

## WHISTLE BLOWER AND ANTI CORRUPTION POLICY

### **Anti-Corruption and Gratification Policy**

The Company forbids any bribes, gratification or equally, either directly or indirectly, in any forms, including but not limited to cash, valuable goods, or other forms, as recipients or givers in all transactions committed by the Company with any party to gain business advantage in an unfair manner. The provision of gratification or equally as described above is an illegal act because it is intended to affect decision/behavior of recipients in accordance with the desired of the giver for the Company or personal interests.

### **Whistle Blowing System Policy by Reporting Unethical or Illegal Behavior**

Trimegah requires the Board of Directors and employees to always implement business standards and individual ethics in every performance of tasks in accordance with applicable regulations. Employees are required to implement honesty and integrity in performing the work and be subject to applicable laws and regulations. If employees aware of any ethical deviations, illegal or unethical behavior, they should report it immediately in accordance with a policy set by the Company with the principle of handling reporting, which are:

1. Objectivity (handling shall be based on valid facts/evidence)
2. Relevance (data submitted shall be consistent with duties and responsibilities)
3. Coordination (cooperation with the relevant Division and/or Business Unit)
4. Effectiveness and efficiency (handling shall be conducted in a proper, timely and cost-saving manner)
5. Accountability (handling and follow-up shall be accountable)
6. Transparency (handling shall be conducted based on a clear and transparent mechanism, procedure)
7. Presumption of innocence principle
8. Protection of witnesses and reporting persons

Each report may be submitted to the Internal Audit unit via email [internal.audit@trimegah.com](mailto:internal.audit@trimegah.com) as set forth in this policy. Internal Audit shall be responsible for investigating and reasonably making recommendations to the Board of Directors, as a follow-up to any submission of the report that has been received. Report will be followed through investigation process to ensure that such action was an act of deviating and later to determine the act of handling and prevention in the future.