



**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 individual 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 Individual 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 Individual 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 Individual 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  
June 2023

Boards of Commissioners and Directors

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## **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 Individual 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 Individual 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 Individual 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.
3. The Company respects the privacy and diversity of all Individual 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 Individual'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 Individual.
8. The Company uses its Assets only for the purpose of its Business.
9. The Companies are required to comply with applicable legal provisions regarding anti-corruption and anti-fraud laws.
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:

1. To create good behavior in accordance with the ethical standards applicable to all the Company Individual.
2. To establish a healthy and conducive work environment in order to bring out the best performance of each Individual 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:

1. To give guidance to the Company Individual regarding expected and unexpected behaviors.
2. 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 Individual 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.6. 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 Individual** 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 Individual, 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 Individual**

The Company fairly treats all the Company Individual 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 Individual 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 Individual 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.
- c. 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 any other illegal acts must be supported and realized by all Company Individual in the workplace. The Company has the right to search alcoholic beverages and illegal drugs at work without prior notice, including conducting urine tests to the employees. Any consumption, ownership, 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 Individual 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.
- d. 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 prevailing laws and regulations have been organized and developed with a view to protecting the health and safety of the Company's Individual and Business Partners and the surrounding community. All Company Individual 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 Individual 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, therefore, the Company will maintain the confidentiality of such data and information and limit the disclosure

thereof only to the interested parties, unless such disclosure is in the interest of the state and in accordance with the prevailing laws and regulations, subject to prior approval of the Company's Board of Directors. The Company has provided some data and/or information related to the Company in the Company's website, but all the Company Individual are obliged to maintain the confidentiality of all data and/or information owned by the Company and/or any parties that have business 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 Individual concerned is required to inform his/her Direct Manager and, if such request relates to any corporate information or data, the said Company Individual 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 Individual shall notify the relevant Company Officer or the Board of Directors of the Company of a leak of the Company's confidential data or information that they become aware of.

The Company's confidential in the form of information, data or internal documents shall include, but not be limited to:

- The Company's legal documents;
- The Company's Policy and Procedure (SOP) Documents;
- Approval documents for internal purposes (including IOM, AM, TSA);
- The Company's internal and confidential financial and operational data;
- Coordination email/internal correspondence between divisions/departments (including MoM);
- Other confidential documents, data and information (apart from those mentioned above), both verbal and written.

**g. Work Attire and Attributes:** All Company Individual shall 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 Individual shall wear them in accordance with the directions and provisions specified by the Company.

**h. Community Organizations and Activities:** Each Company Individual is given the freedom to participate in any community activities, charities, regional government bodies (such as RT (Neighborhood Unit)/RW (Community Unit)), non-governmental organizations and/or any other 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 Individual 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 Individual shall 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.

**a. 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 Individual 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 Individual 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 Individual are given the freedom to participate in all forms of political activity. The Company Individual'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 Individual 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 Individual 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 Individual concerned and, therefore, the Company Assets must be maintained and used in a responsible manner.

### **a. The Company's Properties and Goods**

- The Company Individual 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 Individual shall 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 Individual 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 Individual 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 Individual 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 Individual must uphold integrity and adhere to prudential principles in carrying out his daily work activities with both internal and external parties. The Company will not tolerate any breach of integrity that occurs. Types of integrity violations:

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. Performing duties not in compliance with prudential principles and company regulations

11. 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

All forms of integrity violations that lead to violations of the above provisions and other forms of violation of legal provisions. The Company Individual committing such violations shall be fully responsible and shall indemnify and hold harmless the Company and other Company Individuals from and against all demands, claims and/or suits, both civil and criminal, for the violations committed.

### **II.3. LEGAL COMPLIANCE**

The Company Individual must submit to and comply with applicable laws and regulations as well as regulations and policies established by the Company, including:

1. Always complying with applicable laws and regulations in carrying out the operating activities of the Company including but not limited to entering into business transactions on behalf of the Company.
2. Implementing the Company's policies and procedures.
3. 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.
5. Refraining from committing bribery, corruption, collusion and nepotism in any aspect related to the operating activities of the Company.
6. Refraining from giving or receiving bribes, commissions or any gifts that are not in accordance with the company's ethical values and applicable laws.
7. Obligated to report any act of bribery or violation of legal provisions found in the Company's operating activities through both internal and external channels with guaranteed protection for whistleblowers.

The company is committed to dealing with all violations of legal provisions firmly and fairly, and will take corrective action in accordance with applicable laws and regulations and ethical standards prevailing in the Company.

The Company shall not approve of all forms of actions of the Company Individual that lead to violations of legal provisions, acts of bribery, corruption, collusion and nepotism and other forms of violation of legal provisions. The Company Individual who violates legal provisions, commits bribery, corruption, collusion and nepotism as well as other forms of violation of legal provisions shall fully be responsible therefore and shall indemnify and hold harmless the Company and other Company Individuals from and against any demands, claims and/or suits, both civil and criminal, for the violations committed.

### **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 Individual 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 Individual 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 Individual 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 Individual concerned must notify the Human Resources work unit.

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

- The Company Individual 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 Individual 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 Individual are not permitted to carry out any work that should be conducted by a Business Partner. The Company Individual 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 Individual 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 Rp5,000,000,000 (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 Individual 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 Assurances to Employees from Business Partners or vice versa**

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

1. If the recipient is a Company Individual in the form of goods, the gift must be rejected and returned.
2. If the recipient is a Company Individual 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 Individual 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:

1. 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, 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 Individual 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
<b>Dismissed</b>	- Junk e-mails (blank/test e-mails) - Reports that are not related to violations of the Code of Ethics and fraud (allegations, gossips, having malicious

	<p>intention of slander, revenge, defamation, having a specific purpose for personal or group interests)</p> <ul style="list-style-type: none"> <li>- Reports that do not include at least the predetermined components (chronology of incident, place of incident, time and offender)</li> </ul>
<b>Acceptable*</b>	<ul style="list-style-type: none"> <li>- The Report shall contain mandatory elements that have been determined, but it is still considered that there is still a lack of information, including anonymous reports.</li> </ul>
<b>Accepted</b>	<ul style="list-style-type: none"> <li>- The Report shall contain all mandatory and optional elements that have been determined, including anonymous reports.</li> </ul>

\* 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 Individual.

### 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.