

Whistle Blowing System

1. PURPOSE AND OBJECTIVES

As a guideline in the implementation of the Whistle Blowing System (“WBS”) which accommodates all complaints and reports whether from internal parties of the Company or external parties, to improve the quality of transparency, accountability, responsibility, independency and fairness in the implementation of Good Corporate Governance. PT Samudera Indonesia Tbk and its subsidiaries (the “Company”).

WBS is intended to help in fulfilling the Company's obligations related to compliance towards applicable laws and regulations, the effective and measurable application of the Code of Ethics and Code of Business Conduct, Company Regulation, and other policies of the Company.

2. POLICY

WBS mechanism

All complaints and reports can be reported through the following channels:

Email : kode.etik@samudera.id

Letter : Samudera Indonesia Compliance Committee
Gedung Samudera Indonesia Building Lantai 8
Jl. Letjen S. Parman Kav. 35 Jakarta 11480,
Indonesia

WBS Reporting Organization

1. The Company's Compliance Committee is chaired by the Compliance Director and consists of the Corporate Compliance Division, HC Director, and other relevant members who will be appointed by the Compliance Director, which has the task of:

- Receive, record and classify reports based on the categories of the violation;
 - Implement and/or ensure that the whistle-blower's protection program is in accordance with the established policies, including in this case maintaining the confidentiality of the whistle-blower and the reported party (with presumption of innocence);
 - Maintain communication with whistle-blowers.
2. Investigation Team
- a. The Internal Investigation Team consisting of the Internal Audit Division, Legal Division, Risk Management Division, and external parties if needed, will carry out investigations, collect information, collect evidence in the form of documents or other forms in connection with suspected violations allegedly committed by Company employees, as well as members of the Board of Commissioners and the Board of Directors of Subsidiaries.
 - b. The Company's Investigation Team consisting of Independent Commissioners, representatives of major shareholders and external parties if needed, will conduct investigations for alleged violations committed by members of the Board of Commissioners, the Board of Directors and supporting organs of the Board of Commissioners of PT Samudera Indonesia Tangguh and PT Samudera Indonesia Tbk.

Types of Violation

Category 1 (Violations related to Company policy)

Including but not limited to all violations of the Code of Ethics and Business Conduct, Company Regulations and various policies and regulations/operational procedures of the Company.

Category 2 (Crime/ offense)

Including but not limited to crimes/violations of applicable laws and regulations, such as theft, use of acts of violence and/or bullying of employees or leaders, extortion, drug use, harassment, provision of false data, and other criminal acts including actions that endanger occupational safety and health, security and community life and the environment in which the Company is located.

Protection for Whistle-blowers

The Company guarantees the confidentiality of the whistle-blower's identity. Employees who report and show good faith to cooperate will be protected from acts of dismissal, demotion / rank, harassment or discrimination in all forms and adverse records in their personal data files.

The submission of anonymous reports will still be accepted by the Compliance Committee and will be followed up in accordance with existing procedures, if accompanied by evidence deemed sufficient so that the case can be followed up and investigated.

Misuse of the WBS for one's own benefit or for the group, by submitting a report in the form of slander, false and untrue will be sanctioned, for internal parties of Company, violations in this case will be considered as serious violations.

WBS System Guidelines

The WBS mechanism can be reported through the communication channels as listed above with the following conditions:

1. The whistle-blower contacts the Compliance Committee through the communication channels as listed above.
2. The whistle-blower provides information regarding his/her identity, which at least includes name/email/ telephone number. Reporting can be done anonymously but must attach supporting documents to the report.
3. The whistle-blower provides information on the incident he/she knows, at least fulfilling the following elements: what, where, when, who and how.
4. The whistle-blower selects the report category according to the type of alleged violation he reports.
5. The whistle-blower informs whether he/she is willing to be contacted for confirmation and follow-up reporting.
6. The Compliance Committee will provide phone/Whatsapp number that can be used to ask the follow-up status of the report.