

CONFLICT OF INTEREST POLICY

Legal Basis

1. Law Number 8 of 1995 concerning the Capital Market;
2. Financial Services Authority Regulation No.42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions;
3. Guidelines for the Implementation of Good Corporate Governance.
To apply the principles of Good Corporate Governance, the Company needs to establish a policy regarding Conflicts of Interest in accordance with the prevailing laws and regulations.

Policy

1. An employee shall not place himself in a position where there is a conflict between one's obligations as an employee and his personal or family interests or, between those obligations and any obligations he owes to others. An employee must act in good faith at all times, that is, in what he or she believes is the best interest of the company.
2. A conflict of interest may arise if an employee holds a position or owns property where, directly or indirectly, his duties or interests conflict with one's duties or interests as an employee. This includes situations where an employee, directly or indirectly, is interested in a contract or proposed contract with the company. A financial interest in a supplier, customer, agent or competitor is considered a conflict of interest except in the case of a publicly listed company listed on a recognized stock exchange, where interest of less than 5% in the equity of the public company will be ignored.
3. Conflicts of interest, both actual and potential, must be reported in writing, as soon as practicable after the relevant facts are known by the employee, to the respective Division Head and where the relevant executive employee, also to Group Headquarters, is concerned. state the facts, nature and extent of the conflict.
4. In the case of directors, conflicts must also be disclosed to the Board of Directors, and if relevant, prior approval from shareholders is requested. The Division Head, on the advice of the Group Headquarters, will then take the necessary actions to safeguard the interests of the company/Group and/or grant dispensation based on permissible circumstances. Where the conflict involves a contract or proposed contract with the company/Group, the Division Head will ensure that the terms of the contract are negotiated and decided independently for example through an independent tender committee.
5. "Family" references include spouses, parents, children (including adopted children and stepchildren), brothers, sisters and spouses of children, brothers or sisters.
6. An employee who violates the Conflict of Interest policy may be subject to disciplinary proceedings and management has the right to initiate legal action against the employee.
7. In any case, no employee may act or do nothing that is contrary to the company's Articles of Association and the law.