

LOMS

L.M. SITORUS, OSMAN SIREGAR, MANIMBUL LUHUT SITORUS

PENERJEMAH RESMI & DISUMPAH

CERTIFIED, AUTHORIZED AND SWORN TRANSLATORS

MULTILINGUAL TRANSLATION SERVICES:

Office: Komplek Rukan Sentra Pemuda Kav. 14

Jalan Pemuda No. 61, Rawamangun, Jakarta Timur 13220

Telepon: (021) 4711363, 4893355, 3914542; Faksimili.: (021) 47863366

Email: m-luhut-s@cbn.net.id

OFFICIAL TRANSLATION



**CODE OF CONDUCT
(COC)**

NUMBER: A-003/PHE040/2018-S9

REVISION: 0

PT PERTAMINA HULU ENERGI

RELATIONS FUNCTIONS

JOINT COMMITMENT STATEMENT



TABLE OF CONTENTS

CHAPTER I. GENERAL	1
A. Purpose	1
B. Scope	2
C. Definition	2
D. Vision, Mission and Corporate Values	5
E. Parties required to comply with PHE Code of Conduct (CoC)	7
F. Responsibilities as Workers	7
G. Responsibilities as a Leader	8
H. REFERENCE	8
CHAPTER II. OPERATIONS THAT MEET HEALTH, SAFETY, SECURITY AND ENVIRONMENT	9
Commitment to Health, Safety, Security and Environment ..	9
CHAPTER III. HUMAN RESOURCES	11
A. Integrity at Work	11
B. Professional Work Attitude	12
C. Equal Career Opportunities	14
D. Avoiding Discrimination	15
CHAPTER IV. COMMITMENT TO PARTNERS AND CUSTOMERS	16
A. Fair Business Competition	16
B. Gifts, Meals and Entertainment	17
C. Money Laundering Criminal Act	17
D. Commitment to Customers	18



BAB V. COMPANY' s COMMITMENT	20
A. Commitment to Shareholders	20
B. Commitment to Stakeholders	20
C. Corporate Social Responsibility (CSR)	21
D. Political Activities and Professional Organizations	21
E. Public Information Disclosure	22
CHAPTER VI. PROTECTION OF COMPANY' s ASSETS	23
A. Protecting Company' s Assets	23
B. Confidentiality of Data and Information	23
C. Intellectual Property Rights	24
D. Deviation Reporting Channel	24



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 1 of 26

CHAPTER I

GENERAL

The Company's Code of Conduct (COC) is an important thing in business competition which will be a differentiating element and make the Company stand out from other companies. Integrity is one of these differentiating elements and is an important point for the Company's business continuity.

To build integrity with the hope that integrity will become an integral and inseparable part of every PHE Personnel, commitment is required from every PHE Personnel. To support this commitment, a guide is needed that will be a reference in behavior. One of these guidelines is the Code of Conduct (COC) which is compiled or prepared based on the values and principles of Good Corporate Governance and Corporate Values (Clean, Competitive, Confident, Customer Focused, Commercial, and capable).

A. PURPOSE

The purpose of the preparation of this guideline is to provide guidance for all PHE Personnel to behave in accordance with the standards set by the Company based on the values and principles of Good Corporate Governance



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 2 of 26

(GCG). This is in order to build integrity and support the achievement of the Company's vision and mission.

B. SCOPE

The scope of this guideline is with regard to matters related to the code of conduct within the Company and its Subsidiaries.

C. DEFINITION

1. **Subsidiary** shall mean a company:
 - a) which is more than 50% of its shares are owned or possessed by PHE.
 - b) which is more than 50% of its votes in a GMS are controlled by PHE.
 - c) whose operations, appointments, dismissals of the members of the Board of Directors and the members of the Board of Commissioners are controlled by PHE.
2. **Assets** shall mean all assets belonging to the Company including but not limited to movable or immovable, tangible or intangible.
3. **Chief Compliance Officer (CCO)** shall mean an offi-



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 3 of 26

cial appointed by the President Director who is responsible for the Company's compliance program and ensures that the Board of Commissioners, the Board of Directors, the Management and employees/workers comply with the regulations and provisions issued by the government, the company and other applicable provisions.

4. **PHE Code of Conduct (COC)** shall mean a guideline that explains the code of conduct of the PHE Personnel to implement Good Corporate Governance practices.
5. **Compliance Function** shall mean a function that has the duty to develop, guide, implement and enforce the Good Corporate Governance (GCG) practices.
6. **Good Corporate Governance (GCG)** shall mean the principle that directs and controls the Company in order to achieve a balance between the strength and authority of the Company in providing accountability to shareholders in particular, and stakeholders in general. This is related to the arrangement of the authority of the Shareholders, the Board of Commissioners, the Board of Directors, the authorized



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 4 of 26

officials, and other parties related to the management of the Company.

7. **Gifts/Souvenirs** shall mean objects of receiving, giving, and asking for in the widest sense of the word which includes receiving/giving/asking for money/cash equivalents, goods, rebates (discounts), commissions, interest-free loans, travel tickets, lodging facilities, travel tours, free medical treatment, and other facilities. The gifts/souvenirs are both received domestically and abroad as well as carried out by using electronic means and/or without going through electronic means.
8. **Entertainment** shall mean everything either in the form of words, places, objects, behavior that is entertaining and enjoyable. In general, entertainment may take the form of invitations to dinners, music, films, operas, dramas, or in the form of games and even sports and tourism.
9. **PHE Personnel** shall mean the Board of Commissioners, the Board of Directors, and Employees/Workers who work for and on behalf of PHE or within PHE as well



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 5 of 26

as personnel who work within PHE.

10. **Company or PHE** shall mean PT Pertamina Hulu Energi.

D. VISION, MISSION AND CORPORATE VALUES

1. Vision

To be a World Class Oil and Gas Company.

2. Mission

Carrying out the management of operations & business portfolio in the upstream oil and gas sector in a professional and high-profit manner and providing added value for the stakeholders.

3. Corporate Values

PHE Culture refers to the Corporate Values which are important values that must be possessed by the PHE Personnel. PHE personnel acting on behalf of the Company must ensure that they behave in accordance with these Corporate Values, among others as follows:

Clean

Professionally managed, avoiding conflicts of interest, not tolerating bribery, upholding trust and integrity, and guided by the principles of Good



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 6 of 26

Corporate Governance.

Competitive

Able to compete on a regional & international scale, driving growth through investment, building a cost-conscious culture and appreciating performance.

Confident

Playing a role in national economic development, be a pioneer in SOE reform and building national pride.

Customer Focused

Oriented to the interests of the customers and committed to providing the best service to the customers.

Commercial

Creating added value with a commercial orientation and making decisions based on the sound business principles.

Capable

Managed by professional leaders and workers who have talent and high technical mastery, committed to building research and development capabilities.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 7 of 26

E. PARTIES REQUIRED TO COMPLY WITH PHE CODE OF CONDUCT (COC)

This Code of Conduct is a guide for the PHE Personnel, namely the Board of Directors, the Board of Commissioners, Definite Term Workers, Indefinite Term Workers, and Supporting Service Manpowers who work within PHE.

Hereinafter, this Code of Conduct will also serve as a guide for:

1. External parties acting for and on behalf of PHE.
2. Subsidiaries and corporate structures under it, namely legal entities/other businesses controlled by PHE, either directly or indirectly.
3. Partners.

An organization can only achieve its vision through the commitment of all people and with solid cooperation and optimal contributions from all members of the organization. Likewise for PHE, the compliance and commitment of every PHE Personnel to this Code of Conduct contributes to the achievement of PHE's vision to become a World Class Oil and Gas Company.

F. RESPONSIBILITIES AS WORKERS

1. Reading, understanding and implementing this Code of Conduct.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 8 of 26

2. Filling out a statement of compliance with the Code of Conduct every year through the compliance online system.
3. Reporting any actions that are not in accordance with the provisions of law and other Company regulations.

G. RESPONSIBILITIES AS A LEADER

1. Reading, understanding and implementing this Code of Conduct.
2. Filling out a statement of compliance with the Code of Conduct every year through the compliance online system.
3. Reporting any actions that are not in accordance with the provisions of law and other Company regulations.
4. Be a role model for workers in their environment.
5. Provideingprotection for the workers who report the same (whistleblowers).

H. REFERENCE

1. Law Number 40 of 2007 regarding Limited Liability Companies.
2. Code of Corporate Governance (COCG) of PHE.
3. Code of Conduct of PT Pertamina (Persero).



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 9 of 26

CHAPTER II

OPERATIONS THAT MEET HEALTH, SAFETY, SECURITY AND ENVIRONMENT

COMMITMENT TO HEALTH, SAFETY, SECURITY AND ENVIRONMENT

PHE is committed to carrying out operations in a safe, comfortable, and environmentally friendly manner by applying high standards to aspects of occupational health, safety, security, and environmental protection to minimize risks by preventing accidents, fires, occupational diseases, pollution and security disturbances and other impacts due to operational failures on the environment surrounding the Company's business activities. PHE's commitment is to increase PHE's competitiveness.

To fulfill its commitment, PHE Personnel are required to:

1. Prioritizing aspects of occupational health, safety, security and environmental protection.
2. Minimizing the risk as low as possible to prevent incidents from occurring by identifying, evaluating, controlling, and monitoring potential hazards and threats.
3. Complying with the provisions of laws and regulations



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 10 of 26

related to aspects of occupational health, safety, security, and environmental protection, as well as using appropriate technology in accordance with standards.

4. Making the performance of occupational health, safety, security, and environmental protection in the assessment and appreciation of all workers.
5. Increasing awareness and competence in order to carry out work correctly, safely and environmentally friendly.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 11 of 26

CHAPTER III

HUMAN RESOURCES

A. INTEGRITY AT WORK

PHE is committed to conducting business activities with integrity and professionalism, avoiding conflicts of interest, not tolerating bribery, upholding trust, and guided by the principles of Good Corporate Governance. PHE's commitment is to create a clean company.

To achieve this commitment, PHE Personnel:

1. Must comply with laws, regulations and constitution prevailing in the area of their assignment, both national and international levels, including the Company's internal regulations.
2. Must be responsible to ensure that personal interests outside of work do not interfere with the implementation of their duties and responsibilities for the Company.
3. Must avoid all forms of conflict of interest, either directly or indirectly.
4. Are prohibited from being involved in any form of



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 12 of 26

corruption, collusion and nepotism.

- Are prohibited from offering, giving, and/or receiving anything that is not in accordance with the provisions of gratification for the purpose of obtaining benefits/rewards/contra-achievements and preferential treatment from certain parties.

B. PROFESSIONAL WORK ATTITUDE

PHE realizes that the key to the company's success is the professionalism of PHE Personnel in carrying out their work. This is PHE's commitment to improve competitiveness and provide the best service to the customers.

In interacting with the PHE Personnel:

- We must trust each other, be heartfelt, sincere, remind each other, and provide input, be solid, as well as synergize to achieve the PHE's vision and mission.
- We must do every job in good faith and full of responsibility (every individual is part of the Company who must support each other and have an interest in the progress or continuity of the Company's operations).



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 13 of 26

3. We must behave in a disciplined manner and refrain from engaging in other activities for personal gain/interest during working hours.
4. We must maintain the confidentiality of documents and information with regard to PHE.
5. We must comply with the agreements as contained in the agreement/contract as well as the provisions of prevailing laws and regulations.
6. We must make decisions based on the principle of prudence and full responsibility.

As Leaders, the PHE Personnel shall be required to:

1. Be a good role model in actions and words and be fair and open with their subordinates.
2. Always try to coordinate and cooperate harmoniously with their work team in making policies.
3. Provide opportunities for subordinates to develop themselves.
4. Comply and respect the agreements as contained in the Collective Labor Agreement (CLA) /Company's Regulations.
5. Assess the performance of their subordinates objectively based on predetermined criteria.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 14 of 26

6. Not to take advantage of their positions for personal, group, or other party interests.

As the Employees/Workers, the PHE Personnel are required to:

1. Be respectful and courteous to the leaders and loyal to the Company in every duty assigned.
2. Comply and consistent with the laws, rules, policies, and Working System (STK) that have been established.
3. Not to take actions that are outside their authority.
4. Always be disciplined in carrying out each duty.
5. Obey and respect the duties and instructions of their superiors that do not conflict with the applicable regulations and provisions.
6. Comply and respect the agreements as contained in the Collective Labor Agreement (CLA)/Company Regulations.

C. EQUAL CAREER OPPORTUNITIES

PHE is committed to ensuring that every employee/worker has the same opportunity to develop his/her/their career according to his/her/their qualifications and performance. PHE provides competency development programs for career development for all employees/workers supported



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 15 of 26

by the Company's internal standards, procedures and provisions.

PHE ensures that decisions, such as hiring, evaluating, and providing compensation, promotions and termination of employment are only made based on qualifications, performance, internal Company regulations and other factors related to work.

D. AVOIDING DISCRIMINATION

PHE is committed to maintaining a work environment free from discrimination. PHE will not allow discrimination against a person due to ethnicity, race, nationality, religion, gender, age, disability, or other reasons. PHE Personnel do not intimidate, humiliate, harassment, provocation, and unfair competition.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 16 of 26

CHAPTER IV

COMMITMENT TO PARTNERS AND CUSTOMERS

A. FAIR BUSINESS COMPETITION

PHE is committed to creating added value with a commercial orientation and making decisions based on sound business principles in accordance with the Law on Prohibition of Monopolistic Practices and Unfair Business Competition.

In order to achieve this committment, the support from the PHE Personnel is needed in the following forms.

1. The PHE Personnel must ensure that the Company's business activities are carried out in accordance with the regulations and the Law on Prohibition of Monopolistic Practices and Unfair Business Competition.
2. The PHE Personnel must be aware of efforts that lead to unfair business competition.
3. The PHE Personnel must carry out fair, ethical business practices and not disseminate any sensitive information to other parties in order to maintain fair competition.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 17 of 26

4. The PHE Personnel must carry out a transparent procurement process for goods/services in accordance with the regulations applicable in the Company.
5. The PHE Personnel in seeking, obtaining, and using information must comply with prevailing laws and regulations.

B. GIFTS, MEALS AND ENTERTAINMENT

PHE upholds integrity and professionalism as well as does not tolerate bribery. To realize the PHE commitment, the PHE Personnel:

1. Must be careful not to offer or receive if, in the opinion of the PHE Personnel, such actions may influence or appear to influence decision making.
2. Are permitted to give or receive such facilities only if, according to a common sense, if it is rejected, such rejection will disrupt the good relationship that has been established between the giver and the Company, and the same must be reported.
3. Must comply with the provisions of gratification that have been set out in the Gratification Guidelines.

C. MONEY LAUNDERING CRIMINAL ACT



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 18 of 26

PHE is committed to preventing and eradicating money laundering crimes that occur within the Company. PHE requires the support from the PHE Personnel as follows:

1. The PHE Personnel shall be obliged to comply with the laws and regulations related to the Money Laundering Crime.
2. The PHE Personnel must be alert to suspicious financial transactions.

D. COMMITMENT TO CUSTOMERS

PHE is customer-oriented and committed to providing the best service to the customers. PHE places customers as strategic partners. PHE provides products and services of good quality according to standards to all customers. PHE is committed to complying with all regulatory provisions with regard to products, ensuring the customers' safety, and strengthening bonds between the Company and the customers. Every PHE Personnel plays an important role in ensuring the quality and safety of products/services.

To achieve the above commitments, every PHE Personnel must:



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 19 of 26

1. Focus on the customer interests.
2. Ensure the PHE products comply with the determined quality standards.
3. Care and actively provide the best service to the customers.
4. Conduct research and innovation for products development.
5. Develop capabilities to be able to compete, both on a regional and international scale.
6. Create added value with a commercial orientation.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 20 of 26

CHAPTER V.

COMPANY' s COMMITMENT

A. COMMITMENT TO SHAREHOLDERS

PHE is committed to playing a role in building the national economy and becoming the pride of the nation. PHE strives to optimally and sustainably increase the shareholder value through the profits level and growth rate determined by shareholders and present financial reports in accordance with applicable financial reporting principles.

PHE Personnel work to support the Company in fulfilling its commitments to the Shareholders in accordance with the applicable provisions.

B. COMMITMENT TO STAKEHOLDERS

PHE is committed to building mutually beneficial relationships with the stakeholders based on the principles of Good Corporate Governance to generate added value for all stakeholders.

The PHE Personnel are required to always be professional in dealing with the stakeholders.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 21 of 26

C. CORPORATE SOCIAL RESPONSIBILITY (CSR)

PHE intends in order that its existence to provide the maximum benefit to the community around the place where the business/operational activities are carried out.

The PHE Personnel are involved in the Coprorate Social Responsibility programs for community empowerment and nature conservation.

D. POLITICAL ACTIVITIES AND PROFESSIONAL ORGANIZATIONS

PHE respects the political and association rights of the PHE Personnel. PHE is neutral by not participating either directly or indirectly in party political activities and does not make donations or contributions in any form. As a form of its commitment, PHE stipulates as follows:

1. The PHE Personnel are prohibited from conducting political activities within the Company and providing donations and other assistance in any form on behalf of the Company, including the use of Company means, facilities and funds in the interest of the political parties.
2. The PHE Personnel are prohibited from carrying, installing, showing, and wearing symbols, pictures,



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 22 of 26

and/or ornaments of political party in the office environment of the Company's workplace/other public facilities.

3. The PHE Personnel may become the executive board of political parties and/or candidates/members of legislative or candidates/Regional Leaders/Government Leaders by filing for termination of employment (PHK) as the employees/workers or their employment relationship with the Company is terminated.
4. PHE supports the PHE Personnel to actively participate in the professional organizations activities or other social organizations activities that provide benefits to the Company.

E. PUBLIC INFORMATION DISCLOSURE

PHE is obliged to provide public information services in accordance with the provisions of the prevailing laws and regulations. Mechanisms related to public information disclosure are further regulated in the Relations Guidelines.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 23 of 26

CHAPTER VI.

PROTECTION OF COMPANY' s ASSETS

A. PROTECTING COMPANY' S ASSETS

PHE is committed to maintaining all of the Company's assets to be used in accordance with the appropriations and benefits that have been determined in accordance with applicable provisions. The PHE Personnel are obliged or required to protect the Company's assets and are prohibited from misusing the Company's assets for personal gain or interest.

B. CONFIDENTIALITY OF DATA AND INFORMATION

PHE is committed to protecting data and information which is an important asset from the access of unauthorized external parties.

In support of PHE's commitment, the PHE Personnel:

1. Are prohibited from divulging any confidential data and information to other parties.
2. Are prohibited from using the Company's confidential data and information for personal, relatives, and other parties' interests.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 24 of 26

3. Must immediately report to the leaders if they know the loss of Company data and information.
4. Must ensure that all external parties who have temporary access to the Company are required to maintain the confidentiality of the Company's data and information.

C. INTELLECTUAL PROPERTY RIGHTS

PHE is committed to developing ideas and knowledge as valuable assets that contribute to the Company's competitiveness and profitability. PHE is committed to protecting intellectual property from unauthorized parties. The PHE Personnel must respect intellectual property rights and comply with the laws and regulations governing intellectual property rights.

D. DEVIATION REPORTING CHANNEL

PHE is committed to maintaining all of the Company's assets in order that its business/operational activities run cleanly in accordance with the Clean value in the PHE Values. The PHE Personnel are required to actively participate in reporting any suspected fraud that are known to them. Reporting is carried out supported by



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 25 of 26

relevant data and is intended for the benefit of the Company, not aiming to bring down someone.

Reporting can be submitted to the highest leader in the function/working unit where PHE Personnel are assigned. If the PHE Personnel do not feel comfortable to report it directly, the reporting can be submitted through the whistle blowing system. Reporting through the whistle blowing system is carried out on an anonymous, confidential and independent basis. The PHE personnel are required to report irregularities through the whistle blowing system for alleged violations of the law, including the following matters:

1. Corruption.
2. Bribes.
3. Conflict of Interest.
4. Theft.
5. Fraud.
6. Violation of laws and Company Regulations.

Violations of the Code of Conduct will be followed up by PHE. Sanctions for violations committed will be given in accordance with applicable provisions.



GUIDELINES

FUNCTION : RELATIONS	NOMOR : A-003/PHE040/2018-S9
TITLE : CODE OF CONDUCT (COC)	REVISION : 0
	VALID COMMENCING FROM: DECEMBER 20, 2018
	PAGE : Page 26 of 26

I, **Manimbul Luhut Sitorus**, certified, authorized and sworn translator, appointed by virtue of the Decree of the Governor of Jakarta Special Capital Region number 5226/1998 SK GUB DKI, dated June 17, 1998, registered with the USA, United Kingdom, and Australian Embassies in Jakarta, and also registered with the Ministry of Law and Human Rights of the Republic of Indonesia, hereby certify that to the best of my ability this translation is correct and true to the document written in the Indonesian language which was submitted to me.
Jakarta, March 04, 2022.

