

Company's Code of Conduct

1. Maintaining Confidentiality of Data and Information

Maintaining the confidentiality of all information relating to the Company's business and products, in written, oral or electronic forms, which is, based on its character or condition or method of disclosure, clearly confidential, including but not limited to documents, drawings, data, graphical, technical specifications, letters and samples, electronically transmitted documents, e-mails, etc, except any information that:

- a. is already in the public domain at the time of disclosure, through no fault of the Board of Directors or the Employee;
- b. is disclosed to the Board of Directors or the Employee by a third party which to the best of the Board of Directors' or the Employee's knowledge does not violate confidentiality obligations and may be disclosed without any restrictions;
- c. is disclosed under a decision of any courts or other government bodies or laws and regulations; or
- d. is disclosed under the written permission of the Company.

2. Compliance with Applicable Laws and Regulations

The Board of Directors and all employees shall comply with all laws and regulations relating to the Company's business. This includes an understanding of the laws and regulations in accordance with the work of each employee and compliance with applicable laws and regulations in Indonesia. Laws and regulations that need special attention are the regulations issued by the Financial Services Authority (FSA), the Indonesia Stock Exchange (BEI) and other competent institutions.

All employees need to understand that Trimegah's trust will be disturbed by non-compliance with applicable laws and regulations, and how difficult it is to restore that trust. Therefore, all employees must have a proper understanding and comply with the letter and spirit of all applicable laws and regulations.

3. Conflict of Interest

All members of the Board of Directors and employees shall act in the interests of the Company and shall not engage in activities or transactions that have a potential conflict of interest. Therefore, each member of the Board of Directors and the Employee shall be prohibited from taking any action or any decision on the basis of personal interest as a result of their position in the Company to benefit members of the Board of Directors and/or employees or their family members or those who have a relationship with members of the Board of Directors and employees that will or may harm the interests of the Company.

4. Company's Assets

Every employee shall maintain the Company's assets that are entrusted to him and understand that the assets and property of the Company shall be used solely for the benefit of the Company. In the event that the employee has been appointed and/or acts in accordance with his/her function and responsibility to represent the Company in the purchase and/or sale of assets, the decision to buy or sell the Company's assets shall be made by putting the interests of the Company as a priority.

5. Prohibition of Insider Trading

In accordance with the laws and regulations on Capital Market, the Company shall prohibit the Board of Commissioners, the Board of Directors and employees as well as parties who have a close relationship with them from trading shares or other securities based on inside information the company has not published. The information shall be data or information related directly or indirectly to the issuer or the Company that has not been available to the public and may influence the decision of the shareholders or investors to make a purchase or sale.

6. Anti-Corruption and Gratification

The Company shall prohibit bribes, gratifications or the like, either directly or indirectly, in any form, including but not limited to cash, valuables, or any other forms, either as a recipient or giver in all transactions undertaken by the Company with any party to gain a business advantage "unfairly". Giving gratuities and the like as described above is unlawful because it is intended to influence decisions/behaviors of the recipient in accordance with what is desired by the giver, whether for the benefit of the Company or personal interests.

7. Involvement in Political Activities

The Company gives freedom to the Board of Directors or employees to participate in the political process to the extent not disturbing activities, working hours and not using the company's identity and facilities, and not defaming the Company.

The Company shall not take sides with and shall not make donations to any parties and/or political party-wing organizations, whether in cash or other form.

8. Relationships between Employees

The Company shall encourage the relationship between employees based on mutual trust and mutual respect. The Company may not tolerate the employment relationship filled with violence, harassment, provocation, unhealthy competition between colleagues and superiors and subordinates.

9. Relationships with Clients

The Company shall give priority to client services over its own interests and is committed to conducting business in a fair and transparent manner with clients and shall continue to understand clients' needs and maintain the confidentiality of information disclosed by the client.

10. Negotiation and/or Pricing Policy

Decision-making for negotiation and/or pricing of goods and services to the Client and/or other third parties shall be conducted by prioritizing the interests of the Company and through the approval of the Board of Directors or the authorized officers of the Company.

11. Relationships with Regulators

The Company is very aware of the laws and regulations that apply to everything related to the business of the Company, or the Company becomes the subject governed by the laws or regulations that impact on the Company.

12.Side Activities and/or Business

A conflict of interest may arise if the Board of Directors or the Employee is involved in activities outside of the Company or makes investments that may be in conflict with the Company's business. The Board of Directors and employees must avoid situations that pose a risk to the Company or may restrict the Company's business activities. In the event that the employee has a side activity and/or business beyond his/her duties and responsibilities to the Company, he/she shall be obligated to inform his/her immediate superior, the Board of Directors and the Human Capital Division in writing at least 14 (fourteen) days after the side activity and/or business has been conducted. Furthermore, employees shall not be allowed to have other businesses in the same field as the company has.

13.Document Administration and Retention

The Board of Directors and employees of the Company shall comply with the administrative procedures applicable to its business functions and maintain any records for which they are responsible in accordance with applicable policies and regulations. In connection with an investigation or litigation by the regulator, the Board of Directors and/or the Employee shall be prohibited from providing false information or deliberately covering up or destroying relevant documents.

14.Reporting Unethical or Illegal Behaviors

In the event that employees become aware of a deviant, illegal or unethical behavior, they shall immediately report it in accordance with the policy that has been stipulated by the Company. This report shall be followed up through the process of investigation to ensure that such action is a deviant act and further the future handling and prevention actions shall be determined.
