

# CODE OF CONDUCT

## STANDAR ETIKA PERUSAHAAN

### 2025





## THE VISUAL CONCEPT



Illustrates the importance of compliance with the Corporate Ethics Standards and laws and regulations to support the achievement of ANTAM's Vision of becoming a leading global corporation.



Represents that transparency of ANTAM's corporate governance that is anti-corruption, nepotism and other actions that are only oriented towards personal profit and group profit.



Illustrates ANTAM Personnel commitment for health and occupational safety as the main aspect which must be obeyed in work.



Describe ANTAM's commitment to a work ethic that always upholds the principles of fairness and balance in running the Company's wheels by complying with laws and regulations



It is a symbol of the commitment of all ANTAM Management and Employees to comply with and comply with the Corporate Ethics Standards.



It is a symbol of guidelines and procedures for handling whistleblowing which is part of the internal control system.



PT ANTAM Tbk

# STANDAR ETIKA PERUSAHAAN

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2025



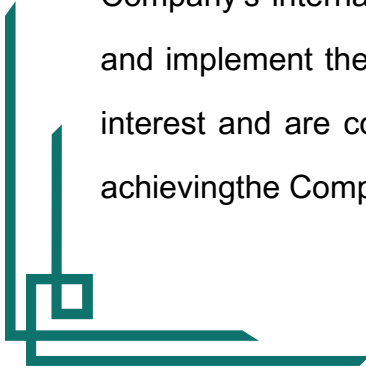


## Implementation Sheet and Declaration of GCG Implementation Commitment of the Board of Commissioners and Board of Directors of PT ANTAM Tbk



### We, the Board of Commissioners and the Board of Directors PT ANTAM Tbk

As ANTAM, we believe that the implementation of Good Corporate Governance (GCG) is the foundation for the formation of systems, structures and cultures that will be the foundation of the Company's operations and are strengths The company in running a sustainable business, and has competitive advantages to increase the Company's added value.



Along with the continuation of our commitments, today we are again committed to ensuring the implementation of good corporate governance, fulfilling the Company's internal policies and applicable laws and regulations, comply with and implement the Company's Ethical Standards, act free from all conflicts of interest and are committed to gratuity control and anti-bribery, for the sake of achieving the Company's Vision and Mission.





25th MARCH 2025

 <b>Rauf Purnama</b> President Commissioner Independent Commissioner	 <b>Nicolas D Kanter</b> President Director
 <b>Gumilar Rusliwa Somantri</b> Independent Commissioner	 <b>Hartono</b> Director of Operations and Production
 <b>Anang Sri Kusumawardono</b> Independent Commissioner	 <b>I Dewa Bagus Wirantaya</b> Director of Business Development
 <b>Bambang Sunarwibowo</b> Commissioner	 <b>Arianto Sabtonugroho</b> Director of Finance and Risk Management
 <b>Dito Seno Widagdo</b> Commissioner	 <b>Achmad Ardianto</b> Director of Human Resources





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### **1. Abuse of Power**

Is the abuse of authority carried out by an official for certain interests, either for one's own interests or for other parties of ANTAM.

### **2. Asset**

is any form of physical or non-physical property owned by a company that is used to support business operations, including but not limited to buildings, vehicles, equipment, IT systems, confidential information, intellectual property rights, and company money in the form of cash, accounts, or company investments. These assets must not be used for personal gain, including political activities.

### **3. Company Attributes**

i.e. logos, names, uniforms, facilities, positions, authorities, or other resources that are officially related to the company. Included in the title attribute is the use of the title in public communication, such as in articles, interviews, or statements that can be associated with the company.

### **4. Conflict of Interest**

is a condition where the Company's ranks in carrying out their duties and obligations have interests beyond the interests of the service, both related to personal interests, family and the interests of other parties, so that the Company's ranks may lose objectivity in making decisions and policies according to the authority that has been given to them.

### **5. Confidential Data and Information**

is data and information that has not been officially published by the Company including the Company's business plan and strategy, information on mineral reserves, research and development results used in the production process, the Company's operating standards and procedures, internal documents signed by the Company's management, intellectual property rights or other important data and information that may affect the Company's performance if spread out of ANTAM.

### **6. Board of Commissioners**

is the Company's organ that is tasked with conducting general and/or special supervision in accordance with the Company's Articles of Association and advising the Board of Directors.

### **7. Discrimination**

is a distinction in the treatment of others based on skin color, class, ethnicity, economy, religion, and so on.

### **8. Disorientation**

is a discrepancy with the actual goal to be achieved.



### 9. Board of Directors

is the Company's Organ that is authorized and fully responsible for the management of the Company for the benefit of the Company, in accordance with the Company's purposes and objectives and represents the Company, both in and out of court in accordance with the provisions of the Company's Articles of Association.

### 10. Work Ethics

the standard of work behavior used by ANTAM personnel in carrying out duties for and on behalf of the Company, as well as in interacting and relating with fellow colleagues and stakeholders.

### 11. Business Ethics

the standard of business behavior applied by the Company as a business entity in interacting and relating to Stakeholders both internally and externally.

### 12. Good Corporate Citizen

are individuals who comply with all the Company's policies, legislation, fight and work hard to defend all the interests of the Stakeholders and never take personal advantage of a business activity.

### 13. Good Corporate Governance (GCG)

These are the principles that underlie a company's management process and mechanism based on laws and regulations and business ethics.

### 14. Gratification

is a gift in a broad sense which includes the provision of money, goods, rebates (discounts), commissions, interest-free loans, travel tickets, lodging facilities, tourist trips, free medicine, and other facilities. These gratuities are both received domestically and abroad and are carried out using electronic means or without electronic means.

### 15. Things to Consider

a set of further elaborations of the points listed in the Company's Ethical Standards, in the form of potential risks and possible impacts arising from the application of points in the Standard Operating Procedure (SOP)/related work instructions, conformity with applicable regulations and other matters beyond the Company's control.

### 16. Holding

is a Mining Industry Holding as regulated in Government Regulation No. 47 of 2017, namely PT Indonesia Asahan Aluminium (Persero) in its function as a Holding.

### 17. Material Information

is information that may affect the price of securities or investment decisions of the Company, including matters that may affect the Company's performance/reputation or other definitions based on other laws and regulations.



### **18. Infrastruktur**

the company's supporting organs which include the General Meeting of Shareholders (GMS), Board of Commissioners (BOC), Board of Directors (BOD), Supporting Committee of the Board of Commissioners, Internal Audit, Risk Management, Corporate Secretary, and other Board Work Units.

### **19. ANTAM Personnel**

are the Board of Commissioners, the Board of Directors, the Supporting Organs of the Board of Commissioners, and Company Employees.

### **20. Internet**

is an electronic communication network that connects computer networks and computer facilities organized around the world via telephone or satellite.

### **21. Occupational Safety and Health**

hereinafter abbreviated as K3 is all activities to ensure and protect the safety and health of the workforce through efforts to prevent work accidents and occupational diseases.

### **22. Knowledge Management**

is a collection of tools, techniques, and strategies for maintaining, analyzing, organizing, improving, and sharing understanding and experience.

### **23. Political Contributions**

is financial or non-financial support given to a political party, candidate, or politically-related organization.

### **24. Social Media**

is a channel or means of online social interaction in cyberspace (internet). Social media users communicate, interact, message each other, and share with each other, and build networks.

### **25. ANTAM Partners**

adalah mitra dalam mengadakan pekerjaan seperti kontraktor, konsultan, media, pengacara serta rekanan kerja lainnya.

### **26. Moral Hazard**

Is a condition which related to personality, talent, and human character which can increase amount of loss compared with average risk.

### **27. Political Neutrality**

is an attitude of impartiality and not involvement in certain political activities, either directly or indirectly, in the work environment.

### **28. Violation**

is an attitude, action or behavior deviating from the Code of Conduct.





### 29. Money Laundering

is the act of placing, transferring, paying, spending, granting, donating, entrusting, bringing abroad, changing shape, exchanging for currency or securities or other acts of wealth that is known or reasonably suspected to be the result of a criminal act with the intention of concealing or disguising the origin of the property so that it seems to be a legitimate property.

### 30. Terrorism Financing

provide, collect, provide, or lend funds, whether directly or indirectly, with the intent to be used and/or known to be used to carry out terrorist activities, terrorist organizations, or terrorist activities.

### 31. Bribery

offering, promising, giving, receiving or soliciting undue benefits of any value (in the form of financial or non-financial), directly or indirectly, regardless of location, constitutes a violation of laws and regulations, as an inducement or reward for a person who acts or refrains from acting in relation to the performance of the person's duties.

### 32. Collective Labour Agreement (LBA)

is an agreement held by the employer and the Miscellaneous Mining Employees Association (Perpantam) which regulates the terms, norms, rights and obligations, as well as matters related to the employment relationship between the Company and employees.

### 33. Company

the Company of PT Aneka Tambang Tbk or abbreviated as PT ANTAM Tbk.

### 34. PIONEER

the actualization of ANTAM's values consisting of Professionalism, Integrity, global mentality, harmony, Excellence, Reputation.

### 35. GCG Principles

the basic matters adopted in managing the Company in an appropriate manner based on the elements of TARIF which include; Transparency, Accountability, Responsibility, Independence, and Fairness.

### 36. The Principle of Know Your Customer

The process of verifying the customer's identity to ensure the legality and legitimacy of the source of funds.

### 37. SENSE

the leadership attributes of ANTAM People consisting of Speed, Energize, respect, and courage.

### 38. Shareholders

Are the parties that own shares of the Company such as Investors.



### 39. Anti-Bribery Management System

dokumen tertulis yang memuat langkah-langkah yang diperlukan untuk mengelola Anti Penyuapan di Perusahaan dan dirancang untuk mengembangkan dan menumbuhkan budaya anti-penyuapan pada Perusahaan.

### 40. Softstructure

Corporate Policies such as Corporate Governance Policy, Code of Conduct, Charter-Charter, Management Policy, Standard Operating Procedure (SOP), Work Instruction (WI) and other Corporate policies.

### 41. Stakeholders

are all interested parties of the Company including Employees, Partners, Government, Shareholders/Investors, Labor Unions within the Company.

### 42. Code of Conduct

is a set of commitments consisting of ANTAM's business ethics and ANTAM's work ethic which is designed to influence, shape, regulate and conform behavior so that consistent outputs are achieved in accordance with ANTAM's culture in achieving its Vision and Mission.

### 43. Tacit Knowledge

is something that we know and experience, but it is difficult to express clearly and completely and it is very difficult to transfer to others because the knowledge is stored in the Company according to its competence.

### 44. Personnel Deliberation Team

is a team appointed by the head of the Work Unit or the Director in charge of human resources whose membership consists of parties based on the Collective Labor Agreement.

### 45. Suspicious Transactions

financial transactions that are unreasonable or have Financial Transactions that deviate from the profile, characteristics, or habits of the Transaction pattern of the Service User concerned Financial Transactions by the Service Users that should be suspected to be carried out with the aim of avoiding reporting of the Transaction concerned which must be carried out by the Reporting Party in accordance with the provisions of this Law Financial Transactions that are carried out or canceled are carried out using the alleged Assets derived from the proceeds of criminal acts or Financial Transactions involving Assets that are suspected to be derived from the proceeds of criminal acts.

### 46. Whistleblowing System

is a system that can be used as a medium for reporting witnesses to convey information about indications of violations that occurring within the Company.

### 47. Window Dressing

is a strategy used by a company to attract investors by beautifying its financial reports or performance and business portfolio. The goal, of course, is to convince investors to invest in profitable investment capital for the company.

# INTRODUCTION





## 1.1 Rationale

The importance of implementing of Good Corporate Governance (GCG) is a both a requirement and demands which is inevitable in the global business develop enhancement of the Company's image. GCG is a system as well as a structure in order to give confidence to all stakeholders that the Company is managed and supervised to protect the interests of Stakeholders in line with laws and regulations and GCG principles that are generally applicable and will continue to be developed universally. Basically, the success of GCG implementation is highly determined by the commitment of all levels of the Company, the readiness and completeness of the Company's supporting organs (GCG infrastructure) and also other GCG policies (GCG soft structure) while still paying attention to the suitability, business characteristics and the company's needs.

PT ANTAM Tbk, hereinafter referred to as ANTAM, realizes the importance of GCG implementation as a tool and way to increase long-term business value and growth in a sustainable manner, not only for Shareholders but also for all other Stakeholders. For this reason, ANTAM is committed to implementing GCG consistently, one of which is through the preparation of the Code of Conduct.

Code of Conduct is a set of commitments comprised of ANTAM's business ethics and ANTAM's Human Ethics that are designed to influence, shape, regulate, and conform behavior so as to achieve consistent outputs that are in accordance with ANTAM's values and culture in achieving its Vision and Mission.

Forming, regulating and adapting behaviors so that consistent outputs are achieved in accordance with ANTAM's values and culture in achieving its Vision and Mission. The Corporate Ethics Standards apply to all individuals acting on behalf of ANTAM, Subsidiaries and Affiliates under Control, Shareholders and all other Stakeholders or Partners who conduct business transactions with ANTAM.

ANTAM always encourages compliance with ethical standards and is committed to implementing them, and requires all leaders at every level within the Company to be responsible for ensuring that the code of conduct is adhered to and properly implemented in their respective ranks.



As a form of this commitment, the Code of Conduct must be signed every change by all ANTAM's Personnel, both members of the Board of Commissioners, Board of Directors, Supporting Organs of the Board of Commissioners and every individual, both ANTAM Employees who are stationed at the Head Office, Business Units/Units, Development Projects, Subsidiaries and Affiliates under the control and other parties acting for and on behalf of ANTAM.

The signing can be done in hardcopy on the Statement of Commitment page in this Code of Conduct Book or online through the Company's internal portal or other media. In order to encourage the implementation of the Code of Conduct to run well, it is necessary to implement internalization and socialization programs in all areas of the Company's operations.

Socialization and internalization are carried out periodically to ANTAM employees both at the structural and executive levels.

The Code of Conduct are always adjusted to the law, social, norm, regulatory and business developments of ANTAM. It is expected that all parties will provide input on the development of the Code of Conduct so that they are in line and synergize with the values that already exist in ANTAM. The successful implementation of the Code of Conduct is strongly supported by enthusiasm, communication and a shared commitment to implement them in daily operational activities.





### VISION



**To become a leanding global corporation through diversification and integrated natural-resource based busuness**

### MISION

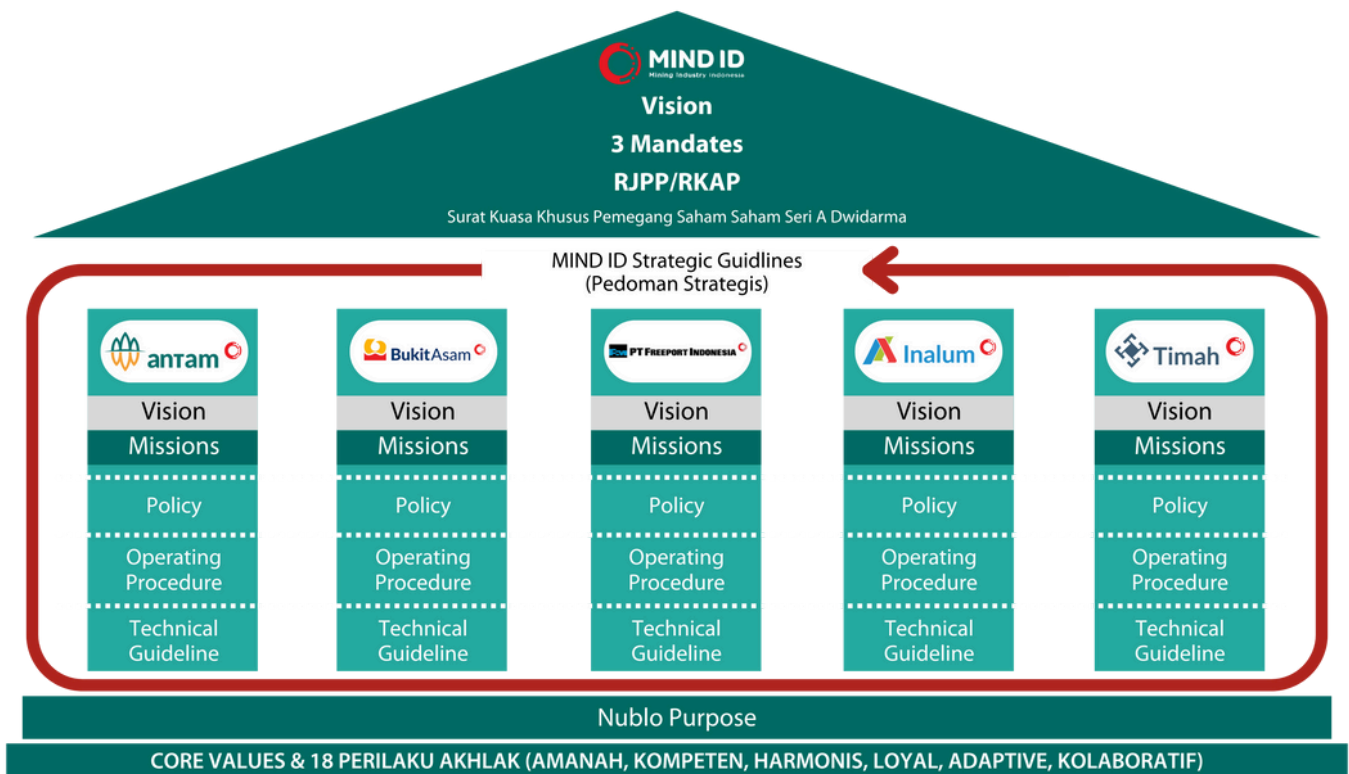


1. Producing quality products by maximizing added value through industry best practices and superior operations.
2. Optimizing resources by prioritizing sustainability, work safety and environmental sustainability.
3. Optimizing resources by prioritizing sustainability, work safety and environmental sustainability.
4. Improving the competence and welfare of employees as well as the independence of the community around the operating area.



## CORPORATE VALUES

Image 1. ANTAM Personnel Values as Operational Foundation



## Goal & Objective

Aligning and establishing the Core Values of BUMN AKHLAK Human Resources, namely; Trustworthy, Competent, Harmonious, Loyal, Adaptive, and Collaborative are the Core Values of MIND ID and Agile, Going Extramiles, and Accountable as Key Behaviors of MIND ID which are the essence of the 18 (eighteen) behavioral guidelines of AKHLAK as the Corporate Culture of MIND ID and its members.





The Core Values of SOEs' human resources, namely AKHLAK, consist of:

### 1. Amanah

Definition: Upholding the trust given

- a. Fulfilling promises and commitments;
- b. Be responsible for the tasks, decisions, and actions performed carried out;
- c. Uphold moral and ethical values.

### 2. Kompeten

Definition: Continue to learn and develop capabilities.

- a. Improve self-competence to respond to ever-changing challenges;
- b. Helping others learn;
- c. Completing tasks and the best quality.

### 3. Harmonis

Definition: Caring for each other and respecting differences

- a. Respect for everyone regardless of background;
- b. Like to help others;
- c. Building a conducive work environment.

### 4. Loyal

Definition: Dedicated and prioritizing the interests of the Nation and State.

- a. Maintaining the good name of fellow employees, leaders, SOEs, and the State;
- b. Willing to sacrifice to achieve a greater goal;
- c. Obey the leadership as long as it is not contrary to the law and ethics.

### 5. Adaptif

Definition: Continue to innovate and be enthusiastic in moving or facing change.

- a. Quickly adapt to get better;
- b. Continuously make improvements following technological developments;
- c. be proactive.

### 6. Kolaboratif

Definition: Building synergistic cooperation.

- a. Providing opportunities for various parties to contribute;
- b. Open in working together to generate added value;
- c. Mobilizing the utilization of various resources for a common goal together.





MIND ID's Key Behaviors which are the essence of 18 (eighteen) AKHLAK behavior guidelines are:

**a. Agile: Responsive to change**

Definition: Always open, flexible, and able to adapt to new environments, challenges become tools for innovating, thinking creatively, and moving forward.

**b. Going extra miles: Working beyond targets.**

Definition: The spirit to work intelligently and strive for real work results according to the target or even exceed the target for the benefit of the Company.

**c. Accountable: Act responsibly**

Definition: Ensuring that all actions taken must be accountable and in accordance with applicable laws and regulations.

Every member of MIND ID is obliged to apply the Core Values of human resources of AKHLAK State-Owned Enterprises and Key Behaviors of MIND ID as Corporate Culture and become the basis for the formation of human resource character in each member of MIND ID.

Internalization and implementation of Corporate Culture is carried out by each member of MIND ID through policies, programs and establishing a cultural team that is aligned and coordinated with the MIND ID cultural team.

Objectives of Human Capital Excellence BEST are interpreted as:

**1. Beyond Expectation**

ANTAM Personnel develop themselves to produce superior performance beyond the expected target.

**2. Environmental Awareness**

ANTAM personnel are aware of occupational safety and health as well as environmental sustainability, empowerment and community development based on the principles of Corporate Social Responsibility.

**3. Synergized ParTnership**

ANTAM personnel build harmonious relationships with Stakeholders based on GCG principles and the Code of Conduct





## 1.3 Corporate Commitment

In the operations, ANTAM is committed to achieving the highest level of implementation of the values and business ethics. To achieve it, therefore:

1. The entire ANTAM Personnel must uphold and behave in accordance with the values and standards of behavior set forth in the Code of Conduct.
2. All management from all levels within the Company are responsible for ensuring that the Code of Conduct is adhered to and executed by each ANTAM Personnel on its respective line;
3. The entire Company Partners (consultants, contractors and partners) must understand and comply with the relevant provisions of the Code of Conduct; and
4. Every time the Code of Conduct is changed, all ANTAM personnel will provide a statement of commitment to comply the Code of Conduct.



## 1.4 Goal

1. As a practical guide and code of conduct for all ANTAM personnel that must be adhered to in daily interaction with all parties and must be used as a basis for thinking in the decision-making process.
2. As a means to create and maintain a positive work environment that supports the ethical behaviors of all ANTAM personnel.
3. As a means to increase the sensitivity of ANTAM's Company and Personnel to the values of business ethics by developing discussions or developing discourses on ethics.





## 1.5 Objective

The consistent implementation of the Code of Conduct is expected to provide long-term benefits, for:

### 1. **Impleyess**

- a. Provide guidance to employees about the appropriate and inappropriate behavior in carrying out its duties and responsibilities in ANTAM.
- b. Create a work environment that upholds the values of honesty, ethics and openness that will improve the performance and productivity of employees as a whole.

### 2. **Company**

- a. Encourage ANTAM's operational activities to be more efficient and effective considering that relationships with customers, the community, the government and other stakeholders have Code of Conduct that must be observed.
- b. Increase the value of ANTAM to provide certainty and protection to the Stakeholders in relation with ANTAM to produce a good reputation, which ultimately realize long-term success of the business

### 3. **Shareholders**

*Adding confidence that ANTAM is managed prudently, efficiently, transparently, accountably and fairly to achieve the level of profitability expected by Shareholders while keeping in mind ANTAM's interests.*

### 4. **Other Stakeholders Company**

Creating a harmonious and mutually beneficial relationship with ANTAM. The increase in ANTAM's value will provide certainty and protection to Stakeholders in dealing with ANTAM, which will ultimately create economic-social welfare for the community and other related parties.



## 1.6 GCG Principles

### ***Transparency***

- 1.The Company discloses information in a timely, adequate, clear, accurate and accessible manner by stakeholders;
- 2.The Company has a written and communicated Company policy to stakeholders who have the right to obtain information on the policy;
- 3.The Company applies the principle of openness while still paying attention to the provisions of the applicable laws and secrets of the position.

### ***Accountability***

- 1.The company sets business goals and strategies can be accountable to stakeholders;
- 2.Clear division of duties and responsibilities for each member of the Board of Commissioners, the Board of Directors and all ranks under them that are in line with the Company's Vision, Mission, Values, Business Goals and Corporate Strategy;
- 3.All levels of the company have competencies in accordance with their responsibilities and understand their role in the implementation of the Company's governance;
- 4.The Company's management is carried out by a Check and balance system;
- 5.Performance measurement based on measures that are consistently agreed upon in accordance with the Company's business goals and strategy and has a rewards and punishment system.

### ***Responsibility***

The company is responsible by adhering to the principle of prudence and ensuring compliance with applicable regulations as well as having concern for the environment and carrying out social responsibilities reasonably.

### ***Independency***

- 1.The Company avoids the occurrence of unnatural domination by stakeholders and is not affected by unilateral interests and is free from conflict of interest;
- 2.All parties involved in the Company's business processes make decisions objectively and are free from any pressure from any party.



## Fairness

1. The Company pays attention to the interests of all stakeholders based on the principles of equality and fairness (equal treatment);
2. The Company provides opportunities for all stakeholders to provide input and express opinions for the interests of the Company.

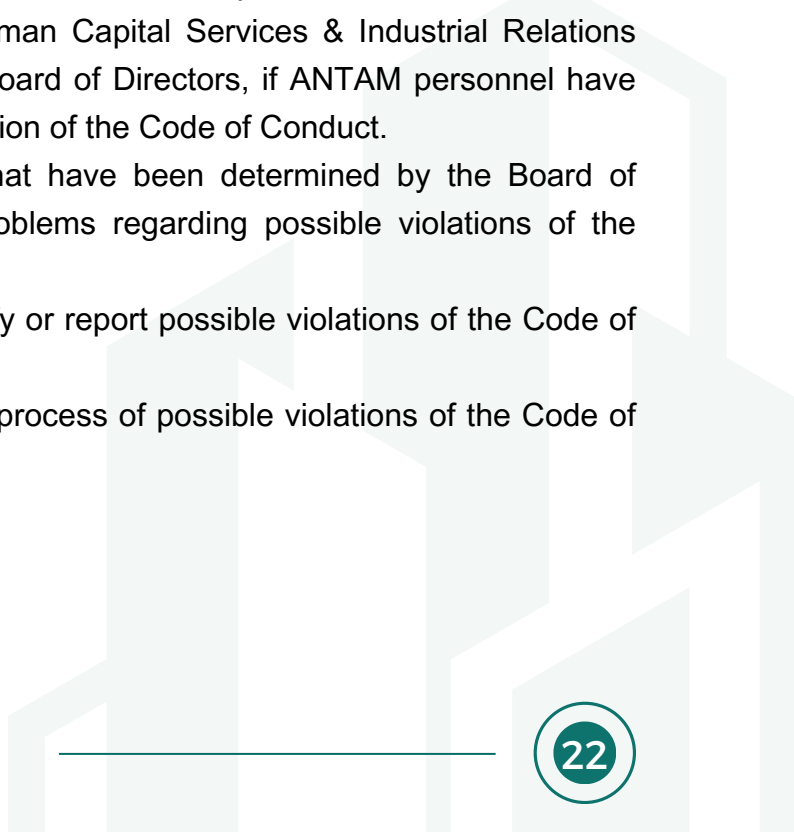
## 1.7 Objects of Code of Conduct

The parties who are obliged to comply with and implement the Code of Conduct are:

1. All ANTAM Personnel at all levels;
2. Fixed-Time Workers (TKWT), Outsourcing workers and all parties acting for and on behalf of ANTAM;
3. The Board of Directors, Board of Commissioners and Employees of Subsidiaries and Affiliates under control. Affiliates under control are Subsidiaries or other Business Entities owned by ANTAM, either directly or indirectly, with more than 50% voting rights or ANTAM has the ability to control such business entities;
4. ANTAM Investors (Shareholders); and
5. ANTAM's Partners include contractors, consultants, media, lawyers, and other partners

## 1.8 Responsibilities of ANTAM Personnel

1. Learn in detail the Code of Conduct related to their work. Every ANTAM employee must understand the ethical standards outlined in this Corporate Ethics Standard.
2. Consult with your direct supervisor, Human Capital Services & Industrial Relations Division, or parties determined by the Board of Directors, if ANTAM personnel have any questions regarding the implementation of the Code of Conduct.
3. Immediately discuss with the parties that have been determined by the Board of Directors, whenever they encounter problems regarding possible violations of the Code of Conduct.
4. Understand the procedures used to notify or report possible violations of the Code of Conduct.
5. Willing to cooperate in the investigation process of possible violations of the Code of Conduct.





## 1.9 Responsibilities of ANTAM Management

1. Build and maintain a culture of compliance with the Code of Conduct through:
  - a. Personally encourage compliance with the Code of Conduct;
  - b. Conduct regular supervision of programs aimed at encouraging ANTAM's compliance with the Code of Conduct; and
  - c. setting a good example in the way of attitude and in daily acting.
2. Ensuring that every ANTAM employee understands that adherence to the Code of Conduct is as important as the achievement of performance.
3. Encourage ANTAM personnel to ask questions about various integrity and business ethics issues.
4. Considering the issue of compliance with the Code of Conduct in evaluating and awarding ANTAM personnel.
5. Prevent possible violations of the Code of Conduct by striving to:
  - a. Ensure that the risk of possible violations of the Code of Conduct in relation to business processes can be identified early and systematically;
  - b. Identify and report in accordance with established procedures on the activities of subsidiaries, affiliates and Partners that may cause possible violations of the Code of Conduct; and
  - c. Ensuring the implementation of education and training on Code of Conduct for all ANTAM Personnel, Subsidiaries, Affiliates and socializing to Partners so that these parties understand and understand the Code of Conduct as a whole.





6. Detect possible violations of the Code of Conduct through:
  - a. Implementing supervision to minimize the risk of possible violations of the Code of Conduct;
  - b. Creating a reporting system for possible violations of the Code of Conduct and protecting the confidentiality of ANTAM's personnel as whistleblowers; and
  - c. Ensure the implementation of periodic evaluations of the implementation of the Code of Conduct by the Internal Audit Division to assess the effectiveness of implementation and how to improve existing weaknesses.
  
7. Follow up on reports of possible violations of the Code of Conduct by:
  - a. Quickly correcting deficiencies found in the assessment of compliance with the implementation of the Code of Conduct;
  - b. Provide appropriate disciplinary actions; and
  - c. Consult with the Legal & Compliance Division if violations of the Code of Conduct that occur require the intervention of law enforcement or the authorities.



# CORPORATE BEHAVIOUR POLICY





Corporate Behavior Policy is an explanation of how the Company including the organs as a business entity behave ethically and act in an effort to balance ANTAM's interests with all of Stakeholders interest in accordance with the GCG principles and healthy corporate values while maintaining Corporate profitability and sustainability.

Some critical aspects are deemed necessary to be regulated in the Code of Conduct as a guidance of ANTAM in dealing with Stakeholders, both internal and external, among others, include the following:

## 2.1 Business Ethics

**(Regarding the standards of behavior applied by the Company in interacting and dealing with Stakeholders)**





## 2.1.1. Relationship with Employees

ANTAM realizes that employees are the most important aspect in supporting the Company's success. Therefore, ANTAM provides the same and widest opportunity for all employees to always actively participate in achieving the Company's Vision and Mission.



### 2.1.1.1 Code of Conduct

1. The Company honor and respect the rights and obligations of employees under the Collective Labor Agreement (CLA) of ANTAM and the legislation in force.
2. The Company treats Employees as valuable assets so that the Company will provide equal opportunities to Employees to develop their potential without any gender, ethnic, religious, racial and inter-group discrimination.
3. The Company implements a system of recruitment, promotion, and career development in a reasonable manner in accordance with the competencies of each Employee and the needs of the Company.
4. The Company provides freedom to Employees to express their opinions and aspirations in an ethical manner and does not contradict the applicable regulations in the Company.
5. The Company ensures a good and conducive work climate for Employees, as well as protects Employees from all forms of possibilities that endanger occupational safety and health.
6. The Company gives appropriate awards to outstanding Employees and provides strict punishment for all forms of violations committed by Employees.
7. The Company supports Employees to have competence and tacit knowledge.



### 2.1.1.2 Things to Consider

1. Rights and Obligations of the Company and Employees as stated in the Collective Labor Agreement (CLA). A work culture that does not support the creation of dynamic and harmonious relationships.
2. The function of the Trade Union is less active in bridging the relationship between the Company and the Employee.
3. There is an external intervention that can affect the Company's behavior towards certain employees.
4. Laws and regulations related to employment.
5. Personal motives, moral hazards of employees that are not in accordance with the Company's goals, values and culture.
6. Index of satisfaction and attachment of employees to the Company.
7. Employee Turnover.



#### QUESTION

ANTAM is conducting employee recruitment. One of the Company's employees included his child in the selection process. Is it permitted?



#### ANSWER

ANTAM provides equal opportunities to all selection participants as long as they meet the required criteria and as long as the employee does not intervene in the entire recruitment process and selection results

### 2.1.2 Relationship with Customers

ANTAM is committed to fulfilling all agreed sales contracts in an effort to improve customer satisfaction and fulfillment of supply to customers.



### 2.1.2.1 Code of Conduct

1. Always work hard to provide the best production results at competitive prices.
2. Always prioritize professional service standards to satisfy customers.
3. Always pay attention to the needs of customers and continuously monitor, improve products, through systematic improvement of work standards supported by adequate technology.
4. Always maintain safety and innovation aspects at every stage of the development, production and distribution process with the aim of maintaining the quality of the products produced.
5. Mutual respect for each party's interests through clear and fair contract terms (including in the implementation process).
6. Customer-related activities must be done fairly, honestly, with integrity, and meet consumer protection aspects.
7. The two sides also made mutual evaluation efforts for improvement and a more harmonious and constructive relationship.

### 2.1.2.2 Things to Consider

1. Attitude and partnership relationship with customers.
2. Changes in product prices and exchange rates.
3. Control over the development, production and distribution processes that affect product quality.
4. The process and legality of the sales contract agreement.
5. Applicable trade-related regulations.
6. Control over the payment system used.
7. Customer satisfaction survey results.



#### QUESTION

At the time of launching new product, ANTAM giving souvenirs to customers, is it be permitted?



#### ANSWER

Souvenirs could given as promoting purposes for ANTAM's product.





### 2.1.3 Relationship with Suppliers

ANTAM bases the Company's relationship with suppliers on the principles of legal, efficient and fair business practices. ANTAM expects that every supplier always upholds the applicable laws and regulations in dealing with ANTAM Personnel, between suppliers and ANTAM as a company.



#### 2.1.3.1 Code of Conduct

1. Follow all procurement regulations set by ANTAM, when procuring the goods or services needed.
2. Using suppliers who meet the qualifications set by ANTAM and are consistently able to meet the quality standards of both goods and services at competitive and representative costs.
3. Conduct employment only with suppliers who comply with applicable laws and regulations and additional requirements of ANTAM, especially those related to employment, environment, health and safety, intellectual property rights and unreasonable payments.
4. The two sides also made mutual evaluation efforts for improvement and a more harmonious and constructive relationship.





### 2.1.3.2 Things to Consider

1. Selection of suppliers which is not through open bidding (tender) and not performed competitively and ignoring suppliers performance based on the database of the recorded in the Company.
2. Potential conflict of interest in the selection of suppliers, including the receiving and giving (gratification/bribe) in the form of money, gifts, entertainment or other items of value, except as expressly set forth in the Company's policies and the applicable procurement of goods and services policies.
3. Supplier does not meet the ANTAM's requirements of the Mining Safety. And Environment Occupational regulation and other regulations.
4. Suppliers who do not fulfill part/all of the contents of the contract thus causing ANTAM's loss.
5. Lack of control over the process of procurement of goods and services of the Company.
6. Practices of marking up the price and quantity and conformity of the quality/ technical specification, collusion between suppliers in pricing (price fixing) as well as in the division of work (bid pooling) and the reliance on one supplier in a long-term.
7. The use of e-procurement in the procurement process.
8. The Result of supplier satisfaction index.



#### QUESTION

Suppliers who won the procurement process, giving a gift to user, is it allowed?

#### ANSWER

ANTAM firmly prohibit that action because that is one of kind gratification and may be potentially make bribe. User should give understanding to suppliers that Company firmly prohibit giving which any form.





## 2.1.4 Relations with Competitors

In carrying out its business activities, ANTAM is committed to doing so in a responsible manner so that ANTAM is always committed to implementing healthy competition and considers competitors as the Company's driver to always provide the best for customers and other interested parties.

### 2.1.4.1 Code of Conduct

1. Maintain good relationships and respect the existence of competitors.
2. Demonstrate healthy and ethical competitive behavior in accordance with the Company's provisions and applicable laws and regulations.
3. Avoiding business relationships and cooperation that lead to unnaturalness, providing benefits for certain parties and sacrificing the interests of consumers.
4. Conducting market research to find out the position of competitors and making the Company a competitor as a benchmark to improve the Company's performance.
5. The company conducts sustainable promotions in a healthy, fair, honest manner that does not bring down competitors.

### 2.1.4.2 Things to Consider

1. Having relationships with certain parties in a competing company that has the potential to cause losses for one party such as insider information on both parties.
2. Negative promotion with the intention of bringing down competitors.
3. Provoked by unhealthy business practices carried out by competitors.
4. The potential for unethical recruitment of ANTAM employees by competitors



#### QUESTION

An employee is promoting company's products to candidate buyers. During his explanation, he telling the weakness of competitors product and mention it brand. Is it fair to do?

#### ANSWER

That action is violation of business ethics. ANTAM always comply to business ethics in business operation and not do negative promotions to competitors products





## 2.1.5 Relationship with Regulators

ANTAM is committed to building relationships with all government agencies and officials (Regulators) based on applicable business ethics standards and laws and regulations.

### 2.1.5.1 Code of Conduct

1. Comply to the applicable laws and regulations, especially regarding relations with the Government.
2. Build a harmonious relationship with the Government both as a Regulator and as Shareholders (in a separate context).
3. Requires all ANTAM's Partners to comply with ANTAM's standards of relations with the Government and applicable laws and regulations.
4. Uphold GCG principles in dealing with all government agencies and officials.
5. Every report, statement, certification and application addressed to the Government must be transparent, clear, accurate, complete and not contain matters that can be misinterpreted.
6. Always prioritizing GCG principles in every licensing management process.

### 2.1.5.2 Things to Consider

1. Special requirements or imposition of unauthorized fees in connection with the licensing process issued by the Government.
2. Submission of inaccurate or incomplete information or data of the Company required by the Government.
3. Violation of Government Regulations on the prohibition of giving gifts and regulations on the provision of entertainment.
4. Be aware of actions that are contrary to the Company's values and culture.





## 2.1.6 Relationship with the Surrounding Communities

In line with the Good Corporate Citizen, the Company will not be able to grow and develop without involving the surrounding community to participate in growing and developing together.



### 2.1.6.1 Code of Conduct

1. Always uphold the commitment that wherever the Company's work units operate, good relations and the development of the surrounding community are the main cornerstones for the Company's long-term success.
2. Always appreciate every partnership activity that contributes to society and enhances the company's social value and image.
3. Establish cooperation with organizations, and community institutions, the central and local governments to achieve joint commitments on partnership programs based on mutual trust and in line with the principle of openness.
4. Develop and prioritize dialogue mechanisms with surrounding institutions, in the hope that a more rational and effective policy can be formulated.
5. Appreciate and respect local cultural wisdom.
6. Playing an active role to participate in positive activities carried out by the community around the operating area.
7. Empowering and providing added value to the lives of the people around the Company's operating area.





### 2.1.6.2 Things to Consider

1. Sensitivity and harmonization of problems experienced by the community around the Company's operations.
2. The principle of information disclosure and active partnership.
3. Inequality in the economic level of the community around the Company's operating area.
4. Prioritizing the balance of the ecosystem and the environment.
5. Efforts to achieve win-win solutions to problems that may arise.
6. The potential for jealousy/social disparity in certain communities around the operating area.
7. Is a provocation from certain community members to mobilize the community around the operation area to act anarchically.
8. Demand for personal interests through an illegitimate mechanism as well as the existence of certain political interests.



#### QUESTION

A Headman who has position in one of Company's operational location asking donation to ANTAM for build general praying facility. Is it be permitted?

#### ANSWER

ANTAM can give donation related to corporate social responsibility in the form of assistance through CSR Fund management for communities and to surrounding environment whether not related to politics activity and has suitable authority also can be responsibility evidently.



### 2.1.7 Relationship with Investors and Shareholders

ANTAM personnel are committed to always striving to ensure that the Company experiences continuous growth based on mutually beneficial business standards so that it can provide optimal added value for Shareholders.





#### **2.1.7.1 Code of Conduct**

1. That the communication process with Investors and Shareholders is only carried out through a one-door policy with the knowledge and approval of the Board of Directors (in the context of material matters) and communicated through the Corporate Secretary Division.
2. Each reporting, statement, and disclosure of information to the Investor must be transparent, clear, accurate, consistent, complete and not contain anything that could be misinterpreted except for information where the Board of Directors has an accountable reason for not providing it.
3. Every Investor and Shareholders must comply with the Company's Articles of Association and all decisions lawfully taken in the GMS.
4. To provide equal (fair) treatment to Shareholders and Investors to be able to exercise their rights in accordance with the Company's Articles of Association and applicable laws and regulations.
5. To maintain clarity of accountability and independence, prohibit Shareholders from interfering in the Company's operational activities that are the responsibility of the Board of Directors in accordance with the provisions of the Company's Articles of Association.

#### **2.1.7.2 Things to Consider**

1. Transformation and accountability of the Company's published information.
2. Dissemination of inaccurate or incomplete information or data of the Company as required by Investors and Shareholders.
3. Violations of regulations issued by OJK (Otoritas Jasa Keuangan/Financial Services Authority), the Indonesia Stock Exchange (IDX) and the Australian Securities Exchange (ASX).
4. The determination of dividends is decided by the Shareholders at the General Meeting of Shareholders, based on the interests of the Company, by looking at various matters such as business continuity, dividend policy, strategies that will and are being implemented and investment plans.
5. Shareholder rights as well as equal treatment between shareholders.

#### **2.1.8 Relationship with Creditors**

In achieving its Vision and Mission, ANTAM strives to continue to develop its business with funding both through Investors and Creditors. In establishing relationships with Creditors, ANTAM is committed to always implementing behaviors based on existing work ethics and applicable laws and regulations.



### **2.1.8.1 Code of Conduct**

1. That all Creditor selection processes are carried out for the benefit and development of the Company's business and are able to create added value for the Company by considering the Company's capabilities. The selection process is carried out in accordance with GCG principles while still considering the credibility and reputation of the Creditors.
2. The Company always provides information that is actual and relevant and accountable and refers to the information disclosure policy applicable in the Company.
3. The Company is committed to fulfilling the rights of Creditors in accordance with the Company's policies and applicable laws and regulations or agreements reached by both parties.

### **2.1.8.2 Things to consider**

1. The dissemination of inaccurate or incomplete Company information required by the Creditor.
2. The ability of the Company to fulfill the rights of the Creditors.
3. Anticipation of the possibility of unexpected events (force majeure) both on the side of the Company and Creditors.
4. All applicable laws and regulations related to the rights and obligations of the Creditor.

### **2.1.9 Relationship with subsidiaries/Joint Ventures**

In developing the business, the Company can form subsidiaries or work together to form a joint venture. Relationships with subsidiaries and joint ventures are carried out in order to build better synergy and image and can improve performance and be able to provide added value for the Company.



### 2.1.9.1 Code of Conduct

1. ANTAM personnel ensure that every business relationship with subsidiaries or joint ventures is carried out within the framework of a reasonable business relationship as befits a business relationship developed with an unaffiliated party (arm's length relationship).
2. Mutual respect for the interests of each party through mutually beneficial cooperation agreements.
3. The existence of subsidiaries/joint ventures is able to create its own economic added value for the parent company and can support the sustainability of the Company.
4. The policies that apply in the subsidiary/joint venture must be in line with and refer to the policies that apply at ANTAM. In the event that the Board of Directors of a Subsidiary/Joint Venture requires a more specific policy due to considerations of the effectiveness and efficiency of the company's management, its application refers to the Policy related to the management of ANTAM's Subsidiary/Joint Venture Company.

### 2.1.9.2 things to consider

1. The effectiveness of the span of control over the subsidiary/joint venture related to the implementation of governance in the subsidiary.
2. The internal policies of the Subsidiary are in line with ANTAM's policies and always take into account GCG principles.
3. Unbalanced and legally flawed cooperation agreements.
4. Financial transactions that can deviate from state treasury regulations (transfer pricing).
5. The motive for "window dressing" of the parent company's financial statements is based on the performance of subsidiaries/joint ventures.
6. Dependence on the funding to the hold company.
7. The risk of legal problems that occur in subsidiaries/joint ventures that have an impact on the parent company.





## 2.1.10 Relationship with Politic

As a company located in the unitary territory of the Republic of Indonesia, ANTAM respects Human Rights (HAM) and the rights of citizens in politics. However, as a Company, ANTAM conducts its business with a neutral attitude without taking sides in any particular politics.

### 2.1.10.1 Code of Conduct

1. ANTAM as a Company is neutral and does not support any particular political party.
2. ANTAM does not introduce corporate attributes to be used in support of a particular political party.
3. ANTAM also does not issue any kind of contribution on behalf of ANTAM to support political parties.

### 2.1.10.2 Things to Consider

1. Weak control over activities carried out by ANTAM personnel on behalf of the Company.
2. Obstacles to positioning oneself as a person and as an ANTAM Person in the right way.
3. Regulations governing Political Parties and the implementation of political activities.
4. Potential conflict of interest between the Company and political activities.



## 2.1.11 Relationship with Media

ANTAM believes that by building and developing relationships with the Media, the Company can reach out to the public to improve the Company's image, trust, and achievement of the Company's goals. For this reason, the Company strives to always provide accurate and accountable information to the public.

### 2.1.11.1 Standar Etika

1. To make the mass media as a partner to promote relationships based on openness and mutual respect so that the Company will always strive to deliver relevant and accurate information in accordance with the applicable provisions of the Company and not in violation of journalistic ethics.
2. To receive and follow up the constructive criticisms delivered through the media while considering the risks and costs aspects.
3. Submission of all information material to the media, especially material information must be the information that has been published (public information) as further stipulated in the Company's internal policies.
4. ANTAM Personnel who can convey information to the media are ANTAM Personnel who has been approved or appointed by management or other parties of authority.
5. Any information submitted to the national media both at Head Office and unit/business unit must be coordinated with the Corporate Secretary Division, while for the information to be submitted to the local media must be coordinated with the Public Relations/External Relations at each unit/ business unit/project unit and informed to the Corporate Secretary Division.
6. ANTAM Personnel representing the company in delivering its tacit knowledge must be at the knowledge or consent of the immediate superior or the superior's immediate superior or competent authority



### 2.1.11.2 Things to Consider

1. Weak control over the dissemination of information through regional media that is detrimental to the Company, especially related to Business Units/Units located far from the Head Office.
2. The procedure that ensures the delivery of information to the Media is carried out by parties who have been appointed by the Company as stated in the Company's internal policies and must be carried out in appropriate procedures.
3. All forms of giving and receiving gifts from and for the Media that contain personal or group interests and have the potential to harm the Company.
4. The dissemination of inappropriate information by certain individuals but on behalf of the media includes biased information and misinterpretation.
5. Officials who can be spokespersons and provide information to the mass media (print and electronic) are: Board of Directors of PT ANTAM Tbk; Head Office: Board of Directors, Corporate Secretary Division Head, or other official appointed by the Board of Directors; Business Units and Units: The Head of the Unit and Business Unit, or other officials appointed as the head of the Unit and Business Unit, accompanied by the Public Relations/External Relations Staff in each Unit and Business Unit



#### QUESTION

One day, happening mine accident in ANTAM operational location. An employee interviewed by media related to accident chronological. What should we informed to the reporters?

#### ANSWER

The employee must informed to reporters that the party who had authority to explain to media is SVP Corporate Secretary or Public Relation/External Relation from Unit/Business Unit after coordinating with SVP Corporate Secretary.



### 2.1.12 International Trade

As a company that carried out a lot of international trade, ANTAM has always tried to respect all international laws and regulations related to international trade.





### 2.1.12.1 Code of Conduct

- 1.1.To comply all relevant international trade regulations, including licensing issues, shipping documentation, export and import documentation, reporting and document storage as required.
- 2.2.Ensure that all ANTAM international transactions have been checked in accordance with relevant laws and regulations.
- 3.3.Consult the Company's Legal & Compliance Division in the event of a conflict with the regulations or laws of the destination country.
- 4.4.Trade relations in the international context must be based on the principle of mutual respect and understanding of the authority that is regulated between the two parties.

### 2.1.12.2 Things to Consider

1. Customers are not well known and without convincing references.
2. Unreasonable transactions or payments and the potential for money laundering from the transactions made.
3. Transactions involving embargoed countries, citizens or representatives of embargoed countries as well as individuals or entities that are being sanctioned by the Government.
4. The role of mediation in resolving problems that may arise.
5. Increasing intensity of marketing activities with foreign partners with varied transaction models

### 2.1.13 Relationship with the Community/Professional Organizations

ANTAM personnel are committed to always developing themselves by improving their knowledge and insight so that they can make their best contribution to the Company through a community/professional organization.





### 2.1.13.1 Code of Conduct

1. The Company allows Employees to participate in professional organizations as long as they do not neglect the duties and responsibilities of Employees in the Company.
2. Comply with the ethical standards of relations between members regulated in professional communities/organizations.
3. Always establish the widest possible working relationship with professional communities/organizations to improve insights/hard skills/soft skills.
4. Support to actively strengthen the professional community/organization, set the priority of engagement, and contribute to improving the quality of the professional community/organization as long as it does not interfere with/contradict his/her duties and responsibilities in the Company.
5. Establish cooperation with professional communities/organizations to achieve joint commitments on the development of knowledge management for ANTAM personnel and parties outside ANTAM.

### 2.1.13.2 Things to Consider

1. Penyampaian informasi rahasia terkait Perusahaan kepada pihak-pihak yang tidak memiliki wewenang untuk memperoleh data dan informasi Perusahaan.
2. Peraturan yang berkaitan dengan komunitas organisasi profesi.
3. Potensi kompetensi Insan ANTAM menjadi contoh pembeding dan membawa *image* ANTAM pada event komunitas/organisasi profesi.

### 2.1.14 Relationship with Holding and Mining Industry Holding Member

ANTAM as a member of the Mining Industry Holding, plays a role in realizing synergy in an effort to achieve the goal of forming the Holding.





#### 2.1.14.1 Code of Conduct

1. The Company ensures that the management of the Company as a Holding Member is carried out professionally and free from intervention from any party in the implementation of the Company's operations.
2. The Company as a Holding Member implements the principles of good corporate governance in a disciplined, consistent and continuous manner which is manifested in the real behavior of all levels of the Company.
3. The Company carries out communication relationships with the Holding and other Holding Members through reasonable mechanisms and in accordance with applicable regulations.
4. The Company carries out Best Practices Sharing between the Holding and the Holding Members in accordance with applicable regulations.

#### 2.1.14.2 Things to Consider

1. Communication between the Holding and the Holding Member.
2. Alignment of the Company's internal policies with the Holding's Strategic Guidelines.
3. The potential for unequal treatment from the Company to the Holding as the Majority Shareholder and to other Shareholders.
4. The Company's independence in carrying out the Company's operational activities.





### (Concerning ANTAM Personnel Code of Conduct in Carrying out the Work and in Interaction)

#### 2.2.1 Compliance with Laws

ANTAM realizes that compliance with laws and regulations is the standard for the Company to be able to conduct its business in a reasonable manner so that all applicable regulations must be complied with and implemented in every business activity of the Company.

##### 2.2.1.1 Code of Conduct

1. Each ANTAM Personnel must comply and comply with applicable laws and regulations and implement them consistently.
2. Each ANTAM Personnel must avoid any actions and behaviors that may cause violations of law and decency.
3. ANTAM personnel are prohibited from committing fraud or engaging in activities related to fraud or dishonesty in any form.
4. Prioritize settlement through the deliberation route for consensus on every problem and if no agreement is reached, then legal channels will be used and every ANTAM Personnel is obliged to respect the ongoing legal process and the resulting decisions.
5. ANTAM personnel are always self-aware and avoid the Company's involvement in criminal activities in the financial and operational sectors.
6. Not to cooperate against the law with other parties that are detrimental to the Company.
7. Every ANTAM employee must understand the applicable laws and regulations in the context of work, including other related fields.

##### 2.2.1.2 Things to Consider

1. The Company's internal policy to deal with cases or violations of the law committed by ANTAM personnel.
2. Control of the legal compliance of ANTAM personnel outside of working hours on behalf of the Company's activities.
3. ANTAM personnel who have relationships with parties involved in legal matters.
4. Socialization of understanding of applicable laws including the implementation of other best practices.



## 2.2.2 Conflict of Interest

ANTAM realizes that every ANTAM employee has the right to participate in financial, business, socio-cultural and other legitimate activities outside of work while still paying attention to their duties and responsibilities in the Company. These activities must be legitimate and free from conflicts of interest with their responsibilities as ANTAM Personnel. ANTAM personnel must not misuse the Company's resources or influence so as to discredit the Company's good name and reputation.

### 2.2.2.1 Code of Conduct

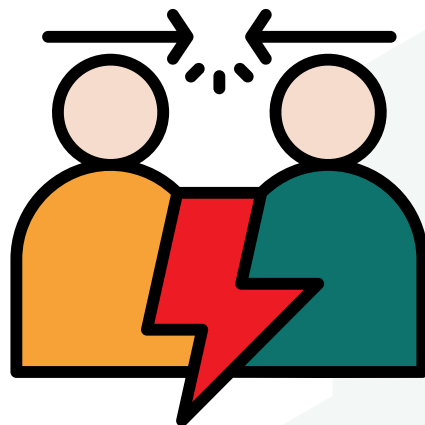
1. ANTAM personnel avoid activities that cause conflicts of interest, especially conflicts of interest caused by certain relationships with ANTAM personnel.
2. If ANTAM personnel have a relationship that may cause a conflict of interest, they are obliged to report it to their direct supervisor or the Human Capital Services & Industrial Relations Division
3. ANTAM personnel are prohibited from working for other companies either as Board of Commissioners, Board of Directors, Employees, or Consultants, unless they have received assignment or written permission from the company. Especially for members of the Board of Commissioners and Board of Directors, the trap of positions refers to the provisions of laws and regulations.
4. ANTAM personnel are prohibited from using their positions, access, or authority at ANTAM for personal gain, including but not limited to selling ANTAM products personally or offering ANTAM product purchase services to other parties for personal gain.
5. ANTAM personnel who have a conflict of interest are not allowed to participate in the decision-making process.
6. Avoid misuse of ANTAM's position, resources, intellectual property rights, time and facilities used other than for the Company's operations.
7. The Board of Directors and the Board of Commissioners make annual statements related to conflicts of interest.
8. Ensuring that parties who have the potential to have a conflict of interest and moral hazard do not take any action that causes a conflict of interest.
9. In the event of the participation of ANTAM Personnel in practical political activities, it shall be carried out with reference to the Collective Labor Agreement and/or applicable laws and regulations, and shall not make any statement indicating that the Company is tied to certain political choices.





### 2.2.2.2 Things to Consider

1. Having a relationship with a company where ANTAM personnel can personally affect ANTAM's business relationship with that company.
2. Perform part-time work where ANTAM Personnel may be induced to perform such work during active working hours or using equipment or materials from ANTAM and without the knowledge of the direct supervisor or superiors of the superior or authorized officers.
3. Accepting prizes from suppliers, customers, competitors or other Stakeholders while ANTAM Personnel are in a position that may influence or be seen to influence ANTAM's decision on the prize giver.
4. Selling ANTAM products personally or offering ANTAM product purchase deposit services to other parties for the purpose of obtaining personal profits, either directly or indirectly.
5. Receive personally or in groups discounts or other benefits from suppliers, service providers or customers, which are not given to the general public or other ANTAM Personnel in similar situations.
6. Accepting an offer to buy shares from another company, even though the ANTAM employee was related to that company in carrying out his work.
7. Provide special treatment to suppliers owned or managed by family or close friends.
8. Abusing ANTAM resources, position or influence to promote or assist other parties without the knowledge or consent of the authorities.
9. Have special preferences in hiring or making decisions, for example: promotion of positions regarding wife or husband, family or close friends.
10. Personal relationships, or other relationships that may cause a conflict of interest with the responsibilities of ANTAM personnel or may cause a compromise in ANTAM's interests.





### 2.2.3 Giving and Receiving

In conducting its business, ANTAM is committed to conducting its business honestly and fairly without committing any actions that lead to all forms of fraud and corruption. In accordance with Law No. 31 of 1999, corruption is formulated into thirty forms/types of corruption crimes that can be grouped into: state financial losses, bribery, embezzlement in office, extortion, fraudulent acts, conflicts of interest in procurement and gratuities. In this ANTAM's Code of Ethics, these matters are implied in the entire content of ANTAM's Business Ethics and Work Ethics Chapter, especially in the points of Conflict of Interest, Improper Payments and Supervision and Use of Assets.

As for the receipt and giving of gifts or assistance in work from internal and external parties of the Company that are cultivated and can cause conflicts of interest and a decrease in public trust in the integrity of the Company, it is also specifically regulated in the Company's policy.





### 2.2.3.1 Code of Conduct

1. Strictly prohibit ANTAM personnel from committing acts of corruption, including bribery in all forms, both directly and indirectly.
2. It is strictly forbidden to give or promise, either directly or indirectly, gifts to parties related to the Company, where such gifts are known or reasonably suspected to be used to influence or induce such parties to do or not to do anything in their positions that are contrary to their obligations.
3. ANTAM may make donations related to ANTAM's responsibility for the surrounding environment and such donations are not politically related or to influence ANTAM.
4. All forms of the Company's giving to the Company's Stakeholders as well as the receipt of gifts/gratuities by ANTAM Personnel refer to ANTAM's Gratification Control Policy.
5. All expenses related to donations and donations must be appropriately authorized and clearly accountable.
6. It is strictly forbidden to accept gifts from any party, who knows and should be suspected that the gift is given to move him to do or not do something in his position, which is contrary to his obligations. This prohibition also includes direct or indirect giving/receiving addressed to ANTAM personnel or on behalf of ANTAM personnel.
7. It is strictly forbidden to deduct or take payments of any amount to third parties in exchange for the performance of their duties and obligations.
8. Ensuring all receipts and expenses are the allocation of the Company's operational activities.





### 2.2.3.2 Things to Consider

1. All forms of receiving and giving (gratuities/bribes) in the form of money, gifts, entertainment (entertainment).
2. Donations/donations for other purposes may only be made in accordance with the applicable laws and regulations by prioritizing the principles of accountability and transparency, which may be in the form of:
  - a. Grants for small business development activities, donations for social and religious activities, and research for educational purposes.
  - b. Giving in the context of the Company's promotion.
3. Laws and regulations related to corruption and ANTAM's Gratification Control Policy.
4. The risk of bribery practices in business processes and in work units.

A Complete description of SMAP risk management will be listed in the Standard Management Policy of the Anti-Bribery Management System and in the Risk Issue Division.



#### QUESTION

In our Tradition, there is a custom about giving presents to the co-workers on special day including religious day and birthday. Is it allowed?



#### ANSWER

That Giving is allowed if in reasonable limits and not to influence performance or work relation with that coworkers and refers to Management Policy concerning Prohibition of Giving and Receiving as well as Gratification in ANTAM.

### 2.2.4 Equality and Respect for Human Rights

ANTAM believes that human rights are universal. As an integral part of the community, ANTAM encourages efforts to ensure the fulfillment of human rights and considers every impact of operations on the surrounding community. ANTAM is always committed to ensuring that every operational activity of the Company does not violate human rights principles.





#### 2.2.4.1 Code of Conduct

1. Ensuring that all ANTAM personnel understand the laws and regulations regarding human rights.
2. Ensure that the community around the operational/mining area also feels the welfare and added value created by ANTAM and respects its human rights.
3. Prioritizing human rights principles in handling conflicts that may occur with the community, employees, and other stakeholders.
4. Conduct human rights related analysis and collaborate with organizations outside the Company such as the Government, Non-Governmental Organizations, and other relevant stakeholders at the initial stage of each business development process, especially in social impact analysis in the preparation of EIA documents.
5. Work with the Government, Non-Governmental Organizations, and other relevant stakeholders to avoid violations of the rights related to ownership from local communities.
6. ANTAM is committed to implementing the UN Guiding Principles on Business and Human Rights at its headquarters as well as in its operating units.
7. ANTAM is committed, in the event of physical and/or economic displacement, to make efforts to restore or improve the physical and economic conditions of the affected communities
8. ANTAM is committed to handling security for its employees and assets and will consistently strive to avoid impacting the rights of others.
9. ANTAM is committed to respecting internationally recognized work-related rights, including: freedom of association, freedom of speech, negotiations, maximum working hours, minimum wage and equal opportunity.
10. ANTAM is committed to not discriminating against individuals based on race, religion, ethnicity, national origin, skin color, gender, age, nationality, marital status, pregnancy, disability, or other legal protections.
11. ANTAM is committed to zero tolerance for human rights violations committed by employees, partners and third parties.
12. ANTAM opposes all forms of slavery, forced or compulsory labour and child labour, both inside and outside the organisation and supply chain.
13. ANTAM is committed to carrying out risk-based human rights assessments at its head office and operating units, namely risks related to working conditions, employee discrimination, health and safety, security, the rights of indigenous peoples and vulnerable groups.





14. ANTAM is committed to treating its stakeholders (including employees, partners, and local communities) fairly and without discrimination or harassment of any kind.
15. ANTAM is committed to respecting the history and culture and traditions of indigenous peoples, their standing as distinct and self-determined peoples with collective rights, and their interests over land, waters and the environment.
16. ANTAM is committed to recognising that governments, local communities and indigenous peoples have a role to play in the development of projects that will impact them and involve stakeholders to provide input and feedback.
17. ANTAM is committed to implementing a grievance mechanism and whistleblowing system that applies to stakeholders and indigenous peoples to submit and resolve complaints related to human rights issues.
18. ANTAM is committed to considering human rights risks and impacts in investment decisions, including the acquisition of new businesses and mines, as well as potential mergers and acquisitions.
19. This human rights commitment is communicated and is the shared responsibility of everyone who works on behalf of ANTAM. The policy is also documented and reviewed periodically to ensure that it is in line with goals and efforts to improve it on an ongoing basis.

#### **2.2.4.2 Things To Consider**

1. The negative impact of ANTAM's operational activities on the welfare of the surrounding community.
2. Deterioration of relationships or conflicts with employees and the surrounding community, the Government, Non-Governmental Organizations, and other related stakeholders.
3. The involvement of the security forces is counter-productive and is an abuse of power.
4. Violation of rights related to ownership from the surrounding community.
5. Violation of the local culture and wisdom of the community around the operating area.
6. The use of force that is not in accordance with applicable laws and regulations to solve problems related to labor problems or the surrounding community.
7. The use of child labor is prohibited under labor laws.





## ANTAM's Approach to Respect for Human Rights

1. Implement mechanisms to identify, assess and control potential human rights risks and impacts, make improvements if human rights risks and impacts occur, and prepare means for submitting complaints.
2. If there is a potential impact of involuntary resettlement or economic displacement in the risk assessment, ANTAM will prepare and implement a resettlement plan as well as adequate monitoring and evaluation.
3. Training on human rights policies as part of the employee and contractor on-boarding program.
4. Follow the Voluntary Principles on Security and Human Rights in relation to public and private security personnel, and local communities.
5. Employ individuals above the legal minimum working age as regulated by national regulations or in accordance with the International Labour Organization (ILO) Conventions.
6. Build and maintain transparent relations with indigenous peoples based on the principle of mutual respect for human rights.
7. Promote diversity and inclusion.
8. Periodically conduct performance monitoring at key suppliers and partners related to human rights issues.
9. Report on policies, approaches and performance related to respect for human rights in the annual Sustainability Report.



## 2.2.5 Fair Employment Opportunity

ANTAM is committed to creating fair employment opportunities, including the prohibition of all forms of discrimination and disorientation. ANTAM provides equal opportunities and fair treatment to all ANTAM Personnel.

### 2.2.5.1 Code of Conduct

1. Comply with applicable labor regulations, including regulations governing freedom of association, assembly and expression.
2. Use the criteria of ability, qualifications (such as education, experience, competence and others) and other criteria related to employment as the basis for all decisions related to ANTAM personnel and job applicants.
3. Conduct labor recruitment, provide training, promotion, dismissal, compensation and other conditions in a fair manner regardless of religious background/belief, race/ethnicity, personal relationships (friendship and kinship), skin color, nationality, gender, age, disability or other characteristics protected by law.
4. Creating a work environment that is free from harassment, such as harassment of a person because of religion/creed background, race/ethnicity, skin color, nationality, gender (gender), age, disability or other characteristics protected by law.
5. Respect the personal rights of ANTAM personnel by using, maintaining and storing their personal data in accordance with applicable instructions and procedures.
6. For the Company's purposes, ANTAM has the right to monitor the use of the Company's assets such as computers, e-mails, telephones, information regarding ANTAM's intellectual property rights and so on in accordance with applicable laws and regulations.





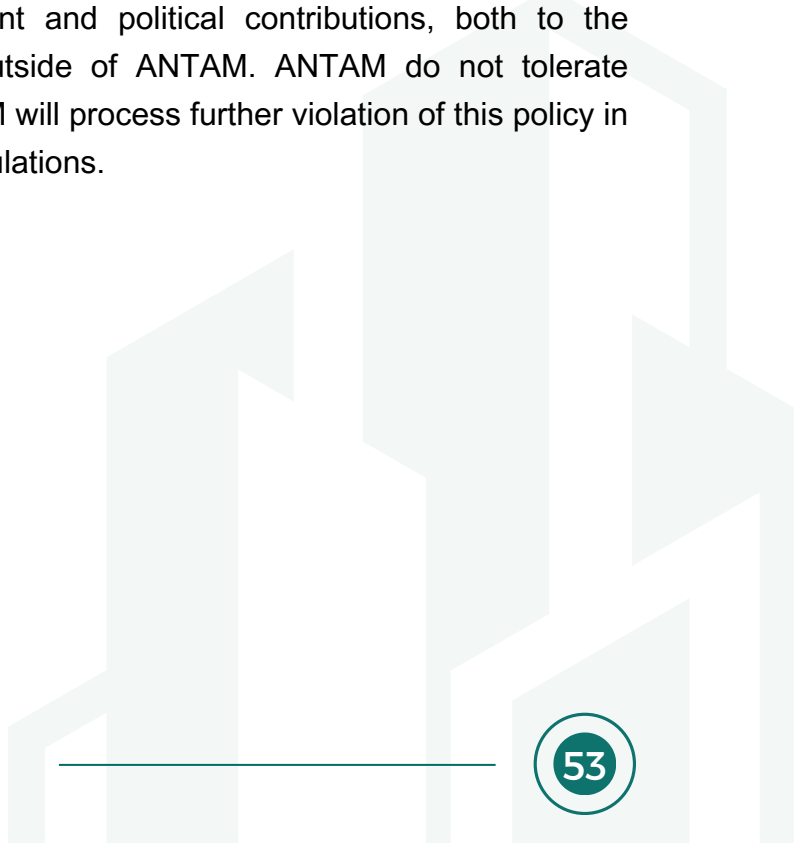
### 2.2.5.2 Things to Consider

1. Uncomfortable work atmosphere such as telling jokes or showing items that mock or offend members of the community or other related stakeholders from certain ethnicities, religions, races or ethnicities.
2. Consider race, personal or group relationships (friendships and kinships), skin color, religion, national origin, gender (gender), age, physical disability (disability) or other legally protected characteristics, as factors in hiring, promoting, compensating, or other decisions related to ANTAM Personnel.
3. Talking about things that have connotations of violating morality and SARA that are unpleasant with other ANTAM personnel.
4. Committing violations of labor law.
5. Refusing to cooperate with certain individuals or groups due to ethnicity, race, religion, gender and so on.
6. To notify data and information about ANTAM Personnel to persons who do not have business interests, authority or approval from the subject concerned.

### 2.2.6 Inappropriate Payments

ANTAM Personnel are prohibited from offering or giving anything of value to obtain a certain advantage or preferential treatment in the conduct of the sale of goods or provision of services or perform financial transactions to government officials or parties outside ANTAM.

Inappropriate Payments Policy regulate the code of conduct and practice of ANTAM concerning specific payments, entertainment and political contributions, both to the Government officials as well as parties outside of ANTAM. ANTAM do not tolerate practices that do not meet this policy. ANTAM will process further violation of this policy in accordance with the applicable laws and regulations.





### 2.2.6.1 Code of Conduct

1. Under no circumstances shall it be strictly forbidden to give, offer or win offers, either directly or indirectly, to anything of value (money, goods or services) to Government officials and parties outside ANTAM for undue gain and/or preferential treatment.
2. This Policy does not prohibit the provision of lawful reimbursements, for example for accommodation and travel expenses incurred by parties outside of ANTAM that are directly related to the promotion of ANTAM's products and services, ANTAM's business development or the performance of a contract.
3. It is strictly forbidden to provide gifts or other payments to parties outside of ANTAM and Government officials to expedite administrative actions.
4. It is strictly forbidden to donate the Company's funds or assets for political purposes either at home or abroad and not to use the Company's name, assets and/or opportunities for political purposes.
5. Requires the Partner to comply with this unreasonable payment provision and all laws and regulations related to it.
6. Before cooperating with a third party, ANTAM must conduct a careful audit of the third party's compliance with the requirements of ANTAM.
7. Carry out payment procedures in accordance with applicable policies and regulations or in accordance with the contract that has been agreed upon by both parties.
8. The implementation of payments in accordance with the applicable policy or in accordance with the contract that has been agreed upon by both parties and free from any form of conflict of interest.
9. The Company's ranks are obliged to take preventive measures in detecting risks that may arise in business and financial activities that may be detrimental to the Company.



### 2.2.6.2 Thing to Consider

1. Third parties who have an employment relationship or who represent ANTAM who:
  - a. Have been accused of unlawful business activities;
  - b. Have been involved in an unfair payment case or have a bad reputation for unfair payments;
  - c. Have relationships with parties that may unreasonably influence the decisions of the customer or the Government;
  - d. Approach ANTAM Personnel at the time the decision will be made and explain that the third party has a special arrangement with Government officials or customers;
  - e. Urge to receive the payment commission before ANTAM makes an announcement regarding the decision taken.
2. All of fee payment or other payment which paid abroad of other place outside the company or using other person name/other institution.
3. Potency of action/activity related to Money Laundering.



#### QUESTION

On administration document arrangement in an institution, ANTAM asked to paying more than normal price as “lubricant money” to make the process faster. As ANTAM Personnel, What Should we do?



#### ANSWER

As ANTAM Personnel, we should reject that demand and follow the applicable procedure.

### 2.2.7 Confidentiality of Data and Information

Policy of data and information confidentiality of the Company is prepared to ensure information security and to ensure that the data and information that needs to be disclosed by ANTAM, be delivered fairly and equally to the parties concerned without any preferential treatment to certain parties in accordance with the applicable laws and regulations.





### 2.2.7.1 Code of Conduct

1. Management of Company provide accurate and accountable data.
2. ANTAM Personnel are prohibited to discuss “material information” about the Company to anyone. This prohibition includes the husband or wife, partner at home, relatives, relatives of partner at home, the broker and other ANTAM Personnel (except co-workers who need to know about that matters).
3. ANTAM Personnel are not allowed to trade the Company’s shares if they have information that could affect ANTAM stock price (insider trading) including the close period (i.e. the period in which people in the company are not allowed to conduct securities trading activities in the form of the company’s shares).
4. For all ANTAM Personnel who are still working at ANTAM, the Company strictly prohibits the unauthorized use or disclosure of confidential data and information to external parties without the knowledge of the Corporate Secretary or authorized officials.
5. For ANTAM Personnel who no longer work at the Company, it is strictly forbidden to take confidential data and information before leaving the Company. All documents that have been made by ANTAM personnel are fully the Company’s property. Before leaving the Company, ANTAM personnel are not permitted to carry any documents.
6. The company respects the rights of ownership of data and information of other companies and requires ANTAM personnel to comply all laws and regulations relating to data and information ownership rights.
7. Collecting data and information about other companies is permissible as long as the data and information is obtained from legitimate sources, such as the authorized party in the company, mass media or public information from the company.
8. The company strictly prohibits the collection of data and external information that is done illegally, such as spying, stealing data and information or by falsifying one’s identity.
9. The entire Management of the Company is only allowed to make changes or deletions of data based on the authorization of the authorized official in accordance with procedures established by the Company.
10. It is not permissible to search for confidential data and information from ANTAM People who have recently moved from another company.



11. Efforts to collect data and information from other companies must be carried out with the knowledge of the relevant Division leaders.
12. ANTAM Personnel who change positions are required to submit all data to the parties holding the position.
13. For ANTAM Personnel who no longer work at the Company, ANTAM strictly prohibits identity fraud by using ANTAM's name to obtain confidential data and information from other companies.
14. If there are doubts or problems that arise in connection with the problem of Company data and information, please contact the Corporate Secretary.

#### **2.2.7.2 Things to Consider**

1. Insufficient controls such as those that allow access by unauthorized persons or groups to ANTAM's material data and information.
2. Submission or request for the submission of confidential data and information of ANTAM or about ANTAM's customers and suppliers by parties who do not have the authority to obtain such data and information.
3. The submission or receipt of non-public data and information about ANTAM or other companies that may influence the decision to sell or buy shares or securities of ANTAM or other companies, which may be allegedly insider information.
4. Dissemination of data and material information or internal documents of ANTAM by third parties who previously had cooperation with ANTAM.

#### **2.2.8 Prohibition of Participation and Neutralization of Political Activities**

ANTAM personnel are required to be politically neutral and are not allowed to use attributes or carry ANTAM's name in political activities, including campaigns or involvement in the legislative and executive fields.





### 2.2.8.1 Code of Conduct

1. ANTAM personnel is obliged to carry out their duties according to their responsibilities, act and behave professionally and neutrally.
2. ANTAM personnel are prohibited from using the company's positions, assets, and facilities to support or hinder certain political activities, whether in the context of elections, campaigns, or legislative and executive policies.
3. ANTAM personnel involved in political activities, including in organizations affiliated with political parties or volunteers supporting executive candidates, are not allowed to use ANTAM's attributes, names, or facilities in such activities.
4. ANTAM personnel are obliged to avoid conflicts of interest in all forms related to political activities. Any relationship or activity that has the potential to cause a conflict of interest must be immediately disclosed to management in accordance with company policy.

### 2.2.8.2 Things to Consider

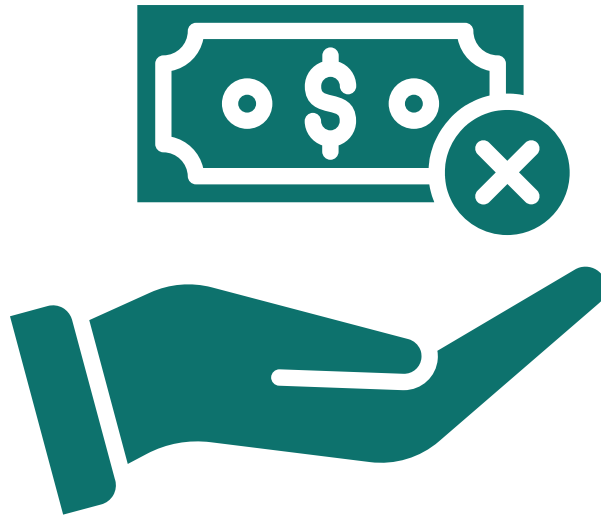
1. ANTAM Personnel and their immediate family is prohibited
  - a. Carrying, using, displaying, installing, and distributing political party symbols, images, and ornaments within the company's asset environment or while performing duties on behalf of ANTAM.
  - b. Expressing support or opposing a certain executive or legislative candidate by using the company's attributes, facilities, positions, or asset environment.
  - c. Using a position at ANTAM to influence, support, or garner backing for a political party, specific executive or legislative candidates, or other political interests.
2. ANTAM will disclose all monetary amounts or other forms of contributions made by the Corporation if it provides assistance to activities involved in the political field, either directly or indirectly, as part of its commitment to transparency and compliance with applicable laws and regulations.
3. Violations of this policy will be processed in accordance with applicable laws and regulations





## 2.2.9 Anti-Money Laundering and Counter-Terrorism Financing

As a company that upholds the principles of integrity, transparency, and compliance with the law, ANTAM is committed to preventing all forms of money laundering and terrorist financing in all its business activities.



### 2.2.9.1 Code of Conduct

1. ANTAM personnel are required to perform their duties diligently and professionally to ensure that the company's products and services are not used in money laundering or terrorism financing practices.
2. ANTAM personnel are prohibited from engaging in, facilitating, or providing support for activities related to money laundering and terrorism financing.
3. ANTAM personnel are prohibited from engaging in any activities related to money laundering and terrorism financing.
4. ANTAM personnel must apply the Know Your Customer principle to ensure the legitimacy of the source of funds and the identity of third parties associated with the company.
5. Every ANTAM personnel is responsible for reporting suspicious activities or transactions to the compliance unit or the authorized internal authorities.
6. ANTAM personnel are prohibited from providing assistance or services that can be used for money laundering, tax evasion, or terrorism financing, either directly or indirectly.
7. Violations of this policy may result in legal consequences, including criminal liability and sanctions in accordance with the applicable laws and regulations.





### 2.2.9.2 Things to Consider

#### 1. ANTAM Personnel Must:

- a. Recognize and understand the company's policies and procedures related to Anti-Money Laundering (AML)
- b. Avoid transactions or business relationships with parties who have indications of involvement in money laundering or terrorism financing.
- c. Participate in training and socialization related to AML policies organized by the company.

#### 2. The Company is committed to implementing a monitoring and risk assessment system to ensure that every transaction is conducted legally, transparently, and accountably.

#### 3. ANTAM will disclose any form of suspected suspicious activity to the competent authorities in accordance with the applicable legal provisions.

#### 4. Violations of this policy will be processed in accordance with applicable regulations and laws, including administrative and criminal sanctions.

### 2.2.10 Monitoring and Use of Asset

The ethical standards for the supervision and use of assets are aimed at ensuring that all physical, financial, intellectual property and other assets are used and protected optimally.

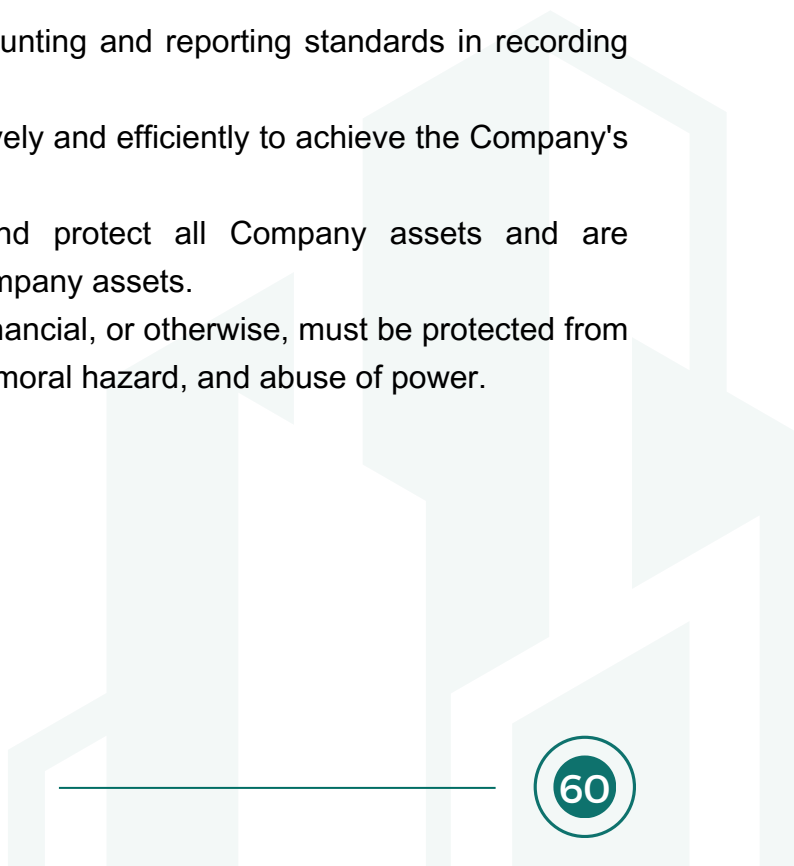
#### 2.2.10.1 Code of Conduct

#### 1. ANTAM follows generally accepted accounting and reporting standards in recording and reporting the Company's assets.


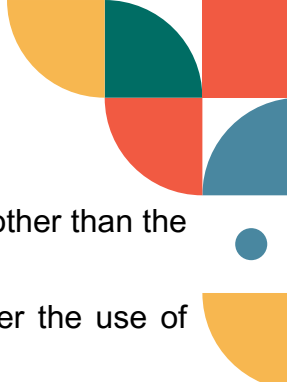
#### 2. All company assets must be used effectively and efficiently to achieve the Company's goals.

#### 3. ANTAM personnel always maintain and protect all Company assets and are responsible for overseeing the use of Company assets.

#### 4. All Company assets, whether physical, financial, or otherwise, must be protected from unauthorized use, embezzlement, fraud, moral hazard, and abuse of power.





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5. ANTAM personnel are prohibited from using Company assets for purposes other than the Company's interests.
  6. The company must implement effective and efficient control processes over the use of company assets to avoid potential losses in the future.
  7. ANTAM personnel are obligated to report indications or occurrences of fraud within the Company promptly, to their direct supervisor, the Human Capital Services & Industrial Division, and parties designated by the Board of Directors, or through the Whistleblowing System mechanism.

#### **2.2.10.2 Things to Consider**

1. The use of Company assets other than for the benefit of the Company.
2. Physical assets or other resources that are used excessively, transferred, or written off unlawfully.
3. Weak control over assets in the Unit/Business Unit/Project.
4. Development located far from the Headquarters.
5. The absence of effective controls to protect the Company's assets from the risk of loss, fraud, and anticipation of extraordinary factors and other force majeure events.
6. Inaccurate financial records such as excessive recording of living and travel expenses, incorrect invoices or work hours.
7. Asset documentation that is less reliable and ordinary due to improper methods and policy interpretation.
8. The asset disposal mechanism must be carried out in accordance with the applicable laws and regulations.

#### **2.2.11 Occupational Health and Safety and Environment**

ANTAM is committed to achieving high standards of Occupational Health and Safety as well as Environmental standards. This is a shared responsibility of the leadership and all ANTAM personnel.





### **2.2.11.1 Code of Conduct**

1. Comply with all laws and regulations regarding occupational health and safety as well as the environment that are applicable, both at the national and international levels.
2. Creating and maintaining a safe work environment and preventing workplace accidents.
3. Reducing waste, emissions, and the use of Hazardous and Toxic Materials (B3).
4. Eliminating unreasonable risks from both operational activities and the products produced.
5. Handling environmental pollution issues that occur effectively and efficiently.
6. Every ANTAM personnel must undergo training on legislation and company policies regarding occupational health and safety as well as the environment.
7. Every ANTAM personnel must understand and comply with all established occupational health, safety, and environmental procedures.
8. Every ANTAM personnel must be willing to undergo a health examination if deemed necessary by ANTAM management.
9. ANTAM personnel are prohibited from engaging in the abuse of narcotics, psychotropics, and other prohibited drugs as well as other substances banned under applicable laws and regulations.

### **2.2.11.2 Things to Consider**

1. Activities or conditions that are unsafe such as:
  - a. Negligence in using personal protective equipment such as safety helmets, safety shoes, safety goggles, ear plugs, life vests, and so on;
  - b. Unlabeled chemicals;
  - c. Exposed and unsafe electrical wires;
  - d. Fire exit (evacuation route) blocked;
2. Other matters as stated in ANTAM's internal policy.
3. Negligence in complying with regulations and procedures regarding occupational health and safety as well as the environment.
4. Complaints regarding occupational safety and health that arise from ANTAM employees.
5. The abuse of narcotics, psychotropics, and prohibited drugs as well as other medications banned by legislation during work hours or outside of working hours, which can cause obstacles and disruptions in performing work.



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6. Hazards or work accidents as well as environmental damage that arise.
  7. The inability to reduce the quantity and impact of Hazardous and Toxic Materials (B3).
  8. Update on the applicable policies and regulations used as a reference.



#### **QUESTION**

Project Head influence to applying work process which have more efficient cost and duration, can potentially cause occupational safety risk. What should we do?



#### **ANSWER**

Never compromise to occupational safety because that is our main priority in all of company operational activity. Consulting this problem to other head or use ANTAM reporting procedure

### **2.2.12 Intellectual Property Rights (IPR)**

Intellectual property rights (including patents, trade secrets, trademarks, copyrights, and other proprietary information owned by the Company) are one of the most valuable assets for any company.



### **2.2.12.1 Code of Conduct**

1. ANTAM personnel must respect the intellectual property rights of others because any unauthorized use of someone else's intellectual property rights can result in ANTAM facing civil lawsuits and damages.
2. All ANTAM personnel must actively participate in protecting ANTAM's intellectual property rights.
3. ANTAM personnel who participate in or work on the development of a process or product to be used by ANTAM, or ANTAM personnel who own the results of such work, must treat information related to the process or product as ANTAM's property both during their employment and after they no longer work for ANTAM.
4. All ANTAM personnel must report any work they produce, whether during or outside of working hours, if the work is related to ANTAM's business or operations. ANTAM is entitled to all exclusive benefits from patents, mining rights, and other related works mentioned above.
5. All ANTAM personnel must sign a statement to maintain confidentiality and willingness to assist ANTAM in the process of obtaining intellectual property rights on behalf of ANTAM.
6. All products and works created by ANTAM personnel intended for the Company become the intellectual property of the Company.

### **2.2.12.2 Things to Consider**

1. Receiving information related to intellectual property rights from external parties without first consulting the Legal & Compliance Division, where confidentiality conditions must be maintained.
2. Hiring someone who previously worked at a competitor without providing protection and prevention measures to ensure that the person does not leak or use proprietary information from the competitor.
3. Introducing a new product or service, or a new product or service name, before checking for patent or trademark violations.
4. Discussing intellectual property rights or information related to ANTAM's intellectual property rights with customers or suppliers without following the official procedures established by ANTAM.
5. Disclosing or leaking information about a new product or service before a patent application is made or a decision not to file an application is officially made by ANTAM.





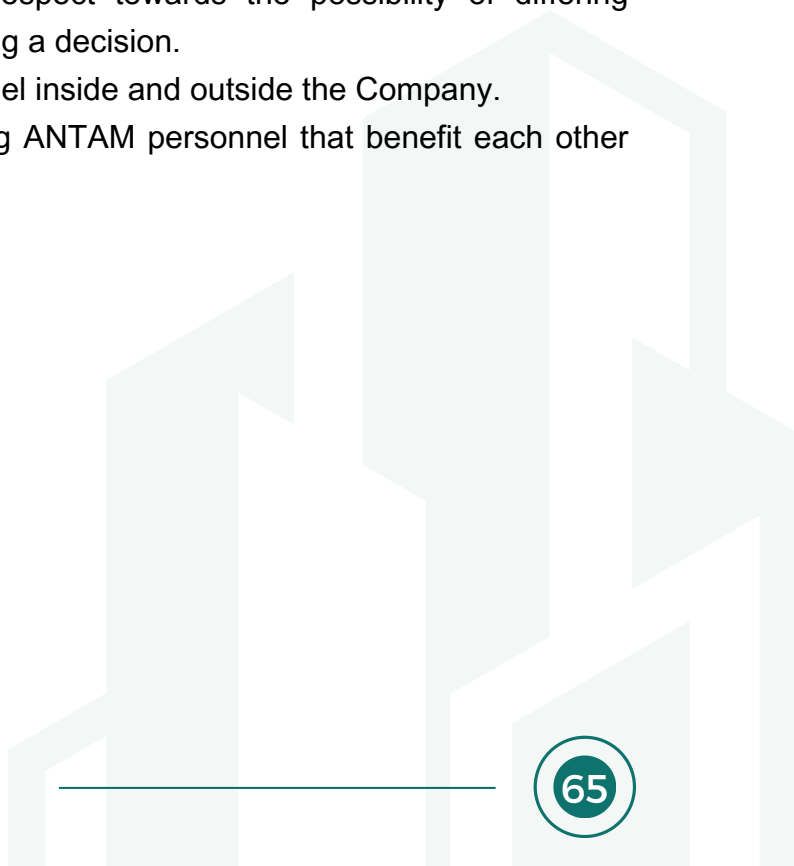
## 2.2.13 Ethical Behavior Towards Fellow Employees

ANTAM is fully committed to creating a harmonious and comfortable work environment within the Company by fostering the character of ANTAM individuals who are disciplined and ethical in daily interactions, both among employees and in the relationship between superiors and subordinates, through various forms of communication, both direct and indirect.

### 2.2.13.1 Code of Conduct

#### Fellow Employee Relationships

1. Do not exert pressure or intimidate fellow coworkers, superiors, or subordinates for specific interests, whether personal or for the benefit of others, internal or external.
2. ANTAM personnel are not allowed to engage in actions or speech that contain elements of harassment based on ethnicity, religion, race, customs, gender, and other matters that contradict norms of decency and propriety, such as the use of vulgar, derogatory, and indecent language towards fellow employees.
3. ANTAM personnel are prohibited from taking actions that involve physical or non-physical threats against other employees.
4. Not engaging in hostile actions or any form of provocation against colleagues, superiors, and subordinates for personal or specific group interests that are deemed to cause harm to the Company.
5. Avoid all forms of unhealthy competition and the use of positions for specific interests.
6. Having an open attitude and mutual respect towards the possibility of differing opinions (dissenting opinion) in formulating a decision.
7. Maintaining the honor of ANTAM personnel inside and outside the Company.
8. Building constructive relationships among ANTAM personnel that benefit each other for the advancement of the Company.





## Superiors and Subordinates Relationships

1. Superiors and subordinates always tried to be open and establish equal and harmonious relationship based on mutual respect and appreciation.
2. Superiors are willing to give an example of a good attitude and behavior to become role models for subordinates.
3. Superiors and subordinates shall respect the ideas and different opinions being expressed.
4. Having high integrity, loyalty and dedication to the interests and improvement of the Company.
5. Using polite language and does not contain elements of gender discrimination and harassment of the respective ethnicity, race, religion, and belief.

### 2.2.13.2 Things to Consider

1. Interaction of fellow employee or superior-subordinate who put personal interests or a particular group above the interests of the Company.
2. The participation of employees in the organization or association that is not recognized by the government and embrace the values that are inconsistent with the values espoused by the Company.
3. Activities causing the loss of working hours and or concentration of employee and fail to prioritize duties and responsibilities as an employee.



#### QUESTION

A male employee telling jokes and inappropriate behaviour to female employee. That female employee feels disgraced and disturbed. What should she do?

#### ANSWER

That male employee behavior is one of harassment and must be reported to that female employee's head or Human Capital Division Head.



### 2.2.14 Social Media Usage

Social Media can be a tool for ANTAM Personnel to share information, expertise, insight to public society. ANTAM respects to ANTAM Personnel's rights to express opinions in public including in social media while still guided by the legislation.



### 2.2.14.1 Code of Conduct

1. ANTAM personnel can express their thoughts verbally, in writing, and so on freely and responsibly in accordance with applicable laws and regulations.
2. ANTAM personnel are not allowed to act on behalf of the Company in making statements to the media, including social media, except for parties who have been assigned tasks and authority by the Company.
3. In using social media, ANTAM personnel do not express views, judgments, and personal interests that could create a negative image for the Company;
4. Act wisely when sharing information, especially related to the Company, on social media;
5. ANTAM is not responsible for personal statements and opinions of ANTAM individuals posted on personal social media.

### 2.2.14.2 Things to Consider

1. The use of social media that can potentially pose risks to the Company;
2. The impact of social media usage on the company's image and reputation;
3. The potential leakage of the Company's data and information confidentiality;
4. Considering the use of the internet as a public area that can be accessed by anyone, anywhere, and anytime;
5. Legislation related to the dissemination of electronic information.



#### QUESTION

An employee posting a statement contained his dissatisfaction to the company in his social media account. Is it be permitted?

#### ANSWER

It is not allowed because it makes Impact to company reputation. Employee can convey his complaint using company procedure..



# PETUNJUK PELAKSANAAN







### 3.1 Violation

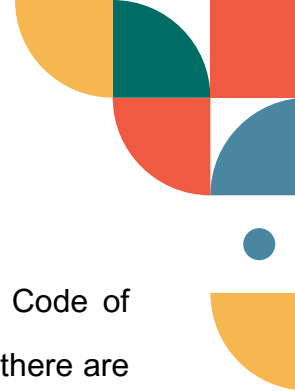
Violation is an attitude, action or behavior that deviate from the Code of Conduct.

Violation include, but are not limited to:

1. Indiscipline;
2. Embezzlement;
3. very of information, data, and documents to both internal and external stakeholders that are confidential to ANTAM;
4. Falsification of financial statements for personal gain that can harm ANTAM both materially and non-materially;
5. Misuse of ANTAM assets for personal, family, and/or relative interests;
6. Abuse of Psychotropics (Narcotics) such as intoxication, consuming intoxicating alcoholic beverages, selling/buying in the workplace, as well as distributing, selling/buying, using, prohibited drugs or other substances prohibited by existing laws and regulations within the Company's environment/facilities;
7. Corruption actions;
8. Abuse of authority/position causes losses for the company;
9. Any form of deviation from ethical standards, ANTAM's internal policies, the Collective Labor Agreement, and other fraudulent actions.

Further provisions regarding categories, levels of violations, sanctions, and mechanisms for enforcing violation sanctions are detailed in the Collective Labor Agreement (CLA).





### 3.2.1 Identifying the Problems Associated with the Code of Conduct

Sometimes it is very difficult to identify when there are issues relating to the Code of Conduct. In work places where there is interaction between ANTAM Personnel, there are different perspectives and the existence of the business pressures, this can reduce the awareness and sensitivity of ANTAM Personnel on the risk of violation of ethics. Every ANTAM Personnel are responsible for behaving in accordance with the Code of Conduct. If ANTAM Personnel feel hesitant in judging whether actions or decisions will be taken in accordance with the Code of Conduct, ANTAM Personnel can ask themselves the following questions:

1. Are the actions or decisions to be taken in accordance with the Values?
2. Company, the norms and ethical standards established?
3. Will the actions taken directly or indirectly harm or endanger the health or safety of others?
4. Will the actions or decisions to be taken not violate the relevant regulations?
5. Has the action or decision to be taken been in accordance with procedures, management policies, and company policy guidelines?
6. Will the actions or decisions taken cause discomfort, unrest, or risk creating problems in the future?
7. Is there a sense of comfort in informing colleagues, superiors, family, or friends about that action or decision?
8. What is the public's view on the actions or decisions that will be taken when this is published in the media?

If ANTAM Personnel in question still feel hesitant for actions or decisions to be taken, it is recommended for the ANTAM Personnel to discuss it with the superior or parties mentioned in this Code of Conduct.





### **3.2.2 Consultation and Reporting of Issues Related to the Code of Conduct**

If ANTAM Personnel found that a decision or action is inconsistent with applicable regulations or do not comply with, objected to the content of Code of Conduct or ANTAM Personnel hesitated for actions or decisions to be taken or ANTAM Personnel do not know what to do in certain situations, then ANTAM Personnel shall immediately notify or consult it as soon as possible to the employee's immediate superior, and every employer is obliged to give full attention to reports of employees who are his subordinates and try to solve it completely in accordance with the provisions of the Company. If ANTAM Personnel fail to do the above, or in this case the issues being reported could lead to a conflict of interest with the immediate superior, the ANTAM Personnel can discuss it with the following parties:

1. Superior of the employee's immediate superior;
2. Divisio
3. Leaders of unit/business unit where the problem arises.

ANTAM's personnel can also conduct Consultation and Reporting of problems which are relates to the Code of Conduct referring to the Complaints mechanism based on Collective Labor Agreement.





### 3.2.3 Procedures for Handling Violations Report

1. In the event of a violation, each employee has the right to submit a report verbally or in writing to the immediate supervisor of the concerned employee, at least the head of the Division, to be resolved in accordance with the applicable regulations.
2. If the efforts as referred to in point 1 above have not reached a resolution, the concerned employee may forward their complaint in writing to a higher-ranking official, in this case, the superior of the immediate supervisor of the concerned employee, to be resolved in accordance with the applicable regulations.
3. If the efforts as referred to in point 2 above have not been resolved, the concerned employee may submit their complaint or objection in writing to the Human Capital Services & Industrial Relation Division Head for resolution.
4. If the efforts as referred to in point 3 have not reached a resolution, employees and their direct supervisors can propose to the Company leadership that the issue of violations be resolved by the Employee Consultation Team.
5. Personnel Deliberation Team is in charge of:
  - a. Performing investigation process by promoting fairness, presumption of innocence and secrecy;
  - b. During the investigation process, Personnel Deliberation Team must maintain the confidentiality of the identity of the Informant
  - c. Recommend disciplinary action to be granted if it proven true and valid that there has been a violation of the Code of Conduct. The determination of disciplinary action under the authority of Management (Board of Directors or Unit Head/SVP/VP) according to the level of violations as stated on the Collective Labour Agreement;
6. If necessary, the Personnel Deliberation Team can perform escalation of the issues involved to the Board of Directors and the Board of Commissioners to get a solution and appropriate treatment measures.





### 3.2.4 Whistleblowing System

1. ANTAM resolves every violation report submitted by Stakeholders, including Employees and/or representatives of the Company's Stakeholders, in relation to violations of the Company's Code of Ethics.
2. The resolution of violation reports is one form of enhancing protection for stakeholders in order to guarantee their rights in relation to the company.
3. Reporting violations by stakeholders that are not promptly followed up on have the potential to increase the Company's reputational risk.
4. To complete the reporting of violations, the Company has established written policies and procedures that include:
  - a. Acceptance of violation reports;
  - b. Handling and resolution of violation reports;
  - c. Protection of whistleblowers; and
  - d. Monitoring the handling and resolution of violation reports.
5. Reporting of violations is submitted in writing to the Board of Commissioners, which will then be followed up by the Violation Reporting Evaluation Team established by the Board of Commissioners.
6. Parties participating in reporting violations are entitled to legal protection from the Company.
7. Parties who have contributed to saving the Company by revealing matters that cause material and non-material harm are entitled to receive recognition from the Company.
8. The complete explanation and provisions are regulated in the Whistleblowing Guidelines and Procedures of PT ANTAM Tbk.





### 3.3 Sanction for Violations

Consequences for violation of the Code of Conduct:

1. Personnel who proven to have violated the Code of Conduct may be subject to actions in accordance with its provisions stated in ANTAM's Internal Policy and Collective Labor Agreement;
2. ANTAM's partners convicted of the violation will be sanctioned in accordance with the rules and decisions of the Company;
3. If the condition involves a violation of law, the problem can be forwarded to the authorities;
4. Nature of the disciplinary action taken will depend on the magnitude of the violation committed and the related situation.



### 3.4 Statement of Commitment

1. All ANTAM employees are required to read and understand the contents of the Company Code of Ethics.
2. All ANTAM employees are required to sign a personal commitment statement after reading the Company's Code of Ethics.
3. The GCG function is required to perform administrative and supervisory functions over the compliance of commitment statement signing to ensure that all ANTAM personnel have read and understood the Company's Code of Ethics. In its implementation, the GCG Function coordinates with the Human Capital Services & Industrial work units in each Unit/Business Unit/Subsidiary and Affiliate.
4. The GCG Function reports the results of the commitment to the Human Capital Services & Industrial Function to be a personal record in the ANTAM employee dossier.



### 3.5 Socialization



Socialization is an important stage of the implementation of the Code of Conduct. ANTAM is committed to the effective and comprehensive socialization by taking into account the following matters:

1. Building commitment for all Business Partners associated with ANTAM;
2. Socializing the Code of Conduct through a continuous program coordinated by the Head Office to all ANTAM Business Units, including in employee orientation programs and periodic refreshers for all ANTAM Employees and ANTAM Business Partners;
3. Linking the application of ethics as an inseparable part of business practices and the performance evaluation of all ANTAM Employees;
4. Developing the Code of Conduct and, if necessary, it can be further elaborated in various Company policies and regulations;
5. Completing the Company's regulations with sanctions for violations that occur and building a system to monitor the implementation of the Code of Conduct.







### 3.6 Monitoring and Evaluation of Code of Conduct



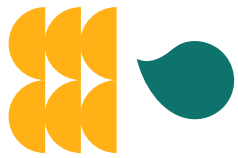
ANTAM performs monitoring and evaluation for the implementation of the Code of Conduct through:

1. The measurement of understanding the Company's Code of Ethics is conducted to determine the extent to which ANTAM employees are aware of and understand the implementation of the Company's Code of Ethics in their respective work areas, as well as how ANTAM employees understand the reporting mechanism for violations of the Company's Code of Ethics.
2. Periodic GCG Assessment. Recommendations and suggestions from the GCG Assessment conducted by the Independent Assessor serve as evaluation materials for continuous system improvement.

Code of Conduct is valid until a new Code of Conduct is issued. Changes to the Code of Conduct are made based on changes in legislation, business processes, and/or the company's strategic direction.

# PERNYATAAN KOMITMEN





Hereby, I declare that I have read and understood the Code of Conduct of PT ANTAM Tbk.

I understand that every ANTAM personnel must comply with and implement the Code of Conduct by acting free from any conflicts of interest, committing to avoid actions that lead to any form of fraud, including bribery and corruption, and committing to efforts to control gratification to improve and maximize work results in order to achieve the Company's Vision and Mission.

I understand that every ANTAM personal is committed to implementing effective, consistent, and sustainable risk management practices.

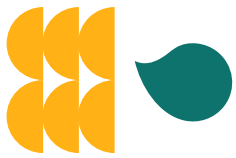
If I violate the ethical standards outlined in the Code of Conduct and ANTAM's Internal Policies, I am willing to support the enforcement of sanctions in accordance with the Code of Conduct and ANTAM's Internal Policies.

\_\_\_\_\_, \_\_\_\_\_ 2025

Statement Makers,

Witness,

\_\_\_\_\_  
NPP :



## Statement of Data and Information Confidentially

I, the undersigned, hereby sincerely promise and declare that I will not, without prior written consent from ANTAM, either directly or indirectly, orally or in writing:

- a. Disclosing Confidential Data and Information to third parties except in the course of performing ANTAM's work; and
- b. Using Confidential Data and Information for any purpose and in any manner that may harm ANTAM, its Subsidiaries, or ANTAM's affiliates.

both during my status as an ANTAM Personnel and after no longer being an ANTAM employee. I hereby acknowledge that all Confidential Data and Information are, and will remain, the property of and/or under the control of ANTAM, and I will return the documented Confidential Data and Information (in written form and/or in other forms, including but not limited to, writings, images, recordings, optical discs, USB drives, servers) obtained during my employment at ANTAM, its Subsidiaries, or affiliates to ANTAM upon the termination of my employment.

I hereby promise not to keep a copy in any form of the documented Confidential Data and Information except for such storage or copies are in order to carry out work or on ANTAM's orders.

I hereby promise and acknowledge and accept ANTAM's right to ask for compensation, report, claim should I violate this data and information confidentiality statement.

\_\_\_\_\_, \_\_\_\_\_ 2025

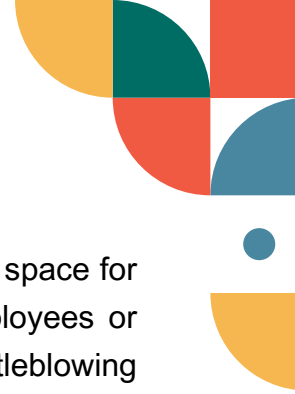
Statement Maker,

Witness,

\_\_\_\_\_  
NPP :

# WHISTLEBLOWING MECHANISM PT ANTAM Tbk





One of the efforts to control violations in the Company, ANTAM provides a safe space for individuals (internal and external) who wish to report violations involving employees or company management. To support this, we have established a reliable Whistleblowing System as a reporting channel to create a work environment that is honest, responsible, and based on integrity.

ANTAM has collaborated with MIND ID to provide an integrated whistleblowing complaint platform called OpenMIND. Through OpenMIND, every individual can report various violations that occur within ANTAM and the MIND ID Group.

Reporting can be done anonymously (without a name). However, we encourage the Reporter to provide a contact that can be reached to facilitate the analysis process of the received report. We are committed to maintaining the confidentiality of the reporter's identity and ensuring that every report is followed up with high professionalism and integrity. OpenMIND is here to create a work environment that is transparent, accountable, and based on company values.

How to submit an Integrated Whistleblowing System report:

Reports can be submitted through the MIND ID Group's integrated Whistleblowing channel, managed by an Independent Party, PT KPMG Siddharta Advisory, via the OpenMIND channel through:

Website : [OpenMind-wbs.com](https://OpenMind-wbs.com)

Email : [OpenMIND@kpmg.co.id](mailto:OpenMIND@kpmg.co.id)

WhatsApp : 0811-1464-632 / 0811-646-343

Surat : PT KPMG Siddharta Advisory

Attn : KPMG EthicsLine (MIND ID)

Menara Astra, Lantai 21, Jl. Jend. Sudirman Kav. 5-6, Jakarta 10220

Every ANTAM personnel has the responsibility to report if they see and/or know of any alleged violations occurring within the company environment. This is part of the commitment to implementing Good Corporate Governance (GCG) and building a culture of transparency and accountability within the company.



# GUIDELINES AND PROCEDURE FOR WHISTLEBLOWING SYSTEM OF PT ANTAM Tbk







## **Background**

As a public company, ANTAM is required to comply with applicable laws and regulations. The implementation of the Integrated Whistleblowing System is a manifestation of the Company's commitment to continuously strive to promote a culture of integrity both within and outside the Company environment. In addition, the guidelines for reporting violations can be used to encourage the reporting of behaviors that violate legal regulations or are unethical, which also includes guidelines on how the corporation protects whistleblowers acting in good faith. In this regard, it is expected to enhance ANTAM's reputation as a trusted state-owned mining subsidiary in Indonesia among stakeholders.

Integrated WBS is one form of an anti-fraud management strategy that is managed independently, along with independent parties, as a platform for employees and all stakeholders of the Company to report fraudulent actions within the Company's scope. Through the WBS reporting mechanism, all forms of fraud and violations are expected to be detected early. In order to encourage the implementation of the Company's reporting system to be managed in accordance with laws and regulations and to be carried out consistently, it needs to be supported by work guidelines and procedures as written references that can be used as a basis for implementing good integrated violation reporting system guidelines in every business process of the Company in accordance with the guidelines adopted by the Company and the applicable laws and regulations.

## **Purpose and Objectives**

This policy is formulated as a reference for the Company to report fraudulent actions within the Company's scope and to enable early detection.

## **Scope**

The scope of this policy serves as a guideline related to the integrated violation reporting system within the Company, including the general provisions of the Company's integrated WBS, WBS structure, duties and responsibilities, the process of managing the Company's integrated WBS, the results of WBS management implementation, and socialization, training, and protection. This Management Policy can also serve as a reference for Subsidiaries.







## Glossary

1. Anonymous is the identity of a party that is not disclosed, to maintain the confidentiality of the Whistleblower's identity and ensure the Whistleblower's safety.
2. A Subsidiary is a limited liability company whose majority shares (more than 50%) are owned by ANTAM or a limited liability company controlled by ANTAM.
3. A conflict of interest is the difference between the economic interests of the Company and the personal economic interests of ANTAM employees or shareholders that can harm the Company.
4. Code of Conduct or it can also be called Guidelines The Code of Ethics is a guideline and a set of commitments consisting of ANTAM's business ethics and the work ethics of ANTAM's personnel, designed to influence, shape, regulate, and ensure behavioral conformity to achieve consistent outcomes aligned with ANTAM's culture in fulfilling its vision and mission.
5. The Board of Directors is the organ of the Company that is authorized and fully responsible for managing the Company in the interest of the Company, in accordance with the Company's aims and objectives, and represents the Company, both in and out of court, in accordance with the provisions of the articles of association.
6. Gender Discrimination is an injustice that includes processes or actions against women or men, differentiating behavior towards ANTAM individuals based on their gender.
7. The MIND ID Group consists of MIND ID and MIND ID Members.
8. Gratification is the giving and/or receiving in a broad sense, including but not limited to the giving of money, goods, discounts, commissions, interest-free loans, travel tickets, accommodation facilities, tourist trips, free medical treatment, and other facilities, whether received domestically or internationally, using electronic means or without electronic means.
9. Laws and Regulations are all positive laws along with other applicable regulations and legislation in the legal jurisdiction of the Republic of Indonesia or the laws to which the Company is subject or submits itself.
10. ANTAM personnel are the Board of Commissioners, the Board of Directors, the supporting organs of the Board of Commissioners, and the Company's employees.




## Glossary

11. Fraud is a dishonest act committed intentionally or unintentionally to gain benefits for oneself or others, including extortion, forgery, document/report manipulation, document/report destruction, carried out by individuals from within or outside the organization to gain benefits and cause potential losses or actual losses to the Company or any party.
12. Corruption is an act carried out in violation of the law that contradicts the authority vested in an individual or is related to the abuse of office/trust to gain personal or third-party benefits, thereby harming the Company.
13. MIND ID refers to PT Mineral Industri Indonesia (Persero) as a State-Owned Enterprise (BUMN) designated as the holding company for BUMN in the mining sector based on the Government Regulation of the Republic of Indonesia Number 46 of 2022 concerning the State Capital Participation of the Republic of Indonesia for the Establishment of a Limited Liability Company (Persero) in the Mining Sector.
14. Case Reference Number is a unique number for each reported case and is only given to parties involved in the case, where the case reference number can be used to inquire/receive a response regarding the status of the report as a guarantee of follow-up actions from the Company.
15. OpenMIND or Whistleblowing System (WBS) is a system that manages the receipt of complaints/reports that can be used by all Stakeholders, both internal and external, confidentially and independently to uncover any alleged fraud and/or violations occurring within the Company.
16. An employee is an individual who has an employment relationship with ANTAM and receives compensation as regulated in the Employment Agreement and/or Company Regulations from their work or expertise at ANTAM.
17. Sexual Harassment is any unwanted action, whether physical or non-physical, including verbal, gestures, and/or other indecent behaviors that result in an uncondusive work environment, feelings of discomfort or pressure, and a sense of being demeaned.
18. The whistleblower is any Stakeholder including ANTAM personnel, the Company's business partners, affiliated parties of the Company, and other parties, who report alleged fraud and/or violations through the Company's Whistleblowing System.
19. Stakeholders are parties that have an interest in the Company.



## Glossary

20. Asset Misappropriation is the misuse of Company assets, including embezzlement or theft of assets, for personal gain or the benefit of others.
  21. Bribery is an undisclosed gratification or any gift or receipt, whether in the form of promises, money, goods, or anything of value to the recipient, with the aim of influencing a decision unlawfully or to act or refrain from acting within authority.  
The company is PT ANTAM Tbk.
  22. An Independent Third Party is a business entity appointed by ANTAM to manage ANTAM's integrated WBS system in accordance with ANTAM's procurement policies for goods and services.
  23. A witness is a person who can provide testimony for the purpose of an investigation based on what they have heard, seen, and personally experienced.
  24. SARA refers to sensitive issues related to ethnicity, religion, race, and inter-group relations, including verbal or nonverbal actions based on sentiments about personal or group identity.
  25. Special Power of Attorney or SKK BUMN is a document from the Minister of BUMN to PT Mineral Industri Indonesia as the largest Series B shareholder specifically to carry out actions that are the authority and/or rights of the Series A Dwiwarna shareholders in the classification of shares as regulated in the Company's Articles of Association.
  26. The reported individual is an ANTAM employee who has been reported for alleged violations against the Company through the Whistleblowing System.  
The WBS Management Team is an internal team formed by ANTAM to manage, including but not limited to inspecting, verifying, and providing follow-up recommendations on reports received from Independent Third Parties.
  27. Tone at The Top is an effort that refers to the organizational culture or ethical work environment created and promoted by the management of ANTAM as a whole, both in the form of involvement from the Board of Directors and/or Commissioners; ANTAM's commitment to the implementation of WBS. And socialization to all stakeholders.
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## BAB II

### GENERAL GUIDELINES FOR THE WHISTLEBLOWING SYSTEM

#### II.1 Definition of Whistleblowing System

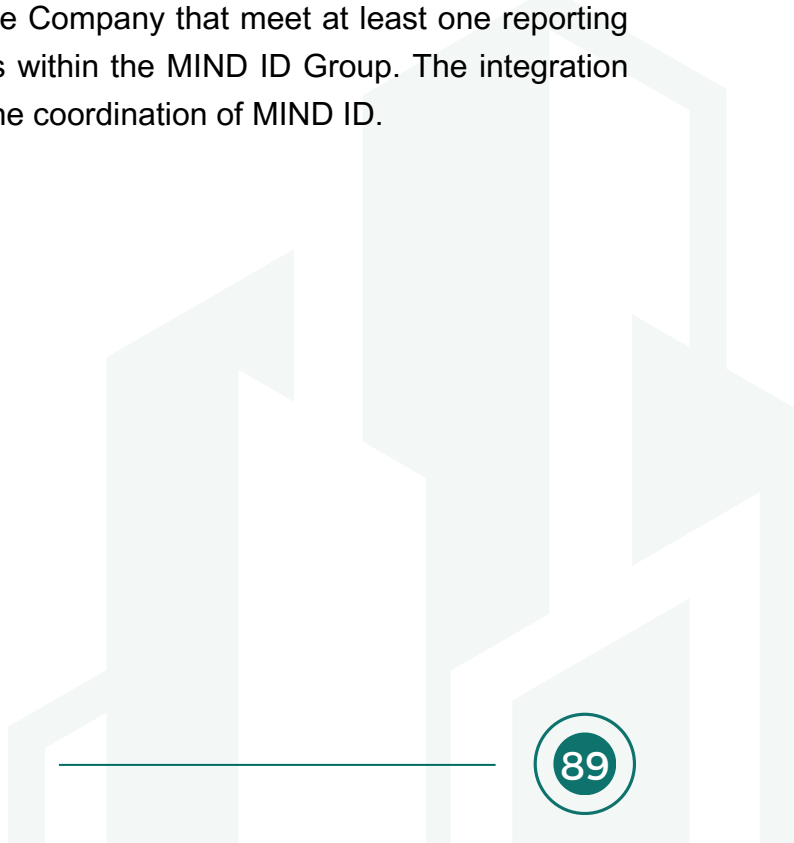
The Integrated Whistleblowing System (WBS), hereinafter referred to as WBS, is the governance framework for handling complaints regarding alleged violations within State-Owned Enterprises (BUMN). Handling complaints involves employees of the respective Company, members of the Board of Directors, members of the Board of Commissioners and/or Supervisory Board, members of the subsidiary's board of directors, and members of the subsidiary's board of commissioners.

It can be concluded that WBS is:

- A. system that regulates the reporting of fraud or violations that occur both internally and externally within the Company.
- B. Reporting is conducted anonymously, independently, and objectively so that identity and confidentiality can be well maintained and provide a means for all stakeholders.

#### II.2 Integrated WBS

WBS is part of the Company's management commitment (tone at the top) to create a safe working environment for Employees and Stakeholders. The MIND ID Group provides an integrated WBS within the MIND ID Group. The integrated WBS is expected to become an effective, reliable, and independent reporting system. With the option of reporting anonymously, independently, and objectively, identity and confidentiality can be well maintained, providing a means for all Stakeholders (both internal and external) to report any acts of fraud or violations occurring in the Company that meet at least one reporting system standard applicable to all Companies within the MIND ID Group. The integration of the Company's WBS is carried out under the coordination of MIND ID.









## II.3 The role of integrated WBS

Management of violation reporting and the integrated role of WBS The company includes:

- a. Emphasizing the commitment of the entire management (tone at the top) of the Company in promoting a culture of compliance and integrity both within and outside the MIND ID Group environment, with:
  - Becoming a role model by practicing a speak-up culture, doing the right thing, and proactively listening to questions or concerns from Company Employees;
  - Ensuring that socialization and periodic training are provided to all Stakeholders;
  - Providing regular communication to promote a speak-up culture, in the form of success stories or encouragement for employees to participate in the WBS OpenMIND ecosystem as informants; and
  - Receiving feedback and input to assess the effectiveness of WBS management and making improvements based on that feedback.
- b. Encouraging a culture and actions of integrity, compliance, and responsibility among all Employees, including in carrying out work and activities related to the Company and the MIND ID Group.
- c. Creating a safe working environment for Employees and Stakeholders by providing an effective, reliable, and independent reporting system with options for anonymous, independent, and objective reporting, ensuring that identity and confidentiality are well maintained.
- d. Early detection of all forms of fraud or violations through reports received from Employees or other internal and external Stakeholders, so that an investigation process and other follow-up actions can be carried out.
- e. Maintaining the image and reputation of the Company and the MIND ID Group in general.
- f. Providing awareness and assurance to Stakeholders about the importance of maintaining an anti-fraud environment within the workplace.
- g. Providing a platform for all Stakeholders (both internal and external) to report any acts of fraud or violations occurring in the Company and the MIND ID Group broadly.
- h. In order to implement WBS in an integrated manner, the Company is required to establish a policy that includes the following WBS attributes:

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- Tone at the Top: The company demonstrates management's message and commitment regarding the management of the WBS system;
  - The duties and responsibilities of the WBS Management Team, the person in charge, the investigation team, and the WBS supervisory board in the Company: the division of duties and responsibilities is explained in detail for each WBS Management Team, the person in charge, the investigation team, and the WBS supervisory board in order to ensure that the assigned duties and responsibilities are effective.
  - Scope of violation categories: namely types of violations that can have a complete negative impact, which are WBS;
  - Violation reporting procedure: which includes regulations regarding reporting channel options and anonymity, and explanations related to the basic principles of initial indications (for example, 4W+1H - what, where, who, when + how);
  - Escalation: the process of escalating reports of violations submitted through the WBS, directed to an objective party that can act independently;
  - Follow-up procedures: detailed provisions related to the follow-up process of violation reports through WBS, including deadlines, reporting follow-up results to Stakeholders, sanctions, status responses, and effectiveness reviews;
  - Protection: there are provisions regarding the Company's commitment to providing confidentiality and protection guarantees for the Whistleblower and other related parties; and
  - Employee Obligation to Submit Reports: there is a provision that requires Company Employees to report any suspected violations through the provided integrated WBS.
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## **BAB III**

### **WBS STRUCTURE**

#### **III.1 Independent Third Party**

Based on risk classification, ANTAM is categorized as a conglomerate and systemic A company, therefore the management of WBS is prioritized to be handled by an independent party, with the following provisions:

1. Integrated WBS The company is managed by an Independent Third Party appointed by MIND ID to carry out the operational management of the company's integrated WBS reports.
2. The Independent Third Party is directly responsible to each WBS Management Team of MIND ID and the WBS Management Team of the Company. To avoid any doubt, the Independent Third Party managing the WBS for the Company is the same as the Independent Third Party managing the WBS for MIND ID.
3. In relation to the Company's integrated WBS, both in internal policies and socialization materials, it must be regulated:
  - a. An Independent Third Party plays a role in maintaining the objectivity and integrity of the reporting process; and
  - b. With the presence of an Independent Third Party, the Reporter has the right to submit a report that will be processed confidentially and has the option to report anonymously (without disclosing identity, or identity kept confidential).

#### **III.2 Company WBS Management Team**

1. Perusahaan wajib memiliki Tim Pengelola WBS yang ditetapkan secara khusus, yang selanjutnya disebut "Tim Pengelola WBS Perusahaan".
2. Tim Pengelola WBS Perusahaan beranggotakan Insan Perusahaan yang ditunjuk oleh Direksi atau Direktur terkait di Perusahaan melalui surat keputusan atau dokumen lain yang sah/mengikat, untuk mengelola WBS.
3. Struktur Tim Pengelolaan WBS terdiri dari:
  - a. The Head of the WBS Management Team is a structural leader in the Company equivalent to one level below the Board of Directors, in the functions of Legal and/or Compliance, Internal Audit, Risk Management, and/or other functions according to the policies and relevance of each in the Company, who has the main role of coordinating the management of WBS and is responsible to the WBS Responsible Person in the Company;
  - b. Members of the Management Team can be composed of various levels of positions (staff to board members) in the Company, which can come from functions such as Legal and/or Compliance, Internal Audit, Risk Management, and/or other functions according to the policies and relevance of each in the Company.





4. Members of the Company's WBS Management Team are considering implementing task separation to avoid potential conflicts and dual roles in a function to ensure independence in WBS management.
5. The Company's WBS Management Team is required to participate in a periodic competency development program through training, seminars, and certification (hereinafter referred to as "Training"), specifically for Training mandated by regulations and policies set by the Series A Dwiwarna shareholders and MIND ID to enhance knowledge in WBS management.

### **III.3 Person in Charge of the Company's WBS**

The person responsible for the integrated WBS The company is the president director of the company or other parties designated based on legislation from time to time.

### **III.4 Company Investigation Team**

1. The investigation team is a team appointed by the Company's Board of Directors or according to the applicable reporting channels to conduct investigations or follow up on reports received through the WBS.
2. The appointment of the investigation team members needs to consider independence and potential conflicts of interest.
3. If necessary, the implementation of the investigation team's duties can request assistance from third parties/expert teams.
4. MIND ID has the right to provide input in determining the investigative party (internal or external).

### **III.5 Corporate Supervisory Board**

The Supervisory Board may consist of the Company's Board of Commissioners, the Company's Audit Committee, and other Committees under the Company's Board of Commissioners.







## **CHAPTER IV**

### **DUTIES AND RESPONSIBILITIES**

#### **IV.1 INDEPENDENT THIRD PARTY**

Tugas dan tanggung jawab Pihak Ketiga Independen, termasuk:


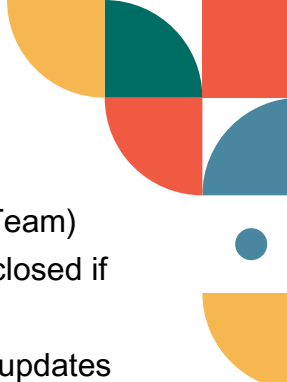
1. Receive reports submitted through the means/media/channel/reporting system provided by the Company and provide additional information to the Reporter if necessary;
2. Conduct an initial adequacy analysis and submit a report based on the 4W+1H principle along with other supporting documents (if any) based on the information provided by the reporter to the Independent Third Party;
3. Delivering the initial analysis report, proposals or recommendations for follow-up actions, and other supporting documents (if any) to the WBS Management Team;
4. Reporting the number of reports, report categories, and report statuses every month to the Company's WBS Management Team. The WBS Management Team of MIND ID will receive a summary report for all reports received by OpenMIND, including reports related to the Company. The WBS Company Management Team will receive the related summary;
5. Maintaining confidentiality and providing protection for the Whistleblower (including the identity of the Whistleblower as long as it is relevant), and maintaining the confidentiality of information and the reporting process;
6. Convey the status of the report to the Reporter, including developments/progress and report closure (including the results of follow-up), by first coordinating with the WBS Management Team of MIND ID and/or the WBS Management Team of the Company.

#### **IV.2 WBS MANAGEMENT TEAM**

Tasks, responsibilities, and authorities of the WBS Management Team within the scope of WBS include:

1. Receiving initial analysis reports and monthly summaries from an Independent Third Party, including deciding on follow-up actions for received reports with investigations (follow-up) or closing them (closed);
2. Conduct additional confirmation with the Reporter through an Independent Third Party;
3. Organizing periodic training and socialization on the implementation of WBS within the Company environment;
4. Maintaining confidentiality, providing protection for the Reporter including the identity of the Reporter (as long as it is relevant), and keeping the information and reporting process confidential;
5. In handling reports related to the Company, the WBS Management Team of MIND ID can monitor and receive report status updates from the Company's WBS Management Team periodically;



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6. MIND ID (which can be accessed through the WBS MIND ID Management Team) also has the right to reopen reports related to the Company that have been closed if necessary;
  7. The Company's WBS Management Team actively provides information and updates regarding the follow-up on reports to the MIND ID WBS Management Team;
  8. Actively coordinate with independent third parties to ensure the effectiveness of the WBS plan's acceptance and management; and
  9. Monitoring the effectiveness of the integrated WBS and making continuous improvements.

### **IV.3 INVESTIGATION TEAM**

The duties and responsibilities of the Investigation Team are:

1. At the request of the WBS Management Team or other authorized parties in accordance with applicable policies, carry out the follow-up process objectively, with integrity, and in accordance with Company policies; and
2. confidentiality and providing protection for parties involved in the investigation process, and safeguarding the confidentiality of information and the investigation process.

The details of the Investigation Team's duties can be adjusted according to the Company's policies, referring to the applicable laws and regulations as well as the provisions and policies set by the Company.

### **IV.4 BOARD OF SUPERVISORS**

The duties and responsibilities of the WBS Supervisory Board, including:

1. Supervising and ensuring that the WBS is running in accordance with the applicable regulations;
2. Providing protection for parties involved who assist in the investigation process; and
3. Maintaining confidentiality and providing protection for the Reporter, including the identity of the Reporter (as long as it is relevant) and the investigation.

The details of the WBS Supervisory Board's duties are adjusted according to the Company's policies, referring to the applicable laws and regulations as well as the provisions and policies set by the Company.



## CHAPTER V

### INTEGRATED COMPANY WBS MANAGEMENT PROCESS

#### V.1 BASIC PRINCIPLES OF REPORT ACCEPTANCE

The integrated WBS in the Company prioritizes the following principles:

1. The report that will be followed up is the report submitted by the Reporter, including information, evidence, or allegations that are clear, true, honest, and accountable.
2. An integrated WBS in the Company will be created by encouraging Reporters to provide information that meets the elements of what, where, when, who, and how ("4W+1H") in the report of alleged violations with the following details:
  - What : What violations are known to the reporter and, if any, the amount of loss and evidence supporting those allegations?
  - Where : Where is the location of the unit or company where the alleged violation occurred?
  - When : When did the alleged violation occur and how often? Has the violation occurred before?
  - Who : Whoever is involved in the alleged violation, including those who are harmed and benefited, as well as those who ordered the violation?
  - How : What is the chronology of the violations committed by the reported party?
3. The reporter can supplement their report with additional data/information/supporting evidence (such as documents, photos, recordings, and videos) to support the follow-up process on the report.
4. Reports will only be accepted or processed if they meet the 4W+1H criteria and/or if the information is deemed sufficient;
5. The reporter is advised to provide a contact that can be reached to facilitate the analysis process of the received report. However, the Reporter can choose to report anonymously (without disclosing their identity, or with their identity kept confidential); and
6. Company employees are required to report any suspected violations through the Company's integrated WBS provided.





## V.2 SCOPE OF REPORTING CATEGORIES

Actions that may harm or pose a risk to the Company will be followed up on, including indications of:

1. Korupsi (corruption) dan penyuapan (bribery);
2. Kecurangan (fraud), termasuk tindakan yang memiliki dampak kerugian finansial kepada Perusahaan, termasuk namun tidak terbatas pada:
  - a. Forgery, manipulation, or destruction of financial documents/reports or other reports;
  - b. a. Conflict of interest, gratuities, and all forms of bribery; and
  - c. Other fraudulent actions, including asset misuse, theft of Company assets, and/or neglecting a violation;
3. Other criminal acts, including extortion, coercion with violence or threats to give something with the intent to gain benefits for oneself or others, whether from internal or external parties, that do not comply with applicable laws and regulations;
4. Violations in the workplace, including any actions that create an uncondusive work environment, sexual harassment, bullying, and defamation, including gender discrimination, SARA (ethnic, religious, racial, and inter-group relations), and any unwanted actions, whether physical or non-physical, causing offense, and degrading dignity;
5. Other violations, including but not limited to:
  - a. Violation of the Company's code of ethics, as outlined in the provisions of the Code of Conduct;
  - b. Violation of confidentiality (information leak), except for information that has already become public domain (public property);
  - c. Partiality towards one party (unfair), and behaving unobjectively in executing the Company's decisions; and
  - d. Violations of environmental pollution and/or destruction caused by negligence that can result in property damage and/or health or physical hazards to humans.





### **V.3 REPORTING MECHANISM**

1. Reports will be received through the integrated WBS channel, namely OpenMIND provided by MIND ID. The provided channels include a website, email address, WhatsApp, SMS, and mail; which can only be accessed by an Independent Third Party. Information regarding the WBS channels must be provided and announced on the company's website.
2. The Case Reference Number is given to the Reporter to be used as a reference where the Reporter can monitor the status of the report; and
3. Considering independence and objectivity, in accordance with applicable policies, the report will be forwarded for further action to the authorized parties within the Company, including the Ministry of State-Owned Enterprises (specifically concerning members of the Board of Directors and Board of Commissioners, which will be further regulated in another section of this Management Policy).

### **V.4 REPORT HANDLING PROCESS**

1. The Independent Third Party, as far as possible, conducts verification based on the 4W+1H principle on incoming reports and collaborates with the Reporter to gather supporting evidence, such as documents or photos related to the reported violation. Reporting that is accompanied by sufficient evidence will facilitate the Independent Third Party and the WBS Management Team in processing and following up on the report in question.
2. The Independent Third Party prepares an initial analysis report along with follow-up reporting proposals based on information received through the OpenMIND channel from the Whistleblower and submits it to the WBS MIND ID Management Team or the Company (with a copy to the WBS MIND ID Management Team) no later than the following time;
  - a. 1 (one) working day of written notification in verbatim form followed by an analysis report on the next working day if the report falls into the following reporting categories:
    - the report has the potential for significant financial losses for the Company;
    - the report directly impacts the reputation and image of the Company;
    - the reported individual holds a Director position or higher at the Company level; and/or
    - included in the list of severe sanctions under the Company's regulations.
  - b. 2 (two) working days of written notification after the complete report for other categories of violation reporting not mentioned above. The report to be provided consists of an analysis report and a verbatim report. The WBS Management Team conducts an initial review of the preliminary analysis report and follow-up recommendations received from the Independent Third Party before forwarding them to the relevant stakeholders according to the reporting line in Chapter V Article V.5. If necessary, the WBS Management Team can request further information from the reporter through the Independent Third Party; and





- c. 2 (two) working days of written notification in verbatim form for reports that are not within the reporting scope.
3. The Independent Third Party will submit the initial analysis report to the appropriate WBS Management Team, namely:
  - a. In handling the Company's report, the Independent Third Party will submit the initial analysis report to the Company's WBS Management Team with a copy to the MIND ID WBS Management Team; and
  - b. In handling reports from MIND ID or other subsidiaries that do not include the Company, an Independent Third Party will submit an initial analysis report to the WBS MIND ID Management Team.

## V.5 FOLLOW-UP/CONTINUATION OF REPORT

### 1. Reporting Forwarding Process

Depending on the substance of the report, the reporting pathway, and the follow-up decisions based on the initial review results, the analysis report, and the follow-up request letter, including the determination of the Investigation Team (if necessary), are as follows:

No.	Subtansi Laporan	Jalur Pelaporan
1.	Insan ANTAM dan pihak eksternal lainnya (selain Direksi, Dewan Komisaris dan Tim Pengelola WBS)	1. Ketua dan Anggota Tim Pengelola WBS Perusahaan; 2. Dewan Pengawas WBS Perusahaan dengan tembusan Direkur Utama Perusahaan (bila laporan dikategorikan sebagai <i>out of scope</i> maka laporan verbatim akan diteruskan kepada Direktur yang membawahi kepatuhan); dan 3. Ketua dan Anggota Tim Pengelola WBS MIND ID.
A2.	Direksi Perusahaan (selain Direktur Utama)	1. Direktur Utama Perusahaan; 2. Dewan Pengawas WBS Perusahaan; dan 3. Ketua dan Anggota Tim Pengelola WBS MIND ID.
3.	Direktur Utama Perusahaan	1. Dewan Pengawas WBS Perusahaan; 2. Direktur Utama MIND ID; dan 3. Ketua dan Anggota Tim Pengelolaan WBS MIND ID.
4.	Dewan Komisaris, Komite Audit, dan Komite lainnya di Perusahaan	1. Direktur Utama Perusahaan; 2. Dewan Pengawas WBS MIND ID; dan 3. Ketua dan Anggota Tim Pengelola WBS MIND ID.
5.	Ketua atau Anggota Tim Pengelolaan WBS Perusahaan	1. Direktur Utama Perusahaan; 2. Dewan Pengawas WBS Perusahaan; dan 3. Ketua dan Anggota Tim Pengelola WBS MIND ID.





With the provision that the Chairperson and Members of the WBS MIND ID Management Team have the right to forward reports of alleged violations to the President Director of MIND ID as the Person in Charge of WBS MIND ID.

## **2. Process of Determining Follow-Up Actions**

- The determination of follow-up actions through investigation (follow-up) or the closure of the report if the information is insufficient (closed) (accompanied by initial analysis results and supporting evidence) will be made no later than 15 (fifteen) working days from the date of the initial OpenMIND report by the designated officials as mentioned in Chapter V Article V.5 point 1. An extension of time may be granted for up to 10 (ten) working days if necessary.
- If necessary, MIND ID (either through the WBS Management Team of MIND ID or the Director responsible for WBS) can reopen reports that were previously closed.
- According to the applicable reporting channels, if the report is decided to be followed up, the analysis report along with other supporting documents can be submitted to the Investigation Team. If the Company decides to follow up with the involvement of the Investigation Team, the Company is required to inform the WBS MIND ID Management Team about the follow-up plan to the Investigation Team and report the entire progress of the investigation periodically.
- The appointment of Investigation Team members needs to consider independence and potential conflicts of interest (referring to Company policy). If necessary, the execution of the Investigation Team's duties can seek assistance from an appointed independent third party/external entity to follow up on the report.

## **3. Investigation Based on Reporting Results**

- a. The Investigation Team or other parties appointed by the Company can follow up and conduct further verification of the report to prove the presence or absence of any violation elements. The investigation is conducted in accordance with the applicable investigation guidelines/policies of the Company.
- b. The team that will conduct the investigation is the team appointed by the authorized personnel in accordance with the reporting line in Chapter V Article V.5 point 1 of this Management Policy.
- c. The WBS Management Team through an Independent Third Party can conduct additional confirmation with the Reporter and/or provide a response regarding the status of the violation reporting resolution process to the reporter who requests the follow-up results of the report. To avoid any doubt, the provision of information or responses is optional, not mandatory.







da. Reports followed up by the WBS Management Team and the Investigation Team in the Company must be provided with regular status updates to the WBS Management Team MIND ID.

b. If the Investigation Team determines that there are elements of a violation after conducting the investigation, the report can be used as a basis for taking disciplinary action in accordance with the Company's regulations. If the violation is committed by Stakeholders other than Company personnel, then the enforcement will be carried out in accordance with the applicable regulations.

c. After the investigation has been conducted and a decision has been made based on the investigation results (i.e., whether the case is proven or not), the WBS Management Team is required to provide a status update of the report as closed to MIND ID, with a copy of the status information to the Independent Third Party.

d. The WBS Management Team of the Company monitors the follow-up on the resolution of reports and reports the monitoring results to the Board of Directors every quarter, no later than 1 (one) month after the relevant quarter ends.

e. The Director of MIND ID, as the Person in Charge of WBS MIND ID and/or the WBS Management Team of MIND ID, has the right to provide recommendations and/or suggestions to the Company (either through the WBS Management Team or other WBS structures within the Company) regarding the planning and/or execution of investigations.







## **CHAPTER VI**

### **RESULTS OF WBS MANAGEMENT IMPLEMENTATION**

#### **VI.1 PENNALTY**

1. Reported Party who has been proven guilty of committing fraud and/or violations, sanctions will be imposed based on the applicable provisions in the Company and/or the applicable statutory regulations.
- 2.2. The decision on sanctions will be made by considering input from related aspects, including legal aspects and/or Human Capital Services & Industrial, as well as taking into account the results of coordination with MIND ID (through the MIND ID WBS Management Team or other WBS structures at MIND ID);
- 3.3. The Company is required to establish a policy related to the WBS, which includes provisions that obligate Company Employees to report any suspected violations through the provided integrated Company WBS, along with the consequences or sanctions if Employees who are supposed to be aware of the suspected violations do not report them through the WBS.

#### **VI.2 OPENNESS OF INFORMATION**

1. As a form of information transparency, the Company can convey information related to the implementation of WBS in the Company's media as deemed necessary. Here are the types of information that can be conveyed, among others:
  - a. Method of delivering the violation report:
  - b. Protection for Whistleblowers;
  - c. Handling of complaints:
  - d. Party managing the complaint: and/or
  - e. The results of handling the complaint, at a minimum, include:
    - f. The number of complaints received and processed;
    - g. Follow-up on the complaint.with the provision that the Company is obliged to disclose information only to the extent required by the applicable laws and regulations.
2. The details of the publication material can be adjusted according to the obligations based on the applicable laws and regulations, including those related to the submission of the Company's Annual Report;
3. Without reducing the provisions of Chapter VI Articles 1 and 2 of this Implementing Policy, the Company WBS Management Team is required to provide reports and/or submit the information and data requested by the MIND WBS Management Team.





### **VI.3 REPORTING TO THE MINISTRY OF STATE-OWNED ENTERPRISES**

1. For complaints related to members of the Board of Directors or members of the Board of Commissioners of the Company, they must be forwarded by the WBS Management Team of MIND ID to the WBS management at the Ministry of State-Owned Enterprises.
2. The President Director of the Company submits to the President Director of MIND ID (with a copy to the Company's WBS Management Team) the report from the Company's WBS Management Team regarding the handling of complaints of alleged violations to MIND ID periodically every semester, no later than 15 (fifteen) calendar days after the period ends. Subsequently, MIND ID, through the President Director of MIND ID, will forward the report to the senior high-ranking officials who handle the complaint management function at the Ministry of BUMN (or other officials as required by the policies at the Ministry of BUMN) periodically every semester, no later than 1 (one) month after the period ends.
3. The format of periodic reports from the Company to MIND ID as referred to in Chapter VI Article VI.3 uses the format in Appendix I of this Management Policy.





## **CHAPTER VII**

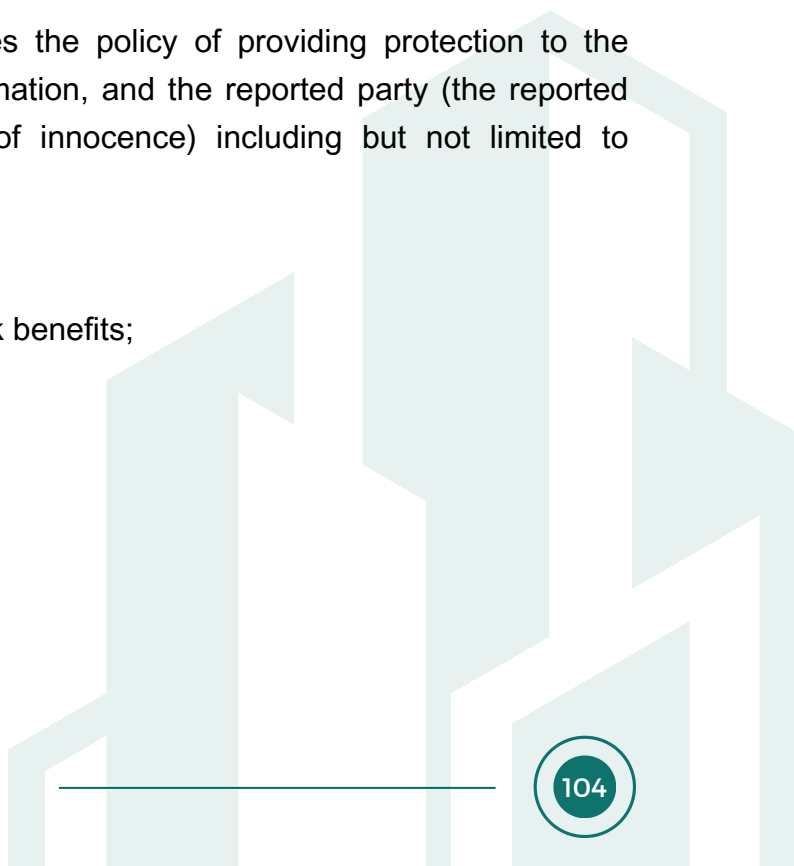
### **SOCIALIZATION, TRAINING, AND PROTECTION**

#### **VII.1 SOCIALIZATION AND TRAINING**

1. Socialization and publication related to the integrated WBS in the Company are organized by the Company for Stakeholders, taking into account the applicable legal regulations, and without limiting MIN ID's right to conduct socialization and publication related to the integrated WBS in the Company.
2. The company must ensure that Stakeholders and Reporters understand that the WBS will be conducted integratively within the Company, and understand the provisions in this Management Policy that must be known by Stakeholders and Reporters.
3. Training is conducted for each company's personnel on a regular basis.
4. Periodic evaluations can be conducted to refine the whistleblowing system in accordance with the business developments of each Company, with the stipulation that any changes/adjustments to the whistleblowing system must first be coordinated with the Company to obtain MIND ID's approval before implementation.
5. ANTAM personnel who are aware of or witness violations of the Company's Code of Conduct and/or collective labor agreements or company regulations (applicable within the Company) are required to report through the provided reporting system (violation reporting handling system/whistleblowing system).

#### **VII.2 PROTECTION**

1. The company is required to have an anti-retaliation policy implemented within the company ("Anti-Retaliation Policy"), which is included as one form of implementation of the Anti-Bribery Management System, with the following provisions;
  - a. One form of anti-retaliation policy includes the policy of providing protection to the Whistleblower, witnesses who provide information, and the reported party (the reported party will be subject to the presumption of innocence) including but not limited to protection
    - 1) Demotion;
    - 2) Subjective performance evaluation;
    - 3) Revocation of compensation or other work benefits;
    - 4) Mutation; and/or
    - 5) Termination of Employees.

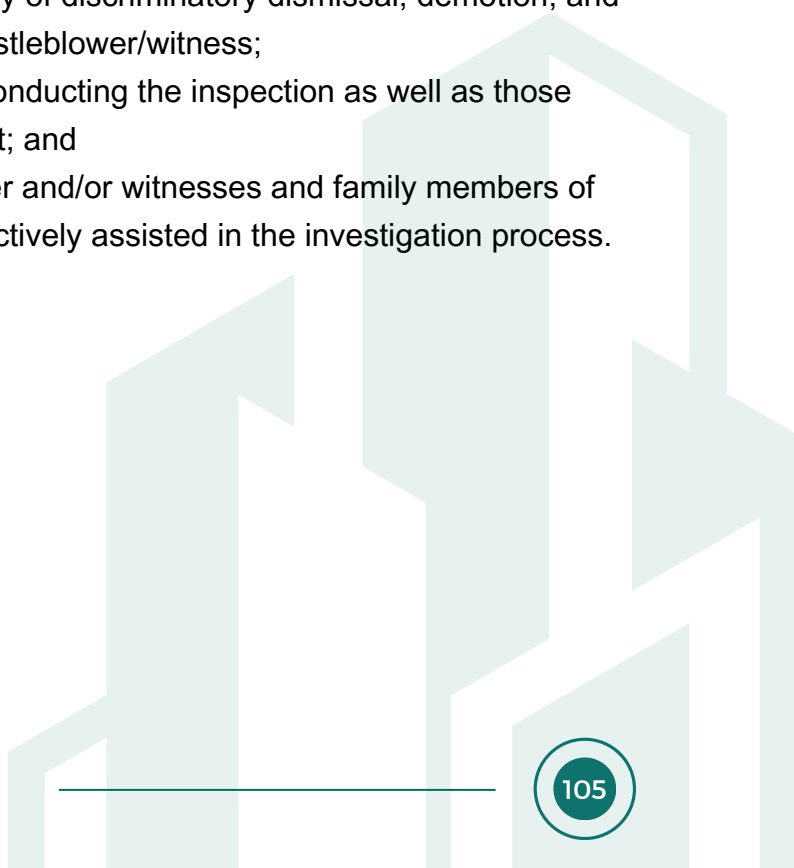


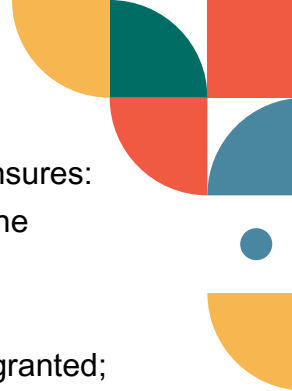


- a. The Company Management Team is required to report any conduct that violates the provisions of Chapter VII Article 2 of this Management Policy to the human resources function or the function responsible for personnel matters in the Company.
- b. ANTAM employees who are known and proven to have committed acts of revenge can be subject to sanctions or other disciplinary actions in accordance with the policies implemented by the Company.
- c. Such actions in Chapter VII Article 3 of this Management Policy that occur repeatedly and/or are considered concerning must be reported by the Company to MIND ID. MIND ID has the right to take necessary actions in response to the Company's report in this Article.
- d. MIND ID and the Company can collaborate with the Witness and Victim Protection Agency (LPSK) or other related agencies to provide support in protecting the whistleblower.

2. Referring to the Anti-Retaliation Policy, the Company is committed to:

- a. Keeping the identities of the Reporter, the Reported, witnesses, and also the investigation process confidential;
- b. Providing protection for the safety of the Reporter and/or witness, and the family members of the Reporter or witness from physical or mental threats;
- c. Providing protection to the whistleblower (including internal whistleblowers who receive negative treatment related to their complaint);
- d. Guaranteeing protection for the whistleblower and/or witness and their family members from any form of threats, intimidation, discrimination, or unpleasant actions as long as the whistleblower and/or witness maintain confidentiality with any party;
- e. Providing protection against the possibility of discriminatory dismissal, demotion, and other detrimental actions against the whistleblower/witness;
- f. Protection also applies to other parties conducting the inspection as well as those providing information related to the report; and
- g. Providing legal assistance to the Reporter and/or witnesses and family members of the Reporter or witnesses who have effectively assisted in the investigation process.





3. During the investigation process for the party being examined, the Company ensures:

- a. The examination process is carried out in a proper manner while prioritizing the protection of Human Rights (HAM).
- b. Protection of confidentiality and reputation throughout the process;
- c. The work process can continue, and all of his rights as an Employee will be granted; and
- d. During the investigation process, the Company is obliged to uphold the principle of presumption of innocence, confidentiality, and the identities of the parties involved.





## CHAPTER VII CONCLUSION

This Management Policy will be periodically evaluated for improvement in accordance with applicable laws and regulations.

1. All positions and work unit nomenclatures stated in this Management Policy are adjusted to the positions applicable from time to time in the Company, which have the same duties and functions as the positions stated above at the time this Management Policy is established.
2. Matters that have not been regulated or are not sufficiently regulated in this Management Policy can be subsequently regulated by a Board of Directors' Decision or a Director's Decision overseeing the Land Procurement field.
3. This Management Policy is subject to all applicable laws and regulations. In the event that there are provisions and/or conditions set forth in this Management Policy that violate and/or contradict the applicable laws and regulations, the Company is obliged to adhere to the applicable laws and regulations and to set aside any provisions in this Management Policy that violate and/or contradict the laws and regulations. The Company will promptly adjust all provisions in this Management Policy to ensure they comply with and/or do not conflict with the applicable laws and regulations governing the Company, while also considering the Company's needs.

