

Anti-Corruption Policy

Introduction

The anti-corruption policy ("Anti-Corruption Policy") of PT Samudera Indonesia Tbk and Subsidiaries (the "Company") is a guideline to know, recognize and to respond any actions that can be considered and/or categorized as bribery, gratification, embezzlement, conflict of interest, and/or extortion (collectively shall be referred to as "Corruption"). This Anti-Corruption Policy is an anti-bribery management system mechanism.

The Company adheres to high moral values and compliance with laws and regulations and internal regulations related to the anti-bribery management system in making decisions and taking actions and will take a firm stance against all forms of bribery to realize a clean, healthy and correct company management that is free from all forms of Corruption, Collusion, and Nepotism.

The Company will play an active role in ensuring the implementation of the anti-bribery management system, including by supporting reporting of policy violations (whistleblowing) in good faith without fear of retaliation in accordance with the applicable mechanisms in the Company, and will make continuous improvements to the anti-bribery management system implemented by the Company.

The Company strictly prohibits and does not tolerate any action that leads to and/or can be considered and/or classified as Corruption. The Company will fully comply with prevailing laws on anti-corruption regulations and accurately documenting all transactions.

All members of the Board of Directors and members of the Board of Commissioners, employees, including both permanent and contract, and all related parties within the Company ("Personnel") are prohibited from engaging in, participating in, or facilitating any Corruption activities.

This policy covers all Company's transactions in all countries where the Company operates.

To support the Anti-Corruption Policy, the Company appointed a compliance function to develop and oversee the implementation of the anti-bribery management system, and will support the compliance function to act independently in monitoring implementation and reporting to the Board of Commissioners and Directors.

The Board of Commissioners and Directors of the Company will take firm action in accordance with their authority for violations of the Anti-Corruption Policy, and are willing to accept sanctions that have been determined by the Company if proven to have violated the Anti-Corruption Policy and anti-bribery Management System policies.

This Anti-Corruption Policy also binds third parties including but not limited to any person or organization that cooperates with the Company, including but not limited to consumers, suppliers, vendors, distributors, partners, agents, advisors/consultants, government agencies and bodies, Public Officials and/or its representatives.

For the avoidance of doubt, Public Officials are civil servants and government employees, which falls into the category of State Employee or people who receive salaries from national/regional treasury, people who receive salaries from a corporation that receives assistance from national/regional treasury, including State Owned Enterprises/Regional Owned Enterprises employees, people who receive salaries from other corporations that use capital or facilities from the state or society, state officials who carry out executive, legislative or judicial functions and other officials whose main functions and duties are related to the administration of the state in accordance with the applicable laws and regulations.

Legal Reference

1. Law No. 8 Year 1981 on the Code of Criminal Procedure.
2. Law No. 28 Year 1999 on Good State Governance, Free of Corruption, Collusion and Nepotism.
3. Law No. 31 Year 1999 on Eradication of the Criminal Act of Corruption.
4. Government Regulation No. 71 Year 2000 on Procedures for Implementation of Public Participation in Prevention and Eradication of Corruption.
5. Law No. 20 Year 2001 on Amendment to Law No. 31 Year 1999 on Eradication of the Criminal Act of Corruption.
6. Regulation of the Minister of Finance of the Republic of Indonesia No. 78 /PMK.02/2019 on the Standard Input Costs for Fiscal Year 2020.
7. Regulation of the Corruption Eradication Commission of the Republic of Indonesia No. 2 year 2019 on Gratification Report.
8. Regulations and Circulars of the Corruption Eradication Commission.

Objectives of Anti-Corruption Policy

1. As source of information and guidance for Personnel on how to recognize and deal with Corruption issues.
2. To increase Personnel adherence and discipline to law, regulations and ethics and to support government programs in order to prevent Corruption.
3. To regulates the responsibility of the Company and Personnel in ensuring and affirming the refusal of Corruption.
4. To prevent material and immaterial losses that may interfere with the Company's business sustainability.
5. To increase awareness of high ethical culture in carrying out work activities.

Company's Anti-Corruption Policy

1. Bribery

The Company prohibits bribery and will not tolerate Personnel or third parties, who offer, promise, request, demand, give or receive goods, money or any other forms intended to influence the decision making of the consumers, suppliers, vendors, distributors, partners, agents, advisors/consultants, government agencies and bodies, Public Officials and representatives (the "Third Parties"). The Company also prohibits the use of consultant or third parties to offer Bribes, relating to any of the Company's business. The following are included in the acts of Bribery:

- a. **Facilitation Payment**
Is a gift, commonly in the form of money, to start, secure, speed up access to a service. Commonly, the party that asks for the payment (in this matter the recipients of bribes) will use the threat of delay, inconvenience, additional business costs, or other unwanted results, whether explicitly or implied. The bribe can also be requested with a promise of faster service, ignoring incomplete documents, or some other benefits.
- b. **Kickback or Commission**
Is a payback or commission payment given directly to Personnel for a portion of the Company's payments to a third party. This payback is provided as return for awarding the contract, work or other matters, to that third party.
- c. **Donations**
Is a gift of donation in the form of in-kind or money to political parties, institutions, or individuals to gain influences, in politics, economics, legal or others paid not in accordance with the prevailing laws and regulation. The Company will only contribute in accordance with the prevailing ethics, laws and regulations and in accordance with the Company's social responsibility (CSR) plan.

2. Gratification

Personnel are prohibited to give gratuities, whether significant or small, including but not limited to money, goods, discounts, commissions, interest-free loans, travel tickets, lodging facilities, tour, free medical treatment, and other facilities as efforts to influence, or are deemed capable of influencing business decisions and/or policies in the long run.

By observing the above provisions, Personnel are not prohibited from giving or receiving normal and reasonable gift for or from Third Parties as long as they are carried out with the principles of transparency, proportionality, reasonable and carried out in good faith, for example:

- a. Gifts: including money, vouchers, goods, or services must be given without expecting anything in return. Gift may not have significant value and have a role other than improving relations between the Company and Third Parties or promoting the Company. Gift being given must have a Company logo or message on promotional items and may not be sent to personal address.

Personnel can give or receive gifts for or from Third Parties, as long as the following are fulfilled:

- 1) Not being offered, given or received with the aim of obtaining improper advantages such as improper influence in relation with business transactions or involvement in public policy.
- 2) given on behalf of a company and/or institution, not on personal reason.
- 3) not in the form of money, or things which can be cashed (for example vouchers) and is reasonable in terms of type and value, and does not exceed to Rp1,000,000 or its equivalent.
- 4) not given regularly.
- 5) in accordance with the event, for example marriage, condolences.

- 6) given openly in the presence of witnesses.
- 7) not being offered, given or received at or prior to contract negotiations or tender processes.
- 8) Must comply with applicable laws, regulations and policies.
- 9) Must be recorded accurately, fairly and in detail.
- 10) gifts must be reported to and known by relevant stakeholders.

If Personnel receives a gift that violates the above rules but impossible to be refused, or has been received and impossible to be returned, such Personnel must immediately contact Corporate Compliance to report about that case.

- b. Hospitality or entertainment: being given or accepted to initiate, strengthen, or develop relationships between the Company and Third Parties with the principle of transparency, proportional, reasonable and in good faith. Hospitality includes but not limited to, meals and ticketing for social or sporting events. The Anti-Corruption Policy requires that such Personnel be present at the time of giving hospitality, if such Personnel is absent then the hospitality is included in the gift category.

Personnel are allowed to accept invitations to attend lunch or business dinners, watch concerts, sporting events or other similar events (whether sponsored or not) in order to carry out daily tasks, by first notifying and getting permission from the direct manager and Corporate Compliance.

Personnel can give gifts or hospitality to Public Officials provided that:

- 1) gifts within the family namely grandfather/grandmother, father/mother/in-laws, husband/wife, children/son-in-law, adopted children/legal guardians, grandchildren, in-laws, uncles/aunts, brothers/sisters/in-laws, cousins and nieces, as long as there are no conflict of interest.

- 2) given to participants in official activities such as seminars, workshops, conferences, training, or similar activities, which are generally applicable.
- 3) gifts not in the form of money or other means of exchange, intended as a means of promotion using a logo, as long as there is no conflict of interest and are generally applicable.
- 4) direct prizes /lottery, discounts/ rebates, vouchers, point rewards, or souvenirs that are generally applicable.
- 5) compensation or honorarium for professions outside of official activities that are not related to duties and obligations, as long as there is no conflict of interest and does not violate the applicable Regulation of the Minister of Finance of the Republic of Indonesia concerning Standard Costs for Fiscal Year Input and other relevant regulations/codes of conduct of employees/officials.
- 6) compensation received related to official activities such as honorarium, transportation, accommodation and other cost that refers to the Regulation of the Minister of Finance of the Republic of Indonesia concerning Standard Input Costs for the Fiscal Year and the standard costs applicable in the recipient agency as long as there is no double dipping, there is no conflict of interest, and does not violate the applicable provisions at the receiving agency.
- 7) flowers given at events such as engagement, marriage, birth, death, baptism, circumcision, or other traditional/religious ceremonies, retirement, promotions.
- 8) gifts related to engagement, marriage, birth, baptism, circumcision, or other traditional/religious ceremonies with a limit of not more than Rp 1,000,000.00 (one million rupiah) for each event.
- 9) gifts related to the disaster or disaster experienced by the recipient, husband, wife, children, father, mother, father-in-law, and/or son/daughter-in-law as long as there is no conflict of interest, and fulfils fairness or appropriateness with a limit of Rp 1,000,000.00 (one million rupiah) each event.
- 10) giving souvenirs/placards to agencies in the framework of official and state relations, both domestic and abroad as long as they are not given to individuals.

- c. Marketing Costs: namely the Company's expenses for travel, lodging and other expenses incurred by potential customers or business partners. Marketing costs are given only for the marketing of the Company, for example to visit facilities or attend exhibitions, events, conferences, or training organized by the Company.

If there are offers or business discussions involving government officials or their departments, then it is prohibited to use marketing cost.

3. Extortion

Personnel are prohibited to force or threat someone with violence in order to make that person give an item, wholly or partly owned by that person or another person, or to make debts or write off receivables with a view to benefiting or the Company against the prevailing laws or toward himself.

Personnel Responsibilities

1. Personnel is obliged to read, understand, and comply with this Anti-Corruption Policy.
2. Personnel is obliged to prevent, detect, and report any violations of the Anti-Corruption Policy in any form.
3. Personnel is obliged to avoid any activity that could lead to or indicate a violation of the Anti-Corruption Policy.
4. Personnel must immediately notify Corporate Compliance, or access and use the Company's Whistle Blowing System, if Personnel believes or suspects that violations of this Anti-Corruption Policy have or may occur.

5. Personnel who violate this Anti-Corruption Policy shall be subject to disciplinary sanctions which may result in termination of employment due to serious violations.

Protection

1. The Company commits to ensure that Personnel will not experience adverse/unpleasant treatment because they refuse to be involved in Corruption, or because they report in good faith, their suspicions that a Corruption has occurred or will occur. The adverse treatment includes being fired, disciplined, threatened, or other actions related to the report.
2. If Personnel experiences adverse treatment/unpleasant treatment above, Personnel must immediately report the matter to Corporate Compliance.

Training and Communication

1. Personnel will receive special training on how to implement and comply with this Anti-Corruption Policy.
2. The Company's zero-tolerance approach to corruption must be communicated to all suppliers, contractors and business partners from the beginning of the contact;
3. Personnel is required to support the success of this Anti-Corruption Policy.

BOARD OF DIRECTOR

Bani Maulana Mulia
President Director

Ridwan Hamid
Finance Director

Farida Helianti Sastrosatomo
Compliance Director

Tara Hidayat
Human Capital Director



SAMUDERA INDONESIA