

CONFLICTS OF INTEREST

A. Basic Principles

1. Conflicts of Personal, Family and / or Group Interests

All Insan Elnusa who due to his position, when meeting the potential or condition / situation Conflicts of Interest DILARANG continue activities / carry out the obligations related to his position.

In order to avoid potential or conditions / situations of conflict of interest, Insan Elnusa:

1. It is prohibited to conduct transactions and / or use company property for personal, family or group interests;
2. It is prohibited to invest in any other party that has the potential to create a conflict of interest;
3. Establish unofficial formal / unionized organization / organization / is prohibited by applicable laws and regulations;
4. Having multiple positions outside the Elnusa group's environment that creates a conflict of interest;
5. All members of the Board of Commissioners and Board of Directors are prohibited from borrowing on behalf of the Company and Subsidiaries;
6. It is prohibited to use confidential information and Company data for purposes other than the Company;
7. It is prohibited to be discriminatory, unfair to win certain suppliers of goods / services / partners in order to receive compensation for personal, family and / or group interests;
8. No direct or indirect involvement in the management of competitor companies and / or partner companies or other potential partners;
9. It is prohibited whether directly or indirectly intentionally participates in the chartering, procurement or leasing which at the time of the work is being assigned to conduct management or supervision;
10. Prohibited from performing work not related to duties except with the written permission of the supervisor;
11. No refunds and other personal benefits which are in excess of funds or non-rights from the hotel or any other party within the framework of any service or matters which may create potential conflicts of interest;
12. Elnusa's personnel are prohibited from requesting and / or receiving gifts relating to their offices and occupations, which are known and / or reasonably suspected that the prize is given to influence decision-making and / or to mobilize to do or not to do something in their positions which contradicts his duties and duties for personal gain.
13. Exceptions and restrictions relating to the receipt of prizes are set out in detail on the acceptance and awarding guidelines.
14. Must make a statement of potential conflicts of interest if it has a blood relation in the family relationship with members of the Board of Directors and / or members of the Board of Commissioners.

2. Conflict of Interest of Company

In order to avoid potential or conditions / situations of conflict of interest, Insan Elnusa:

1. It is prohibited to provide gifts and / or entertainment to parties relating to the Company in which the grant is known to be used to provide privileges which the Company may not accept.
2. It is prohibited to be discriminatory or unfair in conducting procurement processes for providers of goods / services (not in accordance with applicable SOPs).
3. It is prohibited to utilize any confidential and business data of other companies or competing companies for the benefit of the Company.

B. Causes of Conflict of Interest

1. Power and authority of Insan Elnusa;
2. Multiple Positions;
3. Affiliation relationships both because of the relationship of blood and marital relationships;
4. Gratuities, granting and receiving prizes of funds or entertainment in a broad sense;
5. Personal interests;

C. Implementation

1. List the conflict-related provisions of interest as part of the Code of Conduct of the Company.
2. Deliver information related to this provision in socialization to all workers and third parties on a regular basis.
3. Members of the Board of Commissioners and the Board of Directors shall submit a special list and list of affiliate relationships to be published in the Company's annual report and website.
4. In the event of a Conflict of Interest conditions, which is not provided / not provided in this provision, Elnusa Insan is obliged to make a Conflict of Interest Statement of the Terms accompanied by an explanation submitted to the direct superior or local superior and third party if necessary.

II. HANDLING CONFLICTS OF INTERESTS

A. Reporting Mechanism

In the event of a conflict of interest, the Insan Elnusa shall report it through:

1. Direct Supervisor
Reporting through direct supervisors is done if the reporter is Insan Elnusa who is involved or has the potential to be directly involved in a conflict of interest situation. Reporting is carried out by submitting Statement of Conflict of Interest.
2. Whistleblowing System
Reporting through the Whistleblowing System is performed when the reporter is Insan Elnusa or other parties (Customers, Partners and Community) who have no direct involvement, but are aware of any potential conflict of interest in the Company. Reporting through the Whistleblowing System is carried out in accordance with the mechanisms and conditions set forth in the Whistleblowing System guidelines.

B. Sanctions Against Conflict of Interest

Any Elnusa Persons who are proven to act on Conflict of Interest will be followed up under the rules and regulations applicable in the Company.