

Code of Business and Work Ethics

COMMITMENT OF BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS

The Company is committed to fulfilling its moral and social responsibilities towards the society in general and, in particular, the environment in which the Company operates. As a responsible corporate citizen, the Company in achieving its objectives requires all its personnel to carry out the Company's business activities with full responsibility and in an ethical manner, in compliance with all laws and regulations applicable to the Company's business. All employees, including the management, may consider this code as the standard and guideline for the performance of their day-to-day operation in an honorable, forthright, transparent and professional manner.

Any of the Company Personnel who violates the provisions set forth in this Code will be subject to a disciplinary action, including Termination of Employment (PHK) as specified in more detail in the Company Regulation.

Any Company Personnel or Business Partner who becomes aware of any noncompliance within the Company is obliged to report it through the applicable Whistleblowing System provided by the Company. The Company has provided the necessary reporting media for all parties concerned and, therefore, such system may function as an effective medium.

Reports made to the Whistleblowing System need to be taken into account and followed up, and appropriate sanctions

need to be issued in order to generate a deterrent effect on actual and potential violators.

All Company Personnel are expected to perform their everyday work process with reference to the principles of business and work ethics as set out in this Code. In regard to its Business Partners, the Company expects that they can make transactions and businesses with the Company always in compliance with the principles contained in this Code and the spirit thereof.

PT Inti Bangun Sejahtera Tbk
Boards of Commissioners and Directors

TABLE OF CONTENTS

COMMITMENT OF BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS . 2
TABLE OF CONTENTS 4
CHAPTER I - INTRODUCTION 6
BACKGROUND 6
CORE VALUES OF THE COMPANY 6
PRINCIPLES OF BUSINESS AND WORK ETHICS 7
PURPOSES 9
BENEFITS 9
DEFINITIONS 10
CHAPTER II - GUIDELINES FOR IMPLEMENTATION OF BUSINESS AND
WORK ETHICS 14
CODE OF CONDUCT 14
BEHAVIORAL INTEGRITY 24
LEGAL COMPLIANCE 25
INTERNAL CONFLICTS OF INTEREST 25
GIFT, RECEPTION AND ENTERTAINMENT 29

CHAPTER III - WHISTLEBLOWING SYSTEM	30
DESCRIPTION	30
PROTECTION FOR WHISTLEBLOWER	30
REPORTING, SANCTION AND REWARD	31
REFORMENCY DEMOTEOR THE TELESCOPE VICTORIAN CONTRACTOR	
CHAPTER IV - CODE IMPLEMENTATION	34
Appendix 1. Form of Declaration	
Appendix 1. Form of Declaration	
5	

CHAPTER I

INTRODUCTION

I.1. BACKGROUND

The Code of Business and Work Ethics (hereinafter referred to as the Code) is an important means for the achievement of long-term success of PT Inti Bangun Sejahtera Tbk (hereinafter referred to as "the Company") and forms an integral part of the Company Regulation to serve as a guideline for the Company and its Personnel in carrying out its business and work including in interactions with fellow employees, customers, business partners, shareholders, authorities or officials, government agencies and society in general. As a dynamic guide, this Code will be periodically and continuously reviewed in line with the Company's development.

This Code applies within all the Company's premises including its representative offices throughout Indonesia. Every Company Personnel and Business Partner must read, understand, comply with, follow and implement all provisions contained herein properly.

I.2. CORE VALUES OF THE COMPANY

The Company's core values that should be upheld in this business serve as the moral foundation in achieving the Company's vision and mission and are reflected in the adopted principles of business and work ethics.

- Integrity: Acting consistently and truthfully in accordance with the organizational values and policies and the professional code of ethics.
- Care: Fostering awareness and interest in assisting and supporting others with the surroundings.
- Commitment: Fulfilling commitments to comply with all prevailing regulations and requirements and maintaining occupational safety and health at all times through hazard identification and risk assessment.
- Customer Satisfaction: Constantly rendering the best and maximum services to the customers.
- Innovative and Continuous Improvement: Continuously innovating to meet expectations of the market and customers, and always taking preventive and corrective actions continuously for things that may have adverse effect on customers, employees and the Company.

I.3. PRINCIPLES OF BUSINESS AND WORK ETHICS

These are the basic principles adopted as a reference for: (i) the Company, in carrying out its business activities, including in interacting with stakeholders;

and (ii) Personnel, including the ethics of relations among the Company Personnel in general.

Such basic principles are as follows:

- 1. The Company will conduct its business in a truthful and fair manner and in compliance with the law.
- 2. The Company will maintain the situation in the workplace in order to avoid any Conflict of Interest.
- The Company respects the privacy and diversity of all Personnel of the Company.
- 4. The Company prohibits any harassment in the workplace and/or other work-related places.
- 5. The Company guarantees a healthy work environment, which is free of alcohol and liquors and drugs, and ensures its Personnel's Occupational Health and Safety.
- 6. The Company supports environmental sustainability in accordance with all laws and regulations applicable to the its business activities.
- 7. The Company guarantees the confidentiality of its data and information, including those of its Personnel.
- 8. The Company uses its Assets only for the purpose of its Business.
- 9. The Company uses its best efforts to comply with all prevailing anti-corruption and anti-fraud laws and regulations.

10. The Company implements the principles of Good Corporate Governance in each of its business activities, namely transparency, accountability, responsibility, independence, and fairness and equality.

I.4. PURPOSES

The purposes of this Code are as follows:

- To create good behavior in accordance with the ethical standards applicable to all the Company Personnel.
- 2. To establish a healthy and conducive work environment in order to bring out the best performance of each Personnel in achieving the Company's goals.
- 3. To develop sense of pride among its employees that the Company is a responsible corporation.
- 4. To improve the Company's reputation in a fair and responsible manner.

I.5. BENEFITS

The benefits of this Code are as follows:

- To give guidance to the Company Personnel regarding expected and unexpected behaviors.
- To create a workplace that highly respects the values of honesty, ethical manner and transparency in order

- to improve the performance and productivity of the Company Personnel as a whole.
- 3. To encourage the Company's operational activities to be more efficient and effective since the existing relations with the customers, community, government and stakeholders have ethical standards that should be taken into account.
- 4. To establish confidence that the Company is managed in a careful, efficient, transparent, accountable and fair manner to achieve the profitability level expected by the Shareholders while taking into account the Company's interests.

I.7. DEFINITIONS

- Company Assets means buildings, telecommunication sites, equipment, tools, supplies, communication facilities, funds, accounts, computer programs, information, technology, expertise documents, data (contracts, etc.), patents, trademarks, copyrights, any resources or other properties owned by the Company.
- Direct Manager means an employee who is, due to his/her position, in charge of directly assigning, developing and supervising Employees who are assigned to his/her department.

- Conflict of Interest means the difference between the Company's economic interests and the personal interests of any of its shareholders, commissioners and directors, and employees that may be prejudicial to the Company.
- Board of Commissioners means the Company's organ assigned to conduct general and/or specific supervision in accordance with the articles of association and to give advice to the Board of Directors.
- Board of Directors means the Company's organ authorized to conduct and fully responsible for the management of the Company for the benefit of the Company, in accordance with the Company's purposes and objectives, as well as entitled to represent the Company, in and outside the court of justice in accordance with the Company's articles of association.
- Gift or Present means any form of direct or indirect gift/present from any person in cash or in kind.
- Family Relationship means a relationship by marriage and descent to the second degree, both horizontally and vertically.

- Company Personnel means the Company's Commissioners,

 Directors, Officers and permanent and contractual

 Employees.
- Employee means any individual who is formally bound directly or indirectly in employment relationships with the Company and receives wages and/or salaries as specified in the Company Regulation.
- Company Officer means an employee in charge of a work unit and authorized to make decisions as required by the Company.
- Company Premises means all places that are under the control of the Company and used for the purpose of conducting and/or utilized to support the Company's business activities.
- Mission means the fundamental reason for the existence of an organization.
- Business Partner means any agent and/or supplier of goods and/or services designated by the Company.
- Customer means any individual or institution that uses products or receives the Company's services, including potential customers.
- Stakeholders (other than shareholders) means those who have an interest in the Company and those who are directly affected by the Company's strategic and operational decisions, consisting of the Company's

Personnel, customers, sales agents, suppliers and creditors, and the community, in particular those around the Company's business premises.

- Shareholder means an individual or institution that legally holds one or more shares in the Company.
- Company means PT Inti Bangun Sejahtera Tbk, a public limited liability company engaged in the business of providing telecommunications towers and telecommunication infrastructure networks in Indonesia.
- Company Regulation means the regulation prepared in writing by the Company, setting forth the employment conditions and rules of the Company.
- Company Competitor means any business entity engaged in the same industry or a substantially similar industry as the Company.
- Investor Relations Work Unit means a person or work unit whose scope of work is, among others, acting as a liaison between the Company and the shareholders.
- Vision means a statement of organizational goals in respect of products and services to be offered, requirements to be fulfilled, groups of people to be served, values to be obtained and future aspirations and objectives to be achieved.

CHAPTER II

GUIDELINES FOR IMPLEMENTATION OF BUSINESS AND WORK ETHICS

II.1. CODE OF CONDUCT

The Company will not tolerate any matters which may adversely affect the integrity and, therefore, the followings are some critical aspects which are deemed necessary to be regulated in this Code:

1. The Company and the Company Personnel

The Company fairly treats all the Company Personnel and upholds the principle of transparency and accepts all forms of criticism, suggestions, comments and ideas conveyed to the Company.

a. Prohibition of Discrimination: The Company respects each individual and, accordingly, the Company will not discriminate in its process of recruitment, promotion, transfer, salary and/or allowances, career ladder or termination of employment. Likewise, all Company Personnel are prohibited from committing any discriminatory treatment against their co-workers and should treat them fairly regardless of their ethnicity, race, religion, gender, social class or physical form.

- b. Objectionable Act: All Company Personnel have the right to a work environment that is free of verbal and physical abuse or any other objectionable acts. Objectionable Act means any behavior or action directed at a person with an intention to disturb, irritate, threaten, or cause great emotional distress to such person based on ethnicity, race, religion, gender, social class or physical form.
 - Healthy and Safe Work Environment: The Company's commitment to provide a healthy, safe work environment which is free of cigarettes, alcohol, illegal drugs, gambling activities and/or other illegal acts must be supported and realized by all Company Personnel in the workplace. The search alcoholic Company has the right to beverages and illegal drugs at work without prior notice, including conducting urine tests to the consumption, ownership, Any employees. distribution and sale of illegal drugs within the Company's premises is strictly prohibited and may serve as the basis for termination of employment. All Company Personnel are also prohibited from carrying any sharp weapons, firearms, explosives or combustible materials within the Company's

- premises, unless they are needed for the proper performance of their duties and works.
- The Company's Occupational Safety and Health: The Company cares about the health and safety of its employees. Several occupational health and safety programs and standards in compliance with the regulations have laws and prevailing organized and developed with a view to protecting the health and safety of the Company's Personnel surrounding Business Partners and the and community. All Company Personnel should understand and comply with various occupational health and safety requirements applicable in the Company, including those prevailing in their respective work units or within the Company Premises in general as required by the applicable laws and regulations.
- e. Use of the Company's Fund/Facility: The Company
 Personnel should be responsible for any use of the
 Company's funds and/or facilities entrusted to
 them during and outside the working hours for
 business purposes and in the interests of the
 Company.
- f. Confidentiality of the Company's Data and
 Information: All the Company's data and
 information are basically confidential and,

will maintain Company therefore, the confidentiality of such data and information and the disclosure thereof only to the limit interested parties, unless such disclosure is in the interest of the state and in accordance with the prevailing laws and regulations, subject to approval of the Company's Directors. The Company has provided some data and/or information related to the Company in the Company's website, but all the Company Personnel are obliged to maintain the confidentiality of all data and/or information owned by the Company business parties have that and/or any relationships with the Company that are not available in the Company's website.

In case of doubts relating to the request for data and/or information from any person outside the work unit or outside the Company, the Company Personnel concerned is required to inform his/her Direct Manager and, if such request relates to any corporate information or data, the said Company Personnel should inform the Corporate Secretary work unit that will then conduct coordination with the relevant Company Officer or the Company's Board of Directors. The Company Personnel must notify the relevant Company Officer or the

Company's Board of Directors if they are aware of any disclosure of any of the Company's data or information to any external person.

- must wear clothing not conflicting with the norms of propriety and decency while carrying out their duties within the Company's premises. In the event that the Company provides certain work uniforms and/or attributes, the Company Personnel must wear them in accordance with the directions and provisions specified by the Company.
- and Activities: h. Community Organizations freedom to is given the Company Personnel community activities, any participate in charities, regional government bodies (such as RT (Neighborhood Unit)/RW (Community Unit)), and/or any governmental organizations institutions as long as such participation is the personal responsibility of such personnel and does not in any way relate to the Company's business activities and as long as all such activities do not interfere with his/her work and performance in the Company.

2. The Company and the Customers

Customers are the basis for the existence of the Company. All of the Company's resources are intended

to meet the customers' requirements, demands and expectations.

- a. Commitment to Customers: In interacting with the Customers, the Company Personnel must have the integrity to maintain the Company's reputation, the quality of products and services, and the good long-term relationships with them.
- b. Data and Information of Customers: All data and information regarding Customers are basically limited and confidential. Therefore, the Company will limit the disclosure of data and information regarding Customers to interested parties only if such data and information is in the interests of the state and in accordance with the prevailing laws and regulations, subject to prior approval of the Company's Board of Directors.

3. The Company and the Business Partners

All Company Personnel must realize that in order to achieve the Company's goals and objectives, the Company needs Business Partners. The interdependence between the Company and its Business Partners is inevitable. Therefore, the Company considers that a partnership should be based on mutual trust and mutual benefit.

- Procurement of Goods and Services: The procurement of goods and/or services must be decided entirely based on the needs and interests of the Company. Selection of suppliers is based on compatibility of product specifications, prices, services and delivery times and the quality of goods and/or services provided. The purchase contract must be documented and should in detail identify and explain the services and/or products to be provided, the amount to be paid, and the price or costs to be incurred in connection with the contract.
- b. Business Partners' Commitment to the Company's Principles of Business and Work Ethics: The company requires/encourages all Business Partners to understand and implement all principles and policies as set out in this Code and/or applicable laws and regulations. The Company will take serious action against any violation of the Code and/or prevailing laws and regulations, which may result in the termination of the cooperation contract between the Company and such Business Partner. The commitment of the Business Partner to comply with the same principles of business and work ethics as stipulated in this Code may be

stated in the cooperation contract between the Company and such Business Partner.

4. The Company and the Shareholders

In conducting its business, the Company derives its capital from, among others, its shareholders and, therefore, the Company highly respects and appreciates the existence of both majority and minority shareholders and guarantees the fulfillment of the rights and responsibilities of shareholders on the basis of equality and fairness in accordance with the prevailing laws and regulations.

5. The Company and the Community and Environment

The Company is an organization that is part of the community in which the Company conducts its business. Therefore, the Company uses its best efforts to give attention to the community and contribute to the preservation of the environment.

6. The Company and the Authorities

If any of the Company Personnel is summoned by the authorities (Police, Prosecutor's Office, Courts, KPK (Corruption Eradication Commission), KPPU (Commission for Supervision of Business Competition) or any other law enforcement agencies), any such Company Personnel

is required to provide correct and accurate information upon consultation and coordination with the Company's Legal work unit.

7. The Company and the Political Organs

The Company Personnel are given the freedom to participate in all forms of political activity. The Company Personnel's involvement in political activity is a personal responsibility in which case such activity must be separated from its roles and responsibilities as a Company Personnel and must not conduct its political activities within the Company's premises and must not use the any of the Company's facilities. The Company Personnel are not permitted to make any form of contribution and/or use the name, funds, property and equipment of the Company to support any political activities.

8. The Company and its Assets

The protection of the Company's Asset against loss, damage, misuse, theft, embezzlement or violation is the responsibility of each Company Personnel concerned and, therefore, the Company Assets must be maintained and used in a responsible manner.

a. The Company's Properties and Goods

- The Company Personnel are prohibited from lending, giving, selling, damaging, renting, mortgaging or disposing of any of the Company's equipment or goods for their personal benefit, unless approved in writing by the Board of Directors and Human Resources work unit of the Company.
- The Company Personnel must immediately report to the Human Resources work unit of the Company if they discover or are aware of or expected to be aware of or there have been any misuse with respect to any of the Company's property by the Business Partner or any other Employee.
- b. The Business Partner's Property and Goods: The Company Personnel are obliged to protect all goods of the Customers and Business Partners under their and/or the Company's supervision.
- C. Computers and Information Technology: The Company Personnel must understand, comply with and implement the information technology policies as set forth in the information technology procedures and policies applicable in the Company. The Company Personnel are prohibited from using any of the Company's computers and equipment to view, access, store, display and disseminate anything not related to their work and having potential to

compromise the security and efficiency of the Company's information technology network.

II.2. BEHAVIORAL INTEGRITY

The Company Personnel must uphold integrity in carrying out day-to-day activities with the Company's internal and external parties. The company will not tolerate any integrity violations. Types of integrity violations are as follows:

- 1. Unlawful fees
- 2. Fraud
- 3. Deception
- 4. Document forgery
- 5. Deliberate removal of documents
- 6. Fictitious transactions
- 7. Extortions
- 8. Collusions
- 9. Deception by deliberately not recording, or by intentionally concealing, certain data, or by knowingly making incorrect/inaccurate entry with a view to giving incomplete, misleading and unlawful information.
- 10. Any act of giving, receiving any gift and/or promise, directly or indirectly in the form of presents or otherwise (gratuities) to any person including but not limited to any employee or official of any

government and/or State-Owned Enterprise (SOE), government agency, vendor and any third party.

In case of any demand, claim and/or suit filed by any third party including but not limited to any competent government agency with respect to violation of any of the above provisions, the person committing such integrity violation should be fully responsible in its capacity as an individual for such violation and should indemnify and hold harmless and release the Company and its Directors, Commissioners and affiliates (if any) from any such demand, claim and/or suit, either civil or criminal, in respect of such violation.

II.3. LEGAL COMPLIANCE

The Company Personnel must adhere to and comply with all prevailing laws and regulations and regulations and the policies specified by the Company, including:

- 1. Complying with all prevailing laws and regulations
- 2. Implementing the Company's policies and procedures
- Not provoking any leader, co-worker, or subordinate to commit any unlawful act.
- 4. Not committing any failure which may incur losses to the Company.

II.4. INTERNAL CONFLICTS OF INTEREST

Every decision and action must be aimed at maximally preserving the Company's interests and every decision-making process must be conducted professionally without the influence of any person and/or regardless of any personal interests, considerations and relationships among co-workers and/or among the Board of Commissioners, the Board of Directors and/or the Employees, their family, business groups and/or business partners.

1. Conflict of Interest related to Business Partners

To avoid any Conflict of Interest, the Company Personnel must disclose to the Company all forms of personal relations they have with Business Partners, directly related to their duties and works, including their share ownership and/or management membership in corporations/business entities that cooperate with the Company.

2. Conflict of Interest related to Family Relationship

• The Company Personnel who have a family relationship with the other employee/s are not allowed to work in a work unit or project that may cause Conflicts of Interest in the performance of their duties. Therefore, the Company Personnel must disclose to the Company any such Family Relationship in the Company. • if, on an occasion, a family member joins any of the Company's Competitor, then the Company Personnel concerned must notify the Human Resources work unit.

3. Conflict of Interest related to Concurrent Position and Side Job

- The Company Personnel are not permitted to work or have positions that earn income in any other company engaged in same line of business as the Company.
- The Company Personnel are not allowed to occupy concurrent position as civil servant and/or in any other company that takes any part of their working hours in the Company.
- The Company Personnel are not permitted to carry out any work that should be conducted by a Business Partner. The Company Personnel are allowed to have a side job to the extent that it does not interfere with their working hours in the Company.

4. Conflict of Interest related to Investment in Public Company

The Company Personnel are allowed to own shares (directly or indirectly) in any other public company which is a Competitor of the Company only upon giving a written statement to the Corporate Secretary work unit.

The permitted share ownership should not exceed 0.5% (zero point five percent) of the paid-up capital of such public company which is the Company's Competitor and is maximally Rp.5,000,000,000 (five billion Rupiah).

5. Conflict of Interest related to Investment in Private Company

The Boards of Commissioners and Directors are permitted to own shares (directly or indirectly) in any other private company which is the Company's Competitor, or not the Company's Competitor, only upon giving a written statement to the Corporate Secretary work unit. The Company Personnel and their families are not permitted to own shares (directly or indirectly) in any private company which is the Company's Business Partner.

6. Conflict of Interest related to Loans and Assistances to Employees from Business Partners or vice versa The Company Personnel are not permitted to receive and/or give any loan or assistance from and/or to a Business Partner.

7. Other Matters related to Conflict of Interest

In case of any doubt regarding all matters related to Conflict of Interest, the Company Personnel concerned may consult their Direct Manager, the related Company Officer and/or the Human Resources work unit.

II.5. GIFT, RECEPTION AND ENTERTAINMENT

The Company Personnel must maintain high integrity and professionalism in the decision-making process. The Company Personnel must report any gift or reception received/given with the following conditions:

- 1. If the recipient is a Company Personnel in the form of goods, the gift must be rejected and returned.
- 2. If the recipient is a Company Personnel in the form of reception, it must be reported to his/her Direct Manager for further process and decision.
- 3. Reception or entertainment given by a Company Personnel to an external party is permitted by the Company provided that it is intended to develop or establish cooperation with such party and is limited to respectable and public restaurants and/or cafes. Any use of funds for such reception or entertainment must be reported in accordance with the Company's applicable rules.

CHAPTER III

WHISTLEBLOWING SYSTEM

III.1. DESCRIPTION

Whistleblowing system is a system that manages the reporting by whistleblower of violations or unlawful acts, frauds and breaches of ethics or other actions that may be prejudicial to the Company and other parties interested in the Company within the Company's premises through the media provided.

The Company implements the mechanism of whistleblowing system because it is part of the Internal Control System to prevent nonconforming and fraudulent practices and strengthen the application of good governance practices.

III.2. PROTECTION FOR WHISTLEBLOWER

Regarding complaints proven to be accurate, the Company will provide protection to the whistleblowers, including:

- Guaranteed confidentiality of the whistleblower's identity and the content of the submitted reports.
- 2. Guaranteed protection against any retaliation by the reported person, including protection against coercion, postponement of promotion, termination of employment,

ANANG FAHKCRUDIN
SWORN & AUTHORIZED
TRINILATOR
SK. GUD IDER A. (Granden)

- lawsuit, threat to properties, physical force and deleterious personal file record.
- 3. Sanction reduction in the event that the whistleblower is involved in the reported case.
- 4. The appointed committee must monitor the case and report to the President Director in case of any issue in the protection for whistleblowers, witnesses and reported persons.

III.3. REPORTING, SANCTION AND REWARD

1. Reporting

Any Company Personnel who is aware of any violation of the Business and Work Ethics, any non-compliance with the prevailing laws and regulations, the Company Rules and the Company Regulations, and any indication of fraud is obliged to immediately report all information known to him/her through the available reporting media. Whistleblowers can file a complaint by e-mail: admin@ibsbersih.com in a free writing format, but the following components should be included in such e-mail:

- Chronology of the reported incident (mandatory)
- Place of the incident (mandatory)
- Time (mandatory)
- Offender (mandatory)
- Amount of losses, etc (optional)

All submitted complaints will be processed by the Whistleblowing System Admin for classification into the following criteria:

Report Treatment		
Criteria	Condition	
Dismissed	- Junk e-mails (blank/test e-mails)	
	- Anonymous reports (upon	
	consideration and approval of the	
	Board of Directors)	
	- Reports that are not related to	
	violations of the Code of Ethics and	
	fraud (allegations, gossips, having	
	malicious intention of slander,	
	revenge, defamation, having s specific	
	purpose for personal or group	
	interests)	
	- Reports that do not include at	
	least the predetermined components	
	(chronology of incident, place of	
	incident, time and offender)	
	- Reports that include the	
Acceptable*	predetermined mandatory components,	
	but are still lack of information	
Accepted	- Reports that include all	

predetermined mandatory and optional components

* For a complaint classified as "Acceptable", the Whistleblowing System Admin will send an e-mail to the whistleblower to get the required information in order for such report to be classified as "Accepted".

2. Sanction and Reward

- a. Based on a report of verifiable and proven violation, the Company is authorized to impose sanction according to the severity of such violation and to dismiss any employee proven guilty of the violation. The imposition of sanctions will refer to the applicable Company Regulation.
- b. Any whistleblower who sends slandering or false reports will be imposed with a sanction and will not receive a guaranteed confidentiality or protection of a whistleblower. The imposition of sanctions will refer to the applicable Company Regulation.
- c. Any whistleblower who has contributed to the prevention of violations which may harm the Company will be entitled to award/reward in accordance with the applicable Company Regulation and Company Rules.

CHAPTER IV

CODE IMPLEMENTATION

The implementation of the Code of Business and Work Ethics is the duty and obligation of all the Company Personnel.

- 1. Boards of Commissioners and Directors
 - The Commissioners and Directors should put themselves as a role model in the implementation of the Company's ethical values and corporate behavior.

2. Managers

- The Managers should ensure that all staff under their charge have received the Code of Business and Work Ethics and the Company Regulation and that all such staff understand and comprehend them and the Managers should also continuously communicate the importance of implementing the Code and monitor its implementation
- The Managers should ensure that all Employees in their work unit implement the Code of Business and Work Ethics
- The Managers should familiarize all Employees in their work unit with the Code of Business and Work Ethics.

 The Managers should report and escalate any suspicion, indication, and/or violation to the related parties or through the reporting media.

3. Employees

- The Employees should read, understand and implement the
 Code of Business and Work Ethics
- The Employees should report to their Managers or through the reporting media if suspecting any violation or attempted violation of the Code of Business and Work Ethics.

I, Anang Fahkcrudin, residing at Jl. Kalibata Timur Raya No. 12, Kel. Kalibata. Kec. Pancoran, South Jakarta, (anangf@gmail.com), a sworn and authorized translator, by virtue of Jakarta Capital Territory Governor's Decree No. 2228/2001, practicing in Jakarta, do solemnly and sincerely declare that the foregoing document is 3 true and faithful translation from Indonesian into English of the original version.

Jakarta, July 16, 2019

