

# KODE ETIK DAN BUDAYA PERSEROAN

## COMPANY CODE OF ETHICS AND CULTURE

Perseroan menyadari arti pentingnya implementasi GCG sebagai salah satu alat untuk meningkatkan nilai dan pertumbuhan bisnis jangka panjang. Atas dasar tersebut, Perseroan berkomitmen mengimplementasikan GCG secara konsisten serta menyetujui Visi dan Misi Perseroan sebagai dasar etika dan budaya perusahaan. Kode Etik dan Budaya Perusahaan telah diimplementasikan dan kualitas pelaksanaannya terus ditingkatkan dari waktu ke waktu.

The Company realizes the importance of implementing GCG as a tool to increase long-term value and business growth. On this basis, the Company is committed to implementing GCG consistently and approving the Company's Vision and Mission as the basis of corporate ethics and culture. The Code of Ethics and Corporate Culture has been implemented and the quality of its implementation continues to be improved from time to time.

## SISTEM PELAPORAN PELANGGARAN WHISTLEBLOWING SYSTEM

Perseroan belum memiliki sistem pelaporan pelanggaran sebagai salah satu upaya untuk mitigasi risiko yang dapat menimbulkan kerugian dengan tujuan untuk mendapatkan informasi mengenai pelanggaran terhadap Peraturan Perusahaan. Sistem ini tengah dikembangkan dan harapannya dapat digunakan sebagai penampung kritik dan saran untuk dievaluasi oleh Manajemen secara berkala.

sepanjang tahun 2020, belum ada pengaduan atau pelaporan yang signifikan mengenai pelanggaran etika atau penyimpangan/kecurangan yang melibatkan karyawan perusahaan.

The Company does not yet have a violation reporting system as an effort to mitigate risks that may cause losses with the aim of obtaining information about violations of Company Regulations. This system is being developed and it is hoped that it can be used as a container for criticism and suggestions to be evaluated by Management regularly.

Throughout 2020, there have been no significant complaints or reports regarding ethical violations or irregularities/fraud involving company employees.

## KEBIJAKAN ANTI KORUPSI DAN ANTI FRAUD ANTI CORRUPTION AND ANTI FRAUD POLICY

Perseroan telah mematuhi ketentuan yang berlaku melalui Peraturan Perusahaan, yang diantaranya mengatur larangan bagi setiap pekerja untuk melakukan tindakan korupsi dan tindakan curang lainnya yang dapat merugikan perusahaan.

The Company has complied with the applicable provisions through Company Regulations, which include regulating the prohibition of every employee from committing acts of corruption and other fraudulent acts which can harm the company.

## KEBIJAKAN SELEKSI UNTUK PEMASOK DAN VENDOR SELECTION POLICY FOR SUPPLIERS AND VENDORS

Perseroan memiliki kebijakan untuk pemasok dan vendor bahwa dalam penunjukannya harus melalui proses tender terlebih dahulu untuk mendapatkan hasil yang terbaik.

The company has a policy for suppliers and vendors that appointments must go through a tender process first to get the best results.

## KEBIJAKAN PERDAGANGAN ORANG DALAM INSIDER TRADING POLICY

Perseroan sesuai peraturan yang berlaku di pasar modal mengikuti kebijakan tentang perdagangan orang dalam. Inti dari ketentuan tersebut berupa larangan pihak-pihak dalam Perseroan yang mempunyai informasi material untuk menyalahgunakan jabatannya demi kepentingannya sendiri untuk mengungkapkan informasi material tersebut sehingga dapat mempengaruhi investor atau pihak lainnya untuk membuat keputusan investasi melaporkan adanya pelanggaran yang dilakukan oleh Karyawan.

The Company, under the applicable regulations on the capital market, follows the policy on insider trading. The essence of this provision is a prohibition on parties in the Company who have material information to abuse their position for their interests to disclose such material information so that it can influence investors or other parties to make investment decisions to report violations committed by employees.

## KEBIJAKAN PEMENUHAN HAK-HAK KREDITUR POLICY FOR FULFILLING THE RIGHTS OF CREDITORS

Perseroan belum memiliki kebijakan pemenuhan hak-hak kreditur, namun untuk menjaga hak-hak kreditur Perseroan senantiasa berupaya mematuhi perjanjian-perjanjian yang sudah dibuat dengan para kreditur.

The Company does not yet have the policy to fulfill the rights of creditors, but to protect the rights of creditors the Company always strives to comply with the agreements that have been made with creditors.

## PENERAPAN ATAS PEDOMAN TATA KELOLA PERUSAHAAN TERBUKA THE IMPLEMENTATION OF OPEN CORPORATE GOVERNANCE GUIDELINES

Dalam implementasi tata kelola perusahaan, Perseroan telah menerapkan tata kelola perusahaan terbuka sebagaimana yang diatur dalam POJK No. 21/2015 dan SEOJK No.32/2015, pedoman tata kelola mencakup 5 (lima) aspek, 8 (delapan) prinsip dan 25 (dua puluh lima) rekomendasi penerapan aspek dan prinsip tata kelola perusahaan yang baik. Perseroan senantiasa menerapkan rekomendasi dan meningkatkan kualitasnya dari waktu ke waktu. Rincian rekomendasi tersebut meliputi:

In implementing corporate governance, the Company has implemented public corporate governance as regulated in POJK No. 21/2015 and SEOJK No.32 / 2015, governance guidelines cover 5 (five) aspects, 8 (eight) principles, and 25 (twenty-five) recommendations for the implementation of aspects and principles of good corporate governance. The Company always implements recommendations and improves its quality from time to time. The details of these recommendations include:

No.	Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
<b>Aspek 1 : Hubungan Perusahaan Terbuka dengan Pemegang Saham Dalam Menjamin Hak-Hak Pemegang Saham;</b> <b>1<sup>st</sup> Aspect : Relationship between Public Company and Shareholders in Guaranteeing the Rights of Shareholders;</b>			
1	Prinsip 1 Meningkatkan Nilai Penyelenggaraan RUPS <b>1<sup>st</sup> Principle</b> Improve the Organizing Value of the GMS	1. Perusahaan Terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan pemegang saham.  The Public Company has technical means or procedures for voting both openly and closed which prioritizes the independence and shareholders' interests.	Menerapkan kuorum kehadiran minimal sesuai UU 40 tahun 2007 mengenai Perseroan Terbatas dan Anggaran Dasar Perseroan.  Stipulated the minimum quorum attendance based of the Law No. 40 of 2007 regarding the Limited Liabilities Company and the Company's Article of Association
		2. Seluruh anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan.  All members of the Board of Directors and members of the Board of Commissioners of the Public Company are present at the Annual GMS.	Seluruh anggota Direksi dan Dewan Komisaris hadir pada pelaksanaan RUPS  All members of the Board of Directors and the Board of Commissioners attend in the GMS
		3. Ringkasan risalah RUPS tersedia dalam Situs Web Perusahaan Terbuka paling sedikit selama 1 (satu) tahun.  A summary of the minutes of the GMS is available on the Public Company Website for at least 1 (one) year.	Risalah RUPS akan dipublikasi setelah menjadi Perseroan Terbuka  The Result of GMS will be published after transformed into public company
2	Prinsip 2 Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor. <b>2<sup>nd</sup> Principle</b> Improve the Quality of Public Company Communication with Shareholders or Investors.	4. Perusahaan Terbuka memiliki suatu kebijakan komunikasi dengan pemegang saham atau investor.  The Public Company has a communication policy with shareholders or investors.	Perseroan melalui Biro Administrasi Efek secara berkala memberi informasi kepada pemegang saham/investor  The Company utilizing the share registrar provided regular information to the shareholders/investors
		5. Perusahaan Terbuka mengungkapkan kebijakan komunikasi Perusahaan Terbuka dengan pemegang saham atau investor dalam Situs Web.  The Public Company discloses the communication policy of the Public Company with shareholders or investors on the Website.	Sudah diterapkan  Implemented
<b>Aspek 2 : Fungsi dan Peran Dewan Komisaris</b> <b>2<sup>nd</sup> Aspect : Functions and Roles of the Board of Commissioners</b>			
3	Prinsip 3 Memperkuat Keanggotaan dan Komposisi Dewan Komisaris <b>3<sup>rd</sup> Principle</b> Strengthening the Membership and Composition of the Board of Commissioners	6. Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perusahaan Terbuka.  Determination of the number of members of the Board of Commissioners considers the condition of the Public Company	Sudah dilakukan penambahan Komisaris Independen  The independent commissioner has been appointed
		7. Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.  Determination of the composition of members of the Board of Commissioners takes into account the diversity of expertise, knowledge, and experience required.	Sudah di sesuaikan dengan kebutuhan perseroan  Has been adopted as the Company's requirement
4	Prinsip 4 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris. <b>4<sup>th</sup> Principle</b> Improving the Quality of Implementation of Duties and Responsibilities of the Board of Commissioners.	8. Dewan Komisaris mempunyai kebijakan penilaian sendiri (Self Assessment) untuk menilai kinerja Dewan Komisaris.  The Board of Commissioners has a Self Assessment policy to assess the performance of the Board of Commissioners	Diterapkan sesuai kebutuhan.  Implemented as needed
		9. Kebijakan penilaian sendiri (Self Assessment) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Perusahaan Terbuka.  A Self Assessment Policy to assess the performance of the Board of Commissioners is disclosed through the Annual Report of the Public Company.	Sudah tertuang dalam Laporan Tahunan perseroan  Stated in the Annual Report of the Company
		10. Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.  The Board of Commissioners has a policy related to the resignation of members of the Board of Commissioners if involved in financial crimes.	Telah mematuhi sesuai UU. 40 Tahun 2007 Mengenai Perseroan Terbatas dan Anggaran Dasar Perseroan.  Comply based of the Law No. 40 of 2007 regarding the Limited Liabilities Company and the Company's Article of Association
		11. Dewan Komisaris atau Komite yang menjalankan fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.  The Board of Commissioners or the Committee that carries out the Nomination and Remuneration function composes a succession policy in the process of nominating members of the Board of Directors.	Mengikuti arahan Hasil RUPS dan Dewan Komisaris.  Following the result of GMA and the Board of Commissioners

No.	Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
<b>Aspek 3 : Fungsi Dan Peran Direksi</b> 3 <sup>rd</sup> Aspect : Functions and Roles of the Board of Directors			
5	Prinsip 5 Memperkuat Keanggotaan dan Komposisi Direksi.  5 <sup>th</sup> Principle Strengthening the Membership and Composition of the Board of Directors.	12. Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perusahaan Terbuka serta efektifitas dalam pengambilan keputusan.  Determination of the number of members of the Board of Directors considers the condition of the Public Company and the effectiveness in decision making.	Diterapkan sesuai kebutuhan.  Implemented as needed
		13. Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.  Determination of the composition of members of the Board of Directors takes into account, the diversity of expertise, knowledge, and experience required.	Diterapkan sesuai kebutuhan dan keahlian yang diperlukan.  Implemented as needed in accordance with required skills
		14. Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.  Members of the Board of Directors in charge of accounting or finance have the expertise and/or knowledge in the field of accounting.	Langsung ditangani oleh Direktur Utama  Directly managed by the President Director
6	Prinsip 6 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.  6 <sup>th</sup> Principle Improving the Quality of the Duties and Responsibilities of the Directors.	15. Direksi mempunyai kebijakan penilaian sendiri (Self Assessment) untuk menilai kinerja Direksi.  The Board of Directors has a Self Assessment policy to assess the performance of the Board of Directors.	Diterapkan sesuai kebutuhan.  Implemented as needed
		16. Kebijakan penilaian sendiri (Self Assessment) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan Perusahaan Terbuka.  Self-assessment policy to assess the performance of the Board of Directors is disclosed through the annual report of the Public Company.	Sudah tertuang dalam Laporan Tahunan perseroan  Stated in the Annual Report of the Company
		17. Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.  The Board of Directors has policies related to the resignation of members of the Board of Directors if involved in financial crimes.	Telah mematuhi sesuai UU. 40 Tahun 2007 Mengenai Perseroan Terbatas dan Anggaran Dasar Perseroan.  Comply based of the Law No. 40 of 2007 regarding the Limited Liabilities Company and the Company's Article of Association
<b>Aspek 4 : Partisipasi Pemangku Kepentingan</b>			
7	Prinsip 7 Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.  7 <sup>th</sup> Principle Enhancing Corporate Governance Aspects through Stakeholder Participation.	18. Perusahaan Terbuka memiliki kebijakan untuk mencegah terjadinya insider trading.  Public Companies have policies to prevent insider trading.	Telah dilaksanakan sesuai ketentuan  Implemented as regulation
		19. Perusahaan Terbuka memiliki kebijakan anti korupsi dan anti Fraud.  The Public Company has an anti-corruption and anti-fraud policy.	Memaksimalkan peran kontrol dari Komite Audit dan Internal Control  Maximizing the roles of Audit Committee and Internal Control
		20. Perusahaan Terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.  The Public Company has a policy regarding the selection and improvement of the ability of suppliers or vendors.	Selalu dilakukan seleksi sesuai kompetisi.  Conducted through competition
		21. Perusahaan Terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditor.  The Public Company has a policy regarding the fulfillment of creditor rights.	Perseroan selalu memenuhi kewajiban terhadap kreditor  The Company always fulfill the creditors' rights
		22. Perusahaan Terbuka memiliki kebijakan sistem whistleblowing.  The Public Company has a whistleblowing system policy.	Melakukan kontrol secara berkala untuk internal control  Conducted to regular control for the internal control
23. Perusahaan Terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan Karyawan  The Public Company has a policy of providing long-term incentives to Directors and Employees	Telah mematuhi sesuai UU. 40 Tahun 2007 Mengenai Perseroan Terbatas dan Anggaran Dasar Perseroan.  Comply based of the Law No. 40 of 2007 regarding the Limited Liabilities Company and the Company's Article of Association		

No.	Prinsip Principle	Rekomendasi Recommendation	Implementasi Implementation
<b>Aspek 5 : Keterbukaan Informasi</b> <b>5<sup>th</sup> Aspect : Information Disclosure</b>			
8	Prinsip 8 Meningkatkan Pelaksanaan Keterbukaan Informasi.  8 <sup>th</sup> Principle Improving the Implementation of Information Disclosure.	24. Perusahaan Terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain Situs Web sebagai media keterbukaan informasi.  Public companies utilize the use of information technology more broadly than the Website as a media for information disclosure.	Sudah diterapkan keterbukaan informasi melalui situs web, dan Media Sosial serta akun Youtube official Perseroan.  Information disclosure implemented through website, and social media as well as the Company's official Youtube account
		25. Laporan Tahunan Perusahaan Terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka paling sedikit 5% (lima persen), selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka melalui pemegang saham utama dan pengendali.  The Annual Report of the Public Company reveals the owner of the final benefit in the ownership of the Public Company at least 5% (five percent), in addition to the disclosure of the final beneficial owner in the shareholding of the Public Company through the main and controlling shareholders.	Telah dilaksanakan sesuai dengan ketentuan Otoritas Jasa Keuangan  Implemented based on the Financial Services Authority's regulation.