

THE GUNUNG SEWU GROUP  
CODE OF  
CONDUCT

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## GLOSSARY

**Competition law** – Also known as an antitrust law, a competition law promotes and maintains market competition by regulating anti-competitive conduct and monopolistic practices.

**Conflict of interest** – A conflict of interest involves multiple interests where one of them has the potential to corrupt and influence the intentions of another.

**Information technology** – Involves the application of computers and telecommunications equipment to retrieve, store, manipulate and transmit data.

**Insider trading** – Involves the trading of a company's stock by individuals privy to information not available to the general public.

**Intellectual property** – Otherwise known as IP, intellectual property involves inception and establishment of an idea. Moreover, an IP law grants creators exclusive rights over their product(s), e.g. literary, artistic or musical works.

**International trade controls (laws)** – Otherwise known as ITC laws, these include the appropriate rules and customs for handling trade between countries. As such, a formal organization known as the World Trade Organization (WTO) was established to oversee and regulate prospective trade between nations.

**Money laundering** – Money laundering involves the process of attempting to conceal funds obtained by illegal means, though the ways in which such practices are carried out can have varying levels of sophistication.

### GS GROUP GROWTH VALUES

**3 CS + 2 ES**  
**1 I**

**3 Cs** – Collaboration, Clear Thinking and Creativity & Courage  
**2 Es** – Expertise and External Focus  
**1 I** – Integrity

The Gunung Sewu Group Code of Conduct:

## Consistently doing what is fair and right

As we strive to succeed as a business with global standards, we are constantly challenged with situations that test our sense of right and wrong. While there is no one easy full-proof formula to help us consistently make the right decisions, I encourage everyone to always remain mindful of two questions: Is it the right thing to do? Is it fair to all involved?

The Gunung Sewu Group Code of Conduct (GS Group CoC) embodies this thinking. The CoC establishes the right thing to do and the fundamental responsibilities we expect our staff to observe at work. These responsibilities intend to instill respect for the law and the desire to report any apparent wrongdoing. They are meant to apply not only to Gunung Sewu Group staff, but to all those whom we work with and those who work for or represent us. This spirit will in turn ensure a sense of fairness to all involved. Take time to read the CoC carefully. It describes

Applied consistently with this frame of thinking, I am certain we will develop ethical discipline throughout the Gunung Sewu Group.

what we believe in, who we are and how we conduct our business. The CoC stands for everything that Gunung Sewu Group hopes to be - an exemplary corporate citizen.

I invite you all to take to heart the teachings of our CoC and be a proud a member of the Gunung Sewu Group family!

Best regards,

A handwritten signature in black ink, appearing to read 'Ed Ng', with a stylized, cursive script.

Ed Ng  
Group Chief Executive

## USING THE COC

The CoC outlines our most important responsibilities and obligations that you as an employee must comply with as you work. The CoC provides guidance on **twenty key issues** that may arise as you work for GS Group and indicates who you should contact if you think that you or another member of staff may have breached these guidelines.

As expected, there will always be challenging situations that are not presently covered by the CoC. If you are unsure of how to act, speak with your direct manager first, or call our confidential compliance hotline.

You are required to provide an annual statement of compliance with the terms of the CoC. You must perform this duty accurately and truthfully. If you are unable to provide this statement, you will be expected to explain your reasons why. Disciplinary action may result from breaches of the CoC, GS Group policy or the law.

## HOW DOES THE COC APPLY TO OUR BUSINESSES AROUND THE GS GROUP?

As a business group, we operate within a complex matrix of laws, regulations and policies, and the CoC establishes what we expect from our staff wherever they are located. Individual businesses within the group may also adopt their own CoC to reflect additional local requirements, customs or best practices, so long as they are no less strict than this CoC. Please note that where local laws or policies are stricter than the CoC, the law takes precedence. If you are unsure about the application of local laws or policies, you should contact your direct manager first, or our chief compliance officer at headquarters (HQ) for further advice.

### WHAT IS EXPECTED OF ME IF I PERFORM A NON-MANAGERIAL ROLE?

You should:

- obey the law and demonstrate that you understand your duties and responsibilities
- ensure that your manager has briefed you on the CoC and has addressed any questions you have about it. If you'd like to receive further copies, ask your direct manager or visit the GS Group corporate website ([www.gunungsewu.com](http://www.gunungsewu.com))
- note that if you think that the law or the CoC have been breached, you have an obligation to raise your concerns (see Raising your concerns on page 8)

### WHAT IS EXPECTED OF ME IF I AM A PEOPLE MANAGER?

As a manager, you have additional responsibilities to:

- know the CoC
- ensure your team understands the CoC and how it affects them
- act responsibly and professionally if your subordinates bring to your attention any allegations that the CoC has been breached. In instances such as this, you should investigate any complaint or allegations reported to you and work with your local ombudsman or the head office chief compliance officer to resolve the issue(s)

If you suspect that the CoC or the laws that underpin it are not being followed, you have an obligation to report it. Anyone who acts in good faith to raise a concern about a possible breach will be supported.

### WHO SHOULD I CONTACT IF I BELIEVE THE COC MAY HAVE BEEN BREACHED?

The first person you should contact is your direct manager, unless you suspect that he/she is the one who has breached the CoC. If you cannot speak to your direct manager, you may contact your human resource manager. Alternatively, you can contact your local ombudsman through face-to-face or written correspondence. You may also voice your concern by calling or sending your report to:

**Compliance Hotline: (NUMBER)**  
**Compliance E-mail: (EMAIL)**

### ABOUT THE COMPLIANCE HOTLINE

The Compliance Hotline allows you to report your genuine concerns regarding misconduct at work.

You must speak out if you:

- have concerns about anything you think may be unlawful or in breach of the CoC or company policy
- think there are unreported dangers to staff, customers or the general public
- think that information about these things is being deliberately withheld. The Compliance Hotline is completely confidential and offers callers total anonymity. However, if you leave your name, we can report back to you with the results of any investigations or contact you to request further information as necessary. As long as you act in good faith and your concerns are genuine, you are legally protected from victimization and will not be at risk of losing your job, even if your concerns are mistaken

# WHAT ARE THE PENALTIES FOR VIOLATIONS?

Employees and leaders who violate the GS Group CoC are subject to disciplinary action up to and including termination of employment. Misconduct that may result in disciplinary action includes:

- violation of the GS Group CoC or related policy
- requesting others to violate the GS Group CoC or related policy
- failure to promptly point out a known or suspected violation of GS Group policy
- failure to cooperate in GS Group investigations of possible policy violations
- retaliation against another employee for reporting a concern
- failure to demonstrate leadership and diligence to ensure compliance with the GS Group CoC or related policy



# WORKING WITH CUSTOMERS AND BUSINESS PARTNERS

1

- A. Business Partner relationships
- B. International Trade Controls (ITC) laws
- C. Money laundering prevention
- D. Privacy

We aim to **meet customers' needs** without compromising our relationships with **suppliers. This section of the CoC covers issues** that are critical to how **we conduct our business** and **handle customer and business partner transactions.**

## 1A. Business Partner relationships

GS Group's relationships with suppliers are based on lawful and fair practices. We expect our suppliers to meet high labor standards for their employees, treat them fairly, provide safe and healthy working conditions and uphold environmental standards. This is to ensure that our business partner relationships will not damage our reputation and its long-term business sustainability. We also require our business partners to sign an agreement/undertaking not to bribe our employees.



## What does it mean for me?

### DO ✓

- ✓ comply with applicable laws and government regulations covering business partner relationships
- ✓ ensure you are familiar with and follow government acquisition regulations when purchasing materials and services for fulfilling government contracts
- ✓ choose business partners who comply with local requirements relating to labor standards, the environment, and health and safety through open and competitive bidding
- ✓ safeguard “personal data” obtained from business partners
- ✓ safeguard GS Group’s confidential and proprietary information with a confidentiality agreement; safeguard any business partner-provided information protected by a confidentiality agreement

### DON'T ✗

- ✗ engage in direct business with a business partner owned or managed by a relative or close friend without disclosing it to management
- ✗ place orders with a business partner if you believe they may need to breach existing laws or supply standards to complete it
- ✗ enter into any supplier agreement or contract if there are potential conflicts in business partner selection such as accepting improper gifts or other items of value
- ✗ accept business with a business partner whose facility’s conditions are unsafe or those who ignore environmental standards
- ✗ entrust “personal data” or confidential information to business partners without ensuring that they have appropriate technical, physical and organizational measures to prevent unauthorized access or use



### CONTACT

If you suspect that you or others may have breached the suppliers’ laws or GS Group suppliers’ policy, immediately contact one of the following:

- your direct manager
- your local ombudsman
- your HR leader
- your compliance hotline

## 1B. International Trade Control (ITC) laws

International Trade Control (ITC) laws affect the transfer of goods, services and technology across national borders. These laws apply to GS Group's operations beyond the shipping of products. Exchanges of information across national boundaries, including e-mail and web access, are subject to trade controls.

### What does it mean for me?

#### DO ✓

- ✓ follow relevant ITC regulations in the area in which you operate, along with your business's own ITC procedures, as they relate to the import and export of goods, technology, software, services and financial transactions
- ✓ report all relevant information to your import manager to ensure accurate and complete import declarations
- ✓ check the export classification of the product, software or technology prior to export to determine whether special authorization is required
- ✓ screen your transactions against all applicable rules that restrict transactions with certain sanctioned countries, persons and prohibited end-users

#### DON'T X

- x cooperate with any restrictive trade practice or boycott that is prohibited or penalized under foreign or applicable local laws
- x ignore or take for granted any acts that suggest your customer may be attempting to evade ITC laws
- x accept evasive, reluctant or otherwise unsatisfactory answers from a customer to questions about end-use, end-user, delivery dates or delivery locations
- x get involved with parties or activities suspected of any connection with the development of biological, chemical or nuclear weapons, or ballistic missiles

**DO ✓**

- ✓ screen all of your business partners, suppliers and parties involved in your international transactions against government provided watch lists

**DON'T X**

- x conduct transactions involving an embargoed country, a citizen or representative of an embargoed country or an individual or entity subject to government sanction
- x accept an invoice on imported goods where the price shown does not reflect the full value, the description of the goods is not complete, or the country of origin is not correctly identified
- x accept or process any payment to the exporter or benefit the exporter in a way that is not stipulated in the invoice price or otherwise reported
- x take or accept transfer pricing between related parties that fail to cover appropriate costs and profits
- x use an import tariff classification that does not accurately describe the imported goods.
- x accept or allow the designation of GS Group as the importer of record (party responsible for an importation) without maintaining necessary processes to comply with import laws
- x allow the entry of goods under a preferential duty program (North American Free Trade Agreement [NAFTA], etc.) without supportive procedures assuring compliance with the program's requirements

**CONTACT**

If you suspect that you or others may have breached the ITC regulations or GS Group ITC policies and procedures, immediately contact one of the following:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 1C. Money laundering prevention

People involved in criminal activity – e.g., terrorism, narcotics, bribery and fraud – may attempt to “launder” the proceeds of their crimes to hide them or make them appear legitimate. GS Group is committed to complying with all anti-money laundering and anti-terrorism laws worldwide. It will conduct business only with reputable customers involved in legitimate business activities and with funds derived from legitimate sources.

### What does it mean for me?

#### DO ✓

- ✓ follow your business’s rules concerning acceptable forms of payment
- ✓ comply with all applicable laws and regulations that prohibit money laundering, the support and financing of terrorism, and that require the reporting of cash or suspicious transactions
- ✓ collect and understand documentation about prospective customers, agents and business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources

#### DON'T ✗

- ✗ deal with a customer, agent or proposed business partner who is reluctant to provide information, provides insufficient, false or suspicious information, or is anxious to avoid reporting on recordkeeping requirements
- ✗ accept payments using monetary instruments that appear to have no identifiable link to the customer or have been identified as money laundering mechanisms
- ✗ accept payments or early repayments of a loan in cash or cash equivalents by a customer or proposed business partner if there is suspicion that the fund is from money laundering-related activities

**DO** ✓

- ✓ learn the types of payments that have become associated with money laundering (for example, multiple money orders or travelers checks, or checks on behalf of a customer from an unknown third party)

**CONTACT**

If you suspect that you or others may have breached the anti-laundering law or related GS Group ITC policies and procedures, immediately contact one of the following:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

**DON'T** X

- x process orders, purchases or payments that are unusual or inconsistent with the customer's trade or business
- x get involved in unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms
- x allow unusual fund transfers to or from countries unrelated to the transaction or those that are not logical for the customer
- x participate in transactions involving locations identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity
- x get involved in transactions involving foreign shell or offshore banks, unlicensed money remitters or currency exchangers, or nonbank financial intermediaries
- x allow the structuring of transactions to evade recordkeeping or reporting requirements (for example, multiple transactions below the reportable threshold amounts)
- x grant requests to transfer money or return deposits to a third party or an unknown/unrecognized account

## 1D. Privacy

A growing number of countries are regulating the collection and use of consumers' "personal data" (names, home and office contact information, etc.). Additionally, many countries regulate the personal data of company representatives in business-to-business transactions. GS Group is committed to handling personal data responsibly and in compliance with applicable privacy laws.



## What does it mean for me?

### DO ✓

- ✓ obtain/process and use personal data for legitimate business purposes only
- ✓ limit access to personal data to individuals who need it for a legitimate business purpose
- ✓ use “anonymous” data (names removed) or “aggregated” data (summarized so as not to be identifiable) instead of personal data where appropriate or required
- ✓ use care to prevent unauthorized access in the processing of personal data or accidental loss or destruction of personal data
- ✓ learn and comply with the applicable laws and regulations of jurisdictions from which the personal data is collected and in which it is processed or used

### DON'T ✗

- ✗ store or keep personal data where there is inadequate access or security control, such as e-mailing or otherwise distributing personal data to a larger group than needed, or leaving printouts with personal data at a printer, copy machine or fax machine for others to see
- ✗ allow the sharing of personal data with unaffiliated third parties such as vendors or suppliers who lack appropriate security safeguards or restrictions
- ✗ permit the transfer of personal data between countries without first considering applicable legal requirements



### CONTACT

If you suspect that you or others may have breached the privacy law or related GS Group policies and procedures, immediately contact one of the following:

- your Direct Manager
- your local ombudsman
- your HR leader
- your compliance hotline

## HANDLING GOVERNMENT BUSINESS

# 2

- Working with government organizations

We frequently do business with **national governments and government-owned companies**. Specifically, we transact with **government agencies, officials and international public agencies**. As such, our employees must conduct themselves with **the highest ethical standards** and comply with the applicable laws and regulations.

## Working with government organizations

When working with government organizations and officials – whether as customers, regulators or partners – we must ensure that our activities and interactions demonstrate the company’s commitment to ethical conduct. Adherence to the law and compliance to specific regulations are expected.

### What does it mean for me?

#### DO ✓

- ✓ abide by applicable laws and regulations relating to working with governments, particularly special requirements associated with government contracts and transactions
- ✓ be truthful and accurate when dealing with government officials and agencies
- ✓ require anyone – including consultants, sales representatives, distributors or suppliers – providing goods or services for the company on a government project or contract to agree to comply with the intent of the company’s working with government policy

#### DON'T ✗

- ✗ negotiate for employment with a government official or government official’s family members while the official has the ability to influence decision making about contracts
- ✗ provide incorrect or unauthorized charges on a government contract
- ✗ make any unauthorized substitutions for contracted goods and services or deviate from contractual requirements without the written approval of the authorized government official

## DO ✓

- ✓ adopt processes that ensure reports, certifications, statements and proposals are current, accurate and complete and that contract requirements are identified to the responsible parties

## DON'T X

- x deviate from contractual requirements or authorized contract substitutions such as failure to perform required tests and inspections
- x submit inaccurate or incomplete cost or pricing data when it is required by the government
- x violate government regulations that establish gratuity restrictions, recruiting and hiring restrictions, or certification procedures
- x accept information about a government's competitive selection of a supplier or a competitor's bid or proposal (unless the contracting officer or agency leader has lawfully authorized the information's release)



### CONTACT

Speak to your line manager for clarification on special requirements that apply to transactions with the government, including commercial transactions between private parties financed by government agencies.



## COMPETING GLOBALLY

- Complying with competition laws

# 3

To compete globally, we must be **aware of how antitrust laws are applied**. These complex laws govern how **business players behave** so as not to undermine competition. These laws also **regulate the behavior of dominant companies**.

## Complying with competition laws

GS Group competes to best serve the customers' needs and enhance shareholder value. In doing so, GS Group is subject to antitrust laws and regulations. In general, the laws and regulations prohibit agreements or actions that unreasonably restrain trade or reduce/hinder competition.



## What does it mean for me?

### DO ✓

- ✓ comply with all applicable antitrust laws and regulations
- ✓ review and understand GS Group and business-specific policies and procedures
- ✓ consult with the company's chief compliance officer to help reduce the risks of non-compliance or the company raising competition law issues

### DON'T ✗

- ✗ make contact of any kind with competitors, as it could give the appearance of an improper agreement or understanding
- ✗ propose or enter into agreements on behalf of GS Group with any competitor regarding prices, bids, territories, terms of sales, production/sales capacity, cost and profit margins, market share, product or service offering, customer/supplier classification or distribution methods
- ✗ propose or enter into agreements with anyone regarding a bid submission for no other purpose than to win the business
- ✗ propose or enter into agreements with customers and/or suppliers that restrict the price or other terms at which the customer may resell or lease the product/service to a third party



### CONTACT

If you suspect that you or others may have breached competition laws, immediately contact your chief compliance officer.

## APPLYING PERSONAL AND BUSINESS INTEGRITY

- A. Fraud, bribery and corruption
- B. Conflicts of interest
- C. Personal Investment
- D. Insider trading and market abuse
- E. Handling of gifts and improper payments
- F. Offering gifts and entertainment
- G. Political activity

As a professional organization **we will always handle our activities – personal and business – with integrity.** This means **consistently being honest** and doing what is right within the purview of the law, regulatory prescriptions and best practice.

## 4A. Fraud, bribery and corruption

We are committed to maintaining the highest standards of ethics and integrity in the way we do business. Any act of fraud, bribery or corruption is not tolerated by GS Group, nor is any help given to people carrying out such acts.



## What does it mean for me?

### DO ✓

- ✓ immediately report any attempts to offer you a bribe or to get you to act in a way that could be disadvantageous for GS Group to your direct manager, chief compliance officer, local ombudsman or compliance hotline
- ✓ cooperate fully with law enforcement agencies and investigators and support prosecution or disciplinary action where sufficient evidence exists
- ✓ be aware of the possibility that bribery and corruption can occur and regularly review our procedures and controls to ensure they are current
- ✓ check with the chief compliance officer as to what is permitted and acceptable before taking any action

### DON'T X

- x accept bribes of any kind
- x give bribes



### CONTACT

Speak to your local legal department for more information.

## 4B. Conflicts of interest

A “conflict of interest” arises when you use your position to make a personal gain or benefit over and above what is defined in your employment agreement. We must ensure that our personal interests do not conflict with the interests of the business or our customers.



## What does it mean for me?

### DO ✓

- ✓ inform your direct manager if you feel you might have a potential conflict of interest
- ✓ ensure that your personal activities and interests do not conflict with your responsibilities to the company
- ✓ immediately report any attempts to act in a way that could be disadvantageous for GS Group
- ✓ check with your direct manager, HR leader or chief compliance officer as to what is permitted and acceptable before taking any action

### DON'T ✗

- ✗ do business on behalf of GS Group with a company from which you or a family member might benefit from unfairly (other employees can do business with such a company, though you must not be involved or try to influence the relationship in any way)



### CONTACT

If you have any questions regarding possible conflicts of interest, please contact one of the following:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 4C. Personal investment

Ensure that your investments or personal business do not create conflicts of interest or impair your ability to make objective decisions on behalf of GS Group. Conflicts can occur if personal investments are made in GS Group competitors', suppliers' or customers' businesses. Publicly traded mutual funds, index funds and similar pooling of securities, when the individual investor has no say in which investments are included, do not present conflicts.



## What does it mean for me?

### DO ✓

- ✓ check with your line manager and legal/HR leader as to what is permitted and acceptable before taking any action

### DON'T ✗

- ✗ invest in a supplier if you have any involvement in the selection, negotiation with or assessment of said supplier, or if you supervise anyone who has such a responsibility
- ✗ invest in a customer if you are responsible for dealing with them or if you supervise anyone with such a responsibility



### CONTACT

If you have any questions regarding personal investment, please contact:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 4D. Insider trading and market abuse

We have a legal duty to never use company information that has not been made public for our own benefit, or for the benefit of others we know – for example, by selling or buying shares on the basis of price-sensitive information. Using information for our own benefit or for others is called insider trading and in almost all cases is a serious criminal offense. Other abuses of information such as disclosing sensitive material other than in the proper course of your employment (known as “market abuse”) may also result in serious criminal and/or civil penalties.



## What does it mean for me?

### DO ✓

- ✓ maintain the confidentiality of company information
- ✓ consult with your chief compliance officer before trading in the security or disclosing company information
- ✓ deal in other publicly traded companies' shares
- ✓ note that where your employment requires you to be in possession of non-public, price-sensitive information, you will be added to an "insider list" and notified by the company secretary. You may not deal in the company's shares until you have been taken off the insider list

### DON'T ✗

- ✗ talk about sensitive information regarding GS Group business or what you are working on with family and friends
- ✗ convey information to anyone outside the company unless it is necessary for the company's business activities
- ✗ pass on non-public, price-sensitive information to other people or encourage others to deal in the company's shares on the basis of such information, even if you yourself do not deal in or otherwise profit from passing on the information
- ✗ buy or sell a security, asset or property because you heard about it at work and think the price will go up or down once it is publicly announced



### CONTACT

For more information about insider trading or to report irregularities, please contact:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 4E. Handling of gifts and improper payments

Business gifts and entertainment from business partners build goodwill, but they should never influence – or appear to influence – our business decisions in any way. As such, we will never seek or exert improper influence in exchange for promises or gifts, regardless of the local business practice.

### What does it mean for me?

#### DO ✓

- ✓ keep your manager updated, obtain receipts and document the details of your payment for any private work where you know the supplier or contractor works for GS Group
- ✓ if you accept a gift or entertainment above a locally determined financial value, tell your manager and document the details
- ✓ require any person or firm who represents GS Group (such as a consultant, agent, sales representative, distributor or contractor) to comply with this policy and the related laws

#### DON'T ✗

- ✗ accept any gift or entertainment that is illegal or would result in any violation of the law
- ✗ accept any gift of cash or cash equivalent, bank check, money orders, investment securities, negotiable instrument, loans, stocks/stock options or services from third parties/suppliers/contractors for your personal benefit
- ✗ accept a commission that is disproportionate to the services provided

**DO ✓**

- ✓ return any gift or cash equivalents such as gift certificates that are transferrable or convertible into cash, bank check, money order, investment securities, negotiable instrument, loans, stocks or stock options
- ✓ immediately report any attempts to offer you gifts and entertainment or to get you to act in a way that could be disadvantageous for GS Group
- ✓ regularly review our procedures and controls to ensure they are current

**DON'T X**

- x participate in any entertainment that is unsavory, sexually-oriented or otherwise violates our commitment to mutual respect
- x participate in any activity that you know would cause the person providing the gift or entertainment to violate his or her own employer's standards
- x accept free or discounted work or services from a supplier or contractor for personal gain
- x accept any gift, entertainment or service from a third party that comes with conditions that result in suppliers (including potential new suppliers) gaining a benefit
- x offer a business courtesy such as a gift, contribution or entertainment under circumstances that might create the appearance of impropriety
- x pay, promise, offer or authorize anything of value (such as money, goods or services) to a government official or employee of a customer to obtain or retain an improper advantage

**CONTACT**

**If you have any questions regarding gifts and improper payments or have observed violations, please contact:**

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 4F. Offering gifts and entertainment

It is common in the commercial world to offer social amenities and business courtesies such as modest gifts, meals and entertainment to enhance business relationships. However, every courtesy offered should always comply with the policies of the recipient's organization.



## What does it mean for me?

### DO ✓

- ✓ immediately report any attempts to offer officials (government/private) or employees gifts to the direct manager/legal/HR leader
- ✓ regularly review our procedures and controls related to offering gifts to ensure that they are officially and legally within acceptable limits

### DON'T ✗

- ✗ offer or provide a gift, entertainment or anything of value if it is:
  - illegal
  - known to be in violation of the rules of the recipient's organization
  - cash or other monetary instrument
  - unsavory, sexually-oriented or otherwise violates our commitment to mutual respect
  - *a quid pro quo*<sup>1</sup>
  - not recorded properly on company books/gift registry
- ✗ offer or provide a gift or anything of value to a government official that is illegal or would cause the official or employee to violate established ethics or rules governing his or her conduct



### CONTACT

In case of doubt or questions and before taking any action, please contact:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

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<sup>1</sup>Legally speaking, *quid pro quo* indicates an item or service that has been traded in return for something of value, usually when the propriety or equity of the transaction is in question. Otherwise known as "you scratch my back, I'll scratch yours."

## 4G. Political activity

We have no political affiliations and make no political donations – we work with governments and parties around the world only on issues vital to the interests of GS Group. All employees have the right to be politically active as long as they keep their work separate and remain professional around customers, colleagues, etc.



## What does it mean for me?

### DO ✓

- ✓ you are free to engage in political activity as long as it is done on your own time and does not adversely affect the reputation of the business
- ✓ talk to your manager if you require time off from work for political or representative activity, e.g., carrying out duties as an elected councilor



### CONTACT

Speak to your direct manager for more information about political activity.



## WORKING IN THE GS GROUP COMMUNITY

# 5

- A. Fair employment practices
- B. Environment, health and safety
- C. Harassment – free work environment

As a company, we are **committed to managing the welfare** of the community where we operate to ensure long-term business sustainability. This means that we **protect the human, natural and physical resources** under our care by complying with the laws that govern them.

## 5A. Fair employment practices

We are committed to building workplaces that promote teamwork, diversity and trust. In providing equal employment opportunities for everyone we recruit, hire, develop, promote, discipline and offer other conditions of employment without discriminating against a person's ethnicity, religion, sex, age, national origin, sexual orientation, disability as well as citizenship, marital or any other legally protected status.



## What does it mean for me?

### DO ✓

- ✓ support our commitment to provide equal opportunities for everyone in the organization
- ✓ demonstrate respect for your fellow employees and others you may come into contact with, whether they are employees, customers, suppliers, etc.
- ✓ ensure your own employment decisions. For example, recruiting new staff and performance reviewing those on your team are determined by merit and business considerations alone
- ✓ understand employment, labor and equal opportunity laws and local cultures that may have an impact on workplace decisions

### DON'T X

- x do anything that fosters disunity within GS Group
- x raise issues that may cause discriminatory consequences or implications



### CONTACT

In case of any observed breach of the CoC, labor laws and other related employment regulations, please contact:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 5B. Environment, health and safety

We strive to promote a safe workplace free from violence, meaning threats (whether implicit or explicit) and intimidation will not be tolerated. In addition, our company has rules that strictly forbid the use of drugs and alcohol while working. Violations of these rules are taken very seriously.



## What does it mean for me?

### DO ✓

- ✓ observe the rules in each area of work
- ✓ comply with all health and safety laws, as well as our own health and safety requirements
- ✓ remember that all employees and anyone else working on our premises must know the health and safety requirements associated with their jobs
- ✓ conduct business in accordance with all applicable environmental laws, regulations, requirements and corporate commitments
- ✓ understand the environmental consequences of what we do and look for ways to reduce or eliminate those consequences

### DON'T X

- x use drugs, alcohol or improper medication while working
- x ignore all applicable environmental laws and regulations wherever we do business



### CONTACT

In case of any observed breach of the CoC, safety laws, and other related environmental regulations, please contact:

- your direct manager
- your HR leader
- your local ombudsman
- your compliance hotline

## 5C. Harassment-free work environment

In exhibiting a professional work environment, we will not tolerate any form of harassment such as verbal, physical or visual behavior where the purpose or effect is to create an offensive, hostile or intimidating environment.



## What does it mean for me?

### DO ✓

- ✓ treat colleagues and subordinates with respect and dignity
- ✓ provide guidance, training or counseling if any of your subordinates make mistakes
- ✓ follow procedure for punishment: begin with a verbal warning before moving to a written one. In the event that warning your subordinate has no effect, their carelessness may result in termination
- ✓ avoid anything that will lead you to harassment of any kind

### DON'T X

- x shout, yell, threaten or use degrading words or acts for the purpose of belittling others
- x make disturbing sexual comments/ suggestions, e.g. commenting on one's appearance or sexual life
- x perform disturbing physical actions, including assault or the hindering/ blocking of your subordinate or anyone in the company's progress
- x offer special treatment, including promotions and/or salary increments in return for sexual favors
- x make any racially, ethnically, religiously, age related or sexually offensive jokes or insults
- x display offensive pictures or cartoons or use voicemail, email or other electronic devices to transmit derogatory or discriminatory information



### CONTACT

**Report to your direct manager and HR leader any breach of this CoC and policy.**

## PROTECTING GS GROUP ASSETS

# 6

- A. Intellectual property
- B. Responsible use of company IT
- C. Confidentiality and data protection
- D. Controllership

Proper protection and use of company resources/ assets is the **responsibility of each employee**.

While personal use of certain resources is sometimes permissible, we should **never abuse this privilege** or assume that we have a right to privacy when using these resources.

## 6A. Intellectual property

Intellectual property (IP) includes all patents, trademarks, design rights, copyrights or other know-how owned by GS Group. By protecting our IP and the IP rights of others, we ensure that the brands, designs and overall value of our company remain safe.



## What does it mean for me?

### DO ✓

- ✓ identify and protect GS Group's IP
- ✓ ensure that the ownership of new IP is agreed on upfront when working with another company or asking a third party to work on our behalf
- ✓ respect valid patents, copyrighted materials and the protected IP of others
- ✓ comply with the guidelines for use of GS Group's primary trademarks and trade names

### DON'T X

- x use or copy the IP rights of others
- x disclose GS Group proprietary information to others
- x allow third parties to use our brands or any other IP without consulting your local legal department or group legal
- x introduce a new product or service, or new product or service name, before checking for patent or trademark infringement
- x threaten anyone suspected of infringing any GS Group IP without first consulting with the company's chief compliance officer



### CONTACT

Please contact group legal services if you have any questions about the use of IP rights.

## 6B. Responsible use of company IT

Company computers are intended for company use and limited personal use, not for work outside the office. GS Group reserves all legal rights to access, review and use all communications, records and information created at work or with company resources, including things such as intranet or Internet activities, email, voicemail and telephone conversations and computer files.



## What does it mean for me?

### DO ✓

- ✓ use company resources appropriately
- ✓ protect company assets from misuse, theft and waste
- ✓ ensure that hardware such as laptops, phones and other handheld devices are never left in public or unsecured locations

### DON'T ✗

- ✗ provide personal employee information to anyone outside of GS Group without proper authorization
- ✗ misuse company resources, including telephone, email or Internet access for personal activities
- ✗ share user IDs or passwords
- ✗ install any non-GS Group approved or unlicensed software on your computer or download, store or pass on inappropriate material
- ✗ connect any non-GS Group or unauthorized device to your computer or to the network



### CONTACT

Speak to your local IT Department for more information.

## 6C. Confidentiality and data protection

GS Group respects the confidentiality of our employees' personal information - we ensure it is protected and handled responsibly. This means that access to personal records should be limited to company personnel who have authorization and a clear business need for such information. Employees who have access to personal information must treat it confidentially.



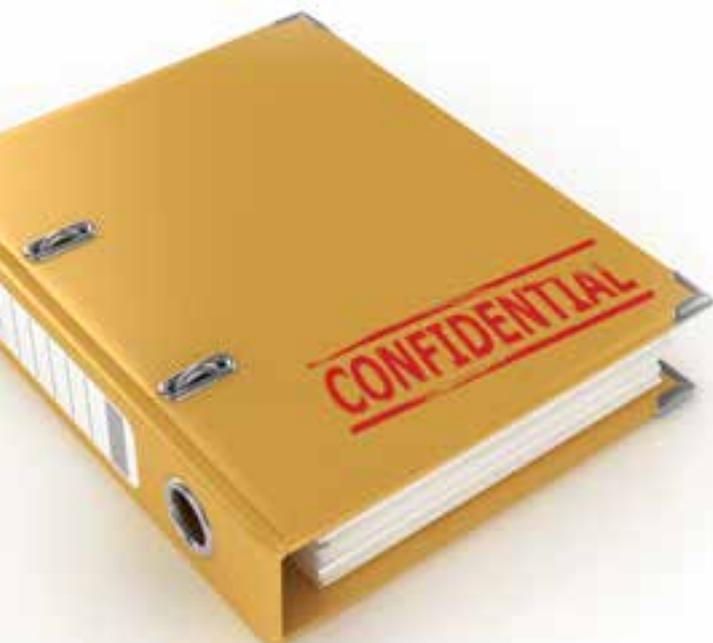
## What does it mean for me?

### DO ✓

- ✓ ensure that data is securely stored and disposed of properly
- ✓ keep customer and employee information secure and use them only for the purpose for which they were obtained.
- ✓ collect only relevant, accurate and updated customer or staff information

### DON'T ✗

- ✗ release information without ensuring that the person you are providing it to is authorized to receive it and, where necessary, that it has been encrypted in accordance with GS Group policy



### CONTACT

If you are unsure of how to handle GS Group data, use caution and seek advice from:

- your direct manager
- your HR leader
- your IT leader

## 6D. Controllership

Robust controllership processes are needed to allow our management to make well-informed decisions regarding our operations and to ensure integrity in disclosures to government agencies and the public.

### What does it mean for me?

#### DO ✓

- ✓ comply with applicable internal and external accounting principles, standards and regulations affecting accounting and financial reporting
- ✓ make certain that financial and non-financial information and operating metrics are reported accurately
- ✓ keep complete and factual records reflecting all business transactions, expenditures and expenses
- ✓ protect company assets (physical, financial and IP) from unauthorized access, use or loss

#### DON'T X

- x provide/produce financial results that lack transparency or do not appear to reflect underlying business performance
- x provide/produce distorted financial records such as inflated travel expense reports, inaccurate overtime reports or invoices
- x disclose to individuals outside the company financial information or other information concerning the company's past or anticipated results of operations unless such information has previously been disclosed in an authorized press release or public report

**DO** ✓

- ✓ comply with the company's delegation of authority with respect to the approval and execution of transactions and documents
- ✓ cooperate and openly communicate with independent auditors by responding to requests for information in a timely manner. Avoid any action that may fraudulently influence, coerce, manipulate or mislead auditors in their work
- ✓ safeguard documents that may be relevant to pending or reasonably foreseeable litigation, audits or investigations, as directed by the company's chief compliance officer

**DON'T** X

- x discourage suggestions to improve processes and controls to protect assets from risk of loss
- x attempt to bypass internal authorization controls
- x allow a third party vendor to begin work before an authorized purchase order has been issued
- x use alternate accounting treatments without specific justification
- x destroy documents (including e-mail) without determining whether the documents are subject to legal preservation requirements

**CONTACT**

For more information, contact your direct manager and/or your confidential compliance hotline.



# THE GUNUNG SEWU GROUP CODE OF CONDUCT



GUNUNG SEWU GROUP

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