

## ANTI-FRAUD

### Basic principles

The Company does not tolerate any form of fraud acts (including to or from partners, employees and government officials) including but not limited to:

1. Deceit
2. Corruption
3. Fraud
4. Assets embezzlement
5. Confidential leak

### Anti-Fraud Principle of Strategy

The anti-fraud strategy, which in its application is formed as fraud control system, has 4 (four) principles as follow:

#### 1.1. Prevention:

- Actively supervision of the Ethics & GCG Committee in the implementation of Good Corporate Governance (GCG).
- Awareness campaigns on anti-fraud, including anti-bribery and anti-corruption through various internal and external media.
- Continuous socialization through training for all employees, induction to new employees to constantly alert and ensure that employees have sufficient knowledge about anti-fraud.
- *Know Your Employee* principle.

#### 1.2. Detection:

- The Company has a whistleblowing system as a channel to report and convey employees' aspiration safely and confidentially in order to encourage employees to actively participate in maintain and express inappropriate ethical and behavioral issues, including but not limited to fraud.
- The Company has an Ethics & GCG Committee who tasked to monitor the implementation of ethics.

#### 1.3. Investigation, Reporting and Sanction:

- The Company has Ethics & GCG Committee which one of their task is to investigate alleged fraud.
- The Ethics & GCG Committee is periodically submits report to the President Director regarding to implementation of ethical oversight.
- The Ethics & GCG Committee recommends corrective action against proven offense which reported to related party (in this case to the relevant manager or head of the reported party).

#### 1.4. Monitoring, Evaluation and Follow Up:

- The Company has a fraud reporting system and records all events along with its follow-up.

All information / data are documented as periodical evaluation material as effort to culture and ethics improvement.