

REGULATION OF THE BOARD OF DIRECTORS OF

PT DAYAMITRA TELEKOMUNIKASI Tbk

NUMBER : C.Tel.015/HK 200/JDMT - 1056000/2022

REGARDING

BUSINESS ETHICS OF THE COMPANY

THE BOARD OF DIRECTORS OF PT DAYAMITRA TELECOMMUNICATIONS

Tbk

Considering

- a. that in order to implement Good Corporate Governance (GCG) policies, it is necessary to be supported by the regulation of Business Ethics at PT Dayamitra Telekomunikasi Tbk (hereinafter referred to as "Mitratel" or "Company") which can shape the values, norms and behaviour of employees and leaders in order to build fair and healthy relationships with customers, working partners, shareholders, the community and fellow employees;



b. that in line with the development of the business of the Company and ensuring ethical business practices, it is deemed necessary to implement Business Ethics for all parties involved in providing services to stakeholders within the Company;

c. that in relation to points a and b above, to support the business activities of the Company and to be in line with the prevailing laws and regulations, it is necessary to compile and stipulate the Business Ethics of the Company as outlined in the form of a Regulation of the Board of Directors.



Bearing in mind

1. The Articles of Association of PT Dayamitra Telekomunikasi Tbk as stated in the Deed of Notary H.M. Afdal Gazali, S.H. Number 50, dated 18 October 1995, and has been ratified by the Minister of Justice and Human Rights with the decision letter number C2-13273-HT.01.01.TH95 dated 19 October 1995, the Articles of Association have been amended several times, the last amendment as stated in the Deed of Resolution Statement of the Annual General Meeting of Shareholders of PT Dayamitra Telekomunikasi Tbk Number: 58 dated 22 April 2022 made before Notary Ashoya Ratam, S.H., M.Kn, which has been received and recorded in the Legal Entity Administration System database of the Ministry of Law



and Human Rights Human Republic of Indonesia through letter No. AHU AH.01.03-0238724 dated 18 May 2022 regarding Receipt of Notification to the Amendment to the Articles of Association of PT Dayamitra Telekomunikasi Tbk (hereinafter referred to as the **"Articles of Association"**);

2. Deed of Resolutions Statement of the Annual General Meeting of Shareholders of PT Dayamitra Telekomunikasi Tbk Number: 59 dated 22 April 2022 drawn up before Notary Ashoya Ratam, S.H., M.Kn which has been received and recorded in the Legal Entity Administration System database of the Ministry of Law and Human Rights Republic of the



Republic of Indonesia through the letter Number: AHU-AH.01.09- 0013871 dated 19 May 2022 regarding Receipt of Notification of Company Data Change Notification of PT Dayamitra Telekomunikasi Tbk;

3. Regulation of the Board of Directors of PT Dayamitra Telekomunikasi Tbk Number: PD. 22/HCO/DMT-10000000/XII/2019 dated 5 December 2019 regarding Company Regulations, which have been ratified by the Director General of Development of Industrial Relations and Employee Social Security Number: KEP.683/PHIJSK-PK/PP/VI/2020 dated 18 June 2020 regarding Ratification the Company Regulation of PT Dayamitra Telekomunikasi;



4. Regulation of the Board of Directors of PT Dayamitra Telekomunikasi Tbk Number PD. 042/HC1/DMT-10000000/XII/2021 dated 15 December 2021 regarding Company Organization;

5. Regulation of the Board of Directors of PT Dayamitra Telekomunikasi Tbk Number C.Tel.019/HK 200/JDMT-1340000/2022 dated 05 May 2022 regarding Guidelines for the Management of Good Corporate Governance (GCG) of Mitratel Group;

6. Regulation of the Director of Finance and Risk Management of PT Dayamitra Telekomunikasi Number PR. 25/HC2/DKA-1000000/VI/2021 dated 28 June



2021 regarding Employee
Discipline.

HAS DECIDED

To stipulate: REGULATION OF THE BOARD OF DIRECTORS OF
PT DAYAMITRA TELEKOMUNIKASI Tbk
REGARDING BUSINESS ETHICS OF THE
COMPANY.

CHAPTER I

GENERAL PROVISION

Article 1

General Definition

In this Regulation, what is meant by:

- a. **Subsidiary** means a company in which PT Dayamitra Telekomunikasi Tbk owns more than 50% (fifty percent) shares or has direct or indirect control in the company;
- b. **Company culture** means a statement of the corporate culture formula as a way of working that is clearly



visible in work behaviour and has an impact on services, products and performance;

c. **The Board of Directors/Director** means organ of the Company that are authorized and fully responsible for managing the Company for the benefit of the Company, in accordance with the purpose and objective of the Company and representing the Company, both inside and outside the court in accordance with the provision of the articles of association;

d. **Business Ethics** means the ethical standards of the Company as well as Employee ethics in dealing with customers, suppliers, contractors, Employees and other parties which having a relationship with the Company;

e. **Work Ethics** means a system of values and norms used by all Company's Employees, including leaders in carrying out their daily work;

f. **Good Corporate Governance (GCG)** means a process and structure used by the Company to increase business success and corporate accountability in order to



create long-term shareholder value while taking-into account the interests of other stakeholders, based on laws and regulations and ethical values. Briefly, GCG is a commitment, and the rules of the game in conducting a healthy and ethical business practice in the Company;

g. **Good Governance** means the rules, norms or guidelines that must be used by the leaders of the Company and employees so that all strategic actions and decisions shall be always carried out in order to support the interests of the Company and shareholders;

h. **Harmony** means harmony and balance in managing work;

i. **Company's Confidential Information** means Company's Information that is important and must be kept confidential, both physical and electronic, which includes:

1) Management Policy;

2) Company Performance Data;



- 3) Information that includes Company Trade Secrets (for example: Potential Customer Data, Market Share, and Customer Products Consumption); and
 - 4) Other information that is considered confidential based on the consideration of the authorized unit/official.
-
- j. **Employees** means people working for the Company who receive salary based on the employment relation, i.e. Mitratel Employees and Telkom Employees.
 - k. **Employees of a Subsidiary** means people who have a direct working relationship with a Subsidiary as stated in a certain employment agreement and an indefinite period (legal) employment agreement or Mitratel's employees assigned to a Subsidiary.
 - l. **Company's Employees** means people who have a direct working relationship with Mitratel as set out in a certain employment agreement and indefinite period (legal) employment agreement.



- m. **Employees of the Company (Persero) PT Telekomunikasi Indonesia Tbk ("Telkom") or Telkom Employees** means people who have a direct (legal) working relationship with Telkom who are assigned at Mitratel and a Subsidiary.
- n. **Family of Members of the Board of Directors/ Company's Employees** means family members by marriage and descent to the second degree (including son/daughter-in-law), both horizontally and vertically with members of the Board of Directors or Company Employee;
- o. **Audit Committee** means a Committee established by the Board of Commissioners of Mitratel to carry out oversight of the quality and integrity of the financial reporting of the Company with the scope of duties covering all Company within the Mitratel Group and shall be responsible for managing the Whistleblowing System within the Mitratel Group and following up on complaints accepted according to his/her authority;
- p. **Investigation Committee** means a Committee formed by the President Director of Mitratel either on an ad



hoc basis or for an indefinite period to follow up on the Preliminary Examination Result Report on complaints received according to their authority;

q. **Consultant/Independent Third Party** means third party appointed by Mitratel to participate and play an active role in receiving and distributing complaints and/or play an active role in the process of resolving complaints received through the complaint management system.

r. **Working Environment** means a work process in which the environment interacts with each other according to a certain pattern, and each has certain characteristics and/or values regarding the organization that cannot be separated from the environment in which the organization is located;

s. **Working Partner** means another company or another party that have a cooperative relationship in business practices with the Company;

t. **Integrity Pact** means a commitment to carry out duties and responsibilities in accordance with prevailing laws with a focus on preventing acts of self-



enrichment or enriching other parties that prejudice the financial of the Company, collusion and nepotism;

u. **Leader or Management** means Employees who are entrusted by the Company to occupy managerial positions and are given formal authority to organize, direct, control subordinates who are responsible, so that all work can be properly coordinated in order to achieve Company's goals;

v. **Company or Perseroan** means PT Dayamitra Telekomunikasi Tbk or Mitratel;

w. **Colleagues** means other Employees within the Company who have relationships or interactions in carrying out work assignments;

x. **Synergy** means a process of interaction of two or more individuals/Employees/units that support each other to produce a combined effect that is greater than the total of their individual influences in order to achieve a common goal.



- y. **Internal Audit Unit** means the Whistleblowing System Management Implementation Coordinator appointed to monitor all complaints received from independent consultants or units appointed to manage receiving complaints from all channels (Whistleblowing System) and follow up on complaints according to their authority.

Article 2

Purposes and Objectives

- (1) The purpose of enacting this Regulation is to provide guidelines for the implementation of Business Ethics within the Company.
- (2) The purpose of this Regulation is to ensure that all Company's Employees and unit Leaders can implement the prescribed values, norms and behaviour so that fair and healthy relationships shall be established with customers, Business Partners, shareholders, the community and Employees.

CHAPTER II

BUSINESS ETHICS

The First Part



Scope of Work

Article 3

General

Ethical business governance in the Company is to ensure the effectiveness of the implementation of Good Corporate Governance, so that it is necessary to apply the Business Ethics policy in order to realize a business that has superior performance, sustainable and carried out by adhering to ethical principles that are in line with the prevailing laws and regulations.

Article 4

Scope of Business Ethics

- (1) Business Ethics is a standard of Business Ethics (Company Ethics) and Employee Working Ethics (Employee Ethics) in dealing with stakeholders which have a relationship with the Company.
- (2) The scope of regulation of Business Ethics in the Company shall be as follows:



a. Employee Working Ethics is a system of values or norms used by all Employees and Leaders in their daily work with the following scope:

1) Key Behavior of Employees:

a) Employee Capacity and Capability;

b) Obligations and Prohibitions;

c) Confidentiality of Information;

d) Infrastructure; and

e) Working Environment.

2) Key Behaviour of the Leaders:

a) Leaders behavior;

b) The Board of Directors behavior; and



- c) The Chief Executive Officer (CEO) and Chief Financial and Risk Management Officer (CFRO) behavior.

- b. Business Ethics is a system of values or norms adopted by the Company as a reference for the Company, management and its Employees to relate to their environment with the following scope:
 - 1) Relations with regulators;
 - 2) Relations with stakeholders; and
 - 3) Additional provisions.

CHAPTER III

EMPLOYEE WORK ETHICS

The Second Part

Key Behaviours of Employees

Article 5

Employee Capacity and Capability



- (1) Every Employee must have a basic belief that he/she always intends to give the best in every work he/she does.
- (2) Every Employee must uphold the values of honesty in their intentions, thoughts and actions in every work they do.
- (3) Every Employee must have a seriousness in improving and maintaining all personal capacities and capabilities through formal and non-formal channels in order to give the best in work.

Article 6

Obligations and Prohibitions

- (1) Employees must comply with and subject to all Company regulations and prevailing laws and regulations.
- (2) Employees including their families must avoid any issues that conflict between personal/individual interests and the interests of the Company, including but not limited to:



- a. Have an interest in another company that has a business relationship with the Company which may cause a conflict of interest, in terms of employment, investment, ownership or cooperation which may or possible to benefit personal, family or relatives interests; and
 - b. Invest or set up a private company that is a competitor of the Company.
- (3) Employees shall be required to notify the Company if they have a family relationship between Employees and/or parties cooperating with the Company.
- (4) Employees shall be prohibited from receiving gratuities in accordance with the provisions, procedures and mechanisms in accordance with the prevailing regulations.
- (5) Employees shall be prohibited from taking any action that includes in the acts of money laundering and other suspicious financial transactions that have the potential to violate Anti-Money Laundering and Counter of Terrorism Financing regulations,



including Law no. 8 of 2010 regarding the Prevention and Eradication of Money Laundering Crimes (APU-PPT).

- (6) Employees shall be prohibited from taking any action that leads to a financing scheme for terrorism activities and/or any business relationship with individuals or companies that are known or suspected to be terrorists or terrorist/criminal organizations or registered in the black list of APU-PPT regulators or law enforcer officials.
- (7) Employees shall be prohibited from taking any action that leads to tax embezzlement or evasion.
- (8) Employees shall be prohibited from taking any actions or activities that involve individuals or entities subject to economic sanctions, which may potentially violate the provisions of sanctions and export controls that apply to the Company.
- (9) Employees shall be prohibited from participating in marketing or helping to market products and/or services from other parties who are competitors to the Company or using working time and Company



facilities to market or help market other products and/or services.

(10) Employees must optimize their working time for productive and disciplined activities in carrying out their time for the benefit of the Company.

(11) Employees shall be prohibited from working for other companies as owners, managers, supervisors, and/or employees in bodies/Institutions that can cause or have the potential to cause a conflict of interest without written consent from an official at least at the level of head of unit that is his/her superior or on behalf of the Company with assignments in writing from the Company and remain obedient and comply with the prevailing laws and regulations.

(12) The Company guarantees the human rights of the Employees as citizens in terms of gathering, associating, organizing and channelling their socio-political aspirations, with limitations inter alia but not limited to:

a. Employees must carry out their duties in proper, professional and neutral manners;



- b. To avoid conflicts of interest in carrying out the duties referred to in paragraph (12) point a, Employees are not permitted to become members and/or administrators of political parties;
- c. Employees are not permitted to use their position in the Company or take advantage of Company facilities for political activities;
- d. Employees shall be permitted and encouraged to be actively involved in religious, social activities (Head of *Rukun Tetangga*/RT), environmental and sports officials (officials of sports branches) in their neighbourhood on condition that it does not affect their performance or cause a conflict of interest of the Company; and
- e. Not an organization or community that is prohibited by the Government of the Republic of Indonesia.



Information Confidentiality

Every Employee is required to treat Company's Confidential Information obtained while carrying out their duties with due observance of the following matters:

(1) Protect Company's Information with the following arrangements:

a. Every Employee is obliged to protect and not divulge Company's Confidential Information to anyone and/or any party unless they get permission as stipulated in this Regulation; and

b. To avoid unintentional disclosure of information, Employees shall be prohibited from discussing matters related to all Company's Confidential Information with Working Partners, competitors, other companies including family members and external parties who do not have authority.



- (2) Each Employee in accordance with their authority and scope of work can access Company information, both public and confidential;
- (3) The information referred to in paragraph (1) point b, shall not be permitted to be conveyed to anyone who does not have the authority to receive both inside and outside the Company;
- (4) Employees as referred to in paragraph (1) point b, shall be prohibited from sharing access to Company Information to parties who do not have authority;
- (5) Disclosure of Company's Confidential Information in the form of speech or writing to parties outside the Company can only be conveyed by units/officials who have the authority to do so and are required based on the prevailing laws and regulations; and
- (6) Disclosure of Company's Confidential Information is possible to third parties as long as the Company and third parties are bound by confidentiality agreements, where the disclosure is limited to directors, officers, employees, consultants and other related parties ("Other Related Parties")



related to their duties as stated in the secrecy agreement. Other Related Parties will not make public statements or announcements and ensure that Other Related Parties will not divulge and disclose information, data, documentation and knowledge in the form of paper, tapes, floppy disks, disks or other forms to anyone, unless this is done on a court order or legally obligated to do so. If based on a court order or by law the Confidential Information must be disclosed, then the Other Related Party must notify the Information Provider as soon as possible.

Article 8

Company Infrastructure

- (1) Employees shall be required to safeguard Company assets from parties who will try to take over or damage Company assets and ensure the effective and efficient use of Company assets.

- (2) Employees shall be prohibited directly or indirectly from selling, buying, holding, renting, or lending Company assets including securities.



- (3) Employees shall be required to take preventive measures against damage, theft and misuse of Company assets.
- (4) Company assets such as various facilities, equipment and infrastructure shall only be used for the business interests of the Company.
- (5) Employees shall be prohibited from using communication media for inappropriate activities, including but not limited to accessing pornographic sites, carrying out provocations and incitement, and activities of radical groups.

Article 9

Work Environment

- (1) In order to build a fair and healthy work environment, Employees must implement the following principles:
 - a. Strengthening cohesiveness and mutual trust among Employees;



- b. Increasing speed in responding to business opportunities and providing services to customers;
- c. Increase creativity and innovation in carrying out work; and
- d. Anti-corruption, anti-money laundering, anti-terrorism financing and tax evasion, as well as complying with provisions on sanctions and export controls by taking into account and cross-referencing the principles generally stipulated by The US Department of the Treasury's Office of Foreign Assets Control **(OFAC)** that applies in the Working Environment.

(2) Employees shall be required to maintain a clean, safe and tidy Working Environment including maintaining neatness and security in storing documents, files and working tools.

(3) Employees shall be prohibited from using, distributing or selling liquor and illegal drugs such as narcotics, psychotropics and other addictive



substances in the Working Environment or when acting on behalf of the interests of the Company in accordance with the prevailing laws and regulations.

- (4) Employees in carrying out their duties must maintain the health, security, safety and comfort of their Work Environment.
- (5) Employees shall be prohibited from carrying sharp weapons, firearms or other tools that can be used to carry out threats and acts of violence in the Working Environment.
- (6) Employees must understand and implement the provisions in work as stated in the prevailing occupational safety and health laws and regulations.
- (7) Employees shall be required to build a comfortable and harmonious Working Environment by eliminating differences due to age, group, ethnicity, nation, alma mater and gender in their working activities and free from all forms of pressure that may arise between Employees as a result of differences in personality and cultural background.



The Third Part

Key Behaviours of Leaders

Article 10

General

- (1) Each Leader must comply with and implement the Business Ethics as stipulated in the provisions regarding the key behaviour of Employees.
- (2) In addition to the arrangements referred to in paragraph (1), in carrying out their duties, the Leader must behave as follows:
- a. Able to create a working atmosphere that is Harmony and Synergy based on sincere relationships and good faith in the Working Environment;
 - b. Demonstrate high integrity, loyalty and enthusiasm for the interests and progress of the Company;
 - c. Always pay attention to and apply the principles of anti-corruption, anti-money laundering, anti-terrorism financing and tax



evasion, and comply with the provisions of sanctions and export controls with due regard and cross-referencing the principles generally stipulated by OFAC as reflected in actions and decision-making in the Company;

- d. Able to think strategically that is valuable and beneficial for the Company, society and the environment;
- e. Behave and behave well so that they can become role models for his/her subordinates;
- f. Demonstrate a high morale attitude so as to be able to be a motivator for his/her subordinates;
- g. Building positive communication with his/her subordinates and environment;
- h. Appreciate good ideas and work performance of his/her subordinates;

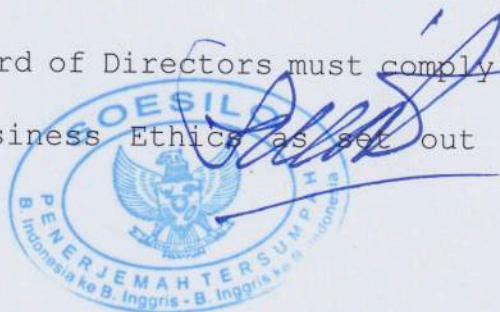


- i. Proactive in carrying out tasks so as to be able to anticipate existing problems and opportunities;
- j. Realizing his/her role as a coach in order to develop the positive potential of subordinates;
- k. Respect the rights and obligations of subordinates and/or Employees in accordance with the prevailing laws and regulations; and
- l. Setting an example, fostering, encouraging and increasing the compliance of Employees in their ranks with the implementation of Business Ethics as stipulated in this Regulation in formal forums and non-formal communications.

Article 11

The Board of Directors

- (1) The Board of Directors must comply with and implement the Business Ethics as set out in the provisions



regarding the key behavior of the Employees and the key behavior of the Leaders.

- (2) In addition to the arrangements referred to in paragraph (1), in carrying out their duties, the Board of Directors must behave as mandated in the Articles of Association, resolution of the Board of Commissioners, prevailing provisions and the laws and regulations.

Article 12

Chief Executive Officer (CEO) and Chief Financial and Risk Management Officer (CFRO)

In addition to the arrangements referred to in articles 10 and 11 of this Regulation, specifically for CEOs and CFROs including all levels of leaders in the financial sector, they must behave as follows:

- a. Responsible for the fulfillment, fairness, accuracy, punctuality and clarity of disclosure of report, both stored in the form of documents and those submitted to the Financial Services Authority (OJK), as well as publications for other institutions or the public;



b. Required to convey matters that require attention or watch out to the Audit Committee relating to the following matters:

- 1) Weaknesses in the design and internal control processes that may affect the ability of the Company to record, process, conclude and report financial data;
- 2) Possibility of fraud, both large and small involving the Leader and/or other Employees who have an important role in the process of reporting, disclosure or internal control of the Company financial;
- 3) Alleged violation of provisions on anti-bribery and corruption, provisions on anti-money laundering, anti-terrorism financing and anti-tax evasion as well as violations of provisions on sanctions and export control involving Leaders and/or Employees.
- 4) Information on violations of Business Ethics including conflicts of interest between



personal interests and professional relations involving both Leaders and other Employees who have an important role in the process of reporting, disclosure or internal control of the Company financial;

5) Evidence of urgent violations by the Company or those representing the Company in carrying out their business of security, laws, regulations or other laws.

c. The CEO and CFRO must assist the Audit Committee in fulfilling their duties and responsibilities.

CHAPTER IV

BUSINESS ETHICS

The First Part

Relations with Regulators

Article 13

Regulators

(1) The Company shall be required to build harmonious and constructive relationships on the basis of honesty, fairness and mutual trust with regulators and the government.



- (2) The Company and all of its Employees shall be subject to and comply with the prevailing law, business laws and regulations.

The Second Part

Relation with the Stakeholders

Article 14

Customer

- (1) The company positions customer satisfaction as a key component through continuous improvement in customer satisfaction in the form of services with quality that exceeds expectations (service excellence) and increases customer value.
- (2) In order to comply with the principles referred to in paragraph (1), the Company shall be obliged to:
- a. Provide clear and easy-to-understand information regarding the rights and obligations of the customer before the contract or agreement signed by both parties;



- b. Fulfilling customer rights in providing services in accordance with what has been promised in the Service Level Agreement (SLA); and
- c. Provide and manage customer contact media (complaint counters, complaint telephone, e-mail and other media) to make it easier for customers to submit complaints, feedback and find information regarding the products and services.

Article 15

Working Partners

- (1) In carrying out its business, the Company and Work Partners always needs each other.
- (2) To maintain good relations with Working Partners, the Company and Employees carry out the following:
 - a. The Company shall be obliged to provide increasing skills, competence and training on products/services, service procedures and service ethics to the Working Partner in



order to provide information regarding products/services (product knowledge) so as to improve service to customers;

- b. In terms of the process of procuring goods and services, the Company shall be obliged to do so in a fair, transparent and accountable manner by involving potential suppliers/partners who have a reputation with a good classification in accordance with the prevailing laws and regulations and the principles of Good Corporate Governance;
- c. Companies and Employees must refuse all forms of bribery from the Working Partner, including gifts, meals, entertainment, business opportunities, scholarships, job offers, and other matters that aim to obtain certain rewards/consideration, which can influence decision making and/or similar actions that are categorized as criminal acts of corruption in accordance with the provisions of the prevailing laws and regulations;



d. In an effort to eradicate money laundering, the Company and Employees must avoid any action taken to hide or disguise the origin of assets that are known or reasonably suspected to be the result of a crime, inter alia by relocating, assigning, transferring, and/or or exchanging it for currency, securities and/or other goods in accordance with the provisions of the prevailing laws and regulations.

e. In an effort to avoid tax evasion, the Company and Employees shall be obliged to carry out all processes and business activities with Working Partners in accordance with prevailing laws and regulations, including regulations in the field of taxation.

f. The Company and Employees shall be prohibited from cooperating with individuals or entities that are subject to economic sanctions, which may potentially violate the provisions of prevailing sanctions and export controls.



- g. The Company and Employees shall be prohibited from cooperating with the Working Partner in carrying out any actions that lead to a scheme for terrorism financing activities or suspected for the purposes of criminal acts of terrorism.
- h. The Company shall be obliged to conduct objective selection and evaluation of the Working Partners regarding quality, quantity, cost, time and benefits for the Company.

Article 16

Shareholders

- (1) The Company shall be obliged to maintain and seek to increase business value in accordance with the expectations of the shareholders.
- (2) The Company shall be obliged to respect the rights of shareholders as stipulated in the prevailing laws and regulations.



Article 17

Competitors

- (1) In an increasingly competitive climate, attempts to obtain information regarding businesses of the competitors to be used for evaluation, comparison, determination of marketing strategy and planning are reasonable and permissible.
- (2) In the case of attempts to obtain information as referred to in paragraph (1), the Company shall be obliged to do so in an honest manner and obtain it from legitimate sources.
- (3) The Company shall be prohibited from obtaining information as referred to in paragraph (1) in an illegal and unethical manner, including but not limited to espionage, wiretapping and/or theft.

Article 18

Social and Communities

- (1) The Company places the Corporate Social Responsibility (CSR) program as one of the Company's priority programs.



(2) In carrying out social responsibility to the community, the Company conducts the following:

- a. Building and fostering congenial and harmonious relationships as well as providing benefits to the community around the place of business of the Company;
- b. Realizing social contributions and providing Company benefits to the community as referred to in paragraph (2) point a, can be realized in the form of money, goods or souvenirs through the approval of the management of the Company in accordance with the prevailing laws and regulations;
- c. Encouraging the emergence of a sense of belonging from the community towards the Company with the objective that the community will take part in safeguarding the assets of the Company; and
- d. Reducing to a minimum the impact on the environment.



Article 19

Employee

- (1) The Company shall be obliged to avoid discriminatory practices towards the Employees by carrying out the following:
- a. Respect the human rights of the Employees and the rights and obligations of the Employees based on Company regulations;
 - b. Providing equal opportunities regardless of age, group, ethnicity, nation, religion, alma mater and gender;
 - c. Treating the Employees as a valuable resource;
 - d. Respect freedom of religion; and
 - e. Providing equal and fair treatment in terms of employment, implementing provisions and providing benefits and other compensation.



(2) The company has a commitment to maintain the health, security, safety and comfort of the Working Environment with the following arrangements:

- a. Providing health insurance for the Employees and their families;
- b. Providing guarantees of legal protection to the Employees in matters relating to duties in the Company;
- c. Providing appropriate compensation and pension securities according to the capabilities of the Company by taking into account compliance with the prevailing laws and regulations;
- d. Provide working security, especially for the Employees who make a good contribution and having competence in accordance with the objective of the Company;
- e. accommodate aspirations of the Employees by making them partners in building business that is moral and effective in achieving the



objective, vision and mission of the Company; and

- f. Provide a comfortable Working Environment.

The Third Part

Additional Terms

Article 20

Business Competition

- (1) In carrying out its business, the Company must comply with the prevailing laws and regulations.
- (2) Companies shall be required to carry out honest, fair and balanced business practices in accordance with the prevailing laws and regulations.

Article 21

Exposure

- (1) The preparation of Company reports and documents both as archives and as presented to securities exchanges including capital market regulatory agencies in Indonesia shall be presented fairly,



accurately, punctually, full of transparency and in compliance with the prevailing laws and regulations.

- (2) In addition to his/her role as Leader, management shall be obliged to implement the regulations referred to in paragraph (1) by developing standards, policies and procedures that are in line with these Regulation.

CHAPTER V

APPLICATION OF ETHICS

Article 22

Socialization

- (1) All Leaders at all levels shall be required to communicate and socialize this Business Ethics policy to all Employees in their ranks and ensure the establishment of inherent oversight of the implementation of the Business Ethics of the Company.
- (2) The socialization shall also include socialization regarding provisions on anti-bribery and corruption, provisions on anti-money laundering, anti-terrorism financing and anti-tax evasion as well as provisions



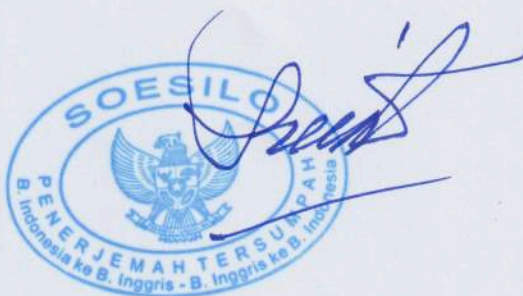
on sanctions and export control with due regard and conducting cross-reference to the principles that generally set by OFAC which aims to increase the understanding and awareness of the Employees in the Company.

- (3) All Employees must understand the Business Ethics policy which is socialized via online or offline media on a regular basis.

Article 23

Implementation

- (1) All Leaders must understand, implement and encourage all Employees in their ranks to behave in accordance with the rules of Business Ethics, especially to comply with the provisions on anti-bribery and corruption, the provisions on anti-money laundering, anti-terrorism financing and anti-tax evasion as well as provisions on sanctions and export control with due regard and cross-referencing the principles generally stipulated by OFAC as stipulated in this Regulation;



- (2) All the Employees must understand, implement and behave in accordance with the rules of Business Ethics as regulated in this Regulation.
- (3) The unit in charge of the human resource management function shall be assigned to update the Business Ethics policy, especially the provisions on anti-bribery and corruption, provisions on anti-money laundering, anti-terrorism financing and anti-tax evasion as well as provisions on sanctions and export control with due regard and cross-referencing to the principles generally stipulated by OFAC so that they are always in line with the development of the Company, the business environment and the prevailing laws and regulations.
- (4) To ensure compliance with the implementation of Business Ethics, including compliance with anti-bribery and corruption provisions, anti-money laundering, anti-terrorism financing and anti-tax evasion provisions as well as provisions on sanctions and export control with due regard and cross-referencing the principles generally stipulated by OFAC, the Internal Audit shall be obliged to carry out periodic inspections.



- (5) Units that carry out the risk management and compliance functions in the Company shall also be required to carry out periodic risk assessments, including those relating to provisions on anti-bribery and corruption, provisions on anti-money laundering, anti-terrorism financing and anti-tax evasion as well as provisions on sanctions and control export with due regard and cross-referencing to the general principles stipulated by OFAC on a regular basis.

Article 24

Complaints of Violations

- (1) Every Employee and/or Board of Directors and/or Company Management shall be responsible for submitting complaints of errors that are essential and have the potential to prejudice materially and/or the image of the Company.
- (2) The company protects and guarantees the confidentiality of the reporter and that the complaint given will not have a negative impact or affect the potential and career development



opportunity of the relevant Employee in the Company. Therefore, complaints must be submitted by the reporter with full sense of responsibility and not slanderous in nature which can defame someone's good name or reputation.

(3) Complaints received both from internal Mitratel Group and from other third parties must be placed within the framework of improving Good Corporate Governance.

(4) Complaints received shall include, but not limited to:

a. Issues in accounting and internal control over financial reporting that have the potential to result in material misstatements in the financial statement of the Company.

b. Audit issues, especially those related to the independence of the Public Accounting Office.



- c. Violation of laws and regulations and capital market regulation relating to the operations of the Company.
- d. Violations of internal regulations that have the potential to result in losses for the Company.
- e. Fraud and/or abuse of position committed by officials and/or employees within Mitratel Group.
- f. All actions of Company officials and/or employees that are involved in money laundering and other suspicious financial transactions that have the potential to violate Anti-Money Laundering and Prevention of Terrorism Financing (APU-PPT) regulations.
- g. All actions of Company officials and/or employees involving individuals or entities subject to economic sanctions, which may potentially violate sanctions and export control policies with due regard and cross-



referencing the principles generally stipulated by the Office of Foreign Assets Control (OFAC).

h. All actions of Company officials and/or employees that lead to tax embezzlement or evasion.

i. All actions or activities of officials and/or employees of the Company involving individuals or entities subject to economic sanctions, which may potentially violate sanctions and export control policies with due regard and cross-referencing the principles generally stipulated by the Office of Foreign Assets Control (OFAC).

j. The behaviour of the Board of Directors and Management that is not commendable has the potential to tarnish the Company's reputation or prejudice the Company. Disrespectful behaviour of the Board of Directors and Management inter alia, but not limited to: being dishonest, having a conflict of interest with the Company, or



providing misleading information to the public.

(5) For this reason, complaints received and which will be followed up shall contain at least:

- a. Information that provides clues regarding the reported problem, as mentioned in paragraph (4) above, where, when, and who was involved in the problem.
- b. Information must be supported by sufficient and reliable evidence as initial data for further investigation.

(6) Complaints that meet the criteria shall be submitted to the Consultant/Independent Third Party or the designated unit through the media determined by the Company, i.e:

- a. Website (Whistleblowing Site);
- b. telephone lines;
- c. facsimile;



- d. E-mail;
- e. postal mail;
- f. Short Message Service (SMS); and
- g. WhatsApp.

(7) For complaints received, a handling process shall be carried out with the following stages:

- a. The organizational unit or other party appointed as the party responsible for receiving complaints in the Whistleblowing System monitors incoming complaints from all existing distributions as mentioned in paragraph (6) above;
- b. Complaints received shall be reviewed and verified to ensure that the complaint meets the requirements to be determined as a valid complaint and shall be processed further. Whereas complaints that do not meet the requirements shall not be processed and



stored as Whistleblowing management archives.

c. Complaints that meet the requirements and will be processed further, shall be sorted based on the level or leveling of the complaint with the following provision:

1) Complaints against one or more **members of the Board of Commissioners** the complaint mechanism refers to a separate regulation;

2) Complaints against one or more **members of the Board of Directors** shall be submitted to **the Board of Commissioners, the Audit Committee and the President Director of Telkom;**

3) Complaints against **Telkom Employees** shall be submitted to **the Audit Committee, President Director and Internal Audit;**



4) Complaints against one or more Employees assigned in **the Internal Audit Unit** shall be submitted to **the President Director and the Board of Commissioners through the Audit Committee;**

5) Complaints against one or more **members of the Board of Directors and/or Commissioners of a Subsidiary** shall be submitted to **the President Director and the Board of Commissioners through the Audit Committee;**

6) Complaints against **Mitratel Employees and Employees of Subsidiaries** shall be submitted to **the Audit Committee, President Director and Internal Audit;**

7) Complaints against **Working Partner/ vendor** of the Company and **Subsidiaries** shall be submitted to



the Audit Committee, President
Director and Internal Audit.

- d. For complaints that meet the requirements referred to in point (c) above, an in-depth study shall be carried out through a preliminary examination by the Internal Audit Unit ("**IA**") of the Company or other independent parties if necessary, and a Preliminary Inspection Report ("**LHP**") shall be prepared to be submitted to the Audit Committee and President Director;
- e. Based on the preliminary LHP received from the IA Unit or an independent party, the Audit Committee and/or President Director through the appointed team, shall evaluate and decide whether the results of the inspection required to be followed up and processed further or not required to be followed up and stored as an archive;
- f. For LHP that needs to be followed up and requires assistance from an independent party, approval will be sought from the Board



of Commissioners. Meanwhile, as a follow-up to the LHP which does not require the assistance of an independent party, an Internal Investigation Request Letter shall be made from the Audit Committee and/or IA Unit to the President Director, who then assigns the Investigation Committee to conduct an investigation.

- g. In the event that the Board of Commissioners agrees to use the assistance of a Consultant/ Independent Third Party, the Audit Committee will conduct an investigation and prepare an LHP of the investigation or examination that has been carried out;
- h. In the event that the Board of Commissioners does not approve of the use of independent party assistance, for the LHP that requires to be followed up shall be processed by making an Internal Investigation Request Letter to the President Director as stated in point f above.



(8) The Investigation Process as a follow-up to the Preliminary LHP can be carried out by the Internal Audit Unit in synergy with the Telkom Group Internal Audit Unit or the Investigation Committee formed by the President Director with the following procedure:

a. The Investigation Committee examines the issues to be investigated as stated in the Preliminary LHP to determine whether the investigation process requires the assistance of experts or whether it concerns a Subsidiary. If the investigation process concerns personnel and/or units in the Subsidiary, the Investigation Committee will convey this matter to the President Commissioner and the Board of Directors of the relevant Subsidiary.

b. In the event that expert assistance is required, the Investigation Committee shall request the President Director to process the appointment and assignment of experts to handle the investigation in question.



- c. If the investigation does not require the assistance of experts, the Investigation Committee will form an Investigation Team whose members include personnel from the Subsidiary (if required) to carry out the necessary investigations and prepare an Investigation Report.

- d. The Investigation Report shall be submitted to the President Director and/or the Audit Committee as an evaluation material for the management of the Company to be followed up to the next stage (if necessary).

Article 25

Sanctions

- (1) To ensure that all Employees and Leaders comply with the Business Ethics, any violators shall be subject to sanctions in accordance with prevailing regulations.

- (2) In particular, acts categorized as criminal acts are violations subject to disciplinary sanctions by the Company, including termination of employment in



accordance with prevailing Company regulations, as well as criminal charges against the individuals involved in accordance with the prevailing laws and regulations.

CHAPTER VI

CLOSING

Article 26

Closing Provisions

- (1) Enforce the provisions contained in this Regulation as guidelines within the Company.
- (2) This regulation can be amended and adapted to the dynamics of the business environment in the field of laws, regulations, social conditions, prevailing norms and business developments of the Company which will be stipulated in a separate regulation.
- (3) Every Employee must read, understand and implement the provisions in this Regulation.
- (4) With the enactment of this Regulation, the provisions regarding the Business Ethics of the Company as stipulated in the Resolution of the Board



of Directors of PT Dayamitra Telekomunikasi Number: KD.47/RCO/CEO-010/VI/2011 dated 15 June 2011 regarding Business Ethics and Integrity Pact of PT Dayamitra Telekomunikasi shall be revoked and declared no longer valid and replaced entirely by this Regulation.

- (5) Specifically for provisions regarding integrity pact, it will be further regulated in a separate regulation.
- (6) This regulation can be used as a reference or applied to Subsidiaries, by adopting directly in the regulations or policies of the Board of Directors through a decision-making mechanism in each Subsidiary in accordance with the principle of separate legal entity.
- (7) This regulation shall come into effect on the date it is stipulation.

Stipulated in: Jakarta

On: 21 May 2022

On behalf of the BOARD OF DIRECTORS
of PT DAYAMITRA TELEKOMUNIKASI Tbk



(signed)

THEODORUS ARDI HARTOKO

PRESIDENT DIRECTOR

Carbon copied to:

1. The Board of Directors of PT Dayamitra
Telekomunikasi Tbk
2. The Board of Commissioners of PT Dayamitra
Telekomunikasi Tbk

Jakarta, 3 November 2023
Translated by:

