

**CODE OF ETHICS AND CONDUCT GUIDELINES
PT TRIMEGAH SEKURITAS INDONESIA TBK
and
PT TRIMEGAH ASSET MANAGEMENT**

In accordance with the Board of Directors and the Board of Commissioners of
PT Trimegah Sekuritas Indonesia Tbk and PT Trimegah Asset Management
Resolution No. KEP: 099/CorSec/BoC-BoD/XII/2022.TRIM dated December 14, 2022.

**Article 1
Definition**

1. Code of Ethics is set of norms and principles that are generally accepted as a basis for attitudes and behavior.
2. Conflict of Interest is a situation/business carried out by employees or the Board of Directors, either individually or together with other employees and/or other parties which can interfere with the objectivity of employees/the Board of Directors in making decisions related to the Company's interests.
3. Gratification is a gift in a broad sense which includes providing money, goods, rebates, commissions, interest-free loans, travel tickets, hotel facilities, tourist trips, free medical treatment and other facilities by a particular person/party that expects more services or benefits from the receiver.
4. Internal parties are members of the Board of Commissioners, member of the Board of Directors, employees of the Company and the Company's subsidiary.
5. External parties are parties outside of the Company that have an interest in the business and operational activities that are carried out by the Company, including among others, clients, related parties, partners, vendors, regulators and government institution/other authorized parties.

**Article 2
Code of Conduct Values**

A. Maintain Data and Information Confidentiality

1. All employees must uphold all confidential information that is related to clients, products, and services of the Company.
2. Confidential Information that is mentioned on point 1 is information in writing, verbal or electronic form which based on the character or circumstances or method of disclosure is clearly confidential, including but not limited to documents, images, data specifications, graphics, technical

matters, letters and samples, transmitted by electronic document, e-mail, etc., except:

- a. Has been or becomes publicly known at the time of disclosure, which is not due to the fault of the Management or employees;
- b. Disclosed to Management or employees by third parties who, to the best of Management or employees' knowledge, do not violate confidentiality obligations and can be disclosed without restriction;
- c. Disclosed based on a court decision or government institution/other authority or statutory provisions; or
- d. Disclosed based on written permission from the Company.

B. Comply with Prevailing Legal Provisions

1. The Management and employees are obliged to comply with all prevailing rules and regulations relating to the Company's business and operations.
2. The Management and employees must have a proper understanding of the content and spirit of all regulations and legislation.
3. The Management and employees must understand that the Company's credibility will be compromised if the operational and business activities are carried out without compliance with prevailing regulations and laws.

C. Conflict of Interest

1. The Management and employees must act and make decisions for the interests of the Company and not be involved in activities or transactions that have the potential for a conflict of interest.
2. If this decision must still be made, then Management and employees are obliged to prioritize the interests of the Company and prevent the Company from losses that will occur.

D. The Company's Asset

1. Employees are obliged to preserve the Company assets entrusted to them.
2. Employees must understand that Company assets must be used solely for the benefit of the Company.
3. In the event that employees have been appointed and/or acted according to their functions and responsibilities to represent the Company in the purchase and/or sale of assets, the decision to purchase or sell the Company's assets must be made by prioritizing the interests of the Company.

E. Prohibition of Insider Trading

Referring to the provision of Indonesian Capital Market Laws and Regulation, the Company prohibits the Board of Commissioners, the Board of Directors, and employees as well as parties who have close relationships with them from trading in shares or other securities based on information from within the Company that has not been published. The mentioned information is data or information relating directly or indirectly to the issuer or company that is not yet available to the public and can influence the decision of shareholders or investors to make purchases or sales.

F. Anti-Corruption and Gratification

1. The Management and employees are prohibited from committing acts of corruption, accepting or giving any form of bribery, gratification or anything similar, either directly or indirectly, in any form, including but not limited to cash, valuables, or other forms, whether as recipient or giver in all transactions carried out by the Company with any party to obtain unfair business profits.
2. Accepting and giving gratuities and as explained above is an unlawful act because it is intended to influence the recipient's decision/behavior in accordance with what the giver desires for personal interests.
3. All parties are obliged to notify any unavoidable giving or receiving of gratuities to their direct supervisor, Internal Audit and Human Capital no later than 5 (five) working days after the gratification is given or received and the gratuity/gift is handed over to the Company to become the property of the Company.

G. Involvement in Political Activities

1. The Company gives freedom to Management and employees to participate in political activities as long as the activities are not carried out during working hours, do not interfere with the implementation of their duties, obligations and responsibilities to the Company, do not use the Company's identity and facilities, and do not harm the good name of the Company.
2. The Company does not take sides, is not involved in any political practices and will not provide support to any parties and/or wing organizations of any political parties either in the form of donations or other forms.

H. Relations between Employees

1. The Management and employees are obliged to establish a relationship based on norms, ethics and politeness, mutual respect and appreciation in every work relationship, either relationships between employees and the manager, or the relationship among employees, either in the same work unit, or in different work units.
2. The Company does not tolerate work relationships that are characterized by all forms of violence, pressure/intimidation, insults/harassment, provocation, unhealthy competition among co-workers or among work units.

I. Relations with Clients

1. Employees must prioritize service to clients and establish sustainable relationships.
2. Employees must conduct business fairly and transparently with clients.
3. Employees shall always understand clients' needs and maintain the confidentiality of information submitted by clients.

J. Relations with Regulators

1. The Company shall always carry out business in accordance with the principles of good corporate governance and the provisions stipulated by the regulator.
2. The Company fully understands the provisions and laws that apply to everything related to the Company's business, or the Company is the subject of laws or regulations that impact the Company.
3. The Company shall fulfill all reporting obligations that are accurate, complete, transparent and timely in accordance with the provisions stipulated by the regulator.

K. Negotiation and Pricing Policies

Decision-making in negotiation and/or determination of prices of goods and services for clients and/or other third parties must be made by prioritizing the interests of the Company and with the approval of the relevant director and/or authorized Company officials.

L. Side Activities and/or Business

1. The Management and employees are obliged to avoid situations that pose a risk to the Company or may limit the Company's business activities. Conflicts of interest can arise if the Management or employees are involved in an activity outside the Company that has the potential to conflict with the Company's business.
2. In the event that the Management or employees have activities and/or side businesses outside of their duties and responsibilities to the Company that have the potential to create a conflict of interest with the Company, the employee is obliged to report it in writing to direct supervisor, the related director and the Human Capital Division no later than 14 (fourteen) working days after carrying out the activities and/or side business in question.
3. The Management and employees are not permitted to be involved in any form of activities/fields that are the same as the Company's business activities.

M. Document Administration and Retention

1. The Board of Directors and employees are obliged to comply with the administration procedures applicable to their business functions, and maintain all records for which they are responsible in accordance with prevailing policies and regulations.
2. In connection with investigations or litigation by regulators, the Board of Directors and/or employees are prohibited from providing incorrect information or intentionally covering up or destroying relevant documents.

Article 3 Reporting

1. Employees have the right and obligation to report incidents that have the potential for deviant, illegal or unethical behavior as soon as possible in accordance with the Company's prevailing violation reporting system policy.
2. Employees who do not report incidents that have the potential for deviant, illegal or unethical behavior are considered to have violated the Company's code of ethics.
3. Employees are obliged to comply with the provisions stipulated in this Decree. Violations of the provisions will be subject to sanctions in accordance with the prevailing sanctions provisions.

Article 4 Closing

1. Matters that have not been regulated in this Decree of the Board of Directors of the Company will be regulated later in an implementation guidance which is an integral and inseparable part of this Decree of the Board of Directors.
2. This Board of Directors Decree is effective as of the date of stipulation. If in the future there are additions and/or changes due to regulations and/or policies from the government or the Board of Directors and the Board of Commissioners of the Company, then this Decree will be subject to necessary adjustments.