



Code of Conduct



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VOICE

Visionary

Integrity

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Definition

“Gunung Sewu Group”, “GS Group”, “Gunung Sewu” or “the Company” means (i) Gunung Sewu Kencana as the holding company and (ii) all of the business units under Gunung Sewu Group.

“GSK Compliance”, “Compliance Department”, “Compliance Team” means (i) GSK Compliance Committee, (ii) GSK Compliance Department and also (iii) represents the appointed Compliance Officers & teams and Ombudsmen in each business unit under Gunung Sewu Group.





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Compliance Committee Message

As Our Group's continues growth, we are constantly challenged with situations that test our sense of right and wrong. Upholding values are not optional. Integrity is key and essential to achieving right and fair decisions. **Always be mindful and use good judgment.** Applied consistently, we are certain we will strengthen ethical discipline throughout the Group.

Best Regards,
GSK Compliance Committee

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GSK Compliance Belief

This Code of Conduct is the basic standard of ethical and responsible business conduct that is applicable for the Gunung Sewu Group – including business units under Gunung Sewu Group, and must be followed by all leaders, directors, managers, and employees of Gunung Sewu Group in our daily work.

GSK Compliance extends the expectation of following this Code of Conduct to those with whom we work, collaborate, and those who represent us, ensuring fairness to all involved.





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Gunung Sewu Compliance believes in this principles:



Integrity

We believe that Integrity isn't just doing the right thing when no one is looking. Integrity is also doing the unpopular but right thing when the pressure is on and everyone is looking.



Accountability

We must take ownership, have responsibility and accept the consequences for one's actions and decisions.



Transparency

We believe in open communication and transparency to instill a sense of trust among our diverse stakeholders.

Violations of this Code of Conduct may result in disciplinary action up to and including termination.





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Given the variety and complexity of ethical dilemmas that may arise in the course of business, this Code of Conduct serves as a guide to help the employees make a good judgment and the right decision.

When confronted with ethically ambiguous situations, the employees should remember GS Group's commitment to have a fair and ethical decision. The employees shall seek advice from supervisors, managers or other appropriate personnel to ensure that all actions we take on behalf of the Company, honoring our commitment.



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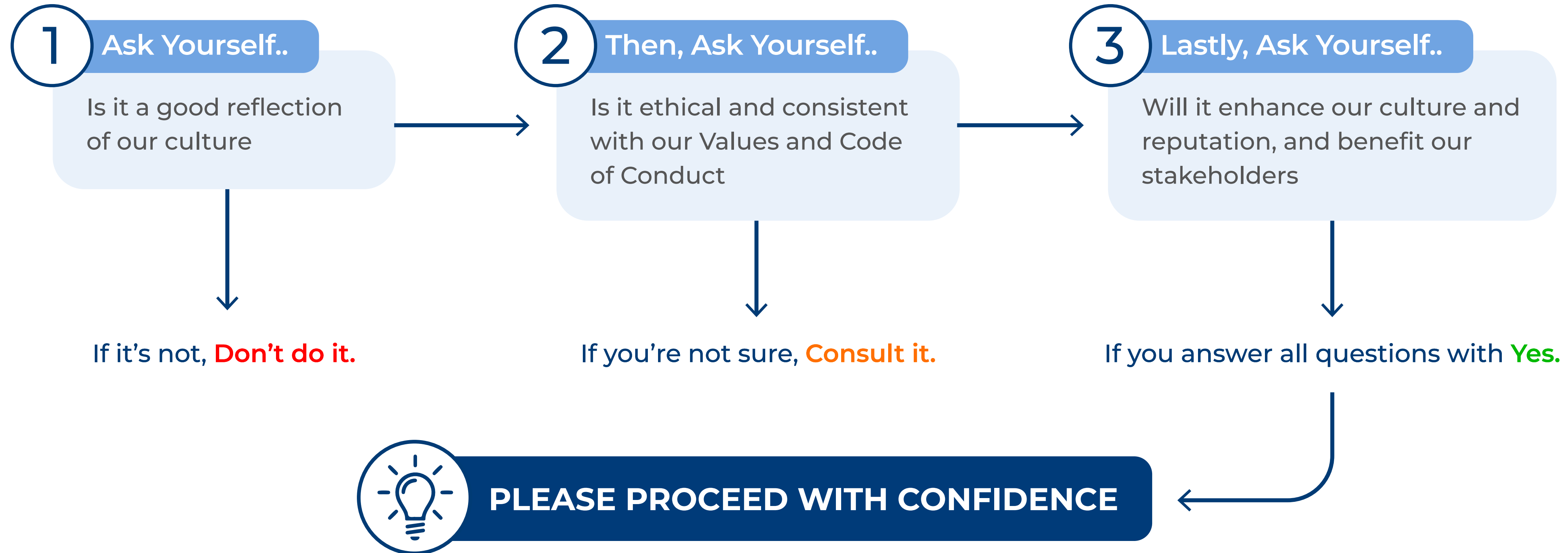
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When facing a situation and you are not sure which decision to make, ask yourself these simple questions:



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Speaking Up

GSK Compliance is building a speaking up culture.

Speaking up doesn't necessarily mean you have to immediately report to the Compliance Department and team whenever you experience, see or know something. Rather, it's about feeling Empowered to voice concerns when needed, knowing that every voice holds value.



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Raising a Concern

If you see or experience something at work which goes against ethical standards, it is Our Shared Responsibility to raise a concern. You should not assume your concerns are known at the right level of the Company. With speaking up, it will give us—you and the Company—the chance to make the right things when and where required.



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Something is not right. Who should I consult with?

1

Start local, consult with Your Supervisor. They are likely to have insight and experience in the matter.

3

You can also reach GSK Compliance by using our Helpline Channels named "**Sahabat Anda**".

2

Reach out to your Unit's HR or Compliance Officers or Ombudsperson (if any).

Email : sahabat.anda@gunungsewu.com | WA : (+62) 8111 739 858

Website : www.gunungsewu.com/about-us/codeofconduct

We are committed to the confidentiality and protection of your personal information. Your report may be made anonymously. Please let the Compliance team know shall you wish so.

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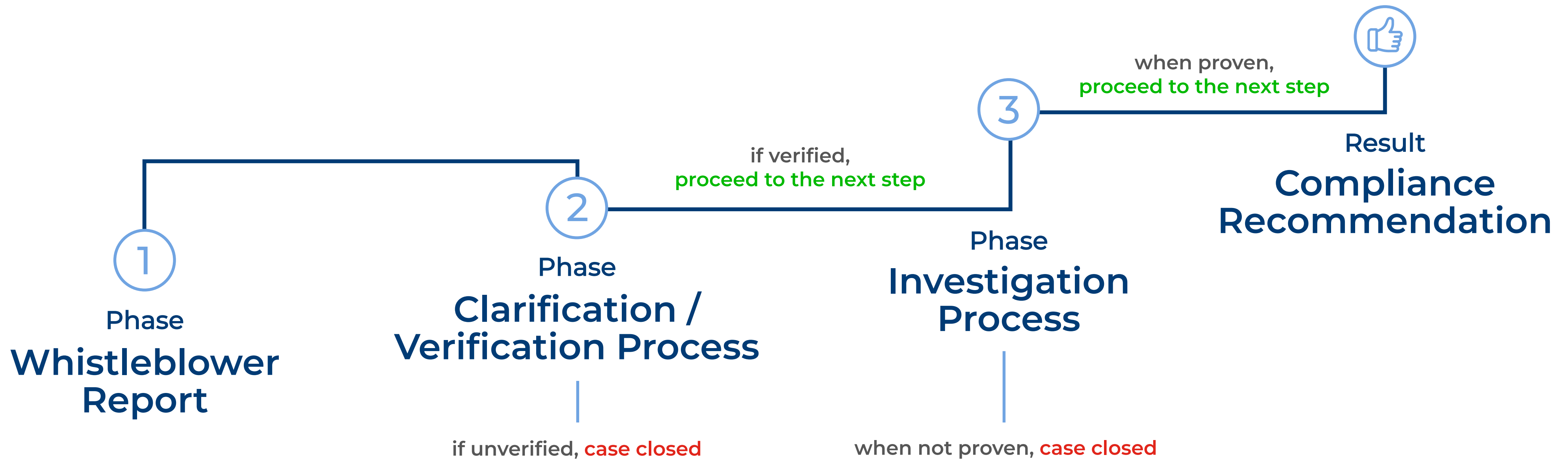
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GSK Compliance Protocol



We prohibit Retaliation. Gunung Sewu Group doesn't tolerate any form of retaliation against anyone who in good faith reports a concern and/or cooperates in a compliance investigation. If you believe you have been retaliated against, let us know.



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The Role of Leaders and Managers

As Leaders and Managers, you bear a special responsibility for establishing the culture and work environment within your team. The way you make decisions, and handle concerns, different opinions, and even bad news, will set the foundation for trust within your teams, and with other employees, partners, communities and stakeholders.

As Leaders and Managers, you should feel empowered to resolve issues yourself, but you should also be able to escalate integrity concerns about business ethics or misconducts to GSK Compliance. If you have a question or are not sure whether you can or should resolve the issue yourself, you can always reach GSK Compliance.





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Be the ethical leaders you are.



Lead by example

Be a role model by modeling ethical decision-making and good judgment.



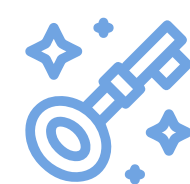
Have constant communication with your team

Talk about the importance of ethics and integrity, about how they feel and their expectancy.



Listen

Be supportive of those who come to you with questions or raise ethical concerns. Make sure your team knows you will listen.



Consistency is key

When an employee comes to you for help, or you notice unwanted behaviors, respectfully and professionally attend to their concerns. Be consistent when enforcing our standards and holding people accountable for their behavior at work.





1

APPLYING PERSONAL INTEGRITY

1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media



1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

APPLYING PERSONAL INTEGRITY

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.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

1A

Conflict 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. The employees must ensure that your personal interests do not conflict with the interests of the business or our customers.



1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✔ Ensure that your personal activities and interests do not conflict with your responsibilities to the Company.
- ✔ Inform your direct manager or the Compliance Department if you feel you might have a potential conflict of interest.
- ✔ Declare yourself, and update at any time, if you have personal investment in a business that you feel might have a potential conflict of interest.
- ✔ Check with your direct manager, Compliance Department, or Human Resources as to what is permitted and acceptable before taking any action.
- ✔ Remove yourself from the decision-making process if you have potential conflicts.

Conflict of Interest Declaration Form





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Don't

- ⊗ Do business on behalf of GS Group with a third party from which you or your family member might benefit from unfairly.
- ⊗ 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.

Remember!

Sometimes, we are the vendor and our obligation to do well stays. Let's maintain the same commitment of Ethics and Integrity in serving our partners, clients and customers as we expect from them.



1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

1B Fraud

Gunung Sewu Group is 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.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✔ Be Alert. Watch for suspicious activity that could undermine our reputation for doing business honestly and fairly. Regularly review our procedures and controls to ensure they are current.
- ✔ Immediately report any attempts to offer or to get you to act in a way that could be disadvantageous to Gunung Sewu Group.
- ✔ Be Cooperative with either Compliance's investigation or law enforcement agencies and support the prosecution or disciplinary action where sufficient evidence exists.

Don't

- ✘ Intentional deception for personal gain and to cause harm, involves knowingly misleading the Company or any individuals to benefit oneself. This can include actions such as falsifying documents, misrepresenting information, or manipulating transactions to illicitly obtain money, goods, or services.
- ✘ Never give in to pressure to do something that's unethical and unlawful, for example: to falsify a document, manipulate information, intentionally record a wrong transaction and any other activities of the same nature.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

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1E - Political Activities

1F - Social Media



1C Gift and Entertainment

Gunung Sewu Group commits to do business with ethics and integrity. Business gifts and entertainment to and from business partners build goodwill, and enhance business relationships. However common the practice of offering modest gifts, meals, hospitality, and entertainment is; it should never influence – or appear to influence – our business decisions in any way.



1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✓ Always use good judgment. Ask yourself questions like: Will it compromise my business judgment or give the appearance of doing so? Will it tarnish Gunung Sewu Group's reputation? Have I obtained all necessary approvals?
 - ✓ Keep receipt. If you accept gifts, hospitality and entertainment that are extravagant or lack transparency or a legitimate purpose, tell your manager and document the details.
 - ✓ Ask for approvals. You generally need approval when you are offered or plan to give gifts and entertainment. Consult your managers and/or Compliance Department to be sure, obtain receipts 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.
 - ✓ 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.
- For you to declare:
- Gift, Entertainment & Special Invitation Form**





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Don't

- ⊗ Participate in any entertainment that is unsavory, sexually-oriented or otherwise violates our commitment to mutual respect.
- ⊗ Participate in any activity that you know would cause the person providing the gift and entertainment to violate their own employer's standard.
- ⊗ 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.
- ⊗ Offer or provide a gift, entertainment or anything of value if it is:
 - Illegal
 - Cash or other monetary instrument
 - *A quid pro quo*¹
 - Not recorded properly on the Company's book or gift registry

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





1A - Conflict of Interest

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1F - Social Media

1D

Insider Trading and Market Abuse

GS Group employees have a legal duty to never use Company information that has not been made public for your own benefit, or for the benefit of others you know – for example, by selling or buying shares on the basis of price-sensitive information. Using information for your 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.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✓ Maintain the confidentiality of Company information.
- ✓ Consult with your manager or the Compliance Department 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 nonpublic, 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.
- ✗ 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.



1A - Conflict of Interest

1B - Fraud

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1E - Political Activities

1F - Social Media

1E Political Activities

Gunung Sewu Group has no political affiliations and makes no political donations – we work with governments and parties around the world only on issues vital to the interests of our Group. All employees have the right to be politically active as long as you keep your work separate and remain professional around customers, colleagues, etc.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✔ Make it clear when engaging in political activity or communicating in your personal social media that your political views and actions are your own and not those of Gunung Sewu Group.
- ✔ Inform the Company when you are considering running for political office. This will help to avoid any potential conflict of interest.
- ✔ Approach every conversation with Empathy and Open Mind. Remember that regardless of individuals political belief, we are united by a shared commitment to Collaboration.

Don't

- ✘ Use Gunung Sewu Group's funds, assets or facilities to support any of personal political activities, even wearing Gunung Sewu Group's attributes.
- ✘ Pressure another employee, customers or business partners to contribute or support or oppose any political candidate or party.
- ✘ Solicit contributions or distribute political literature during work hours.
- ✘ Make political or charitable contributions with the intent to improperly influence someone.





1A - Conflict of Interest

1B - Fraud

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1E - Political Activities

1F - Social Media

1F Social Media

Gunung Sewu Group recognizes the growing importance of social media and believes that it can be a great vehicle for communicating our passion and knowledge to the world. We understand that the lines between professional and personal online interactions can be blurry, but as the Ambassador of the company, the employees should be aware that your online communications can affect not only millions of people, but also Our Reputation. And with that power comes additional responsibilities.





1A - Conflict of Interest

1B - Fraud

1C - Gift and Entertainment

1D - Insider Trading and Market Abuse

1E - Political Activities

1F - Social Media

How to do it right

Do

- ✔ You are responsible for the content you publish. Always use common sense when engaging online. Your digital footprints are permanent. It can always be shared by other people.
- ✔ When stating your own opinion, make that clear. You could add a statement, "These opinions are my own and not the opinions of my Company."
- ✔ If you receive an inquiry regarding Gunung Sewu Group's activities or positions on public issues, and you are not specifically authorized by the Executive Management to respond, refer the request to the right personnel. Ask your manager or Human Resources about that.
- ✔ If you see something online that could be potentially harmful to Gunung Sewu Group, report it immediately to the right personnel, or when in doubt ask the Human Resources. Don't respond to negative comments yourself, unless you are specially authorized to do so.
- ✔ Be careful about sharing detailed personal information online. By protecting yourself, you protect the company.
- ✔ Always be respectful when engaging in online conversation. The online world is full of existing associates and potential clients of Gunung Sewu Group, and just like the "offline" world, we should be respectful in every conversation online as we do in our normal interaction.



1A - Conflict of Interest

1B - Fraud

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How to do it right

Don't

- ⊗ Disclose confidential business information about Gunung Sewu Group, our business partners and customers.
- ⊗ Make false statements or statements that might tarnish our reputation and violate the law.
- ⊗ Post anything that's discriminatory or would constitute a threat, intimidation, harassment or bullying.



2

HEALTHY WORKPLACE

2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

HEALTHY WORKPLACE

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.



2A

REDI (Respect, Equity, Diversity and Inclusivity)

Gunung Sewu Group promotes a workplace that fosters positivity and respect. We believe that our employees will be at their best and give their best when they, firstly, feel safe – both physically and psychologically. Each and every one of us brings a unique set of backgrounds, experiences and skills to enrich the Gunung Sewu Group. We are committed to ensuring fairness and impartiality, creating a balanced and inclusive environment where all employees have equal access and representation.





2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

How to do it right

Do

- ✔ Reflect on your own behavior. Be at your best. Be fair, honest and constructive. Treat colleagues and subordinates with respect and dignity.
- ✔ Be conscious of your own biases. Be respectful of other perspectives that differ from yours.
- ✔ Practice empathy in fostering inclusive work environments. Our inclusive behaviors will empower our employees to bring their best selves forward.
- ✔ Be an active bystander. Anyone who becomes aware of harassment and discrimination must report it.

Don't

- ✘ Discriminate against others. Any kind of discrimination, including based on race, ethnicity, gender, sexual orientation, religion, age, disability, or any other characteristic, will not be tolerated under any circumstances.
- ✘ Ignore harassment and discrimination complaints. Leaders who have received a report of, and/or who become aware of harassment must address promptly.
- ✘ Do microaggression. Microaggression is a statement or action regarded as indirect, subtle or unintentional discrimination against others.



2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

2B

Harassment-free Workplace

In exhibiting a professional work environment, Gunung Sewu Group 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 work environment.





2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

How to do it right

Do

- ✔ Be present. If you are a victim, or you see or know any kind of inappropriate behavior, don't ignore it. Tell the person to STOP if it feels safe.
- ✔ Avoid anything that will lead you to harassment of any kind.
- ✔ Provide guidance, training or counseling if any of your subordinates make mistakes.
- ✔ Always remember that Gunung Sewu Group prohibits retaliation against anyone who in good-faith comes forward to raise a concern.

It's still harassment if:

- It happens on and/or off working hours.
- It happens on and/or off Gunung Sewu Group's properties.
- It is committed by a vendor and/or customers.
- It takes place via Whatsapp, email and/or social media.



2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

How to do it right

Don't

- ⊗ Shout, yell, threaten or use degrading words or acts for the purpose of belittling others.
- ⊗ Make disturbing sexual comments/suggestions, e.g. commenting on one's appearance or sexual life.
- ⊗ Perform disturbing physical actions, including assault or the hindering/blocking of your subordinate or anyone in the Company's progress.

- ⊗ Offer special treatment, including promotions and/or salary increments in return for sexual favors.
- ⊗ Make any racially, ethnically, religiously, age related or sexually offensive jokes or insults.
- ⊗ Display offensive pictures or cartoons or use voicemail, email or other electronic devices to transmit derogatory or discriminatory information.





2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment



2C

Fair Employment Practices

Gunung Sewu Group is committed to building workplaces that promote teamwork, diversity and trust. In providing equal employment opportunities for everyone GS Group recruit, hire, develop, promote, discipline and offer other conditions related to employment, based solely on qualifications, performance, and business needs without discriminating against a person's ethnicity, religion, sex, age, national origin, sexual orientation, disability, as well as citizenship, marital and/or any other legally protected status.



2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

How to do it right

Do

- ✔ Support GS Group 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 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

- ✘ Do anything that fosters disunity within GS Group.
- ✘ Raise issues that may cause discriminatory consequences or implications.





2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

2D

Safe Work Environment

Gunung Sewu Group doesn't compromise when it comes to safety and strives to promote a safe workplace free from violence – meaning threats (whether implicit or explicit), intimidation, the use of drugs and alcohol while working are all forbidden. Protecting ourselves and those around us from injury is a priority. Violations of these rules are taken very seriously.



How to do it right

Do

- ✔ Observe the rules in each area of work.
- ✔ Remember that all employees working on our premises must know the health and safety requirements associated with their jobs.
- ✔ Anyone else who are visiting and/or working on our premises must know the health and safety requirements associated in each working area.
- ✔ Advise the person in charge in all working areas about all injuries and near misses.
- ✔ Comply with all health and safety laws, as well as our own health and safety requirements.
- ✔ Conduct business in accordance with all applicable health, safety and environmental laws, regulations, requirements and corporate commitments.
- ✔ Resolve problems respectfully, and never resorting to acts or threats or violence.



2A - REDI (Respect, Equity, Diversity and Inclusivity)

2B - Harassment-free Workplace

2C - Fair Employment Practices

2D - Safe Work Environment

How to do it right

Don't

- ⊗ Use drugs, alcohol or controlled substances while working.
- ⊗ Ignore all applicable health, safety and environmental laws and regulations wherever We do business.



3

WORKING WITH BUSINESS PARTNERS AND CUSTOMERS

3A - Business Partners Relationships

3B - Working with Governments

3C - Anti-Bribery and Corruption

3D - Competition Laws

3E - International Trade Control Laws

3F - Privacy

3G - Money Laundering Prevention

3A - Business Partners Relationships

3B - Working with Governments

3C - Anti-Bribery and Corruption

3D - Competition Laws

3E - International Trade Control Laws

3F - Privacy

3G - Money Laundering Prevention

WORKING WITH BUSINESS PARTNERS AND CUSTOMERS

We aim to meet customers' needs without compromising our relationships with suppliers. Additionally, to compete globally, we must also be aware of how laws are applied. This section of the COC addresses critical aspects of our business conduct, including handling customer and business partner transactions, and ensures compliance with complex laws to maintain fair competition.





3A - Business Partners Relationships

3B - Working with Governments

3C - Anti-Bribery and Corruption

3D - Competition Laws

3E - International Trade Control Laws

3F - Privacy

3G - Money Laundering Prevention

3A

Business Partners 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.





3A - Business Partners Relationships

3B - Working with Governments

3C - Anti-Bribery and Corruption

3D - Competition Laws

3E - International Trade Control Laws

3F - Privacy

3G - Money Laundering Prevention

How to do it right

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.

See the following resources:

Vendor Qualification Appraisal

Pakta Integritas Form





3A - Business Partners Relationships

3B - Working with Governments

3C - Anti-Bribery and Corruption

3D - Competition Laws

3E - International Trade Control Laws

3F - Privacy

3G - Money Laundering Prevention

How to do it right

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.
- ⊗ 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.

Remember!

If there appears to be a conflict between laws, customs, or local practices, get help from the Legal Department.





3A - Business Partners Relationships

3B - Working with Governments

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3B

Working with Governments

GS Group frequently does business with national governments and government-owned companies. When working with government agencies, officials and international public agencies – whether as customers, regulators or partners – we must ensure that our activities and interactions demonstrate Gunung Sewu’s commitment to ethical conduct. Adherence to the law and compliance to specific regulations are expected.





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How to do it right

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.

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





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How to do it right

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.
- ⊗ Deviate from contractual requirements or authorized contract substitutions to evade performing required tests and inspections.
- ⊗ Submit inaccurate or incomplete cost or pricing data when it is required by the government.
- ⊗ Violate government regulations that establish gratuity restrictions, recruiting and hiring restrictions, or certification procedures.
- ⊗ 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).



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3C

Anti-Bribery and Corruption

GS Group bases our business relationships on trust, transparency and accountability. All forms of corruption, bribery, kickbacks, or basically anything of value offered in exchange for a favorable business advantage or decision are not tolerated by Gunung Sewu Group. They harm not only our Company and its reputation, but also the communities where we do business.



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How to do it right

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, Compliance Department, local ombudsman or compliance helpline – Sahabat Anda.
- ✔ Be aware of the possibility that bribery and corruption can occur. Regularly review our procedures and controls to ensure they are current.
- ✔ Cooperate fully with law enforcement agencies and investigators and support prosecution or disciplinary action where sufficient evidence exists.
- ✔ Check with the Compliance or Legal Department as to what is permitted and acceptable before taking any action.

Don't

- ✘ Accept kickback or bribes of any kind, and don't allow anyone else to accept one for you.
- ✘ Offer or promise to pay bribes or kickbacks to anyone, and don't allow anyone else to offer one for you.



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3D

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.



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How to do it right

Do

- ✔ Comply with all applicable antitrust laws and regulations.
- ✔ Review and understand GS Group and business-specific policies and procedures.
- ✔ Consult with Legal and/or Compliance Department to help reduce the risks of non-compliance or the company raising competition law issues.

Don't

- ✘ Do Bid Rigging. Not only can it leads to potential legal consequences for the Company, but it also undermines fair competition and results in higher prices for goods and services.
- ✘ Collude with competitors on prices, bids, territories, sales terms, production capacities, costs, profits, market share, products, customers, suppliers, or distribution methods on behalf of GS Group.
- ✘ Propose or enter into agreements with anyone regarding a bid submission for no other purpose than to win the business.



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3E

International Trade Control 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 email and web access, are subject to trade controls.



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How to do it right

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.
- ✔ Screen all of your business partners, suppliers and parties involved in your international transactions against government provided watch lists.





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How to do it right

Don't

- ⊗ Cooperate with any restrictive trade practice or boycott that is prohibited or penalized under foreign or applicable local laws.
- ⊗ Ignore or take for granted any acts that suggest your customer may be attempting to evade ITC laws.
- ⊗ Accept evasive, reluctant or otherwise unsatisfactory answers from a customer to questions about end-use, end-user, delivery dates or delivery locations.
- ⊗ Get involved with parties or activities suspected of any connection with the development of biological, chemical or nuclear weapons, or ballistic missiles.
- ⊗ Conduct transactions involving an embargoed country, a citizen or representative of an embargoed country or an individual or entity subject to government sanction.
- ⊗ 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.





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How to do it right

Don't

- ⊗ 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.
- ⊗ Take or accept transfer pricing between related parties that fail to cover appropriate costs and profits.
- ⊗ Use an import tariff classification that does not accurately describe the imported goods.
- ⊗ 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.
- ⊗ Allow the entry of goods under a preferential duty program (North American Free Trade Agreement [NAFTA], etc.) without supportive procedures ensuring compliance with the program's requirements.





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3F 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.





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How to do it right

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.
- ✗ 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.



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3G

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 counter-terrorism financing policies. We will conduct business only with reputable customers involved in legitimate business activities and with funds derived from legitimate sources.





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How to do it right

Do

- ✔ Follow your business' 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.

- ✔ 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).





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How to do it right

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.
- ⊗ Process orders, purchases or payments that are unusual or inconsistent with the customer's trade or business.
- ⊗ Get involved in unusually complex deal structures, payment patterns that reflect no real business purpose, or unusually favorable payment terms.
- ⊗ Allow unusual fund transfers to or from countries unrelated to the transaction or those that are not logical for the customer.
- ⊗ Participate in transactions involving locations identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity.





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How to do it right

Don't

- ⊗ Get involved in transactions involving foreign shell or offshore banks, unlicensed money remitters or currency exchangers, or nonbank financial intermediaries.
- ⊗ Allow the structuring of transactions to evade recordkeeping or reporting requirements (for example, multiple transactions below the reportable threshold amounts).
- ⊗ Grant requests to transfer money or return deposits to a third party or an unknown/unrecognized account.





4

PROTECTING GROUP'S ASSETS

4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records



4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records



PROTECTING GROUP'S ASSETS

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.

4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

4A

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.





4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

How to do it right

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.
- ✓ Seek guidance from the Legal Department before addressing any potential intellectual property infringement.

Don't

- ✗ Use or copy the IP rights of others.
- ✗ Disclose GS Group proprietary information to others.
- ✗ Allow third parties to use our brands or any other IP without consulting your local legal department or Group Legal.
- ✗ Introduce a new product or service, or new product or service name, before checking for patent or trademark infringement.





4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

4B

Responsible Use of Company Information Technology

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.



4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

How to do it right

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.
- ✔ Practice good cybersecurity to avoid ransomware, malware, phishing and social engineering, or other forms of cyberattacks that could put our networks, operations and information at risk.

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. Consult with IT Department for any questions related to IT Acceptable Use Policy.
- ✘ Share or reveal your account password/passphrase to others or allow your account to be used by others.
- ✘ 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 devices to your computer or to the network.



[4A - Intellectual Property](#)[4B - Responsible Use of Company Information Technology](#)[4C - Confidentiality and Data Protection](#)[4D - Financial Statements and Records](#)

4C

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.



4A - Intellectual Property




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4C - Confidentiality and Data Protection


4D - Financial Statements and Records

How to do it right

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.





4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

4D

Financial Statements and Records

Gunung Sewu Group requires honest and accurate recording and reporting of information in order to allow our management to make responsible business decisions regarding our operation.

Robust controllership processes are also needed to ensure integrity in disclosures to government agencies and the public.





4A - Intellectual Property

4B - Responsible Use of Company Information Technology

4C - Confidentiality and Data Protection

4D - Financial Statements and Records

How to do it right

Do

- ✔ Reflect all transactions honestly, accurately and in the proper account, department and period.
- ✔ Comply with applicable internal and external accounting principles, standards and regulations affecting accounting and financial reporting.
- ✔ Ensure all reports, disclosures and communications to regulators, investors, and the public are full, fair, clear, accurate and timely.
- ✔ 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 any records and documents that may be relevant to pending or reasonably foreseeable litigation, audits or investigations.



4A - Intellectual Property

4B - Responsible Use of Company Information Technology

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4D - Financial Statements and Records

How to do it right

Don't

- ⊗ Provide and produce financial results that lack transparency, or a distorted financial records such as inflated travel expenses, inaccurate invoices or any statements that appear to deflect underlying business performance.
- ⊗ 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.
- ⊗ Discourage suggestions to improve processes and controls to protect assets from risk of loss.
- ⊗ Attempt to bypass internal authorization controls.
- ⊗ Allow a third party vendor to begin work before an authorized purchase order has been issued.
- ⊗ Use alternate accounting treatments without specific justification.



Sahabat Anda Helpline

If you wish to express your concern about improving the workplace environment and/or in case of any observed breach of the Gunung Sewu Code of Conduct, please reach us to:



Sahabat Anda Email



Sahabat Anda WhatsApp



Gunung Sewu Website

Choose any reporting option you are most comfortable using. Your confidentiality is our top priority, and will be protected.

All information sent to the above channels will be directed to and received only by the GSK Compliance Department

Need more details? Visit [Raising a Concern](#)