

Code Of Ethics And Business Conduct

Introduction

This Code of Ethics and Business Conduct ("Code of Ethics") of PT Samudera Indonesia Tbk ("the Company") and its subsidiaries and joint venture companies under the control of the Company, directly and indirectly, both domestic and abroad ("Subsidiaries") is compiled to define standards and guidelines for behavior of the members of the Board of Directors and Board of Commissioners, employees including permanent as well as contracts, and supporting organs in the Company ("Personnel").

The Code of Ethics is expected to serve as a guidance for the Personnel to carry out his/her duties in good faith, responsibly, and utmost care, considering the following:

1. Compliance with Regulations

Personnel must understand, comprehend comply, submit, and be bound to the applicable laws and regulations in the Republic of Indonesia and the Company and/or Subsidiaries's internal policies ("Regulation").

Personnel are required to:

- avoid any spoken word, action and behavior that can cause and/or result in violation to the Regulation;
- put forward, strive for, carry out and/or prioritize mutual consensus to settle in any difference, dissension or dispute;
- use, take and/or choose legal settlement in the event that mutual consensus can't be reached and respect the ongoing legal process and the decisions being made;
- not cooperate with other parties that can cost the Company and/or Subsidiaries.

What does this mean for me?

Q: You caught your colleague smoking together with a business partner in the emergency stairs in the Company and/or Subsidiaries's area.

A: You must politely warn your colleague, and told him/her that it violates not only the Regulation but also can cause fire.

2. Conflict of Interests

Conflict of interests arise when personal, individual and/or group interests involved and/or may and/or be reasonably suspected influence the assessment and/or decision making process that should be carried out objectively, based on facts and impartial when acting for and on behalf of the Company and/or Subsidiaries. Personnel are prohibited from using his/her position, property, facilities and/or information of the Company and/or Subsidiaries that is in his/her possession and/or control for the benefit of such personal, individual and/or group.

Personnel should:

- avoid conflict of interests in any form and always prioritize the interests of the Company and/or Subsidiaries above the interest of such personal, individual, group and/or other parties;
- not give and/or request preferential treatment to customers, suppliers, business partners, himself/herself, family, or other third parties when conducting transactions for and on behalf of the Company and/or Subsidiaries by utilizing his/her position and/or using the Company and/or Subsidiaries's assets;

- not, directly or indirectly, be a member of management, and/ or owns shares and assets, in any company which are owned by distributors, competitors, customers and/or companies that have a relationship and/or are in the process of negotiation to establish cooperation and/or partnership (joint operation/ venture) with the Company and/or Subsidiaries, unless it has been declared to and approved by the Board of Directors of the Company. Exceptions are given for shares in public companies;
- not accept and/or request a position from a competitor and/or business partner of the Company and/or Subsidiaries that can and/or is reasonably suspected shall be a conflict of interest with his/her work, duties and functions in the Company and/or Subsidiaries;
- report and/or seek approval from the Compliance Director if:
 - having family relationship, both directly and indirectly with partners, competitors and/or suppliers and are willing not to be involved in any and all discussion and/or decision-making process with regards to the business relations;
 - will hold a position in a social organization, where the Company and/or Subsidiaries has a relationship.

What does this mean for me?

Q: You are a procurement manager. You are asked to order a machine that has special qualifications. You are aware that, your in-laws are suppliers of this machine. Is this permissible?

A: This is permissible provided that your in-laws follow the normal tender process and you must report to the Corporate Compliance Division and request that you will not be included in the tender process to avoid conflict of interest.

3. Insider Trading

Insider trading occurs when the securities of a public company are traded on the basis of information that has not been widely publicized or is non-public in nature so that it can reasonably be expected to influence a person's decision to buy, sell and/or keep shares of that public company.

Personnel are prohibited to:

- be involved and/or participated either directly or indirectly in shares trading of the Company and/or Subsidiaries or other publicly listed companies based on information obtained and/or received while still working for the Company and/or Subsidiaries;
- disseminate information received based on his/her rank and/or position to any other third party;
- abuse his/her position and job in disclosing material information that can influence investor decisions.

What does this mean for me?

Q: You are involved in the process of acquiring another public company that will make that company's shares rise in value, can you buy that company's shares?

A: You are not allowed to trade or inform and/or disseminate information to other parties to trade the company's shares until the public received informations about the acquisition proposal.

4. Fair Employment Opportunities

The Company and/or Subsidiaries are committed to create a fair and equal workplace and employment opportunities. The Company and/or Subsidiaries will only use the ability, qualifications (such as education, experience, competence) and other criteria related to work as the only basis for all decisions relating to employee recruitment and promotion.

What does this mean for me?

Q: You are looking for a prospective employee for the sales manager position. You consider sales affairs to be "men's business" and therefore you will only consider male applicants for the position.

A: This is a form of discrimination. Employee recruitment must focus on the qualifications, expertise and experience of the applicants and the assessment is carried out by looking at how they can fulfill the important functions of the position.

5. The Work Environment that is Free from Discrimination, Harassment, Immoral Acts, Threats and Violence

The Company and/or Subsidiaries is committed to strive for a work environment that is free from all forms of discrimination, harassment, immoral acts, threats, bullying and/or violence that may arise due to differences in culture, religion/beliefs, race/ethnicity, nationality, gender, physical condition, and/or other special circumstances protected by the Regulation.

Personnel are prohibited from conducting any kind of discrimination, harassment, immoral act, threat, bullying and/or violence in any form, either to colleague or any third party.

What does this mean for me?

Q: One of your colleagues opened a comedic site and then shared the jokes with a colleague next to him. For some people the jokes are not funny and even offend them, because it contains sexual harassment. What should I do?

A: You have to warn your colleague that such jokes contain sexual harassment and it should not be used at work. If he/she does not want to break that habit, then you must raise the matter with the Corporate Compliance Division.

6. Occupational Safety and Health ("OSH")

The Company and/or Subsidiaries provide safe and healthy workplaces for all Personnel by integrating OSH into the business process and developing a culture that encourages responsibility for OSH. To achieve this, commitment from Personnel and third parties that have direct or indirect relationship with the Company and/or Subsidiaries are needed to ensure that the Company and/or Subsidiaries' assets, location, and facilities meet OSH standard and regulations and strive to have OSH-related issues to be raised and resolved in each business unit.

Personnel must always implement OSH rules, including but not limited to:

- Using Personal Protective Equipment (PPE) for tasks that requires PPE;
- Report any injuries or incidents that occurs;
- Take appropriate steps to prevent accidents at work;
- Comply with, both for himself and encourage others to comply, with every national OSH provisions that applies generally as well as those that apply specifically within the Company and/or Subsidiaries;

- Ensure that regular examinations, inspections and evaluations have been carried out carefully in all facilities including resources, assets, equipments and detection systems in accordance with his/her authority within the Company and/or Subsidiaries;
- Follow routine health checks in accordance with the schedule determined by the Company and/or Subsidiaries.

What does this mean for me?

Q: To avoid being late to the meeting place, one of your colleagues offers to drive you with a motorcycle, but your colleague only has one helmet.

A: Traffic rules are made to protect the safety of road users, not wearing a helmet does not only violate the rules, but also endangers your own safety.

7. Abuse of Narcotics, Drugs, Alcoholic Beverages and Gambling

Personnel while in the Company's and/or the Subsidiaries' area, or while acting for and/or on behalf of the Company and/or Subsidiaries, are prohibited from carrying and/or consuming and/or offering narcotics and/or other addictive substances and/or drinking alcoholic beverages and/or gamble in any form.

What does this mean for me?

Q: You walked passed a colleague and then a slight smell of alcohol came from his breath, when you asked him, he answered that it was only mouthwash. What should you do?

A: To ensure that everyone is safe and secure at work, you must raise concerns about these colleagues with your supervisor or Human Capital officer. Your colleague may be facing a problem that needs help.

8. Recording, Reporting and Documentation

Timely, complete, transparent, and accurate recording and reporting of information relating to and/or of the Company and/or Subsidiaries, as well as the proper and safe storage of Company and/or Subsidiaries's documents is necessary to maintain the Company and/or Subsidiaries's credibility and reputation.

Personnel are required to:

- record and prepare reports accurately, precisely and accountable based on true and trustworthy sources;
- not change, add, reduce, damage, delete, move, hide documents, data, information or reports that should have been submitted;
- carry out documentation and storage of reports and or documents in accordance with the Company and/or Subsidiaries's policies and Regulations;
- secure, keep and maintain the existence of records that are in the archives or under his/her supervision and use them in accordance with instructions from the authorized parties in the event that there is a legal proceedings, or an internal or external investigation in the Company and/or Subsidiaries.

What does this mean for me?

Q: Your supervisor wants to ensure that your team meets the target of achieving certain numbers within a certain period by recording unconfirmed sales of products or services. Can you follow your supervisor's request?

A: No. Costs and revenues must be recorded in an appropriate and correct period, a misstatement can be considered a fraud if you have entered it into an earlier period.

9. Data and Information Confidentiality and Information Disclosure Policy

The Company and/or Subsidiaries makes a policy to regulate, maintain, guarantee the security of the confidentiality of information or material facts which are controlled and must be disclosed to the public fairly and equally to the parties concerned without giving preferential treatment to certain parties.

Personnel in carrying out his/her duties shall taking into account to the following provisions:

- check that any working papers and documents that are created, copied, scanned, received through a facsimile machine, stored, destroyed and/or disposed have mitigated the risk of being discovered by an unauthorized party;
- maintain the confidentiality of information entrusted by the customers, suppliers and/or business partners as well as safeguarding your own;
- avoid obtaining information from any third party in a manner that is not permitted or not in accordance with the Regulations;
- responsible for protecting the Company's and/or Subsidiaries' information and data and comply with regulations relating to the protection of personal data;
- disclosure of Company's and/or Subsidiaries' material information to stakeholders and/or other third parties can only be conducted by officer who are appointed and authorized by the Board of Directors of the Company or carried out under court order;
- not disclose confidential information to unauthorized parties during or after he/she no longer working for the Company and/or Subsidiaries;

What does this mean for me?

Q: You found several pieces of paper containing information related to the Company and/or Subsidiaries at the office printer, what should you do?

A: You must immediately secure the document, either by keeping it, handing it to the owner of the document and/or destroying it, and remind your colleagues to be mindful in treating documents related to the Company and/or Subsidiaries. If you have read the document, then you are prohibited from discussing or conveying the contents of the document to anyone.

10. Protection and Use of the Company's and/or Subsidiaries' Assets

Company's and/or Subsidiaries' assets which include movable or immovable property, tangible or non-tangible, including but not limited to, intellectual property, information, ideas and/or data of the Company and/or Subsidiaries may not be used for personal interest and benefit.

Personnel hereby committed to:

- always respect the Intellectual Property Rights owned by the Company and/or Subsidiaries and the third parties and avoid unauthorized use which may result in the Company and/or Subsidiaries being sued;
- ensure information and work results of a product related to the business, operations or development of business activities as the property of the Company and/or Subsidiaries, even though he/she also participate/work in the development or process;
- use the Company's and/or Subsidiaries assets according to his/her purpose and function for the interest of the Company and/or Subsidiaries and protect safe-guard them from damage and loss;
- Return the Company and/or Subsidiaries's assets after your term of service ends.

What does this mean for me?

Q: You have developed an Android based application for the Company and/or Subsidiaries, can you register a Copyright for the application on your behalf?

A: No. Because the application is made using the Company's and/or Subsidiaries' facilities and time and for the benefit of the Company.

11. Forgery

Falsifying statements, documents, signatures, trademarks, stamps, signatures, or other imitations of valuable objects that are used with the intent to deceive, constitute dishonest actions that can cause loss and damage to the Company's reputation.

Personnel are prohibited from:

- Falsify information, documents, status and other matters concerning Personnel information to take advantage of the Company;
- Falsify signatures of Personnel, Stakeholders or other third parties;
- Falsify and/or edit Company's documents, logos, and attributes.

What does this mean for me?

Q: Your boss has been out of town for a long time and there is an urgent document that requires his/her signature. To prevent the delay of the project you copy his/her signature on the document, is this allowed?

A: No, this is a forgery that can result in criminal sanctions.

12. Use of Electronic Communication

Internet access, e-mail and other applications are facilities provided by the Company and shall be used for the benefit of the Company. All communication and Company's business collaborations, both internally and externally with third parties must be carried out using the Company's official information and communication media, or email accounts.

In accordance with the Regulation, specifically Law No. 11 year 2008 which was amended by Law No. 19 year 2016 concerning Information and Electronic Transactions in using this facility, all Personnel must apply the precautionary principle.

Personnel are prohibited from:

- misuse the Company's Information Technology ("IT") systems, internet access, e-mail accounts or other media information and communication other than for the benefit of the Company;
- searching, downloading and/or forwarding information that obscene or violates the provisions of the Regulation;
- use and/or copy the contents of software or data from the Company's IT systems for personal purposes or install softwares that are obtained unlawfully at your workplace or on Company-owned equipment;
- damages, removes, changes and/or grants unlicensed access to the Company's hardware and software.

What does this mean for me?

Q: You copied the Microsoft Word downloader onto your USB flash drive and plan to install it on your personal computer at home. You are sure and believe that the Company will not be harmed because the original file remains in the system controlled by the Company. Can you do that?

A: No. When the Company purchases a software, there is usually a licensing agreement that binds the Company with the software company. Using the software for personal purposes may violate the license agreement and the Company may be held responsible and/or guilty of unauthorized use of you for the software.

13. Use of Company Logo and Attributes

The Company's logo is the intellectual property rights of the Company that have been registered and it's usage is protected under the laws.

Personnel hereby committed to:

- not use the logo and name of the Company outside the interests of the Company and without the permission of the Company's official appointed for it, in this regard, the Corporate Communications Division.
- read and understood and/or ask about the Company's branding guidelines and logo documents from Corporate Communication Division;
- avoid downloading material related to the Company's logo through search results on internet engines that refer to sources other than Corporate Communications Division;
- maintain and/or ensure that the Company's attributes/logos are not used in activities that are not related to the Company's activities and/or activities that can have a negative impact on the Company;
- not use the Company's logo for products other than those related to the Company's activities, without prior written permission from Corporate Communications Division;

- report to Corporate Communications Division if there is any inappropriate use of logos on the Company's assets (including operational vehicles, vessels and others).

What does this mean for me?

Q: What should I do if I found Personnel carrying out improper activities when wearing Company's uniforms or attributes at Company's locations?

A: To the extent possible, you can ask the Personnel to stop the activity and make a written report to Corporate Compliance Division accompanied with evidence. If it's not possible, then report this matter in writing to your supervisor and Corporate Compliance Division accompanied with evidence.

14. Website and Social Media of the Company

Website and social media are created as part of a marketing strategy to increase the level of public knowledge of the prospects and sales of the Company's business in the digital world.

Personnel and/or Subsidiaries are prohibited from making business websites and social media using the names, logos, and/or attributes of the Company and/or its Subsidiaries, except:

- has obtained prior written approval, both for content and format from Corporate Communications Division;
- follow the format standards as set out by Corporate Communications Division;
- has 1 (one) person in charge to coordinate with Corporate Communications Division;
- only allowed to have 1 (one) account on each allowed social media channel, namely Facebook, Instagram, Twitter, LinkedIn, and YouTube;

- has created and coordinated content planning to Corporate Communications Division no later than 1 (one) month before the content publishing schedule;
- only use hashtags (#) related to the Company's business;
- use the correct logo and/or attributes of the Company when uploading to social media.

What does this mean for me?

Q: You found a website or social media from one of the Subsidiaries that uploads things that are not related to the Company's business and/or violate the Code of Ethics, what can you do?

A: You can report the website or social media to Corporate Communications Division with evidences.

15. Use of Personal Social Media

The Company respects the rights of the Company's Personnel in expressing opinions publicly including on social media.

Personnel must pay attention to the following when using social media:

- not provide information or statements in any form about the Company on personal social media, except for material prepared and approved by the Corporate Communications Division;
- only spread positive information about the Company;
- does not express matters related to personal views, assessments and interests that can create a negative image for the Company;
- do not post inappropriate poses, contain hate towards ethnicity, race, religion and between groups, cigarettes, alcohol, and make any political statement when wearing the Company's uniform/attributes including when there is a Company's logo on the background of uploaded photos/videos;

- must pay attention to the aspects of OSH when posting his/her activities in the Company and/or Subsidiaries, and are prohibited from distributing personal or team pictures/photos/videos of activities which contain elements that neglecting the OSH;
- only use the Company's logo, attributes and identity correctly if they want to upload material to social media;
- the activities carried out by the Personnel are entirely his/her personal responsibility. The Company will not be responsible for the misuse of social media Personnel;
- Company's uniforms and attributes are not permitted to be used other than for matters related to duties and work.

What does this mean for me?

Q: A colleague of yours uploaded a photo on social media in an area that must use PPE and your colleague only wears casual clothes, what should you do?

A: You can report this to your supervisor and to Corporate Compliance Division and Corporate Communications Division with the evidences.

16. Political Activities

The Company will always be politically impartial. However the Company respects the right of each of the Personnel to exercise his/her political rights in accordance with the applicable laws and regulations.

The Company limits the involvement of any Personnel in political activities, namely prohibited:

- from becoming members and directly involved in political parties;
- to become administrators of political parties;
- from using the Company's position, assets or facilities to support certain political activities and interests;

- to use the attributes of parties or social organizations in the Company's work environment;
- to contribute political funds on behalf of the Company or use the Company's premises or assets to raise funds or as a place for political campaigns.

What does this mean for me?

Q: In your capacity as a Company's employee, you are invited to attend a political meeting where the policies of a political party are presented. On the entry ticket it is stated that by buying the ticket, you have helped with party funding. What should you do?

A: Your attendance at the political meeting can be seen as the Company's support for the inviting political party, if you attend the meeting make sure that you are present in a personal capacity.

17. Family Relations

The Company manages family relations in the work environment to ensure that Personnel do well in his/her jobs, without conflicts of interest and in professional manner.

Employee may have marital, blood and/or marriage relationships with the other employee provided that:

- one of them is not a direct supervisor for the other employee;
- employee is not placed in work unit that have potential to cause conflict of interest.

What does this mean for me?

Q: If my close relatives enter the Company, what should I do?

A: You must immediately report this to Human Capital Division so that the Company can ensure that there are no conflict of interest.

18. Authorization

In accordance with the Company's Articles of Association, the authority to represent the Company both inside and outside the court is only given to the Board of Directors of the Company. Personnel are prohibited from signing official documents, both internally and externally, changing the contents or approval of official documents, for and on behalf of the Company, except with a written power of attorney from the Board of Directors of the Company. provisions regarding the signature will be set forth in separate rules.

What does this mean for me?

Q: If I want to make a standard operating procedure (SOP) or an internal circular, can it be signed by my supervisor?

A: The document may be signed by your supervisor if your supervisor has been given a power of attorney by the Board of Directors of the Company.

19. Anti-Corruption and Prohibition on Monopolistic Practices and Unfair Business Competition Policy

- Personnel shall comply with applicable anti-corruption and bribery laws and regulations; ;
- The Company shall comply with the Anti-Monopoly and Unfair Business Competition laws and will never tolerate Personnel who violate these rules;
- The Company will provide Anti-Corruption and Prohibit Monopolistic Practices and Unfair Business Competition Policy which will become an integral part of the Code of Ethics.

20. Penalty

Violations of this Code of Ethics will be given sanctions in accordance with the applicable rules in the Company's Regulations.

Any matters which require further explanation and violation towards the Code of Ethics can be submitted and informed to the Corporate Compliance Division and if related to employment also copied to the Corporate Compliance and Human Capital Division.

BOARD OF DIRECTORS

Bani Maulana Mulia
President Director

Ridwan Hamid
Finance Director

Farida Helianti Sastrosatomo
Compliance Director

Tara Hidayat
Human Capital Director