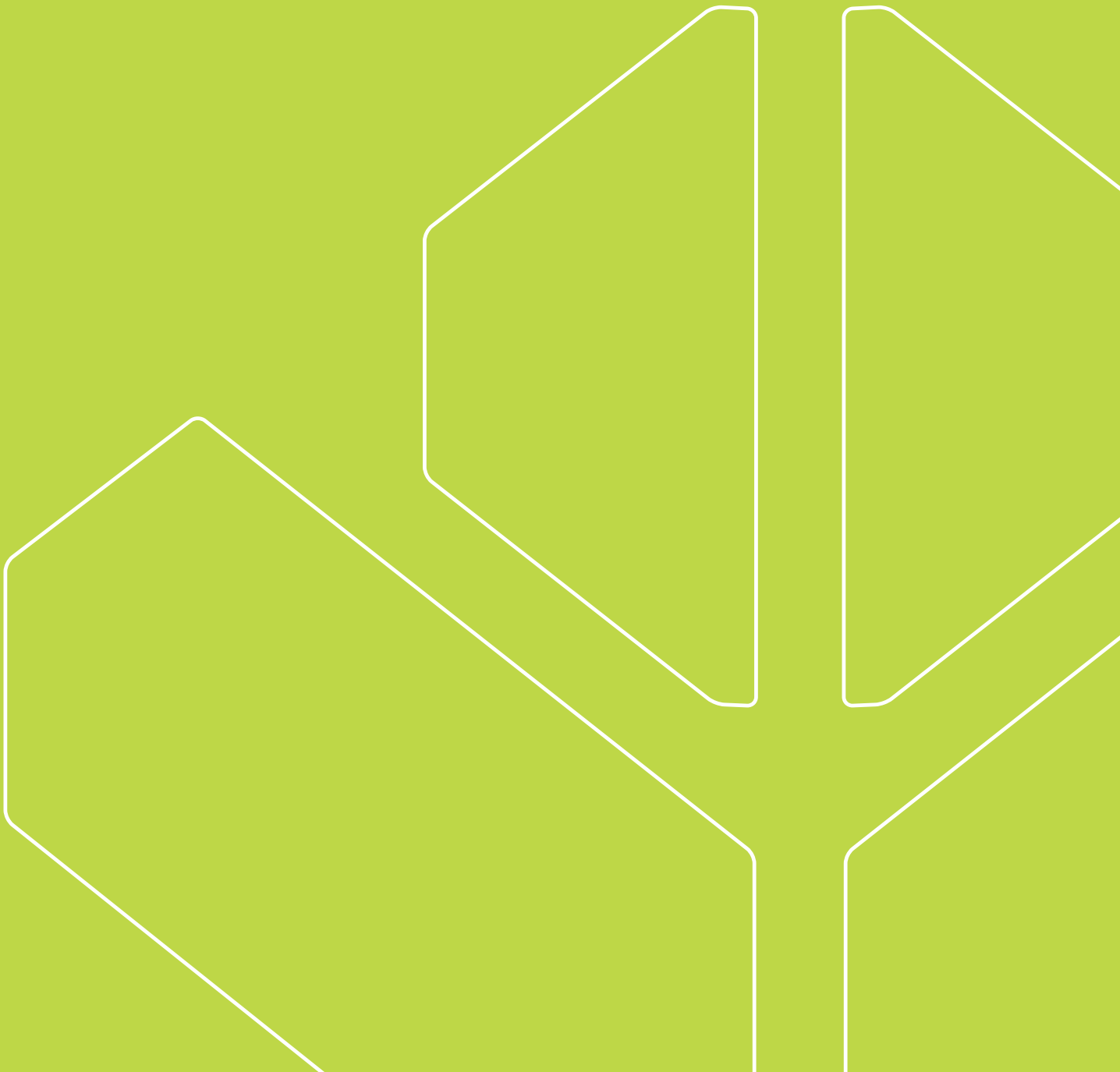
subsidiaries and not giving preferential treatment in business relationships between the Company and subsidiaries.

3. Perform its role as a shareholder in a professional manner and in accordance with applicable regulations for the success and advancement of the subsidiaries, including but not limited to determining the criteria for the appointment and dismissal of the Board of Commissioners and Directors of the subsidiaries.



# 03

## **COMPANY'S BEHAVIOUR ETHICS**







## 3.1 Integrity and Commitment of Company Personnel

All Company Personnel, both individual and groups, adhere to honesty, manners, social ethics, and business ethics in carrying out daily business activities for internal and external parties of the Company. For this reason, in carrying out their daily work activities the Company Personnel must follow ethical standards by:

1. Upholding generally accepted business ethics and Company values and prioritize Occupational Health and Safety (OHS) in their daily duties.
2. Avoiding conflicts of interest by prioritizing the interests of the Company over personal, group and/or other parties' interests.
3. Striving to achieve the standard of success, excelling to build a long-term career, and producing works that are of benefit to the Company.
4. Implementing the principles of awareness, thinking, and ethical behavior to achieve successful implementation of GCG.
5. Upholding the highest standards of integrity and avoid abuse of position.
6. Avoiding acts of fraudulent or unlawful acts in any activities and operations that are detrimental to the Company.
7. Avoiding the practices of corruption, collusion, and nepotism (CCN) in every activity and operation in the Company.





## 3.2 Employment Relationships



### 3.2.1

#### **A Work Environment Free of the Risks of Safety and Health Hazards, Discrimination, Harassment, Moral Violations, Threats, and Violence**

It is the responsibility of the Company Personnel to create a work environment that is free of the /risks of safety and health hazards, discrimination, harassment, moral violations, threats,

and violence. The Company is committed to developing a diverse workforce and providing a work environment where every employee is treated fairly and respectfully by providing equal opportunities to work and be promoted in accordance with applicable regulations. Employment opportunities in the Company are offered and provided on a mutual benefit basis. All Employees and job applicants must be treated and evaluated in accordance with their job skills, qualifications, abilities, and competencies. Decisions on this

matter are not based on differences in race, skin color, gender, religion, personal relationship, region of origin, age, disability, ideology, marital status, family responsibilities, and so forth. Discrimination against an Employee or job applicant is a violation of the terms of equal employment opportunity and is against the Company's policy.

Every Company Personnel is prohibited from committing acts of harassment and acts that violate decency in any form, both towards fellow Company Person-



nel and to partners/suppliers/business partners of the Company. Harassment may take the form of:

- Verbal harassment, which includes words, explicit jokes, or insults; and physical harassment, which includes unwanted and painful touching with the intent of demeaning.
- Harassment carried out through any media such as posters, cartoons, graffiti, letter writing, or body movements with the intention of demeaning and is not consented to by the harassed party.
- Sexual harassment and/or violence, and so forth.

The Company upholds the values and norms of decency. The Company views acts that violate decency committed by the Company Personnel in the work environment as unethical. Acts that violate decency will not only damage the corporate image and reputation of the Company, but they also create an uncomfortable workplace atmosphere. Every Company Personnel is obliged to create and maintain a work environment that is free of immoral acts.



### 3.2.2

#### Relationships and Cooperation between Company Personnel

The Company prohibits all forms of actions that do not support or hinder the establishment of quality cooperation between Company Personnel in carrying out their duties and obligations in achieving group or company goals.

Good relationships between the Company Personnel will bring about a supportive work environment. To that end, every Company Personnel is required to:

1. Build teamwork and work professionally to create a healthy and safe work climate and yield optimum performance.
2. Show mutual trust and kindness towards fellow Company Personnel.
3. Show mutual respect, be open to accepting feedback/criticisms and suggestions, and resolve problems by deliberation and consensus.
4. Be open-minded and have mutual respect should the possibility of dissenting opinions arise when formulating a decision.
5. Remind one another with compassion, openly accept and give constructive input.
6. Develop camaraderie and strengthen relationships between people, both within and outside the Company's affairs.
7. Develop mutual tolerance, empathy, and mutual respect.
8. Build healthy competition to drive performance.
9. Avoid actions and words that contain elements of harassment, humiliation, mockery, slander, and degradation of other Company Personnel.
10. Not exert pressure and intimidation for personal gain or other interests, both verbally and non-verbally.
11. Appreciate attainments or creativity at work.



### 3.3

## Relationships between Superiors and Subordinates



### Behavior as a superior towards subordinates:

1. Act as a role model, director, mentor, and coach for their subordinates, and be responsible for the behavior, performance, and achievements of their subordinates, as well as Occupational Health and Safety (OHS) in the Company.
2. Provide exemplary, honest, disciplined, and professional attitude at work.
3. Fully trust subordinates, following the established division of tasks and responsibilities.
4. Develop a wise and nurturing attitude and appreciate the subordinate's work and achievements.
5. Respect the opinion of each subordinate without discriminating against gender, ethnicity, religion, race, and between groups.
6. Provide equal motivation and opportunity to subordinates to develop their careers.
7. Maintain the integrity and cohesiveness of all employees by avoiding unfair competition and division

8. between departments.
8. Develop an open communication pattern and develop a supportive work climate.
9. Must not intimidate or pressure, humiliate, and harass subordinates.
10. Respond to every report regarding disciplinary violations and conduct investigations in accordance with Company regulations.

### Behavior as a subordinate to superiors:

1. Be honest and professional in carrying out duties with full responsibility.
2. Carry out duties following obligations and comply with the established laws, policies, and standard procedures as well as commitments to Occupational Health and Safety (OHS).
3. Communicate openly and give positive suggestions and inputs to superiors.
4. Have courage and freedom to express opinions politely in discussing their superior's policies that do not follow Company's rules and/or objectives, and give feedback for improvement.
5. Maintain politeness and well-mannered behavior towards superiors and fellow employees.
6. Maintain the trust given by superiors and continuously pursue efforts to improve abilities, knowledge, and professionalism in carrying out tasks.
7. Disciplined in carrying out their work in accordance with Company regulations.
8. Inform the leadership should indications of irregularities be present.
9. Must not take actions that are beyond their authority.



## 3.4 Compliance with Laws and Regulations

Every Company Personnel must comply with the applicable laws and regulations as well as applicable internal policies. Any personnel who do not comply with the laws and regulations cannot be tolerated. Legal-related matters needing reprimands should be consulted with the relevant legal function.

### Standard behavior related to compliance with laws and regulations is as follows:

1. Every Company Personnel must comply with laws and regulations and implement them consistently.
2. Every Company Personnel must avoid any action and behavior that may result in violation of law and decency.
3. Prioritize settlement through deliberation to reach consensus in every issue. Should no agreement be reached, legal options will be pursued, and every Company Personnel is obliged to respect the ongoing legal process and the decisions made.
4. Must not engage in law-violating cooperation with other parties which are detrimental to the Company.





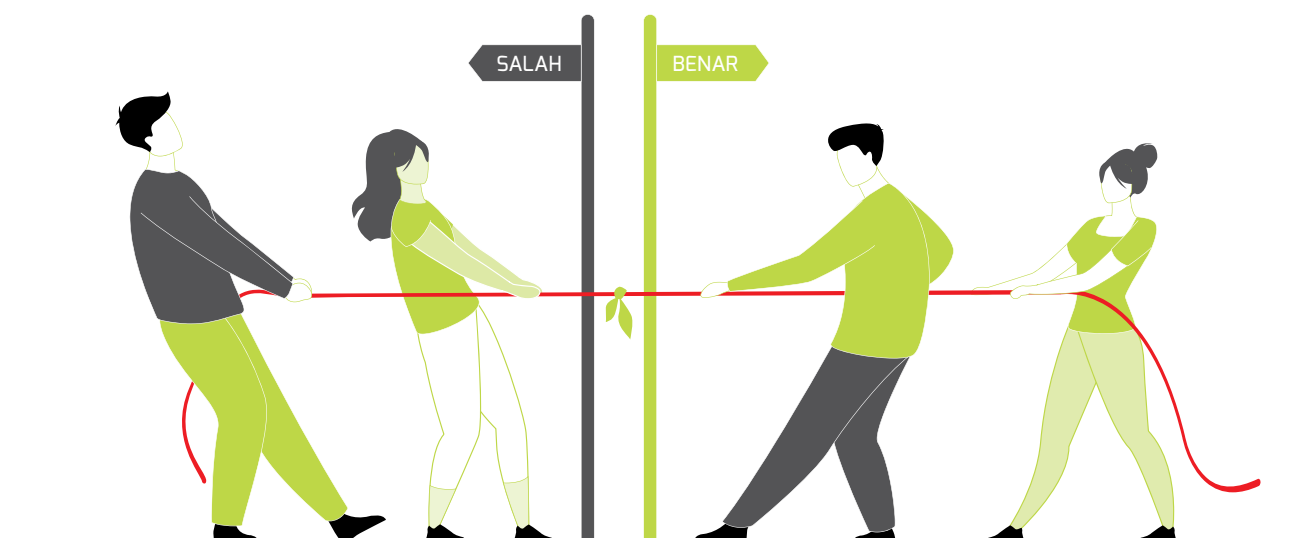
## 3.5

# Conflict of Interest and Abuse of Position

the Company. Company Personnel are prohibited from engaging in activities that benefit their personal, family, or relative interests whether directly or indirectly in the Company. To avoid conflict of interest, Company Personnel who are in a position that poses a conflict of interest are required to free themselves from the situation or notify their management or the party responsible for this matter.

The following main principles must be followed by the Company Personnel to prevent conflicts of interest and abuse of position:

1. Avoid Conflicts of Interest in any form and personally consistently prioritize the interests of the Company above personal interests or those of other parties.
2. Must not conduct transactions and/or use the Company's assets for the benefit of oneself, family, or group.
3. Must not receive and/or give gifts and/or benefits in any form related to their position in the Company.
4. Must not use Confidential Information and the Company's business data for interests outside the Company.
5. Must not hold any position in other companies/institutions, except other companies/institutions that are part of SIG or other organizations recognized by the Company.
6. Must not take advantage of the position to give preferential treatment to family, relatives, groups, and/or other parties at the expense of the Company.
7. Company Personnel involved in a Conflict of Interest are prohibited from taking part in the discussion and decision-making process.



8. Must not give preferential treatment to customers, suppliers, business partners, or other parties exceeding the stipulations in the Company's policies.
9. Must report every interest and/or activities carried out by the Company Personnel during work hours, beyond the Company's interests, to their direct superior to gain approval in accordance with the applicable rules.
10. Must report to the top management should they have familial and/or personal relationships with partners, competitors, or suppliers that are closely related to them and be willing to be excluded from the decision-making process in the business relationships with those parties.
11. Company Personnel who are to hold positions in other organizations/legal entities, with which the

Company has a relationship, should request for approval from their direct supervisors.

12. Any individual who holds a position in the Board of Directors or Commissioners of a Company is prohibited from holding another position in the Board of Directors or Commissioners in Companies apart from SIG, if the Companies:
  - a. are in a similar market; or
  - b. have close relationships with the same industry and/or type of business; or
  - c. can collectively dominate the market share of particular goods or services, resulting in monopolistic practices and/or unhealthy business competition.

The "close relationships" in point (b) refer to the case where those Companies conduct mutual support or have direct relationships in the production process, marketing process, or production and marketing processes.





## 3.6

# Equal Employment Opportunity

The Company is committed to providing fair and equal employment opportunity to all Company Personnel according to functions and duties, with the following principles:

1. Comply with applicable labor regulations, including regulations governing freedom of association, assembly, and expression.
2. Use the criteria of ability, qualifications (e.g. education, experience, competence, etc.), and other work-related criteria as the basis for all decisions pertaining the Board of Commissioners, Directors, and Employees of the Company, as well as job applicants;
3. The Company recruits workers, provides training, determines compensation, creates career paths, and determines other job requirements, regardless of religious/belief background, race/ethnicity, personal relationship (friendship and kinship), skin color, nationality, gender, age, disability, veteran status, pregnancy status or carrying out reproductive functions, and other special circumstances that are protected by applicable laws and regulations.
4. The Company strives for a work environment that is free of all forms of pressure or harassment that may arise as a result of differences in character, personal circumstances, and cultural backgrounds, or because of religious/belief background, race/ethnicity, skin color, nationality, gender (including pregnancy), age, disability, veteran status or other special circumstances protected by applicable laws and regulations.
5. In the event of termination of employment, the Company treats all employees fairly by referring to the Collective Labor Agreement (CLA), Company regulations, in accordance with applicable laws and regulations.



## 3.7

# Confidentiality of Data and Information and Data Disclosure Policy

The Company has established policies concerning the disclosure of Company information to ensure the security and confidentiality of the information while ensuring the disclosure and dissemination of information (material facts or material information subject to public disclosure) in a fair, punctual, and equitable manner to parties of interests without giving special treatment to particular parties. It is imperative that the Company exercise cautions in order to not divulge confidential information, either on purpose or unintentionally. Company Personnel must check that they have considered the risks of unauthorized parties accessing every working paper and document that is created, photocopied, faxed, saved, or discarded by the Company Personnel. Accordingly, in carrying out their duties, Company Personnel must pay heed to the following requirements:



1. Company Personnel must follow the need-to-know basis, which is the criterion used in the procedures of information security where the custodian of Confidential Information must first establish that the intended recipients must have access to the information in order to perform their official duties.
2. The Company sets up the Access Control to limit access to information and facilities for information processing regulated in the Access Control policies. Access Control

policies are made, documented, and reviewed based on business needs and the required information security, and communicated to the employees. The Company controls the access to the network and network services in which the users can only access both network and network services to which they have their user rights.



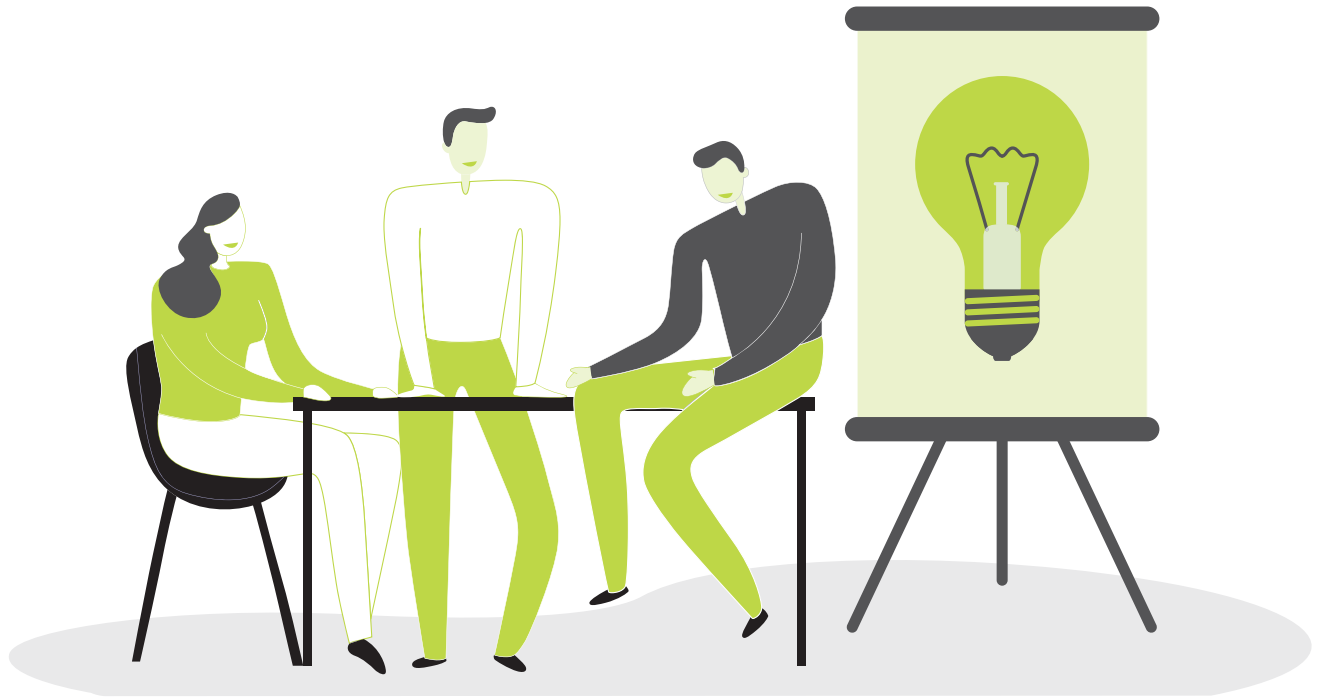


3. Exercise responsibility to take the appropriate actions to guarantee that the information resources have been protected in an equally worthwhile manner with the business values and risks.
  4. Disclosure of important information that belongs to the Company in any form and through any media to the stakeholders can only be done by the authorized officials according to their capacity, or conducted with written permission granted from the Management.
  5. In compliance with relevant Company policies that include but not limited to internal and external communications policies and/or compliance with the applicable laws and regulations,
- Company Personnel, during or after their employment in the Company, shall not disclose confidential information to the stakeholders who are not granted the right to have knowledge of the information.
6. Company Personnel are prohibited from discussing Confidential Information from the Company with their family (wife/husband, children, and other relatives) or with other companies that should not have knowledge of the given information.
  7. The Company regulates the procedures of accessing data and information that have been, have yet to be, or is not computerized.
  8. It is prohibited to use internal information to buy or trade securities for personal or family interests or other parties' interests unless the information has been made available to the public through official announcements/releases.
  9. Company Personnel whose employment have been terminated are obligated to hand over and return all the data they possessed while working as an Employee to the Company.





## 3.8 Intellectual Property Rights



Intellectual Property Rights of the Company that include but not limited to patents, trade secrets, trademarks, service marks, copyrights, industry designs, geographical indications, layout designs of the integrated circuits, and other proprietary information are of the most valuable assets of the Company. Company Personnel must pay respect to the intellectual property rights of

other parties as any unauthorized use of others' intellectual property rights may result in the Company being subjected to criminal charges, civil lawsuits, and compensation. Company Personnel must actively participate in protecting the Company's intellectual property rights. The Board of Commissioners, Directors, and Employees who participate/work in product develop-

ment or operations related to developing the Company's business activities must treat the information and the work outcomes as Company property, and therefore are not allowed to claim them as their personal intellectual property.



## 3.9

### Use of Electronic Communication



All use of electronic communications must follow relevant Company's policies that include but are not limited to the Company's communications policies. The use of electronic communications and information shall be monitored by the Company management. Company Personnel are responsible for utilizing the electronic information that is communicated

via the Company's electronic communication system. All hardware, software, and data must be maintained properly to prevent damage, loss, alteration, or unauthorized access. The Company strives to optimize the use of information technology to support efforts of transparency in business processes that have a high risk of violating this Code of Business Conduct.



## 3.10 Insider Trading

Company Personnel who have access to material information shall not abuse their position and work in disclosing material information that potentially influences investors' decisions. Material information refers to information that have not been widely disseminated and that could encourage someone to buy, sell, or hold the Company stocks. The ethical standards to follow:

1. Company Personnel and parties who obtain information from insiders are not permitted to conduct trades of stocks and other securities issued by the Company, either directly or through other intermediaries if the material information has not been published.
2. Company Personnel are not permitted to utilize material information or material facts that have not been published to gain benefits from the given information.
3. Company Personnel must safeguard the confidentiality of material information they have knowledge of.





## 3.11

### Gratifications, Gifts, Rewards

Giving and/or receiving gifts that occur due to employment relationships can affect the recipient's independence in carrying out their work, may cause a conflict of interest, and/or decrease the public's trust in the integrity of the Company. Accordingly, the Company has established ethical standards that lay specific regulations concerning giving and receiving gifts from and to third parties outside the Company.

#### The ethical standards to follow are:

1. Company Personnel are not permitted to receive gifts in any form from third parties who are related to and/or have business relationships with the Company that may influence the independence of Company Personnel in making decisions concerning their roles and responsibilities at work.
2. Company Personnel are not permitted to give or offer anything either directly or indirectly to the Government Officers/-Public Officers and/or individuals representing business partners without prior written approvals from their respective superiors.
3. Every act of receiving or giving committed by the Company Personnel from/to any parties must comply with the applicable regulations and may be subjected to further regulations by the Company if deemed necessary.





## 3.12 Giving Donations/Charity

The Company gives donations that is associated with the Company's responsibilities to its surrounding community, and the respective donations shall be independent from politics or attempts to influence the business interests of the Company. All donations made by the Company must be accountable, have complied with the applicable regulations, and are in accordance with the Company's policies concerning CSR, Sponsorships, and Donations. Accordingly, the Company requires that every donation made for the purpose of helping others to be proposed through proposal submission to the Company. Donations for other purposes can only be made in accordance with the applicable rules and regulations. The Company's funds, assets, or profits that are collected for the interests of shareholders shall not be used for the purpose of political donation. Donations may

potentially cause issues due to anti-corruption laws, particularly donations related to charity institutions that are associated with government officers and are prohibited according to the applicable regional laws. Donations, in the form of cash or others, may only be made to registered and reputable charity institutions, and may not be made to gain or retain business profits or special treatment from government officers.





## 3.13

# Bribery



The Company and the Company Personnel are prohibited from receiving and/or giving bribes (money, goods, services, or other forms) as a reward, from or to any party with the intention of influencing the decision making in question.

official duties. However, the interactions between the Company and the government body and officers must be performed at the highest level of integrity without creating the appearance of impropriety.

Company prohibits grease payments or facilitation payments.

### 3.13.1

## Prohibition against Bribery for State Administrators

#### 3.13.1.1 General

While the anti-corruption laws prohibit sensitive transactions and corrupt payments to government officers, these laws do not prohibit the Company to conduct business with the government, institutions, entities, or instrumentalists that are controlled by the government. Business activities of the Company often need to engage in a direct relationship with the government body and officers to act in accordance with their

#### 3.13.1.2 Facilitation Payments (Payments to gain particular ease)

Facilitation payment or grease payment is the provision of money paid to the government officers to accelerate or secure work performances that include but are not limited to: issuing a permit, publishing license and other required documents to conduct business in Indonesia or other countries; processing government documents such as visas and work permits; providing police protection as well as letter pick-up and delivery; scheduling inspections related to contract performance or freight transits in all countries; providing telephone services, water and power supplies, loading and unloading of goods; and protecting fragile products or commodities. The

### 3.13.2

## Commercial Bribery

Bribery is dangerous in any context and can severely damage the Company's reputation. Under no circumstances will the Company Personnel or Third Parties offer, promise, give, or authorize gifting money or anything of value to anyone, either directly or indirectly, with intentions to wrongly influence the actions of that person to obtain or retain business, or secure business profits for the Company.



## 3.14 Political Activities



All Company Personnel, as citizens, have the rights to assemble, associate, partake in organizations, and channel their political and social aspirations. The Company does not compel, influence or direct individual participation in politics. The Company respects every Company Personnel to exercise their political rights in accordance with the applicable laws and regulations.

However, the Company sets boundaries around political activities in which the Company Personnel are engaged, as follows:

1. Company Personnel are prohibited from using their position, Company's assets, or facilities to support political activities and interests.
2. Company Personnel are prohibited from wearing the attributes of political parties within the work environment of the Company.
3. Company Personnel are prohibited from conducting political campaigns in the work environment that may cause conflicts or unrest among the Company Personnel and/or cause disruption in the Company's operations.

Concerning Company Personnel who are at risk of committing bribery, the Company has prescribed background checks to be performed prior to recruiting employees or on existing employees. Background checks shall be conducted in the appropriate manner to avoid overspending of time, energy, and financial resources when detecting the risk of bribery, fraud, and corruption in a broader sense.



## 3.15

# Protection and Use of Company Assets

Company Assets are provided for the sole purpose of running the Company business, and therefore they shall not be used for any personal interests and gains, nor be sold, leased, given to other people, or discarded without authorization. Unauthorized removal of Company property from the premises is considered a theft. The Company is responsible for protecting its assets from loss, theft, and misuse. Company Assets include not only tangible goods of financial value but also intellectual property. Intellectual property refers to the business' property/assets or technical information that are protected by the patent law, trademark, copyright, or trade secret. The Company will protect and safeguard its intellectual property and will not commit any actions that may harm the value of the intellectual property.

**All Company Personnel consistently protect and use the Company assets in an efficient manner by:**

3. Using the assets in accordance with their current position, authority, and scope of work.
2. Using the assets in accordance with their designation while maintaining their integrity and functions as well as avoiding the use of assets beyond the Company interests. Safeguard and protect Company property from damage and loss. Utilizing the Company assets/property in an effective and efficient manner to achieve the Company's objectives.
3. Handing over the Company's property under their control by the time their office term ends.







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The Company will protect and safeguard its intellectual property and will not commit any actions that may harm the value of the intellectual property.”

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## 3.16

# Occupational Health and Safety (OHS) and Environmental

The Company consistently prioritizes occupational safety, health, and environmental protection. The Company is aware that prime management of occupational safety and health and responsibilities towards the environment are crucial factors to the long-term success of the Company. The Company consistently takes the proper measures to minimize occupational accidents and health disorders. Additionally, the Company strives to ensure that the Company Personnel work in a safe and healthy environment. To achieve these intents, the Company will ensure that the assets, business locations, and other facilities comply with the applicable rules and regulations concerning occupational health and safety and environmental conservation. Every Company Personnel is responsible for taking the right measures to prevent accidents at work and to create a safe and healthy work environment. The Company pays serious attention to environmental issues and impacts of all respective activities. The



Company performs scientific evaluations to prepare monitoring and preventive measures against all negative impacts imposed by Company operations on the environment.

Some common responsibilities imposed on Company Personnel regarding OHS & Environmental are:

1. Respect life value above all and conduct evaluation and control of risks resulting from the operational activities of the Company.
2. Comply with the standard provisions at national or international levels pertaining to OHS & Environmental that are

applicable in either a general sense or specific to the Company environment.

3. Participate actively in every OHS & Environmental program in the work environment.
4. Prioritize preventive measures which intends to avoid accidents at work.
5. Be responsive to emergencies caused by safety problems, accidents, pollution, pandemics, and natural disasters.
6. Report every occurring work incident and accident to the respective head of unit and relevant authorized institutions within the specified time.
7. Every employee is responsible for their own safety and their colleagues', as well as taking immediate actions to minimize harmful actions and conditions.
8. Control the impact on the environment that arises from operational activities or products in accordance with the rules and regulations.



9. Conduct sustainable business activities by consistently adhering to the applicable environmental provisions, conduct environmental conservations through efficient management of natural resources and strive to prevent environmental pollution.
10. Foster working relationships with stakeholders and perform continual improvement of performance to create a better working environment.
11. Attend regular medical checks according to the schedule set by the Company.
12. Independently implement the OHS & Environmental provisions established by the Company.



## 3.17

# Data Recording, Reporting, and Documentation

Accuracy and reliability in handling Company data are of utmost importance in ensuring the accuracy of reports used in the decision-making process and in order to strengthen the legal position of the Company against any legal issues faced by the Company. Accurate recording and reporting reflect the reputation and credibility of the Company. Accurate and complete documentation of business and financial data is the responsibility of every Company Personnel. Intentional attempts to obscure or improperly archive documents or transactions or falsify them are violations. The slightest mistake may result in major violations of the law.

Therefore, all Company Personnel shall manage Company data meticulously, and in an orderly and accountable manner by:

1. Recording and compiling reports based on true and reliable sources and verified for accuracy.
2. Not changing, adding, reducing, destroying, removing, transferring, hiding documents, data, information, or reports that should be submitted that may affect the Company's business activities.
3. It is prohibited to carry out incorrect book-keeping and/or documentation, irregularities or fraud that are against the Company's policies or applicable laws.
4. Presentation of the reports follow the principles of transparency and accountability. Reports must be accurate, relevant, punctual, and clearly show relevant facts.
5. Documenting the reports in accordance with the Company's internal policies and applicable laws and regulations.



## 3.18

# Abuse of Narcotics, Illegal Drugs, Alcohol, Gambling, Sharp Weapons, and Firearms

Behavior that is based on the moral and decency values of every Company Personnel is believed to be able to affect their performance contributions to the Company and affect the shaping of the Company's corporate image. Therefore, every Company Personnel must observe the following rules:

1. It is strictly prohibited to abuse narcotics and illegal drugs that can interfere with our ability/vigilance to work safely and effectively.
2. It is prohibited to consume alcohol and liquor while within the workplace and it is a must to maintain a healthy and clean work environment.
3. It is prohibited to engage in gambling in any form that can damage morality.
4. It is prohibited to use or possess addictive substances, and liquor in the Company's office or while representing the Company.
5. It is prohibited to misuse sharp weapons and firearms in the Company's office or while representing the Company.

Misuse of narcotics, illegal drugs, liquor, gambling, sharp weapons, and firearms committed by Company Personnel while in the Company's office or while representing the Company will be subjected to disciplinary action/penalties.







## 3.19

### 3.19. Corporate Image

All Company Personnel are required to maintain the reputation of the Company by acting and behaving in accordance with the Company's values, consistently complying with the Company's work guidelines and applicable laws and regulations, and uphold-

ing the Code of Business Conduct. Company Personnel must have a positive attitude towards the Company both inside and outside the Company. If the Company Personnel wish to provide input to show concern for the Company's progress or to report violations

or misconduct that occurred in the Company, they must submit the input in a manner that follows work ethics through the channels available in the whistleblowing system.





## 3.20

### Use of Communication Media

Communication media (print media, electronic media, social media, and other online media) serve as the space for Company Personnel to share information, expertise, and insights with the general public. The Company respects the rights of the Company Personnel in expressing opinions in public, including in communication media (print media, electronic media, social media, and online media) while being guided by the laws and regulations, including but not limited to the Company's communication policies.

Ethical standards related to the behavior of using communication media (print media, electronic media, social media, and online media) by the Company's Personnel are as follows:

1. Company Personnel are not permitted to give comments about the Company, its business, products, services, strategies, or disclose Trade Secrets/Confidential Information, without prior approval from management. If the Company Personnel engage in blogs or other online spaces, even personal sites that are carried out outside of working hours, the Company Personnel must ensure that these activities do not harm the Company/pose conflicts of interests.
2. Company Personnel are strongly recommended to follow the provisions in the Company's internal and external communication policies regarding the use of communication



media and dissemination of information within the Company, as well as the use of communication media and dissemination of information online for both corporate and personal purposes.

It is categorized as a violation if the Company Personnel give negative comments about the Company, its business, products, services, strategies, or practices.

# 04

## **IMPLEMENTATION OF THE CODE OF BUSINESS CONDUCT**





## 4.1

# Implementation of the Code of Business Conduct

The implementation of this Code of Business Conduct is the responsibility of all Company Personnel. The Board of Commissioners and the Board of Directors are responsible for the implementation of the Code of Business Conduct in the Company environment with the assistance of Group Heads and Line Managers.





## 4.2

# Dissemination and Internalization

The Company Personnel are committed to engage in internalizing/disseminating, implementing and monitoring the Code of Business Conduct, the implementation of which is coordinated by the LCCS Group Function, Human Capital ("HC") Group Function, Corporate Communications Division and Internal Audit Division. The Company also conducts dissemination activities as an effort to introduce and disseminate information regarding the Code of Business Conduct to all employees and officials of the Company as well as to external parties of the Company with the aim of ensuring every individual comprehends and is able to implement the Code of Business Conduct.

**The Company is committed to implementing effective and comprehensive dissemination activities by observing the following matters:**

1. Disseminate the Code of Business Conduct to all Company Personnel, customers, and business partners and conduct refreshers periodically.
2. Each Company Personnel receives one copy of the Code of Business Conduct, and signs a commitment statement form to comply with and implement the Code of Business Conduct.
3. Evaluate the Company Personnel's achievement or understanding, both during the orientation and employment period.
4. Review the Code of Business Conduct on a regular basis for its development and if necessary, the Code can be elaborated in various Company policies and regulations.



## 4.3 Reporting, Handling, and Enforcement of Violations

The Company provides opportunities for Company Personnel and other stakeholders to submit reports regarding alleged violations of the Code of Business Conduct to the Company through the management team for reporting violations in accordance with the provisions contained in the guidelines for the whistleblowing system owned by the Company. In reporting a violation or suspected violation, the whistleblower is strongly encouraged to provide their identity in order to facilitate communication without concerns. The Company greatly appreciates and will investigate every true and accountable report submitted in an appropriate manner for the improvement and progress of the Company. The Company guarantees that it will protect each whistleblower's identity that is stated clearly.

The Company will endeavor to maintain confidentiality at all times in all investigations, unless such disclosure is required in connection with reports or investigations conducted by the authorities and maintains the Company's position before the law. The Company appreciates whistleblowers who report violations or potential violations that need to be addressed. The

Company will not commit and tolerate any act of discrimination or retaliation against a whistleblower who in good faith has reported a suspected violation. Reporting, handling, and enforcing violations of the Code of Business Conduct is an integral part of the Company's Whistleblowing System guidelines.







## 4.4

### Penalties for Violations

Non-compliance with this Code of Business Conduct, in the forms of corruption and economic crimes, crimes related to general crimes, and violations of the Company's

policies shall be followed up in accordance with the Collective Labor Agreement (CLA) and/or applicable laws and regulations.

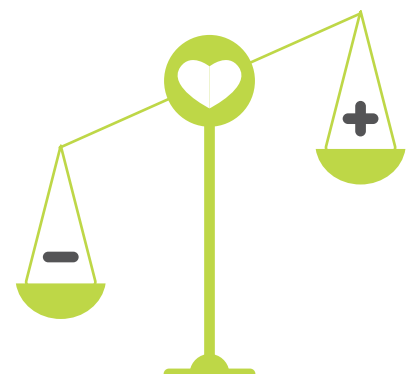


## 4.5

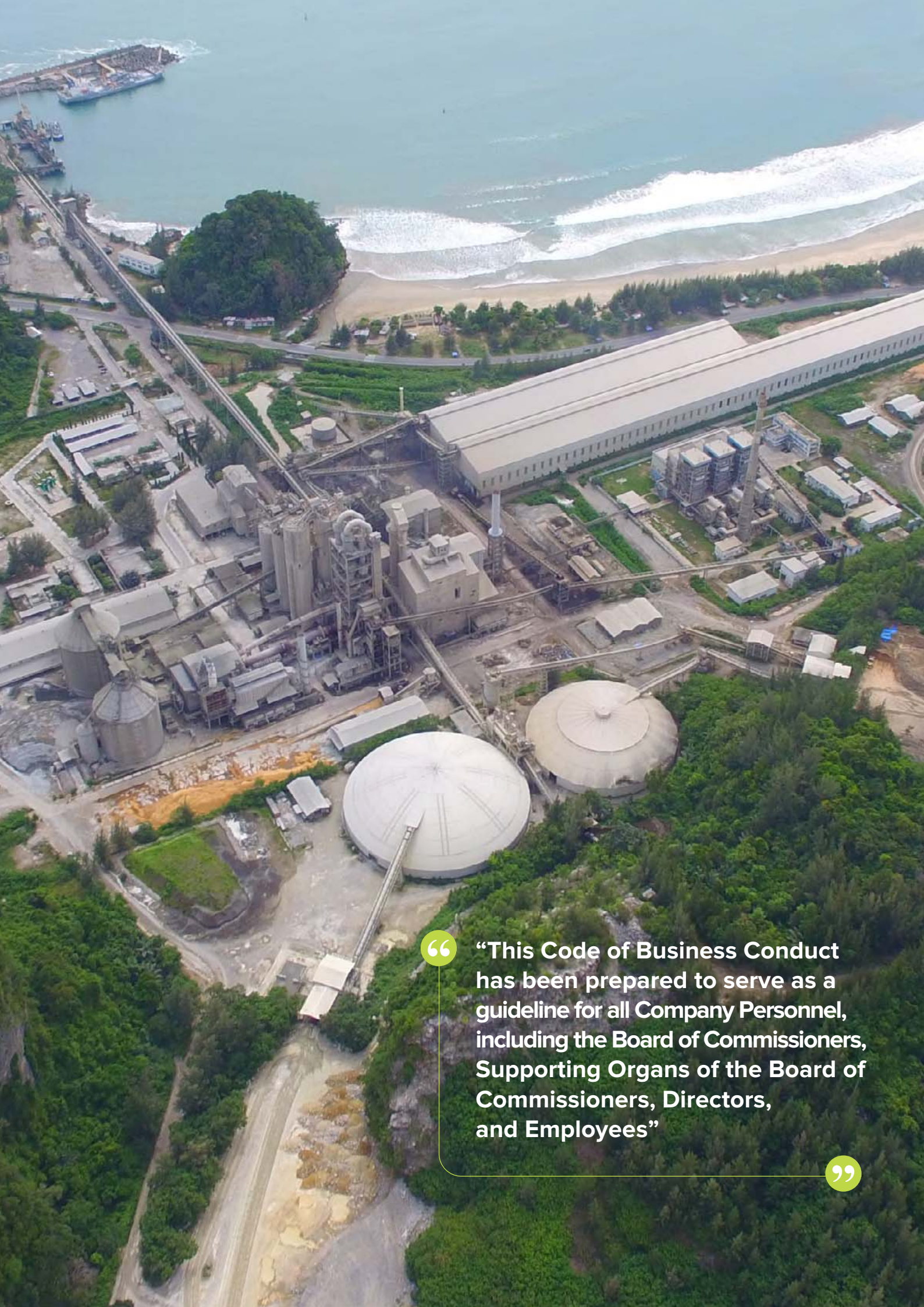
### Specific Code of Conduct

This Code of Business Conduct has been prepared to serve as a guideline for all Company Personnel, including the Board of Commissioners, Supporting Organs of the Board of Commissioners, Directors, and Employees. In matters of a special nature, related to particular competency standards and professional ethical

criteria, or those required by certain regulations, such as those related to the professionalism and ethical standards of the audit committee, a separate ethical guideline needs to be prepared, with reference to and in accordance with this Code of Business Conduct.







“This Code of Business Conduct has been prepared to serve as a guideline for all Company Personnel, including the Board of Commissioners, Supporting Organs of the Board of Commissioners, Directors, and Employees”

# 05

## CLOSING







This Code of Business Conduct applies to and binds every Company Personnel. Every Company Personnel is **required** to sign a statement of compliance with the Code of Business Conduct. Likewise, parties with an interest in the Company such as business partners, suppliers, and others must respect and implement these guidelines while interacting with the Company. This Code will be reviewed regularly and updated according to the development and needs of the Company. Any changes to this Code of Business Conduct must first be subjected to the approval of the Board of Directors and in the event that changes to the Code of Business Conduct are material, they must first be subjected to the approval of the Company's Board of Commissioners.

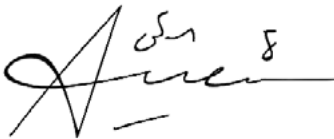




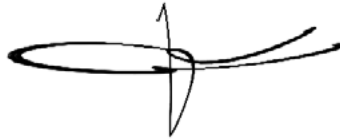
## VALIDATION

### Directors

 PT Solusi Bangun Indonesia Tbk 



Aulia Mulki Oemar  
President Director



Agung Wiharto  
Director



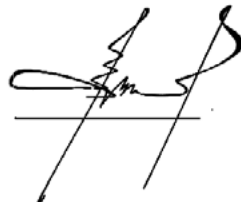
Lilik Unggul Raharjo  
Director

### Board of Commissioners

PT Solusi Bangun Indonesia Tbk



Fadjar Judisiawan  
President Commissioner



Adi Munandir  
Commissioner



Prijo Sambodo  
Independent Commissioner





**This Code of Business  
Conduct also applies to  
Subsidiaries and their  
affiliations.**



Head Office:

**PT Solusi Bangun Indonesia Tbk**

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