

# BUMA International Group Code of Conduct

# **Table of Content**

#### **Commercially Responsible Behavior**



# **Growing Sustainably**



#### **Our Values**



#### **Out-Innovate**

We harness the latest technologies and use strategic data analysis to guide our decisions, opening new doors and continuously innovating and pushing the boundaries of what is possible.



#### **Out-Work**

Our leadership combines technical competence with leadership mastery, fostering an environment where diverse talents thrive under inclusive leadership. Effective leadership not only inspires but actively guides others towards excellence in all facets of our work.



#### **Out-Care**

We excel in our business endeavors by deeply caring for our employees and the communities we serve. Success is measured not only through our achievements but also by how we foster an inclusive culture and enhance the lives of our team and their families.

#### **Adopting Our Values**

Our Code of Conduct reflects PT BUMA Internasional Grup Tbk and its subsidiaries' ("the Group") commitment to its values, ethical standards, and behaviors. It guides us how we work, interact with others, and make decisions. Our Code applies to all of us who work for the Group, including our Board, Committee, employees, and everyone working under the Group's direction. By adhering to this code, we ensure alignment with the Group's core values and upholding the integrity of our operations.

#### **Our Responsibilities**

At the Group, each of us plays an important role in upholding our Code. Together, we commit to act ethically, professionally, transparently, and with integrity. This is crucial for the Group's success and the journey we are on. Employees, managers, and leaders are expected to model these behaviors and encourage others to do the same.

#### As part of our team, we:

- Read, understand and act in accordance with our Code, policies, and applicable laws.
- Create a culture that reflects the principles of respect, fairness, and integrity.
- Represent the company responsibly. Whether on-site, in offices, remotely, during travel, or at events.
- Speak up, ask questions, raise concerns and report any concerns or potential violations of our Code and cooperate fully with investigation or audit.
- Complete mandatory training, including annual Code-related and role-specific courses.

#### Leaders have an additional responsibility to:

- Lead by example, modeling behaviors aligned with our Code and company values.
- Ensure team members understand their responsibilities, acknowledge positive behaviors, address inappropriate conduct, and maintain consistency in holding individuals accountable.
- Create a safe and inclusive environment where everyone feels valued, empowered to speak up, and assured of support without fear of retaliation.



#### Compliance with Laws, Regulations, and Policies

The Group operates in multiple regions. Our Code applies to every operation, no matter where we work. We follow all local, regional, and international laws, including anti-corruption rules, labor standards, environmental laws, and more.

Each of us is responsible for understanding and following the laws and regulations that apply to our roles and locations.

If local laws or customs conflict with our Code, we follow the strictest standard to ensure we operate ethically and responsibly.



We create a workplace where everyone feels safe to speak up when something is not right. If you have questions, concerns, or notice behavior that goes against Our Code, you can report it through the channels listed below. We handle your concerns with care, protect your confidentiality, and ensure you are free from any form of retaliation, intimidation, or threat.

Each company under the Group may have its own designated channels for reporting concerns or seeking help. You are encouraged to use the appropriate resources available within your company or through the Group's whistleblowing channel, DFENCE (Defenders of Fraud, Ethics & Compliance Enforcement):

- Directly (in-person)
- WhatsApp: +628-1318-8700-34
- Email: dfence@bumainternational.com
- Website: https://dfence.bumainternational.com/
- Postal Mail: PT BUMA Internasional Grup Tbk (Up: Ethics Committee) South Quarter Tower C, 5th Floor,
   Jl. R. A Kartini Kav. 8, Cilandak Barat, Jakarta 12430, Indonesia.

#### You can expect

- Our report will be handled on a strict need-to-know basis, meaning only those who need to know will be involved
- You will be protected from any retaliation, negative treatment, intimidation, or threats because you spoke up.
- Concerns in good faith will be taken seriously, reviewed promptly, and addressed with care.
- We will update you on the progress and outcome, while respecting privacy and confidentiality.

#### Your voice matters

Speaking up helps us maintain the values we stand for. By raising your voice, you are helping to protect your colleagues, the company, and the communities we serve. We encourage everyone to play their part in keeping the Group a safe, ethical, and trusted organization.

#### **Adopting Our Values**

Violating our Code can lead to serious consequences, such as disciplinary measures. The severity of these measures can vary, ranging from counseling to termination of employment. Some violations may also violate the law, potentially resulting in civil penalties or criminal charges.

We will address violations immediately and each of us are expected to report any violations they see.

Our business partners, including joint ventures and third parties, also play a key role in shaping our reputation. We choose to work with partners who share our values of safety, ethics, and compliance. We encourage all our business partners and their employees to act in accordance with our Code. If they fail to meet our expectations or their contractual obligations, appropriate action will be taken.

# Respectful Workplace

A place for everyone.





We are united across multiple regions, working together to create a workplace where everyone feels valued, respected, and supported. We build an environment where people from all backgrounds can thrive, collaborate, and contribute their perspectives. Our culture celebrates diversity, promotes inclusivity, and ensures equal opportunities for all, aiming to create a sense of belonging for every team member and a place where everyone can succeed.



#### **Our Commitment**

#### At the Group:

- We provide equal opportunities for everyone, free of bias or discrimination, regardless of their background or personal characteristics.
- We do not tolerate discrimination, exclusion, and unfair behavior.
- We respect and value diversity, welcoming different perspectives, ideas, and cultures.
- We are committed to creating a fair and inclusive workplace where everyone feels valued, respected, and heard.



I noticed my colleague prefers hiring people from a certain ethnicity or gender because of a stereotype that they are better at certain jobs. What should I do?

Address the issue directly with the colleague if you feel safe doing so or report to the whistleblowing channel about the issue. Explain that hiring should be based on skills and qualifications, not stereotypes, to ensure fairness and inclusivity.



#### **What This Means for Us**

As members of the Group, we:

- Treat everyone fairly, with respect and kindness, valuing their contributions and potential.
- **Avoid favoritism** in decisions about hiring, rotation, promotions, or task assignments.
- Respect **cultural differences** and appreciate the practices.
- **Recognize any personal biases** and actively work to treat everyone with fairness and respect.
- Include all relevant team members in projects and activities and communicate properly ensuring **no** one is left out.
- Listen and understand different ideas and perspectives in discussions and decision-making.
- Communicate clearly, thoughtfully, respectfully to ensure everyone feels understood and valued.
- **Report** if we experience or see unfair treatment, exclusion, or discrimination.







We are driven by honesty, integrity, and professionalism in everything we do. With every decision we make and every interaction we have, we choose respect, responsibility, and the values that inspire trust. By holding ourselves to the highest standards, we create a workplace where people are empowered to grow, collaborate, and turn shared aspirations into lasting success.



#### **Our Commitment**

#### At the Group:

- We uphold **honesty** in all actions and decisions, building trust within and outside the organization.
- We move forward with integrity, making ethical and responsible decisions that positively impact the business, community, and environment.
- We respect different opinions and value contributions of our colleagues, partners, and stakeholders.
- We behave with professionalism, demonstrate excellence and accountability in our work and our words.



A colleague used their position to secure a personal discount from a vendor. It feels wrong. What should I do?



#### What This Means for Us

As members of the Group, we:

- Remain **truthful** in all decision and actions, even when no one is watching.
- Maintain respectful, clear, and thoughtful communication, when sharing opinions, or concerns, even during disagreements.
- Use our roles responsibly, avoiding misuse of our **position** to benefit ourselves or others.
- Consider the impact of our decisions on the business, community, and environment.
- Maintain respectful, professional relationships with colleagues and stakeholders.
- Take accountability for mistakes, focusing on solutions and learning from them.

Report the issue through the whistleblowing channel immediately. Professional integrity is key. Ethical behavior ensures trust and accountability across the team.



We are united in our commitment to creating a safe, respectful, and inclusive workplace where everyone can thrive without fear. We stand against violence, harassment, bullying, and discrimination, taking proactive steps to protect and uplift one another. Together, we foster an environment where every individual feels valued, empowered, and inspired to contribute their best.



#### **Our Commitment**

#### At the Group:

- We are dedicated to maintaining a work environment where everyone has the right to feel safe and protected.
- We have zero tolerance towards any violence, harassment, and sexual harassment
- We prohibit bullying, intimidation, and verbal abuse of any kind
- We address harmful behaviors promptly and fairly, ensuring confidentiality and support for those affected.



A team member in my department keeps **making** offensive sexual jokes about a colleague. It's making me uncomfortable, but no one has risen to the occasion. What should I do?

Speak to the individual privately and explain that their comments are inappropriate and unacceptable if it safe to do so. Then, report the issue to their supervisor or through the whistleblowing channel to ensure the that the matter is resolved completely.



#### What This Means for Us

As members of the Group, we:

- Ensure that our actions and words create a positive and supportive environment for everyone.
- **Avoid** bullying, intimidation or any behavior that harms others.
- Never engage in any type of violence, harassment, sexual harassment.
- Treat everyone with **dignity**, ensuring respect in all our interactions.
- Stay aware and support colleagues who may be experiencing harm by offering help or directing them to the appropriate resources.
- Recognize and take responsibility for any behavior that could negatively affect others, address it immediately.
- Report any form of harm or misconduct and harassment promptly through the proper channels, without fear of retaliation.







A culture of health and wellbeing promotes a positive environment where we can thrive physically, mentally, and socially. We create a supportive environment where everyone can thrive by embracing self-care, building strong connections, and finding joy in balance. We empower each other to feel good, live well, and bring our best every day.



#### **Our Commitment**

#### At the Group:

- We prioritize health and wellbeing and create a workplace that supports physical and mental health.
- We provide resources, programs, and support to manage stress, encouraging healthy lifestyles and physical wellbeing.
- We believe that taking care of oneself and supporting colleagues is essential to building a strong and effective team.
- We encourage an open culture where discussing health and wellbeing is welcomed, and seeking help is supported.



#### A&O

My supervisor scheduled my shift without the proper amount of break. I'm feeling exhausted and struggling to keep up. What should I do?

Talk to your supervisor about how the schedule affects your health and ability to work effectively. If the issue isn't resolved, raise it with HR or the whistleblowing channel to ensure proper adjustments are made while meeting operational needs.



#### What This Means for Us

As members of the Group, we:

- Take care of physical, mental, and social health as part of our daily routine.
- **Participate** in health and wellbeing initiatives programs to maintain our health and wellbeing.
- Pay attention to signs of stress, fatigue, or burnout in ourselves or others, seek help when needed, and reduce stigma around mental wellbeing.
- **Demonstrate healthy work habits**, avoid working when unfit due to illness or fatigue.
- Support colleagues and offer support if they show signs of stress or strain.
- Communicate conditions or concerns that may impact our ability to work safely or effectively.





Safety is everyone's business. We look out for ourselves and each other including customers, suppliers, and visitors alike. By staying sharp and making safety a priority in everything we do, we make sure everyone heads home safe and healthy.



#### **Our Commitment**

#### At the Group:

- We prioritize everyone's safety by adopting clear protocols, providing proper training, and ensuring access to the right equipment.
- We have **zero tolerance** for behaviors and actions that compromise the safety of anyone in our workplace.
- We consistently promote and apply a culture of safety across the workplace.
- We are proactive in identifying and eliminating hazards to prevent accidents and injuries before they happen.



#### **What This Means for Us**

As members of the Group, we:

- Stay alert, focused, and responsible during all activities.
- Follow all safety policies and protocols and use personal protective equipment (PPE) when
- Operate machinery or equipment only if trained and authorized to do so.
- Never consume alcohol or misuse drugs in the workplace.
- Take safety seriously in every task, **never** bypassing safety measures or taking shortcuts to save time or convenience.
- Stop work and report to a supervisor if a task feels unsafe or risks someone's safety.
- Report hazards, unsafe practices, or faulty equipment immediately, even if they might seem minor.



I noticed some colleagues are not wearing PPE while working in a high-risk area. What should I do?

**Ensure you are using the proper PPE** and then remind your colleagues to wear theirs. If the issue continues, **report** it to your supervisor or safety officer to ensure everyone's safety.

## **Personal Data Privacy**

We respect the privacy rights of our individuals, suppliers and customers' personal data. Every member of the Group is responsible for protecting personal information, ensuring it is securely stored within our safeguards and protection, handled responsibly by authorized personnel and devices.





Handling personal data is a big responsibility, and we take it seriously. We collect and process information transparently, so individuals know how their data is used. By sharing data carefully, following legal requirements, and treating it with respect, we earn trust and protect everyone's privacy.



#### Our Commitment

#### At the Group:

- We make it a priority to be clear and transparent about why and how personal data is collected, used, and shared.
- We process personal data only when lawful, necessary, and aligned with legitimate business purposes.
- We respect privacy rights, including individuals' ability to access, correct, or delete their data.
- We ensure that third parties handling personal data meet our standards for privacy and security.



I noticed a colleague accessing subcontractor records to review one of the worker's personal details without a clear business need. It seemed unnecessary and unrelated to their role. What should I do?

Remind your colleague that accessing personal data must align with legitimate business purposes. If the behavior continues or seems intentional, report it to your manager or the whistleblowing channel.



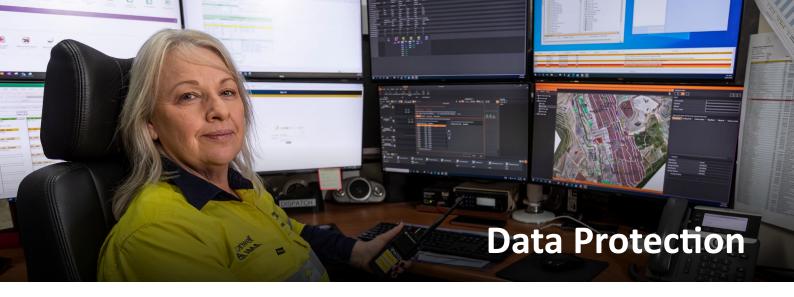
#### **What This Means for Us**

As members of the Group, we:

- Obtain clear and informed consent before collecting personal data.
- Collect and use personal data only for approved purposes and explain why and how the personal data is collected, used, and shared.
- Share personal data only when necessary and aligned with the Group's legitimate business purposes.
- Follow all company policies and protocols when handling personal data.
- Monitor third-party data handling practices and address any issues promptly.
- Seek guidance if unsure about data handling or concerns arise.

As an HR team member, I was contacted by a loan provider claiming that an employee has outstanding debt and requested the employee's personal data. What should I do?

Politely decline the request. We never share any personal data beyond legitimate business purposes. Employee information is confidential and must only be use in compliance to data protection policies.



Protecting personal data is essential to ensuring privacy and security. Strong safeguards, secure systems, and preventing unauthorized access help us keep sensitive information safe and maintain trust.



#### **Our Commitment**

#### At the Group:

- We ensure secure personal data storage with appropriate measures such as, but not limited to encryption, access controls, and secure storage.
- We comply with all privacy and data protection laws wherever we operate.
- We restrict access to personal information, ensuring only authorized personnel handle it.
- We prevent data breaches by implementing and following strict security protocols.
- We prepare for and respond promptly to data breaches, including notifying affected individuals when required.



#### Q&A

I am authorized to access the HR database containing personal data. My coworker asked me for my password because they need quick access while I'm out on-site. Can I share it temporarily?

No, even temporary sharing of passwords creates serious security risks. Passwords are personal for a reason; they protect data by ensuring only authorized users access it. Instead, ask your coworker to go through the proper process to request their own access. This keeps the system secure and avoids potential breaches.



#### **What This Means for Us**

As members of the Group, we:

- Use approved and secure tools and systems to process and store personal data securely.
- Protect sensitive information by keeping credentials private and regularly updated.
- Avoid storing personal data in unauthorized devices.
- Include data protection clauses in contracts with third-party vendors.
- **Follow company policies** and protocol to ensure data stays protected.
- Only access personal information we are authorized to.
- Report any unauthorized access, data breaches, or security risks immediately.





Being our best, the right way.







Bribery and corruption undermine trust, fairness, and ethical business practices, which contradicts our values. We uphold the highest ethical standards by ensuring that business decisions are made fairly and transparently.



#### **Our Commitment**

#### At the Group:

- We prohibit any form of bribery, including facilitation payments, kickbacks, and commercial bribery.
- We choose integrity, even when it's difficult.
   Business targets or competitive pressures never justify unethical actions.
- We do not compromise our stance on bribery and corruption, even at the cost of business opportunity.
- We ensure that all decisions are guided by fairness, honesty, and ethical principles, free from any improper influence.
- We comply with any anti-bribery laws applicable to where the Group companies operate and conduct business fairly and transparently.





A supplier told me if the supplier is appointed by the company, they'll give me a "thank-you bonus" on the side. It sounds tempting, what should I do?



#### What This Means for Us

As members of the Group, we:

- Never offer, accept, promise, or authorize bribes or anything of value which influences other parties to behave unfairly.
- **Refuse and report** any request for an unofficial payment, facilitation fee, or bribe.
- Report immediately if pressured to engage in corruption, facilitation fee, or if a situation seems unethical.
- Fully document transactions and follow approval procedures to maintain transparency.
- Be extra cautious and verify third parties, suppliers, and agents before engaging in business relationships.
- Follow company's policies on anti-bribery and corruption.

**Report it to the whistleblowing channel immediately.** This is considered corruption and is strictly prohibited.

- As the payment was promised before the contract was awarded, it is called a kickback.
- If the money is given after they were appointed, even without prior agreement, it is called **gratification**.

Regardless of when it is offered, accepting such payments is prohibited. Always refuse and report such offers to the whistleblowing channel.



Gifts and hospitality can sometimes help build and strengthen relationships among partners, but they must always be given and received responsibly. We are committed to ensuring that no gift or entertainment creates a conflict of interest or influences business decisions. Transparency and accountability are essential in all exchanges.



#### **Our Commitment**

#### At the Group:

- We do not accept gifts, cash, entertainment, or hospitality that could improperly influence business decisions. However, if it is not possible to decline a gift or hospitality, it must be recorded, disclosed, and approved in accordance with company policies.
- We only allow gifts and hospitality when they are reasonable and culturally appropriate. While we respect cultural norms, we always prioritize our ethical guidelines.



#### **What This Means for Us**

As members of the Group, we:

- **Disclose and seek approval** for gifts or hospitality according to applicable policies and procedures.
- Assess whether gifts or hospitality are appropriate by considering their value, cultural context, and business purpose.
- Seek guidance before giving or accepting gifts or hospitality if unsure.
- Report any concerns about improper exchanges of gifts or hospitality



#### 0.2

A vendor offered me an **expensive watch as a token of appreciation** during contract negotiations. What should I do?

**Politely decline the gift** and refer to the applicable policy on gifts and hospitality. **Report the offer to Ethics Committee.** Accepting valuable gifts, especially during negotiations, can create a conflict of interest or the appearance of favoritism.



Business decisions must remain impartial and free from personal gain or the appearance of favoritism. It's important to be mindful of activities or relationships - such as family or financial connections - that could create, or appear to create, a conflict between personal and company interests.



#### **Our Commitment**

#### At the Group:

- We act with impartiality, keeping business decisions free from personal influence.
- We maintain transparency by providing clear processes for disclosing and managing actual or potential conflicts of interest.
- We actively assess and manage conflicts of interest to maintain integrity in decision-making.
- We encourage and protect those who report actual or potential conflicts without fear of retaliation.



#### **What This Means for Us**

As members of the Group, we:

- Ensure activities, relationships, personal or financial interests do not interfere with professional responsibilities.
- Avoid decisions that compromise objectivity or the company's reputation.
- **Step back** from decisions where personal relationships compromise impartiality.
- Disclose and seek approval for personal relationships, financial interests, or outside work that could create conflicts of interest.
- Seek guidance if unsure whether a situation presents a conflict of interest.



My team and I are in charge of reviewing bids for a contract, and one of the bidding companies is **owned by a close friend.** What should I do?

**Disclose the relationship** to Ethics Committee and **step back** from the decision-making. Staying involved could create a conflict of interest or make it look like favoritism, even if you try to be fair.



The Group strictly prohibits insider trading to maintain market integrity and fairness. We ensure that nonpublic information is handled responsibly. Misusing or sharing such information, whether a financial gain is made or not, undermines trust and violates both legal and ethical standards.



#### **Our Commitment**

#### At the Group:

- We maintain fair and transparent financial markets by prohibiting insider trading and ensuring compliance with all securities laws.
- We promote a culture of compliance and integrity where each of us understands the importance of safeguarding nonpublic information.
- We provide clear guidelines to ensure all employees remain compliant with insider trading laws.



#### What This Means for Us

As members of the Group, we:

- Understand and follow all applicable insider trading laws and company securities policies.
- Never trade company shares using nonpublic information, regardless of whether it results in profit or not.
- Never share insider information with anyone, including friends and family regardless the intention.
- Avoid discussing nonpublic financial information in public places or unsecured digital settings.
- Consult the compliance team before trading if unsure about restrictions.
- Report suspected insider trading immediately to the compliance team.



I work at one of the company's subsidiaries and have access to nonpublic information about the parent company, which is publicly traded. Since I don't work directly for the parent company, would sharing the information be a concern?

Yes. Insider trading laws apply to anyone with access to nonpublic information, regardless of whether they work directly for the public traded company. Even if you don't personally trade stocks, sharing the information can be considered "tipping", which is illegal. Never discuss nonpublic company information outside authorized channels, even with friends or family.



Political engagement is a personal choice, and we respect the right to participate in political activities. However, political roles or affiliations can sometimes create conflicts of interest or impact business relationships. Maintaining transparency, accountability, and neutrality is essential to upholding the trust and integrity we have built as a company.



#### **Our Commitment**

#### At the Group:

- We respect interest in political engagement while ensuring transparency and proper preapproval to prevent conflicts of interest.
- We uphold political neutrality and prevent conflicts of interest between personal political activities and business responsibilities.



#### What This Means for Us

As members of the Group, we:

- Obtain pre-approval from management before assuming a political role.
- Disclose any political roles held by immediate family members.
- Keep personal political views separate from the company's position and avoid public statements that could imply company endorsement.
- Do not use company assets, resources, or time to support personal political activities.
- **Do not pressure or influence colleagues** to adopt or support a particular political opinion.



I've started getting involved in a political campaign and might run for a legislative position, but it's still early, so I haven't informed the company. Since it's not official yet, do I really need to say anything?

You should **inform the company** as soon as you engage in political activities, even if it's not official yet. Transparency prevents conflicts of interest. Consult your supervisor to arrange unpaid leave for campaign activities that may interfere with work and neutrality.



Our growth relies on informed decisions, which depend on the accuracy and integrity of our records. We must document, store, and maintain records clearly, securely, and in line with applicable policies and legal requirements.



#### **Our Commitment**

#### At the Group:

- We acknowledge that all company records and documents created, received, or maintained by the company, in any format, are the sole property of the company. Employees do not have personal ownership or claim over these records and documents.
- We maintain accurate and complete records to ensure accuracy, operational efficiency, and legal compliance.
- We require all records to be properly documented, stored, and retained using the appropriate company systems and facilities.



#### **What This Means for Us**

As members of the Group, we:

- Follow company policies for storing, retaining, and securing records.
- Ensure records complete, properly are maintained, and accessible when needed.
- Do not keep company records and documents in personal storage on unauthorized locations.
- Do not alter, omit, or destroy records improperly.
- Return company documents upon reassignment, termination, or resignation and follow proper procedures.
- **Prevent** unauthorized access, loss, or destruction of records.
- Report missing, incomplete, or improperly maintained records.
- Use approved systems and methods for recordkeeping and security.



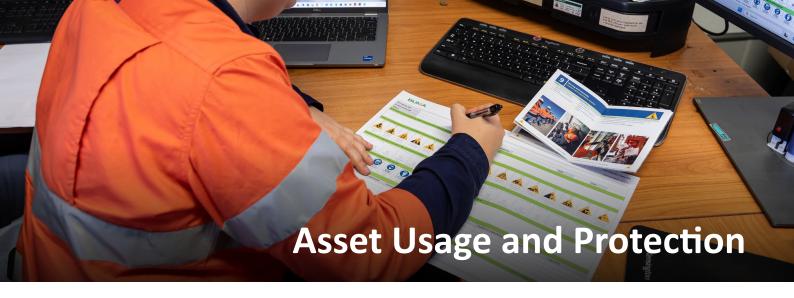
colleague who transferred to department kept company documents that are no longer relevant to their role. What should I do?

Remind them that company documents upon reassignment should only be kept if relevant to their role. If they don't return them, escalate to HR or Ethics Committee to ensure proper handling.

### **Asset Protection**

A secure company is a strong company. From safeguarding equipment to securing confidential data, we all play a role in protecting what keeps us running. Misuse, loss, or unauthorized access put each of us at risk.





Company assets, including equipment, facilities, IT systems, and data, are crucial for ensuring smooth operations and long-term success. We all share the responsibility to protect it from loss, misuse, and security threats. Failing to do so can lead to loss, breaches, and disruptions.



#### **Our Commitment**

#### At the Group:

- We protect and monitor the use of company assets, including physical property, IT systems, **from** misuse, lost, or theft.
- We require each one of us to use company assets responsibly and for legitimate business purposes only.
- We implement security measures to prevent unauthorized access to company physically and digitally.



#### What This Means for Us

As members of the Group, we:

- Use company assets only for business purposes and handle them with care.
- Prevent loss, theft, or unauthorized access to company equipment, devices, and systems.
- Regularly update passwords, avoid downloading unauthorized software, and remain cautious of phishing emails and online scams.
- Do not use company devices to access inappropriate or harmful websites, such as pornography, gambling, or unsecured sites.
- Immediately report any suspected physical or digital breaches, vulnerabilities or misuse.
- Report any damage, loss, misuse, or security risks immediately.



I've been invited to speak at a webinar in a personal capacity, not on behalf of the Group. Can I use my work laptop for this?

No, company devices should only be used for business purposes. Using work laptops for personal activities can pose security risks, expose company data, or violate IT policies. If the webinar is not related to your job, use your personal device instead.



Protecting sensitive business information, trade secrets, and proprietary data is essential to maintaining trust, safeguarding our competitive edge, and ensuring legal compliance. Each of us has a responsibility to handle confidential information with care and professionalism.



#### **Our Commitment**

#### At the Group:

- We protect confidential information and handle data responsibly in compliance with laws, regulations, and contracts.
- We implement security protocols and access controls to safeguard confidential business information.



#### **What This Means for Us**

As members of the Group, we:

- Protect and securely handle confidential business information, including proprietary data, strategic plans, and information entrusted to us by partners or third parties, in line with company policies.
- Avoid discussing confidential information in public, online, or where unauthorized individuals may overhear.
- Share confidential information only when authorized and through approved channels.
- Report any unauthorized disclosure, security breaches, or access to confidential information.



An employee of a subcontractor I work with asked me how much we are paying their company for this project. They say they just want to know if they're being paid fairly. Can I share it?

No, do not share confidential company information. Payment terms, contract rates, and agreements are confidential and should only be shared with authorized personnel. If the employee has concerns, they should raise it with their company instead.

# **Regulatory Compliance**

We operate in a regulated environment where compliance is essential. From accurate disclosures and financial reporting to corporate governance and trade regulations, following the law protects our business, reputation, and stakeholders.





We share accurate, timely, and transparent information about our financial performance and operations with stakeholders, including investors, regulators, and the public. Failing to meet disclosure obligations or misrepresenting information can break stakeholders' trust and may result in penalties.



#### **Our Commitment**

#### At the Group:

- We accurately and promptly disclose material information ensuring it reflects our true financial standing and business operations.
- We **comply** with financial reporting standards, regulatory requirements, and ethical disclosure practices.
- We implement internal controls to prevent fraud, errors, and misleading disclosures.



#### What This Means for Us

As members of the Group, we:

- Ensure financial and business disclosures are complete, truthful, and accurately reflect company activities.
- Never withhold, delay, or manipulate financial or operational information.
- Do not misrepresent, omit, or manipulate information in reports.
- Communicate transparently with stakeholders and report material information properly.
- **Follow** company policies and regulatory requirements for preparing and submitting disclosures.



I witnessed an accident on-site. A customer asked me not to report it because they don't want it to affect the project timeline and completion. However, this could misstate our revenue **recognition** and disclosures. What should I do?

**Report it immediately.** Omitting material information, such as project delays that affect financial performance, misrepresents the company's true standing and violates reporting standards. Transparent disclosures are required to comply with regulator and reporting obligations.



Contracts are essential for protecting the company's interests, defining obligations, and setting clear expectations for all parties. Proper review, approval, and signing processes are non-negotiable. Skipping these steps can lead to financial, legal, and reputational risks that jeopardize our operations and integrity.



#### **Our Commitment**

#### At the Group:

- We ensure all contracts reflect the best interests of the company and are properly reviewed and are approved before signing.
- We authorize only those with proper delegation to sign contracts after due diligence.
- We require all agreements to comply with legal and requirements.



#### What This Means for Us

As members of the Group, we:

- Have contracts reviewed by the appropriate **Director** as well as Legal when required, particularly for unclear or high-risk terms.
- Ensure agreements serve the company's best interests, upholds fairness, ethical business practices, and avoid conflict of interest.
- Only sign contracts when we are authorized to do so and after proper review and approval.
- Follow company policies for contract approval, risk assessment, and legal compliance.



A project is set to begin, but the contract terms are not yet finalized. I was asked to proceed while the contract follows later. What should I do?

Do not proceed without a finalized ad approved contract. Consult to the appropriate Director. Operating without a finalized and signed agreement exposes the company to financial, legal, and compliance risks.



Fair competition drives innovation and builds trust with our customers and stakeholders. Engaging in anticompetitive practices undermines market integrity and exposes the company to significant financial and legal risks. We uphold ethical and lawful competition standards to protect the reputation and sustainability of the Group.



#### **Our Commitment**

#### At the Group:

- We compete ethically, focusing on quality, service, and innovation, following local and international competition laws.
- We monitor and prohibit anti-competitive practices, including price-fixing, bid-rigging, and collusion.
- We ensure that employees understand and follow competition regulations to avoid legal and reputational risks.



#### **What This Means for Us**

As members of the Group, we:

- Compete fairly by offering the best value through quality and services to customers, not by restricting competition.
- Ensure all business decisions and agreements comply with competition laws and document them properly.
- Never participate in or entertain conversations involving price-fixing, bid-rigging, or market allocation with competitors.
- Be truthful and transparent about product pricing, quality, and market conditions when communicating with customers.
- Never communicate false or misleading information about competitors, suppliers, or customers to gain an unfair advantage.



A supplier mentioned that they have insider information about competitors' bid amounts. Can I use that to adjust our pricing strategy?

**No.** Using or accepting insider information about competitors' bids is unethical and illegal. Immediately report the situation to your supervisor or Ethics Committee.



Money laundering disguises illegal funds to make them appear legitimate, while terrorism financing supports criminal activities. Both activities undermine financial systems and pose legal, reputational, and operational risks. At the Group, we are committed to detecting, preventing, and reporting financial crimes to maintain the integrity of our business and comply with global and local regulations.



#### **Our Commitment**

#### At the Group:

- We comply with laws applicable to the prevention of money laundering and terrorist financing.
- We monitor our partners, vendors, and other third parties for money laundering and terrorism financing risks.
- We do not knowingly engage with third parties involved in illegal financial activities.



#### **What This Means for Us**

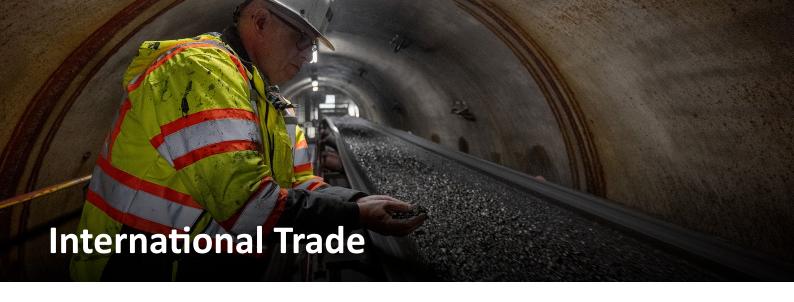
As members of the Group, we:

- Follow company policies and procedures to ensure our financial transactions remain transparent and complaint with regulations.
- Are cautious when dealing with large cash payments or unusual transaction patterns.
- Conduct due diligence and verify the legitimacy of customers, vendors, and third parties before engaging in business relationships.
- Stay aware of potential red flags for money laundering and terrorism financing and report concerns immediately.
- Report any suspicions of money laundering, terrorism financing, or financial misconduct.



A new vendor asked me to send payment to an offshore account under a different company name, but they didn't explain why. It feels unusual. What should I do?

**Do not process the payment.** Verify the vendor's identity and ensure payment details match the agreed terms. If details don't align or the request seems suspicious, report it to the whistleblowing channel as it could be a red flag for money laundering or fraud.



International trade is subject to strict regulations, including export controls, sanctions, and trade laws. Failing to comply can lead to serious legal and financial consequences. We ensure that all cross-border transactions are lawful, ethical, and compliant with global trade regulations.



#### **Our Commitment**

#### At the Group:

- We comply with all international trade laws, including export controls, sanctions, and antiboycott regulations.
- We do not engage in business with sanctioned individuals, entities, or countries.
- We ensure transparency and accuracy in traderelated transactions and documentation.
- We conduct thorough due diligence for crossborder transactions to avoid legal and compliance risks.



A potential partner from a region under international sanctions asked for help to find a way to avoid restrictions. What should I do?



#### **What This Means for Us**

As members of the Group, we:

- Verify all business partners, suppliers, and customers against sanctions lists before engaging in transactions.
- Stay informed about **trade restrictions** that apply to our operations.
- Accurately document all trade-related transactions in accordance with regulatory requirements
- Seek guidance if unsure about trade regulations or compliance risks and contact the legal team.

Refuse the request and report it to Compliance. Doing business with sanctioned regions without proper approvals is illegal and against company policy. Always ensure all transactions follow international trade laws and company regulations.



Each industry has its own regulations, safety requirements, and sustainability expectations. We take pride in upholding the highest standards in our operations, ensuring that all activities meet legal obligations and industry best practices.



#### **Our Commitment**

#### At the Group:

- We comply with all industry-specific laws, regulations, and standards.
- We prioritize ethical business practices and safety in every sector we operate in.
- We ensure that each of us and our operations meet regulatory and certification requirements.
- proactively stay ahead of industry developments and legal changes.



#### **What This Means for Us**

As members of the Group, we:

- Follow all corporate policies and protocols relevant to our operations.
- Do not ignore or bypass regulatory requirements relevant to our operations
- Obtain and maintain any changes in required certifications or licenses for roles involving our specific tasks.
- Report any instance of non-compliance, safety concerns, or environmental risks to supervisors or relevant teams.



My certification expired a long time ago, but no one has ever asked about it, and I've been doing my job well without any issues. Do I really need to renew it?

Even if your role hasn't changed, regulations and best practices may have. An expired certifications means you're not officially recognized as qualified and could create risks for you and the company.



Corporate governance ensures that the Group operates responsibly, transparently, and ethically. It fosters trust among stakeholders and protects the company's reputation by enforcing structured decision-making and accountability. Strong governance helps us navigate challenges, prevent misuse of authority.



#### **Our Commitment**

#### At the Group:

- We follow structured processes to ensure business activities are conducted responsibly and transparently.
- We apply governance mechanisms, such as approvals, audits, and oversight, fairly and consistently.
- We acknowledge the importance of audit procedures in maintaining transparency and accountability.



#### **What This Means for Us**

As members of the Group, we:

- Ensure decisions and actions that require approvals follow the appropriate processes without shortcuts.
- Hold ourselves and others accountable for maintaining proper governance practices.
- Follow and support audit procedures to ensure compliance and integrity in our operations.
- Never bypass governance mechanisms for personal convenience or gain.
- **Report** any misuse of policies, unauthorized approvals, or governance failures.



A colleague is purchasing goods or services without going through the appropriate approval process. What should I do?

Ensure all purchases follow company policies. Buying goods or services without proper authorization can lead to compliance issues. Always check the **approval process** in corporate guidelines or consult your manager or the compliance team if unsure.

# **Communications**

Words matter. What we say online, in public, or to the media shapes how the world sees us. Speak responsibly, share thoughtfully, and always protect the company's reputation.





Our words and actions, both professionally and publicly, affect the company's reputation. Whether interacting with stakeholders, media, or on social platforms, we must represent the company responsibly and avoid any actions that could misrepresent or harm its image.



# **Our Commitment**

#### At the Group:

- We require prior authorization before speaking publicly or engaging with the media on behalf of the company.
- We respect each of us has the right to participate in personal interests and activities outside of work, ensuring they remain separate from company representation.



# **What This Means for Us**

As members of the Group, we:

- Ensure that when representing the company, our statements and engagements align with company values.
- Clearly state when opinions are personal and do not represent the company during public engagements.
- Direct media designated inquiries company representatives such as Corporate Communications or Investor Relation.
- Avoid public opinions and actions could misrepresent or harm the Group's image.
- Seek guidance from Corporate Communication or Management if unsure about an external activity or statement.



A journalist asked me for insights regarding the Group's plans going forward. Can I share my insights and thoughts on it?

Do not provide any comment, please redirect them to Corporate Communication. Only designated representatives are authorized to speak to ensure accurate and consistent messaging.



Social media allows us to engage and express ourselves, but online activity can have real-world consequences. What we post can impact our colleagues, the company, and its reputation. Each of us is responsible for maintaining a positive, respectful, and professional online presence that aligns with company values



# **Our Commitment**

#### At the Group:

- We respect the right to use social media but expect responsible and professional behavior online.
- We ensure that online activity does not harm colleagues, company interests, or its reputation.
- We expect each of us to clearly separate personal opinions from the company's views and follow company guidelines when discussing work-related matters.



#### **What This Means for Us**

As members of the Group, we:

- not share misleading, harmful, inappropriate content about the company, colleagues, or business partners.
- Avoid posts, comments, or engagement, including hate speech, that could harm the company's reputation or mislead the public.
- Do not use company branding, logos, or official statements without approval.
- Do not engage in public disputes or spread unverified or untrue information about the company.
- Follow company policies on confidentiality and do not share sensitive business information online.
- Report online content that misrepresents or damages the company's reputation.



I witnessed a workplace incident and recorded it, but the investigation is still ongoing, and no official statement has been made. Can I share it on social media?

No, do not share or post any information about company incidents without proper approval. Sharing incomplete or unverified details can lead to misinformation and harm the company's reputation. If you have concerns, report the incident through your supervisor or the safety

# **Growing Sustainably**

Shaping a sustainable future, together.







Sustainability is our shared responsibility. The Group is committed to reducing environmental harm, managing resources efficiently, and integrating sustainable practices into every aspect of our operations. Through responsible decision-making, we protect the environment, our communities, and future generations.



# **Our Commitment**

#### At the Group:

- We actively work to manager our environment impact by minimizing waste, reducing emissions, and using resources efficiently.
- We comply with environmental laws and integrate sustainability into how we operate.
- We identify and mitigate environmental risks related to our business while continuously seeking better, greener solutions.
- maintain transparent reporting environmental risks and emission through sustainability reports and other media sources.
- We integrate sustainable practices into business decisions to ensure long-term environmental responsibility.



# **What This Means for Us**

As members of the Group, we:

- Identify and address environmental risks in our area of work.
- Follow best practices and company policies to minimize waste, conserve energy, and use resources responsibly.
- Manage and dispose of waste properly, including hazardous materials, following company policies.
- Support company initiatives to reduce carbon emissions and promote sustainability.
- **Consider the long-term impact** of our actions on local communities and the environment.
- Report environmental concerns or violations immediately.
- Choose sustainable suppliers and materials whenever feasible.



I noticed that hazardous waste from our operations was not being properly disposed of. What should I do?

Communicate the concern immediately. Storing hazardous waste improperly, even temporarily, risks, and legal consequences. All hazardous materials must be clearly recorded, labeled, and disposed according to regulations.



Respecting human rights is at the core of how we operate. We uphold ethical labor practices across our operations, supply chain, and partnerships. We have zero tolerance for forced labor, child labor, exploitation, or modern slavery, and we expect the same from our partners.



# **Our Commitment**

#### At the Group:

- We respect and protect human rights in all business activities.
- We comply with all applicable human rights laws and require our suppliers and partners to do the same.
- We have zero tolerance for forced labor, child labor, human trafficking, or any form of modern slavery. Requiring all suppliers to meet legal working age requirements.
- We take immediate action to address human rights violations within our operations or supply chain.



#### **What This Means for Us**

As members of the Group, we:

- Treat everyone with dignity and respect to create a workplace where human rights are valued.
- **Report** any concerns about human rights violations.
- Communicate our human rights expectations to each other, suppliers, and partners.
- Ensure that employment conditions are legal, ethical, and voluntary.
- Do not engage with suppliers or partners who fail to meet our human rights commitments.



I learned that a supplier is using underage workers to meet tight deadlines and reduce costs. They claim the workers are doing "small tasks" and not involved in dangerous work. What should I do?

Report it to the compliance team. Employing underage workers must comply with the legal working age and labor laws where we operate. Even if certain types of work are allowed, we expect our partners to ensure safe, fair, and legal employment conditions. If a violation is found, business may be paused until corrective actions are taken.



Our operations strive to create an environment where Indigenous Peoples, minorities, and vulnerable groups are respected, heard, and considered in our decisions. We take responsibility for ensuring our operations and partnerships uphold their rights and well-being.



# **Our Commitment**

#### At the Group:

- We respect and protect the cultural heritage, rights, and perspectives of Indigenous Peoples, minorities, and vulnerable groups.
- We engage in open, meaningful, and ethical dialogue with affected communities.
- We acknowledge and actively address power **imbalances** when working with these groups.
- We assess and mitigate any negative impacts our operations may have on Indigenous and vulnerable communities.
- We prohibit discrimination, exploitation, or violations of their rights.
- We require our partners to uphold ethical standards that respect these communities.





A colleague lost their leg in a workplace accident. Instead of finding them a new role, the company let them go. I feel like this isn't fair, but I'm not sure what I can do?



# What This Means for Us

As members of the Group, we:

- Engage respectfully with Indigenous and vulnerable communities, ensuring their voices are heard.
- Recognize and address power imbalances in discussions and agreements.
- Ensure business activities do not harm Indigenous cultural heritage, traditional lands, or community well-being.
- Consider the potential social and environmental **impact** of our decisions on these groups.
- Report any discrimination, exploitation, or violations of their rights.
- Ensure that our vendor selection considers alignment with our ethical standards.
- Refuse to work with partners who exploit or fail to respect the rights of these groups.

If you believe the decision was unfair, raise the issue with your supervisor or HR to ensure the right steps are taken. Terminating an employee due to a disability may violate labor laws and company policies. If they can no longer do their previous job, reassigning them to a suitable role might be better than letting them go.



Wherever we operate, we are part of the community. Our success is intertwined with the well-being of the people and environment around us. By fostering meaningful relationships and creating shared values, we aim to be a trusted partner that contributes to long-term social and economic growth. We take proactive steps to avoid, mitigate, and reduce negative impacts while building stronger, more resilient communities.



# **Our Commitment**

#### At the Group:

- We build trust with local communities through open and transparent engagement.
- We support community programs that enhance education, healthcare, and economic growth.
- We recognize, address, and mitigate any negative **impacts** of our operations on local communities.
- We create opportunities for local employment and partnerships where possible.



#### **What This Means for Us**

As members of the Group, we:

- Engage in two-way communication with communities, ensuring their concerns and feedback are heard and considered.
- Work in a way that minimizes harm and does not disrupt local customs.
- **Take part in initiatives** that promote education, skill development, and well-being in the communities where we operate.
- **Integrate local perspectives** into decision-making where possible.
- **Report** any concerns about discrimination, exploitation, or violations affecting communities.



A local community has raised concerns that dust from our operations is affecting air quality and causing health issues. What should I do?

Report to External Relations or the relevant department and then engage with the assess the impact, and implement measures. Regularly monitor air quality and keep the community informed about mitigation efforts to build trust and ensure responsible operations.



We contribute to the well-being of communities by supporting meaningful initiatives through sponsorships and charitable donations. Our contributions align with ethical standards, company values, and legal requirements to create a lasting, positive impact.



# **Our Commitment**

#### At the Group:

- We support charitable initiatives promote sponsorships that education. healthcare, the environment, and community development.
- We ensure that all donations and sponsorships are transparent and compliant with the law.
- We prevent donations from being misused for personal, political, or improper business advantages.
- We only provide support to verified parties with legitimate charitable or community-focused missions.



# What This Means for Us

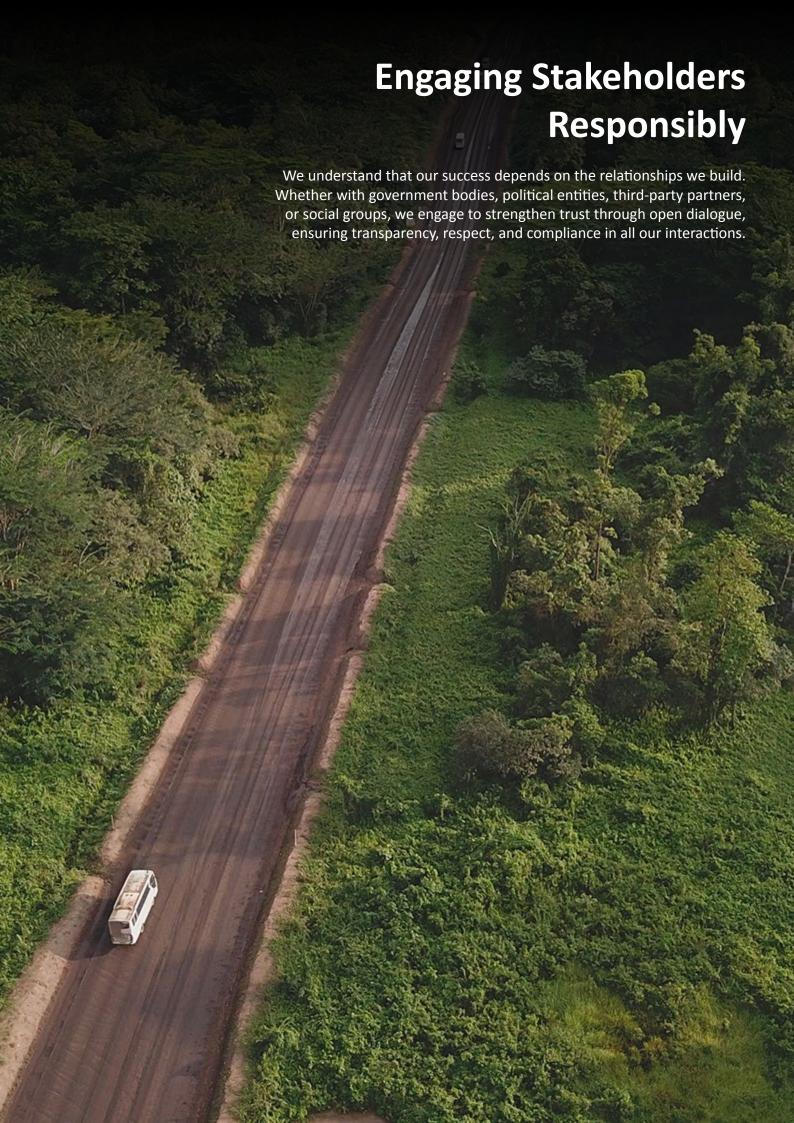
As members of the Group, we:

- Obtain proper approval and follow company policies and procedures when making sponsorships or donations.
- Never offer financial support in exchange for business advantages or political influence.
- Partner only with verified organizations that align with our values.
- **Report** any concerns about misuse or unethical requests related to sponsorships or donations.



A local group asked for financial support for an event, but the group is owned by a public figure who is currently facing legal issues. What should I do?

Do not proceed without proper review. Refer the request to the relevant department for proper due diligence and seek approval from the appropriate Director. Providing support without verification could cause reputational and legal **consequences** for the company.





Our work often intersects with government bodies and political entities. We engage with government officials and political entities lawfully, transparently, and respectfully, ensuring our actions uphold integrity and neutrality.



# **Our Commitment**

#### At the Group:

- We engage with government officials and political entities lawfully and transparently.
- We require all interactions with government officials or political entities follow proper approval and documentation processes.
- We maintain impartiality in business decisions and prevent political bias from influencing company activities.



# What This Means for Us

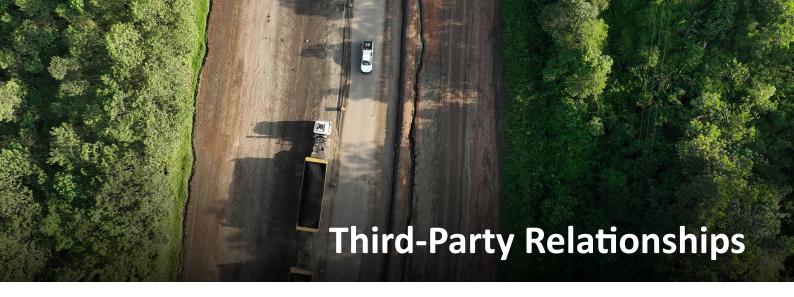
As members of the Group, we:

- Follow company procedures when interacting with government officials or political entities.
- Obtain approval before engaging in discussions with government officials or political entities.
- **Seek guidance from leadership** before attending government-related events or discussions.
- Maintain accurate records of government meetings and engagements.
- Separate personal political views and activities from our professional responsibilities.
- Report any concerns about improper influence or unethical government dealings.



A local government official invited me to attend a government outreach event in the area where my site is located. What should I do?

Seek approval first. Consult your Project Director before Manager attending. Document the event's purpose and ensure any related expenses are reported correctly. During the event, avoid making statements or taking actions that could imply political endorsement or alignment on behalf of the company.



Our ability to deliver high-quality and responsible business outcomes relies on the integrity and performance of our third-party relationships. Whether contractors, suppliers, vendors, or other partners, we expect them to uphold the same ethical, legal, and professional standards that guide our operations.



# **Our Commitment**

#### At the Group:

- We work only with third parties that align with our ethical, legal, and professional standards.
- We assess and monitor third-party conduct to ensure they continue to meet our requirements.
- We set clear contractual expectations and hold them accountable to it to ensure compliance with legal and ethical obligations and act against violations.



#### **What This Means for Us**

As members of the Group, we:

- Follow proper procurement process to ensure third parties meet company standards and risks are assessed and addressed before engaging.
- Ensure all contracts with third parties clearly performance and compliance **expectations,** including legal, safety, and ethical requirements.
- Continuously assess the performance and conduct of third parties to ensure they maintain compliance with our standards.
- **Escalate concerns** if a third party engages in unethical, illegal, unsafe behavior, or fails to meet our standards.
- Provide feedback to third parties and work collaboratively to improve their performance when needed.



Our contract with a long-term vendor that has supplied materials for years is being automatically renewed without undergoing a proper due diligence review. Recent concerns have been raised about their quality end ethical standards. What should I do?

Raise the issue immediately to your supervisor or Procurement. Even if a vendor has been working with us for years, they must still undergo proper due diligence to ensure they continue to meet standards.



We believe that building connections through employee communities creates a positive, inclusive, and engaging workplace culture. These communities help strengthen relationships, encourage collaboration, and ensure everyone feels valued and supported in their professional journey.



# **Our Commitment**

#### At the Group:

- We support employee communities that align with our values and contribute positively to workplace culture.
- We encourage an **open-for-all attitude** to ensure these communities welcomes each of us.
- We accommodate feedback to ensure the community drives engagement and reflects company principles.



# **What This Means for Us**

As members of the Group, we:

- Participate in or establish communities that support shared interests while maintaining alignment with company values.
- Ensure these communities are accessible to each one of us, without discrimination.
- Promote strong relationships through these communities and encourage collaboration.
- Respect cultural and personal differences within these groups.
- Seek input from members to improve the communities' activities and ensure alignment with company values.
- Address concerns within communities constructively and escalate issues to maintain a positive environment.



I joined an employee community to build relationships outside of work, but it feels like there are inner circles, and new members aren't really included. It's hard to engage when it seems like only certain people are involved. What should I do?

Try to **participate in discussion** or activities to integrate yourself, but if the group feels exclusive, raise the issue with the community lead or HR. If needed, suggest ways to plan more activities that encourage broader participation.