



PT TANAH LAUT Tbk

Charter of the Company's Policy on the Code of Conduct and Combating Corruption

In carrying out every aspect of business activities, PT Tanah Laut Tbk places integrity, transparency and accountability as fundamental pillars that cannot be negotiated. We are fully committed to promoting ethical and professional business practices, and firmly reject all forms of corruption, bribery and other despicable practices. This policy charter sets out the noble standards of behaviour that must be adhered to by all employees and those who have relationships with corporate entities.

Article I

Principles of the Company's Code of Ethics

Every individual affiliated with PT Tanah Laut Tbk is required to uphold the following ethical principles:

1. Act with absolute honesty, uphold justice, and always maintain trust in every action and decision making. Avoid all forms of conflict of interest and proactively disclose potential conflicts of interest to maintain objectivity.
2. Carry out duties and mandates with high competence, full responsibility, and unwavering dedication. Always maintain the company's honourable image and reputation.
3. Comply strictly with all applicable laws, internal company regulations, and relevant and accepted industry standards.
4. Build harmonious working relationships, based on mutual respect, and a spirit of constructive collaboration with all colleagues, leaders, subordinates, and external entities.
5. Maintain the confidentiality of strategic company information and third-party information entrusted to the company in accordance with applicable regulations and prudential principles.
6. Contribute positively to environmental conservation and community welfare, and implement sustainable and ethical business practices.

Article II

Corruption Eradication Policy

PT Tanah Laut Tbk enforces a zero-tolerance policy towards all manifestations of corruption and bribery. The following actions are expressly prohibited:

1. Giving, promising, offering, receiving, or soliciting bribes, gratuities, gifts, or other unauthorised benefits with the intent to improperly influence a decision or action. This prohibition applies in interactions with internal and external parties, including state apparatus, customers, suppliers, and other interested parties.
2. Soliciting or receiving valuable consideration through the use of coercion or threats arising from position or authority.
3. Committing acts of fraud, embezzlement of company funds, or manipulation of financial records and reports for personal or group gain.
4. Having personal interests that have the potential to compromise objectivity in the company's decision-making process without transparent disclosure and approval in accordance with established mechanisms.
5. Utilising one's position or authority for personal gain or to benefit parties that do not have a legitimate basis.



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Article III

Mechanism for Reporting Alleged Violations and Whistleblower Protection

PT Tanah Laut Tbk provides a confidential and secure reporting mechanism for any employee or external party who has credible information regarding potential violations of the code of ethics or indications of corruption. The Company guarantees adequate protection to good faith whistleblowers from any form of intimidation, discrimination, or other retaliation.

A structured reporting procedure will be set out in a separate document that is easily accessible to all stakeholders. Every report received will be followed up thoroughly, objectively, and in accordance with the principles of fairness and applicable legal provisions.

Article IV

Implementation and Enforcement of Sanctions

This policy charter is binding and applies to all individuals who are part of PT Tanah Laut Tbk including the Board of Commissioners, Board of Directors, management, permanent employees, contract employees, and other parties acting on behalf of the company. Each individual has the responsibility to understand and internalise every provision in this charter. Management has an obligation to socialise, oversee implementation and set an example in compliance with this charter.

Violations of the provisions in this policy charter will be subject to strict and proportional disciplinary sanctions in accordance with company regulations and applicable legal provisions, including the possibility of termination of employment and reporting to law enforcement officials if there are indications of corruption.

Article V

Continuous Socialisation and Education

PT Tanah Laut Tbk is committed to conducting an ongoing socialisation and education programme on the code of ethics and the eradication of corruption to all employees. This effort aims to increase awareness, deep understanding, and internalisation of ethical values and compliance with anti-corruption policies.

Article VI

Periodic Review and Update

This policy charter will be reviewed and updated regularly by the company's management to ensure its relevance to developments in legal regulations, the latest business ethics standards and best practices in corporate governance.

With the establishment of this Policy Charter, PT Tanah Laut Tbk affirms its integral commitment to conduct business practices by upholding ethics, integrity, and eradicating all forms of corruption in order to maintain business sustainability, protect the company's honourable reputation, and make a positive contribution to the nation and state.

Set at: Jakarta, Indonesia

On Date: 2 January 2024

On behalf of PT Tanah Laut Tbk



Harun Bin Halim Rasip
President Director