



2020
CODE OF CONDUCT



CODE OF CONDUCT

Globe

Illustrates the importance of adherence to the Code of Conduct and regulations to support the achievement of ANTAM's vision to be leading corporation.

Strikethrough Envelope

Represents that transparency of ANTAM's corporate governance that is anti-corruption, nepotism and other actions that only oriented toward for personal profit and group profit.

Safety First

Illustrates ANTAM Personnel commitment for health and occupational safety as the main aspect which must be obeyed in work.

Scale

Illustrates ANTAM's commitment to equity work that always upholds the principle of fairness and balance in running the company's operation.

Shake Hands

A symbol of Commitment of management and employees of ANTAM to comply with the Code of Conduct.

Whistle

A symbol of guide and procedure handling violation report (whistleblowing) as a part of Internal Control System.



2020

CODE OF CONDUCT

PT ANTAM Tbk



Declaration and Implementation Commitment of The Board of Commissioners and Directors of PT ANTAM Tbk

We, the Board of Commissioners and Board of Directors
PT ANTAM Tbk

As ANTAM's Personnel, we believe in the implementation of Good Corporate Governance (GCG) is the foundation for the formation of a system, structure and culture that will form the basis of the Company's operations and the Company's strength in running a sustainable business, and has a competitive advantage to increase value added the company.

Concomitant with the continuity of our commitment, today we are committed to ensure the implementation of Good Corporate Governance, comply with the Company's internal policies and the prevailing laws and regulations apply, comply and implement Code of Conduct, act freely from all conflicts of interest and committed to gratification control and anti-bribery, in order to achieve the Company's Vision and Mission.



Jakarta, July 5 2020

Agus Surya Bakti
President Commissioner

Dana Amin
President Director

Arif Baharudin
Commissioner

Hartono
Director of Operation and
Production

Dadan Kusdiana
Commissioner

Apriland Hidayat Setia
Director of Commerce

Anang Sri Kusuwardono
Independent Commissioner

Luki Setiawan Suardi
Director of Human Resources

Gumilar Rusliwa Somantri
Independent Commissioner

Anton Herdianto
Director of Finance

Bambang Sunarwibowo
Commissioner

Risono
Director of Business Development

Table of Contents

| | |
|---|----|
| Declaration and Implementation Commitment of The Board of Commissioners and Directors of PT ANTAM Tbk | 2 |
| Table of Contents | 4 |
| Glossary | 6 |
| 1 INTRODUCTION | |
| 1.1 Rationale | 12 |
| 1.2 Corporate Vision, Mission and Value | 14 |
| Corporate Vision | |
| Corporate Mission | |
| Corporate Values | |
| 1.3 Corporate Commitment | 20 |
| 1.4 Purposes | 20 |
| 1.5 Benefits | 21 |
| 1.6 GCG Principles | 22 |
| 1.7 Object of the Code of Conduct | 24 |
| 1.8 Responsibilities of ANTAM Personnel | 24 |
| 1.9 Responsibilities of ANTAM Management | 25 |
| 2 CORPORATE BEHAVIOR POLICY | |
| 2.1 Business Ethics (about behavior standard which implemented by Company for Interact and make relationship with stakeholders) | 28 |
| 2.1.1 Relationship with Employees | 29 |
| 2.1.2 Relationship with Customers | 30 |
| 2.1.3 Relationship with Suppliers | 32 |
| 2.1.4 Relationship with Competitors | 33 |
| 2.1.5 Relationship with Regulators | 35 |
| 2.1.6 Relationship with Surrounding Communities | 36 |
| 2.1.7 Relationship with Investors and Shareholders | 38 |
| 2.1.8 Relationship with Creditors | 39 |
| 2.1.9 Relationship with Subsidiaries/Joint Ventures | 40 |
| 2.1.10 Relationship with Media | 42 |
| 2.1.11 International Trade | 44 |
| 2.1.12 Relationship with the Community/Professional Organizations | 45 |
| 2.1.13 Relationship with Holding and Mining Industry Holding Member | 46 |
| 2.2 Work Ethics (concerning ANTAM Personnel code of conduct in carrying out the work and in interaction) | 47 |
| 2.2.1 Compliance with Laws | 47 |

| | | |
|--------|---|----|
| 2.2.2 | Conflict of Interest | 48 |
| 2.2.3 | Giving and Receiving | 51 |
| 2.2.4 | Equality and Respect for Human Rights | 53 |
| 2.2.5 | Fair Employment Opportunity | 55 |
| 2.2.6 | Inappropriate Payments | 56 |
| 2.2.7 | Confidentiality of Data and Information | 59 |
| 2.2.8 | Monitoring and Use of Assets | 61 |
| 2.2.9 | Mining Safety and Environment | 62 |
| 2.2.10 | Intellectual Property Rights (IPR) | 65 |
| 2.2.11 | Ethical Behavior towards Fellow Employees | 66 |
| 2.2.12 | Using Social Media | 68 |

3 IMPLEMENTATION GUIDELINES

| | | |
|-------|---|----|
| 3.1 | Violations | 72 |
| 3.2 | Violations Report | 73 |
| 3.2.1 | Identifying the Problems Associated with the Code of Conduct | 74 |
| 3.2.2 | Consultation and Reporting of Issues Related to the Code of Conduct | 74 |
| 3.2.3 | Procedures for Handling Violations Report | 74 |
| 3.2.4 | Whistleblowing System | 75 |
| 3.3 | Sanctions for Violations | 77 |
| 3.4 | Statement of Commitment | 77 |
| 3.5 | Socialization | 78 |
| 3.6 | Monitoring and Evaluation of Code of Conduct | 78 |

4 STATEMENT OF COMMITMENT

| | | |
|--|---|----|
| | Statement of Personal Commitment of ANTAM Personnel | 80 |
| | Statement of Data and Information Confidentiality | 82 |

APPENDIX

| | | |
|--|--|----|
| | Guidelines and Procedure for Whistleblowing System of PT ANTAM Tbk | 86 |
|--|--|----|

LIST OF IMAGES

| | | |
|-----------------|---|----|
| Image 1. | Values of ANTAM Personnel | 15 |
| Image 2. | Flow Chart of Procedure for Whistleblowing System | 97 |



Glossary

1. Abuse of Power

is the abuse of authority conducted by an official for particular purposes, either for one self or for others.

2. ANTAM Guiding Principles

is points of guidelines used as a checklist of attitudes that must be practiced by all ANTAM Personnel and as a checklist material for superiors to conduct coaching and monitoring, including the provision of constructive feedback.

3. ANTAM Partners

ANTAM Partners is the partners in the ANTAM hold jobs such as contractors, consultants, media, lawyers and other business partners.

4. ANTAM Personnel

ANTAM Personnel are Board of Commissioners, Board of Directors, Supporting Organ, Supporting Committee of Board of Commissioners and Employees of Company.

5. Anti-Bribery Management System

is a written document that contains the steps required for an Anti-Bribery organization in the Company and is designed to develop and to grow an anti-bribery culture in the Company.

6. BEST

is ANTAM's values in Human Capital Excellence consisting of (**B**eyond expectation, **E**nvironmental awareness, **S**ynergized parTnership).

7. Board of Commissioners

is The Company's organs that are tasked with conducting general and/or specific supervision in accordance with the Company's Articles of Association and providing advice to the Directors.

8. Board of Directors

is a Company organ that has the authority and is fully responsible for the management of the Company for the benefit of the Company, in accordance with the aims and objectives of the Company and represents the Company, both inside and outside the court in accordance with the provisions of the Company's Articles of Association.

9. Bribery

is offers, promises, gives, accepts or solicits an improper advantage of any value (financial or non-financial), directly or indirectly, regardless of location, is a violation of laws and regulations, as an inducement or gift to a person who acts or refrain from acting on the performance of that person's task.



10. Business Ethics

are standards of the business conduct performed by the Company as a business entity in interacting and dealing with both internal and external Stakeholders.

11. Code of Conduct

is a set of commitments that consist of business ethics of ANTAM and work ethics of ANTAM Personnel prepared to influence, form, organize and conduct the conformity of behavior in order to achieve consistent output appropriate with ANTAM culture in achieving its Vision and Mission.

12. Collective Labor Agreement (CLA)

is an agreement held by employer and ANTAM Employees Association (Perpantam), which sets out the terms, norms, rights and obligations, as well as matters pertaining to the employment relationship between the Company and the employees.

13. Company

is PT Aneka Tambang Tbk or abbreviated to PT ANTAM Tbk.

14. Confidential Data and Information

is data and information that has not been officially published by the Company including the Company's business plans and strategies, information about mineral reserves, research result and development which implemented in production process, standard and procedure of company operation, internal document signed by Company's management, intellectual property rights or other significant data and information that can affect to company's performance if spread out from ANTAM.

15. Conflict of Interest

is a condition wherein the Company's employee carry out their duties and obligations have interests out of the authorities, both concerns personal, family or interest of other parties, so that is possible for the Company to lose objectivity in making decisions and policies according to authority which has been given to the person.

16. Discrimination

is differences of treatment to fellow based on race, faction, tribe, economics, religion, etc.

17. Disorientation

is a discrepancy with the real purpose to be achieved.



Glossary

18. Employee Deliberation Team

is a team appointed by the Head of the Work Unit or Director who is in charge of human resources whose membership consists of parties based on a Collective Labor Agreement.

19. GCG Principles

are the basic matters adopted in managing the Company in an appropriate manner based on the elements of TARIF which include; Transparency, Accountability, Responsibility, Independency, and Fairness.

20. Good Corporate Citizen

is persons which comply to all corporate policy, regulation, fighting and working hard to defend all of stake holders interest and never get personal benefit from corporate business activity.

21. Good Corporate Governance (GCG)

is a system of Corporate Governance to manage and control the company in order to create added value for all Stakeholders of the Company.

22. Gratification

is a gift in the broadest sense which includes giving money, goods, rebates (discounts), commissions, interest-free loans, travel tickets, lodging facilities, travel tours, free medical treatment, and other facilities. The gratification is received both domestically and abroad and which were carried out using electronic or non-electronic means.

23. Holding

is Mining Industry Holding Company as regulated in government regulations number 47 of 2017 namely PT Indonesia Asahan Aluminum (Persero) in its function as Holding.

24. Infrastructure

are supporting organs of the Company, including General Meeting of Shareholders (GMOS), the Board of Commissioners (BOC), and the Board of Directors (BOD), Supporting Committees of the Board of Commissioners, Internal Audit, Risk Management, Corporate Secretary.

25. Internet

is the electronic communication network that connecting computers network and computer facility which organized around the world through telephone or satellite.



26. Knowledge Management

is a set of technical and strategy to maintain, analyze, organize, enhance, and share understanding and experience.

27. Material Information

is the information which can influence stock prices or corporate investment decision include case which can influence corporate performance or reputation and other definition based on regulations.

28. Moral Hazard

is a condition which related to personality, talent, and human character which can increase amount of loss compared with average risk.

29. Occupational Health and Safety

are all activities to guarantee and protect the safety and health of workers through efforts to prevent work accidents and occupational diseases.

30. PIONEER

is actualization of ANTAM's values which consist **P**rofessionalism, **I**ntegrity, **g**lobal mentality, **h**armo**N**y, **E**x**C**ellence, **R**eputation.

31. SENSE

are the values of the attributes of leadership of ANTAM Personnel comprising **S**peed, **E**Nergize, **R**e**S**pect, **C**ourag**E**.

32. Shareholders

are the parties that own shares of the Company such as investors.

33. Softstructure

is Company Policies such as Corporate Governance Policy, Code of Conduct, Charters, Management Policy, Standard Operating Procedure (SOP), Work Instruction (WI) and other Corporate Policies.

34. Social Media

is media or tool of social communication by online in cyberspace (Internet). Social media's user communicating, Interacting, sending messages, sharing and build networking.

35. Stakeholders

are all interested parties of the Company including Employees/Officers, Partners, the Government, Trade Unions and the Community around the Company.



Glossary

36. Tacit Knowledge

is something that we know and experience, but it is difficult to clearly and completely be articulated and very difficult to be transferred to another person because the knowledge is borned in the Company in accordance with its competence

37. Things to Consider

are further elaboration on the point listed in the Code of Conduct, usually in the form of the potential risks and possible impacts arising from the implementation of the points on Code of Conduct as well as relevant SOP/work instructions, compliance with applicable regulations and other matters that are beyond the Company's control.

38. Violation

is an attitude, action or behavior deviating from the Code of Conduct.

39. Whistleblowing System

is a system that can be used as a media for reporting information regarding indications of violations occurring within a Company.

40. Window Dressing

is a strategy used by a company to attract investors by enhancing its financial statements or performance and business portfolio. The goal, of course, is to convince investors to invest profitable capital for the company.

41. Work Ethics

are standards of works behavior that are used by all employees in performing duties for and on behalf of the Company, as well as to interact and connect with fellow co-workers, superiors and stakeholders.

INTRODUCTION



1.1 Rationale



The importance of the implementation of Good Corporate Governance (GCG) is both a requirement and demands which is inevitable in the global business development and enhancement of the Company's image. GCG is both the system and the structure in order to give confidence to all Stakeholders that the Company is managed and controlled in order to

protect the interests of Stakeholders in line with legislation and GCG principles generally accepted as well as the one which will continue to be developed in universally. Basically the successful implementation of GCG is determined by the commitment of all levels of the Company elements, readiness and completeness of the supporting organs of the Company (infrastructure GCG) as well as other GCG policies (softstructure GCG) with regard to suitability, business characteristics and the Company's needs.

PT ANTAM Tbk, hereinafter referred to as ANTAM realizes the importance of the implementation of GCG as a tool and a way to increase the value and long-term business growth on an ongoing basis not only for the Shareholders but also other Stakeholders. Therefore, ANTAM is committed to implement GCG consistently one of which is carried out through the preparation of the Code of Conduct.

Code of Conduct is a set of commitments comprised of business ethics of ANTAM and work ethic of ANTAM Personnel prepared to influence, form, organize and



conduct the conformity of behavior in order to achieve consistent output in accordance with the values and culture of ANTAM in achieving its vision and mission.

The Code of Conduct applies to all individuals who act on behalf of ANTAM, Subsidiaries and Affiliates under control, Shareholders and all other Stakeholders or Partners who conduct business transactions with ANTAM.

ANTAM always encourage adherence to Code of Conduct and are committed to implement it, and requires that the entire management from all levels within the Company are responsible for ensuring that code of conduct are adhered to and properly executed on each level.

As a form of that commitment, the Code of Conduct shall be Signed annually by all ANTAM Personnel whether by members of the Board of Commissioners, the Board of Directors, Committee Members as well as each individual whether ANTAM Personnel worked at the Head Office, Unit/Business Unit, Project, Subsidiaries and Affiliates under control as well as other personnel acting on behalf of ANTAM.

The signature is carried out in hard copy on the page of **Statement of Commitment** page of Code of Conduct Book or by online through company's internal site or others media.

In order to encourage the implementation of Code of Conduct to run properly, the internalization and socialization programs are needed to be implemented in all areas of operations of the Company. Socialization and Internalization shall be carried out routinely to the ANTAM Personnel both at structural level and implementer level.

The Code of Conduct shall always be adapted to the development of law, social, norms, rules and business development of ANTAM. It is expected that all parties to provide input to the development of the Code of Conduct to be in line and synergize with the values already exist at ANTAM. Successful implementation of the Code of Conduct is strongly supported by the spirit, communication and shared commitment to implement them in their daily operational activities

1.2 Corporate Vision, Mission, And Values



VISION

To become a leading global corporation through diversification and integrated natural-resource based business



MISSION

1. To provide high quality products with a view of achieving maximum added value through best industry practices and competitive operational performance.
2. To optimize resources with emphasis on sustainability, occupational safety and environmental conservation.
3. To maximize the shareholder and stakeholder value.
4. To improve the employee's competency and welfare as well as the independency of the communities In the vicinity of the operational areas.



Corporate Values

Image 1. Values of ANTAM Personnel as Operational Basis



ANTAM believes that ANTAM VISION 2030 can only be successfully achieved if executed with Business Excellence and Operation Excellence, which is based on ANTAM Basic Characters, namely Integrity, Maturity and Abundance Mentality and GCG principles (**TARIF**-Transparency, **A**ccountability, **R**esponsibility, **I**ndependency and **F**airness).

In practice, ANTAM Vision 2030 should also be supported by the Human Capital Strategic Objective namely Human Capital Excellence (**BEST**-Beyond Expectation, **E**nvironmental Awareness, **S**ynergize Par**T**nership) which has Leadership Attributes (**SENSE**-Speed, **EN**ergize, Re**S**pect, Courag**E**) through 20 Behaviours, and inspiring ANTAM Values (**PIONEER**-Professionalism, Integrity, **G**l**O**bal Mentality, Har**mo**Ny, Exc**el**lence, Re**pu**tation) as the values and norms of behavior that must be adhered to and applied in the implementation of day-to-daily work by all levels of the Company.



PIONEER values interpreted by 20 (twenty) behaviors below:

1. Professionalism

- a. Highly committed to working and synergizing best practices with business acumen and corporate culture to provide maximum contribution.
- b. Strive to achieve higher standards and open to new ideas.
- c. Dare to take decisions and actions by taking into account of the risks and benefits for the Company.
- d. Develop themselves an optimally and continuously for enhancement of achievement/performance and career development.

2. Integrity

- a. Comply to Code of Conduct, GCG, and regulations.
- b. Priority fairness and the interests of the Company.
- c. Work transparently, accountably, and fairly.

3. Global Mentality

- a. Construct global mentality (the way of thinking, competence, self-confidence and how to act) in accordance with world class business acumen.
- b. Widely followed business development at a global level to make a transformation to improve the performance of the Company.
- c. Develop the ability to adapt to cultural differences and changes (both local and international).

4. Harmony

- a. Respect for human rights, different opinions, values, norms, and principles espoused by others.
- b. Build cooperation and synergistic relationship with all stakeholders both internal and external parties on a win-win basis and equity.
- c. Care to all stakeholders, particularly employees, strategic partners, and the communities around the area of operation.



5. Excellence

- a. Embed high commitment, winning mentality, strong belief and a positive attitude to do their best in order to achieve the best performance.
- b. Build the best standards and in the most effective and efficient way to achieve the best organizational performance/employees performance.
- c. Enforce discipline to develop and implement effective and consistent work plan.
- d. Make continuous improvement to the systems and procedures of occupational health and safety by implementing world class practices and principles of operational excellence.

6. Reputation

- a. Instill pride as ANTAM Personnel who has a good individual reputation for improvement of the image of the Company.
- b. Build, improve, and maintain a positive company image at national and global levels.
- c. Enhance the Company's position in the national and global business arena.

20 behaviors which has been established as the implementation of PIONEER thereafter are realized into ANTAM Guiding Principles to facilitate ANTAM Personnel to practice it in day-to-day interactions at every opportunity such as in meetings, safety talk, communication, coordination and teamwork, briefing, coaching, dealing with clients or guests and so forth. ANTAM Guiding Principle is made in the verb as follows to facilitate "action" for ANTAM Personnel.

Personal

- **to think positively** and to acting **in line** with **the interests of the Company**,
- **full of enthusiasm** to **improve oneself** and **not easily satisfied**,
- **to bring solutions** with **careful consideration**, and
- **to act comprehensively** from **upstream to downstream**.



Teamwork

- **devote thought** and **energy** in a **fully responsible manner** for **the benefit of the Company**,
- **improve coordination** and **communication** regularly,
- **improve coaching** and **empowerment**,
- **satisfy** the needs of **internal** and external **customers**.

For Personal:

ANTAM Guiding Principles is used as a personal guide and checklist in carrying out the work. The bottom line is to always be **positive, enthusiastic, to bring solutions** and **act comprehensively**.

For Teamwork:

ANTAM Guiding Principle is used as a guide and checklist when performing teamwork. The bottom line is for the benefit of the team, should always **devote energy and mind to achieve goals**, and **enhance communication** and **coordination**.

The superiors and managers shall always carry out support in the form of continuous coaching, so that empowerment can be maximized, and remind subordinates to always satisfy internal and external customers. Internal customer are the whole process of the next series of work including superiors, subordinates, and co-workers. External customers are all those who interact with ANTAM in order to implement the Company's interests.

By using the ANTAM Guiding Principle checklist, communication and positive interaction is expected to be established. Each party can understand what to expect as well as able to remind each other to act in accordance with the checklist.



Leadership Attributes of SENSE are interpreted as:

1. Speed

The ability to make decisions, take action and complete tasks/work quickly, accurately, efficiently, effectively, anticipatory, and holistically in response to changes in the business environment, market dynamics and industry.

2. ENergize

The ability to motivate, encourage to energize and inspire to do the best for the interests of the Company.

3. ReSpect

Respect, trust, and honor the rules and policies of the Company, as well as the opinions, views, and interests of others, although different from the personal opinions, views, and interests.

4. CouragE

Courage to take risks in decision-making and action by the full calculation, wisdom and responsibility to optimize the full potential of the Company.

Objectives of Human Capital Excellence BEST are interpreted as:

1. Beyond Expectation

ANTAM Personnel are aware of the occupational health and safety as well as environmental sustainability, community empowerment and development based on the principles of Operational Excellent and Corporate Social Responsibility.

2. Environmental Awareness

ANTAM Personnel are concerned with occupational safety and health as well Environmental sustainability, empowerment and community development based on the principles of Corporate Social Responsibility.

3. Synergized PartNership

ANTAM Personnel build harmonious partnership relationships with Stakeholders based on the principles of Good Corporate Governance (GCG) and the Code of Conduct.



1.3 Corporate Commitment

In the operations, ANTAM is committed to achieving the highest level of implementation of the values and business ethics. To achieve it, therefore:

1. The entire ANTAM Personnel must uphold and behave in accordance with the values and standards of behavior set forth in the Code of Conduct.
2. All management from all levels within the Company are responsible for ensuring that the Code of Conduct is adhered to and executed by each ANTAM Personnel on its respective line;
3. The entire Company Partners (consultants, contractors and partners) must understand and comply with the relevant provisions of the Code of Conduct; and
4. The entire ANTAM Personnel including will give a commitment statement to comply the Code of Conduct at least once a year.

1.4 Purposes

1. As a practical guide and a code of conduct for all ANTAM Personnel which must be obeyed in their daily interaction with all parties and should be used as the basis of reasoning in the decision-making process.
2. As a means to create and maintain a positive work environment that supports ethical behavior of all of ANTAM Personnel.
3. As a means to improve the sensitivity of the Company and ANTAM Personnel to the values of business ethics by developing discussions or the development of the discourse on ethics.

1.5 Benefits

The consistent implementation of the Code of Conduct are expected to provide long-term benefits, for:

1. Employees

- a. Provide guidance to employees about the appropriate and inappropriate behavior in carrying out its duties and responsibilities in ANTAM.
- b. Create a work environment that upholds the values of honesty, ethics and openness that will improve the performance and productivity of employees as a whole.

2. Company

- a. Encourage ANTAM operations to be more efficient and effective given the relationship with customers, communities, governments and other Stakeholders having Code of Conduct that must be taken into account.
- b. Increase the value of ANTAM to provide certainty and protection to the Stakeholders in relation with ANTAM to produce a good reputation, which ultimately realize long-term success of the business.

3. Shareholders

Add to the belief that ANTAM is managed prudently, efficiently, transparently, accountably and fairly to reach the level of profitability expected by the Shareholders by taking into account of the interests of ANTAM.

4. Other Stakeholders Company

Create a harmonious relationship and mutual benefits with ANTAM. Increasing value of ANTAM will provide certainty and protection to the Stakeholders in relation with ANTAM, which in turn will create economic and social welfare for the community and other relevant parties.



1.6 GCG's Principles

ANTAM conducts its business activities in accountable manner that reflect concern not only to Shareholders but also to other Stakeholders.

Transparency

1. The company avoids the occurrence of unfair domination by stakeholders and is not influenced by unilateral interests and is free from conflicts of interest;
2. All parties involved in business processes in the Company make decisions objectively and free from any pressure from any party;
3. The company applies the principle of openness with due regard applicable statutory provisions and confidentiality of office.

Accountability

1. The company sets business targets and strategies that can be accountable to stakeholders;
2. Clear segregation of duties and responsibilities for each organ members of the Board of Commissioners, Directors and all levels below that are in line with the company's vision, mission, corporate values, business goals and strategy;
3. All levels of the company have competencies according to their responsibilities and understand their role in the implementation of corporate governance;
4. Company management is carried out with a Check and balance system;
5. Performance measurement is based on agreed-upon measures that are consistent with the Company's business goals and strategies and has a rewards and punishment system.



Responsibility

The company is responsible for adhering to the principle of prudence and ensuring compliance with applicable regulations and having a concern for the environment and carrying out social responsibilities appropriately.

Independency

1. The company avoids the occurrence of unfair domination by stakeholders and is not influenced by unilateral interests and is free from conflicts of interest;
2. All parties involved in business processes in the Company make decisions objectively and free from any pressure from any party.

Fairness

1. The company pays attention to the interests of all stakeholders based on the principle of equality and fairness (equal treatment);
2. The company provides an opportunity for all stakeholders to provide input and express opinions for the interests of the Company.



1.7 Object of Code Conduct

The parties to abide by and implement the Code of Conduct are:

1. The entire ANTAM Personnel at all levels;
2. Employee certain time. Outsourcing employee, and other person acting on behalf of ANTAM;
3. Board of Director, Board of Commissioner, employee of subsidiaries and affiliates under control. Affiliates under control are subsidiary or other business entities owned by ANTAM, either directly or indirectly, with more than 50% of the voting rights or of which ANTAM has the ability to control the business entity;
4. ANTAM investors (Shareholders);
5. ANTAM partners such as contractors, consultants, media, advocates, and other partners.

1.8 Responsibilities of ANTAM Personnel

1. To study in detail the Code of Conduct related to their duties. Each ANTAM Personnel should comprehend the Code of Conduct set forth in the Code of Conduct.
2. To consultation with immediate superior, Corporate Secretary Division, Human Capital Management Division, Legal & Compliance Division or the parties that have been set by the Board of Directors, if ANTAM Personnel have any questions regarding the implementation of the Code of Conduct.
3. To immediately talk to the parties that have been determined by the Board of Directors, of any problems encountered on the possible violation of the Code of Conduct.
4. To understand the procedures used to notify or report a possible violation of the Code of Conduct.
5. Willing to cooperate in the investigation of the possible violation of the Code of Conduct.

1.9 Responsibilities of ANTAM Management



1. To establish and to maintain a culture of compliance with the Code of Conduct by:
 - a. Personally encourage compliance with the Code of Conduct.
 - b. Perform regular surveillance on programs that aim to encourage adherence of ANTAM Personnel to Code of Conduct; and
 - c. Provide a good example in how to behave and act in daily conduct.
2. To ensure that each ANTAM Personnel that the observance of the Code of Conduct is as important as the achievement of performance;
3. To encourage ANTAM Personnel to inquire about various issues of integrity and business ethics;
4. To consider the problem of compliance with the Code of Conduct in evaluating and rewarding of ANTAM Personnel.
5. To prevent the possible violation of the Code of Conduct through the efforts of:
 - a. Ensuring that the risk of possible violation of the Code of Conduct relating to business processes can be identified early and systematically;
 - b. Identifying and reporting in accordance with the procedures established against activities of its subsidiaries, affiliates and partners that may lead to the possibility of violation of the Code of Conduct; and
 - c. Ensuring the implementation of education and training on the Code of Conduct for all ANTAM Personnel, subsidiaries, affiliates and outreach to partners so that the parties understand and grasp the Code of Conduct as a whole.



6. To detect possible violation of the Code of Conduct by:
 - a. Implement inherent monitoring to minimize the risk of possible violation of the Code of Conduct;
 - b. Create reporting system of possible violation of the Code of Conduct and to protect the confidentiality of ANTAM Personnel who reported it; and
 - c. Ensure the implementation of regular evaluation of the implementation of the Code of Conduct by the Internal Audit Division to assess the effectiveness of the implementation and how to improve the existing weaknesses.

7. To follow up the report of a possible violation of the Code of Conduct by:
 - a. Quickly fixing the flaws found in the assessment of compliance on the implementation of the Code of Conduct;
 - b. Providing appropriate disciplinary actions; and
 - c. Consulting with Legal & Compliance Division if the violation of the Code of Conduct that require intervention of law enforcement or the authorities.

CORPORATE BEHAVIOUR POLICY



Corporate Behavior Policy is an explanation of how the Company including the organs as a business entity behave ethically and act in an effort to balance ANTAM's interests with all of Stakeholders interest in accordance with the GCG principles and healthy corporate values while maintaining Corporate profitability and sustainability.

Some critical aspects are deemed necessary to be regulated in the Code of Conduct as a guidance of ANTAM in dealing with Stakeholders, both internal and external, among others, include the following:

2.1 Business Ethics

(Concerning the Standards of Behavior that are Applied by the Company in Interacting and Dealing with Stakeholders)





2.1.1 Relationship with Employee

ANTAM realizes that employees are the most important aspect in supporting the success of the Company. Therefore ANTAM provide equal and the widest opportunities for all employees to actively participate in achieving the vision and mission of the Company.

2.1.1.1 Code of Conduct

1. The Company honor and respect the rights and obligations of employees under the Collective Labor Agreement (CLA) of ANTAM and the legislation in force.
2. The Company treats employees as valuable assets that the Company will provide an equal opportunity for employees to develop their potential without discrimination of gender, ethnicity, religion, race and inter-group.
3. The Company implemented recruitment, promotion, and career development system fairly in accordance with the competencies of each employee as well as the needs of the Company.
4. The Company gives employees the freedom to express their opinions and aspirations in an ethical procedure and does not conflict with the applicable regulations of the company.
5. The Company ensures a good and conducive working climate for Employees, and protects Employees from all forms of possibilities that endanger work safety and health.
6. The Company provide appropriate reward to employees who performed well and provide strict punishment against all forms of violations committed by employees.
7. The Company supports employees to have the competence and tacit knowledge that is useful for the Company and other individuals within the Company.

2.1.1.2 Things to Consider

1. Rights and Obligations of the Company and Employee as specified in the Collective Labor Agreement (CLA).
2. Work culture that does not support the creation of a dynamic and harmonious relationship.

3. Functions of trade unions that inactive in bridging the relationship between the Company and Employee.
4. External intervention that could affect the Company's behavior towards a particular employee.
5. Laws related to employment.
6. Personal motive, moral hazard of the employees incompatible with the Company's aim, values and culture.
7. Employee satisfaction index and engagement to company.
8. Employee turnover.



QUESTION

ANTAM is held employee recruitment, one of employee joined his son in selection, is it allowed?

ANSWER

ANTAM give equal opportunity to all selection participants if the participant fulfill to the requirements which needed, through that employee not to do intervention during the recruitment process and the result of it.



2.1.2 Relationship with Customers

ANTAM is committed to meet all sales contracts that have been agreed upon in an effort to increase customer satisfaction and fulfillment of supply to customers.

2.1.2.1 Code of Conduct

1. To always work hard to provide the best production results with competitive prices.
2. To always promote professional standards of service in order to satisfy the customers.
3. To always pay attention to customers need and continually monitor, enhance products, through improvement of systematic operation standards supported by adequate technology.
4. To always maintain the safety aspects and innovation at every stage of the process of development, production and distribution with a view to maintain the quality of products.



5. Mutual respect to the interests of each party through a clear and fair contract terms (including the implementation process).
6. All of transaction which related to customers must be implement fairly, full of integrity and fulfill customer protection aspect.
7. Both parties are also mutually carry out evaluation efforts for improvements and a more harmonious and constructive relationships.

2.1.2.2 Things to Consider

1. Attitude and partnership relationship with customers.
2. Changes in product prices and exchange rates.
3. Control of the process of development, production and distribution that affect the quality of the product.
4. Process and legality of the sales contract.
5. Applicable regulations in relation with trade.
6. Control of the payment system used.
7. The Result of Customer Satisfaction Survey.



QUESTION

At the time of launching new product, ANTAM giving souvenirs to customers, is it be permitted?

ANSWER

Souvenirs could given as promoting purposes for ANTAM's product.





2.1.3 Relationship with Suppliers

ANTAM bases Company relationship with its suppliers based on the principles of legitimate, efficient and fair business practices. ANTAM expects that each supplier to always uphold the legislation in force in dealing with ANTAM Personnel, among suppliers and ANTAM as a Company.

2.1.3.1 Code of Conduct

1. To follow the entire regulations of goods and services procurement set by ANTAM, at the time of procurement for goods or services required.
2. To use suppliers who meet the qualifications set by ANTAM and to consistently be able to meet the good quality standards of goods and services at a competitive and representative cost.
3. To perform working relationship only with suppliers that comply with the applicable laws and regulations and the additional requirements of ANTAM, especially with regard to employment, the environment, health and safety, intellectual property rights and inappropriate payments.
4. Both sides are also ought to carry out evaluation efforts for the improvement and a more harmonious and constructive relationship.

2.1.3.2 Things to Consider

1. Selection of suppliers which is not through open bidding (tender) and not performed competitively and ignoring suppliers performance based on the database of the recorded in the Company.
2. Potential conflict of interest in the selection of suppliers, including the receiving and giving (gratification/bribe) in the form of money, gifts, entertainment or other items of value, except as expressly set forth in the Company's policies and the applicable procurement of goods and services policies.
3. Supplier does not meet the ANTAM's requirements of the Mining Safety. And Environment Occupational regulation and other regulations.

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4. Suppliers who do not fulfill part/all of the contents of the contract thus causing ANTAM's loss.
 5. Lack of control over the process of procurement of goods and services of the Company.
 6. Practices of marking up the price and quantity and conformity of the quality/ technical specification, collusion between suppliers in pricing (price fixing) as well as in the division of work (bid pooling) and the reliance on one supplier in a long-term.
 7. The use of e-procurement in the procurement process.
 8. The Result of supplier satisfaction index.

**QUESTION**

Suppliers who won the procurement process, giving a gift to user. Is it allowed?

ANSWER

ANTAM firmly prohibit that action because that is one of kind gratification and may be potentially make bribe. User should give understanding to suppliers that Company firmly prohibit giving which any form.



2.1.4 Relationship with Competitors

In carrying out its business activities, ANTAM is committed to doing it in a manner that can be accounted for so that ANTAM always committed to implementing fair competition and considers competitors as the Company's drivers to always provide the best for customers and other interested parties.

2.1.4.1 Code of Conduct

1. To maintain good relationships and respect the existence of competitors.
2. To show a fair competitive and ethical behavior in accordance with the provisions of the Company and the applicable laws and regulations.

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3. To avoid business relationship and cooperation tend to be inappropriate, to benefit certain parties and at the expense of the interests of consumers.
 4. Conducting market research to determine the competitor's position and make the competitor company as a benchmark in order to improve the Company's performance.
 5. The company conducts sustainable promotion in a fairly, honestly manner that does not vilify competitors.

2.1.4.2 Things to Consider

1. Having a relationship with certain parties within the competitor that could potentially harm one of the parties such as any insider information on both sides.
2. Negative promotions with the intent to vilify competitors.
3. Provoked by unfairly business practices carried out by competitors.
4. Potential unethical recruitment of ANTAM's employee by competitors.



QUESTION

An employee is promoting company's products to candidate buyers. During his explanation, he telling the weakness of competitors product and mention it brand. Is it fair to do?

ANSWER

That action is violation of business ethics. ANTAM always comply to business ethics in business operation and not do negative promotions to competitors products.



2.1.5 Relationship with Regulators



ANTAM is committed to build relationships with all agencies and government officials (Regulators) based on the standards of business ethics and the applicable laws and regulations.

2.1.5.1 Code of Conduct

1. Comply to the applicable laws and regulations particularly regarding relations with the Government.
2. To build a harmonious relationship with the Government both as the Regulator and as Shareholders (in a separate context).
3. To require all ANTAM's business partners to adhere to the code of conduct in relationship with the Government applied by ANTAM and the applicable laws and regulations.
4. To uphold the principles of GCG-TARIF in relations with all the agencies and Government officials.
5. Any reports, statements, certifications and requests addressed to the Government should be transparent, clear, accurate, complete and does not contain issues that can be interpreted incorrectly.
6. To always put forward the principles of GCG in each licensing process.

2.1.5.2 Things to Consider

1. Specific requirements or the imposition of unauthorized charges in connection with the licensing process issued by the Government.
2. Submission of Company information or data which is inaccurate or incomplete required by the Government.
3. Violation of the Government regulations regarding the prohibition of gratification regulations regarding entertainment.
4. Be aware of “negative cultural imposition” which contradicts with the Corporate values and culture.

2.1.6 Relationship with the Surrounding Communities



In line with Principle of Good Corporate Citizen, the Company will not be able to grow without engaging the surrounding communities to grow and develop together.

2.1.6.1 Code of Conduct

1. To always uphold the commitment that wherever the Company's working unit operates, good relationships and development of surrounding community are the basic foundations for long-term success of the Company.
2. To always appreciate any partnership activity that contributes to the community and improve social values and the Company's image.



3. To cooperate with organizations, community institutions, central and local Government to achieve the shared commitment of the partnership program based on mutual trust and in line with the principle of openness.
4. To develop and to promote mechanisms of dialogue with surrounding institutions, in hopes to formulate a more rational and effective policy.
5. To appreciate and to respect the local wisdom.
6. To actively participate in positive activities undertaken by the communities around the area of operation.
7. To empower and to provide added value to people's lives around the area of operations.

2.1.6.2 Things to Consider

1. Sensitivity and harmonization of the issues faced by the community around the operations of the Company.
2. The principle of information disclosure and active partnership.
3. Inequality of economic levels of the community around the area of operations of the Company.
4. Promoting balance of the ecosystem and the environment.
5. Efforts to achieve a win-win solution to the problems which may arise.
6. The potential for jealousy/social gap in certain communities around the area of operations.
7. Provocation by certain public elements to drive the communities around the area of operations in act of anarchy.
8. Demand for personal interests through an illegitimate mechanism as well as the existence of certain political interests.



QUESTION

A Headman who has position in one of Company's operational location asking donation to ANTAM for build general praying facility. Is it be permitted?

ANSWER

ANTAM can give donation related to corporate social responsibility in the form of assistance through CSR Fund management for communities and to surrounding environment whether not related to politics activity and has suitable authority also can be responsibility evidently.



2.1.7 Relationship with Investors and Shareholders

ANTAM Personnel is committed to continually working hard for the Company to experience continuous growth based on mutually beneficial business standards to be able to provide optimum added value to the Shareholders.



2.1.7.1 Code of Conduct

1. Discussion of the communication process with Investors and Shareholders is only done through one door (one-door policy) with the knowledge and approval by the Board Directors (in relation to material matters) and communicated through the Corporate Secretary Division
2. Each reporting, statements, and information disclosure to investors must be transparent, clear, accurate, consistent, complete and does not contain issues that can be misinterpreted except for information which the Directors have a justifiable reason for not giving it.
3. Every Investors and Shareholders must be obey to ANTAM's Articles of Association and all resolutions adopted lawfully in the GMOS.
4. Provide equal (fair) treatment to Shareholders and Investors to be able to exercise their rights according to the Articles of Association and the applicable laws and regulations

5. To maintain the clarity of accountability and independency, prohibit the Shareholders to intervene in the operations of the Company which is the responsibility of the Board of Directors in accordance with the Articles of Association and the applicable laws and regulations.

2.1.7.2 Things to Consider

1. Transformation and accountability of information issued by the Company.
2. Dissemination of inaccurate or incomplete information or data of the Company required by Investors and Shareholders.
3. Violation on regulations issued by the OJK (Otoritas Jasa Keuangan/Financial Services Authority), the Indonesia Stock Exchange (IDX) and the Australian Securities Exchange (ASX).
4. Determination of dividends decided by the Shareholders in the General Meeting of Shareholders, based on the interests of the Company, by taking into account at a variety of issues such as business continuity, dividend investment plans.
5. The right of Shareholders as well as equal treatment of shareholders.

2.1.8 Relationship with Creditors

In achieving its vision and mission, ANTAM seeks to continue to develop its business with supported by funding both from Investors and Creditors. In a relationship with a Creditors, ANTAM is committed to always apply behaviors based on the existing work ethic and the applicable laws and regulations.





2.1.8.1 Code of Conduct

1. That all the elections of Creditors held for the benefit and development of Company business and be able to create added value for the company. The election process is implemented in accordance with the principles of GCG while maintaining the credibility and reputation of Creditors.
2. The Company continues to provide actual and relevant information and can be accounted for and refer to the applicable disclosure policy of the Company.
3. The Company is committed to fulfill the rights of Creditors in accordance with the Company policies and the applicable laws and regulations or agreement reached by both parties.

2.1.8.2 Things to Consider

1. Dissemination of inaccurate or incomplete Company information required by Creditors.
2. The ability of the Company to fulfill the rights of Creditors.
3. Anticipation of the possibility of the occurrence of the unexpected (force majeure) both from the company and the creditor.
4. All applicable laws and regulations related to the rights and obligations of Creditors.

2.1.9 Relationship with Subsidiaries/Joint Ventures

In developing the business, the Company may establish subsidiaries or cooperate to form a Joint Venture. Relationship with its subsidiaries and joint venture is carried out in order to build synergies and a better image, and can improve the performance and is able to provide economical added value to the Company.



2.1.9.1 Code of Conduct

1. ANTAM Personnel maintains any business relationship with its subsidiaries and joint ventures to be undertaken within the framework of normal business relations as befits business relationships developed with unaffiliated parties (arm's length relationship).
2. Respect the interests of each party through mutual cooperation agreement.
3. The existence of subsidiaries/joint ventures should be able to create economical added value for the parent company and be able to support the sustainability of the Company.
4. The policies that apply in subsidiaries/joint ventures must be in line and refer to the policies that apply at ANTAM. In the event that the Directors of a Subsidiary/Joint Venture Company require more specific policies due to consideration of the effectiveness and efficiency of the company's management, the application refers to the policies related to the management of Subsidiaries/Joint Venture Companies.

2.1.9.2 Things to Consider

1. The effectiveness of control (span of control) over subsidiary/joint ventures which related to governance implementation in subsidiaries.
2. Interventions to the operational activities of the subsidiary/joint ventures with in consideration of the GCG principles.
3. Cooperation agreement that is unbalanced and legally flawed.
4. Financial transactions that could deviate from the regulations of state treasury (transfer pricing).
5. Motive of "window dressing" of parent company financial statements based on the performance of its subsidiaries/joint ventures.
6. Dependence of the funding to the hold Company.
7. Legal case risks that occur in subsidiaries/joint ventures that impact on the parent company.

2.1.10 Relationship with Media

ANTAM believes that by building and developing relationships with the media, the Company can reach out to the public in order to improve the image, confidence, and achievement of the objectives of the Company. Therefore, the company strives to always provide accurate and accountable information to the public.



2.1.10.1 Code of Conduct

1. To make the mass media as a partner to promote relationships based on openness and mutual respect so that the Company will always strive to deliver relevant and accurate information in accordance with the applicable provisions of the Company and not in violation of journalistic ethics.
2. To receive and follow up the constructive criticisms delivered through the media while considering the risks and costs aspects.
3. Submission of all information material to the media, especially material information must be the information that has been published (public information) as further stipulated in the Company's internal policies.
4. ANTAM Personnel who can convey information to the media are ANTAM Personnel who has been approved or appointed by management or other parties of authority.
5. Any information submitted to the national media both at Head Office and unit/business unit must be coordinated with the Corporate Secretary Division, while for the information to be submitted to the local media must



be coordinated with the Public Relations/External Relations at each unit/business unit/project unit and informed to the Corporate Secretary Division.

6. ANTAM Personnel representing the company in delivering its tacit knowledge must be at the knowledge or consent of the immediate superior or the superior's immediate superior or competent authority.

2.1.10.2 Things to Consider

1. Weak control on the spread of information through the media that harm the Company, primarily related to unit/business unit that is located far from the Head Office.
2. Procedures that ensure the delivery of information to the media shall be made by parties designated by the Company as set out in the Company's Internal Policies and must be done with the right procedures.
3. All forms of giving and receiving gifts from and to the media that contains personal or group interests and potentially detrimental to the Company.
4. Dissemination of inaccurate information by certain elements, but on behalf of the media, including biased information and misinterpretation.
5. Officials who can be spoke persons and provide information to the mass media (print and electronic) are: Board of Directors of PT ANTAM Tbk; Head Office: Directors, SVP Corporate Secretary, or other officials appointed by the Directors; Business Units and Units: Head of Business Units and Units, or other officials appointed by the Head of Business Units and Units, accompanied by Public Relations/External Relations Staff in each Business Unit and Unit.



QUESTION

One day, happening mine accident in ANTAM operational location. An employee interviewed by media related to accident chronological. What should we informed to the reporters?

ANSWER

The employee must informed to reporters that the party who had authority to explain to media is SVP Corporate Secretary or Public Relation/External Relation from Unit/Business Unit after coordinating with SVP Corporate Secretary.



2.1.11 International Trade

As a company that carried out a lot of international trade, ANTAM has always tried to respect all international laws and regulations related to international trade.



2.1.11.1 Code of Conduct

1. To comply all relevant international trade regulations, including licensing, shipping documentation, export and import documentation, reporting and storage of documents required.
2. To ensure that all ANTAM's international transactions has been examined by reference of related legislation.
3. To consult with Division of Legal & Compliance of the Company in the event of a conflict with the rules or laws of the country of destination.
4. Trade relations in international context should be based on the principle of mutual respect and understanding the authority set in between the two sides.

2.1.11.2 Things to Consider

1. Customers are not well known and with no any convincing reference.
2. Transaction or inappropriate payments and potential money laundering of transactions.

3. Transactions involving embargoed country, citizen or representative of embargoed countries as well as the individual or entity being sanctioned by the Government.
4. The role of mediation in resolving issues that may arise.
5. The increased intensity of marketing activities with foreign partners with varying transaction model.

2.1.12 Relationship with the Community/Professional Organizations

ANTAM Personnel is committed to continuously develop themselves by enhancing their knowledge and insights that can best contribute to the Company through a media of community/professional organizations.



2.1.12.1 Code of Conduct

1. The company allows employees to participate in professional organizations as long as they do not neglect the duties and responsibilities of employees in the company.
2. To comply with the code of conduct of relationship between members which is governed in the community/professional organizations.
3. To always maintain working relationship to the widest possible with the community/professional organizations to increase knowledge/hard skills/soft skills.

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4. To support to strengthen the community/professional organizations actively, set priorities of engagement, and contribute to improving the quality of the community/professional organizations as long as it does not disturb/conflict with the duties and responsibilities in the Company.
 5. To work closely with the community/professional organizations to achieve a shared commitment on the development of knowledge management for ANTAM Personnel and parties outside of ANTAM.

2.1.12.2 Things to Consider

1. Submission of confidential information related to the Company to parties who do not have the authority to obtain data and information of the Company.
2. Community regulations relating to community/professional organizations.
3. Potential competence of ANTAM Personnel shall be the counter-examples and bring the image of ANTAM to the community/professional organizations events.

2.1.13 Relationship with Holding and Mining Industry Holding Member

ANTAM as a member of Mining Industry Holding has a role in creating synergy in the effort to achieve the goal of holding.

2.1.13.1 Code of Conduct

1. Company ensure that company's management as member of Holding conducted professionally and free from intervention from other party in implementation of company operations.
2. Company as member of Holding implementing good corporate governance principles in a disciplined manner, consistently, continuity which manifested in real behavior from all levels of the Company.
3. Company conducting relationship with holding and holding Member through fair mechanism and related to applicable regulation.
4. Company conducting best practice sharing between holding and holding member related to applicable regulation.



2.1.13.2 Things to Consider

1. Communication between Holding and Holding Member.
2. Alignment of Company's internal policy with Holding strategic policy.
3. The potential for unequal treatment from the Company to Holding as the Majority Shareholder and to other Shareholders.
4. Company independence in carrying out the Company's operational activities.

2.2 Work Ethics

(Concerning ANTAM Personnel Code of Conduct in Carrying out the Work and in Interaction)

2.2.1 Compliance with Laws

ANTAM realizes that compliance with laws and legislation is a standard for the Company to conduct its business in a reasonable manner so that all applicable laws and regulations must be internalized and implemented in any business activities of the Company.





2.2.1.1 Code of Conduct

1. Each ANTAM Personnel must comply with and subject to applicable laws and prevailing regulations and implement them consistently.
2. Each ANTAM Personnel should avoid any action and behavior that can lead to violation of the law and decency.
3. ANTAM Personnel is prohibited to from committing fraud or engaging in activities related to fraud or dishonesty in any form.
4. To promote settlement through deliberation and consensus in every issue and if it does not reach an agreement thereafter shall use legal recourse and each ANTAM Personnel are obliged to respect the ongoing legal process and the resulting decisions.
5. ANTAM personnel are always introspective and avoid the Company's involvement in criminal activities in the financial and operational fields.
6. Not to conduct unlawful cooperation with other parties at the expense of the Company.
7. ANTAM Personnel must comprehend the applicable laws and regulations in the context of the work, including with other related fields.

2.2.1.2 Things to Consider

1. The Company's internal policies to deal with cases or violation of law conducted by ANTAM Personnel.
2. Control of ANTAM Personnel legal compliance outside of office hours in the name of activities of the Company.
3. ANTAM Personnel who have a relationship with the parties involved in legal issues.
4. Socialization of the applicable law, including the implementation of other best practices.

2.2.2 Conflict of Interest

ANTAM realizes that every ANTAM Personnel have the right to participate in financial, business, social, cultural, political activities and other legitimate activities outside of work with regard to its obligations to the Company. These



activities must be lawful and free of conflicts of interest with their responsibilities as ANTAM Personnel. ANTAM Personnel must not abuse company resources or influence in order to discredit the image and reputation of the Company.

2.2.2.1 Code of Conduct

1. To inform ANTAM Personnel activities in the field of financial activities outside the Company or any other business or any relationships that may pose a conflict of interest. ANTAM Personnel are obliged to provide all of that information regarding that matter in a written explanation to the superior, the Human Capital Management Division or the Legal and Compliance Division of the Company.
2. ANTAM Personnel is prohibited to work in other Company either as Board of Commissioner, Board of Director, Employee or Consultant, except if had assignment or written permission from the Company. Specially for Board of Commissioners and Board of Directors of ANTAM, concurrent position refers to applicable law and regulation.
3. Prohibition of ANTAM Personnel who have a conflict of interest to participate in discussions and decision-making process.
4. To refrain from acts of abuse of ANTAM resources, intellectual property, time and ANTAM's facilities that used not for Company's operation need.
5. The Board of Directors and Board of Commissioners to make an annual statement related to conflicts of interest.
6. To ensure that parties who potentially have conflict of interests and moral hazard are not conducting it in which the concerned party status are as ANTAM Personnel.
7. In the case of participation of ANTAM's personnel in practical political activities, it is agreed with reference to the Collective Labor Agreement and/or applicable laws and regulations, and does not make a statement that shows that the Company has ties to certain political choices.



2.2.2.2 Things to Consider

1. Having a relationship with a company in which ANTAM Personnel can personally affect ANTAM business relationship with the company.
2. Performing part-time job where ANTAM Personnel can be compelled to perform such work during office hours on or use of equipment or material of ANTAM and without the knowledge of their immediate superior or superior of the superior or an authorized officer.
3. Receiving gifts from suppliers, customers, competitors or other Stakeholders while ANTAM Personnel are in a position to influence or deemed to be able to affect ANTAM decision on the giver.
4. Receiving personal or group discounts or other benefits from a supplier, service provider or customer, which is not given to the general public or other ANTAM Personnel in similar situations.
5. Accepting an offer to buy shares of other company, whereas the ANTAM Personnel in performing his work in a relationship to the company.
6. Giving special treatment to a supplier owned or managed by the family or close friends.
7. Abusing ANTAM resources, position or influence ANTAM Personnel to promote or assist the other party without the knowledge or consent of the authorities.
8. Having special preferences in hiring or making decisions such as; promotion of the spouse, family or close friends.
9. Personal relationships, or other relationships that could create a conflict of interest with the responsibilities of ANTAM Personnel or may cause the emergence of compromise in the interests of ANTAM.

2.2.3 Giving and Receiving



In conducting its business, ANTAM is committed to do the business fairly and without taking action that leads to all forms of fraud and corruption. In accordance with Law No. 31 of 1999, corruption formulated into thirty forms/types of corruption that can be grouped into: financial loss of the state assets, bribery, embezzlement in position, extortion, cheating, conflict of interest in procurement, gratification. In ANTAM's code of conduct, those things are implicit in the whole content of Business Ethics and Work Ethics, specifically in part Conflict of Interest, Inappropriate Payment, and Monitoring and Usage of Assets.

Related to giving and receiving of gift or assistance in the work from other party or a third party outside of the Company that may cause conflict of interest as well as the decline of public trust confidence to the integrity of the company is also designed specifically in Company policy.



2.2.3.1 Code of Conduct

1. Strict prohibition of ANTAM Personnel conduct corruption, including acts of bribery in any form, either directly or indirectly.
2. Strict prohibition of giving or promise, either directly or indirectly, a gift to the parties associated with the Company, which the administration is known or reasonably suspected to be used to influence or drive the parties to do or not do something in a position that is contrary to its obligations.
3. ANTAM may give donations/contributions associated with ANTAM's responsibility of the surroundings and the donation shall not be related to politics or to influence ANTAM.
4. All of All forms of the Company's giving to Company Stakeholders and receipt of gifts/gratification by ANTAM Personnel is refers to ANTAM's Gratification Control Policy.
5. All expenses related to the donation and contribution must obtain the appropriate authorization and can be accounted for transparently.
6. Strict prohibition of receiving gifts from any party, who is known and reasonably alleged that the gift was given to drive in order to do or not do something in his position, which is contrary to his duty. This Restriction include giving/receiving direct or indirectly purpose to ANTAM Personnel or on behalf of ANTAM Personnel.
7. Strict prohibition of cutting or taking payment in any amount to a third party as compensation of their duties and responsibilities.
8. To ensure all revenue and expenditure are used for the Company operations.

2.2.3.2 Things to Consider

1. All forms of receiving and giving (gratification/bribe) in the form of money, gifts, entertainment.

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2. Donations/donations for other purposes may only be made in accordance with applicable laws and regulations by promoting the principles of accountability and transparency, which may be in the form of:
 - a. Provision for small business development activities, contributions to social and religious activities, and research for educational purposes.
 - b. Gifts for the promotion of the Company.
 3. Regulations related to corruption and ANTAM's Gratification Control Policy.
 4. The risk of bribery occurring in the business process and in units work.
 5. Complete description regarding the risk management of the Anti-Bribery Management System will be listed in Management Policy Anti-Bribery Management System Standards and in the Corporate Risk Issue Document.

**QUESTION**

In our Tradition, there is a custom about giving presents to the co-workers on special day including religious day and birthday. Is it allowed?

ANSWER

That Giving is allowed if in reasonable limits and not to influence performance or work relation with that co-workers and refers to Management Policy concerning Prohibition of Giving and Receiving as well as Gratification in ANTAM.



2.2.4 Equality and Respect for Human Rights

ANTAM believes that human rights are something that is universal. As an integral part of society, ANTAM encourage efforts to ensure the fulfillment of human rights and to consider every consequences of operations on surrounding communities. ANTAM is committed to ensure that every Company's operations do not violate the principles of human rights.



2.2.4.1 Code of Conduct

1. To ensure that all ANTAM Employee comprehend the laws and regulations regarding human rights.
2. To ensure that the community around the area of operations/mining are also enjoying the welfare and the value added created by ANTAM and respect the rights they have.
3. To promote human rights principles in dealing with conflicts that may occur with the public, employees, and other Stakeholders.
4. To perform analysis related to human rights and cooperating with organizations outside of the Company such as the Government, NGOs, and other relevant Stakeholders at an early stage of any business development process, especially in the social impact analysis in the preparation of the EIA document.
5. To cooperate with the Government, NGOs and other relevant Stakeholders in order to avoid violation of the rights associated with the ownership of the local community.

2.2.4.2 Things to Consider

1. The negative impact of ANTAM operating activities for the welfare of the surrounding community.
2. Worsening relationships or conflicts with employees and surrounding communities, the Government, NGOs, and other relevant Stakeholders.
3. The involvement of the security forces which is counter-productive and abuse of power.
4. Violation of the rights associated with ownership of the surrounding community.
5. Violation to culture and indigenous communities around the area of operation.
6. The use of violence which is not in accordance with the applicable laws and regulations to resolve the problems associated with labor issues or the surrounding community.
7. The use of children labor. According to the Labor Law No. 13 of 2003, the definition of a child is a male or female aged less than 13 (thirteen).



2.2.5 Fair Employment Opportunity

ANTAM is committed to create equal employment opportunities, including the prohibition against all forms of discrimination and disorientation. ANTAM provide equal opportunities and fair treatment to all ANTAM Employee.

2.2.5.1 Code of Conduct

1. Comply with applicable labor regulations, including regulations governing freedom of association, assembly and Express opinions.
2. Use ability, qualification criteria (such as education, experience, competencies and others) and other criteria related to work as a basis for all decisions relating to ANTAM Personnel and job applicants.
3. Recruit workforce, provide training, promotion, dismissal, compensation and other terms fair regardless of religion/belief, race/ethnic background, personal relationships (friendship and kinship), color, citizenship, gender, age, disability or other characteristics protected by law.
4. Create a work environment that is free from harassment, such as harassment towards someone because of their religious/beliefs, race/ethnic background nation, color, nationality, gender, age, disability or other characteristics protected by law.
5. Respecting ANTAM Personnel's personal rights by using, maintaining and store their personal data in accordance with the instructions and procedures applicable.
6. For company needs, ANTAM has the right to monitor usage Company assets such as computers, e-mail, telephone, information about ANTAM's intellectual property rights and so on in accordance with the regulations current regulation.



2.2.5.2 Things to Consider

1. Uncomfortable work environment such as telling jokes or show items mocking or offending members of society or other relevant Stakeholder of a particular ethnicity or race.
2. Considering on the race, personal relationships or groups (friendship and kinship), skin color, religion, national origin, sex (gender), age, disability (disabled) or any other characteristic protected by law, as a factor in hiring, promoting, compensating, or other decisions related to ANTAM Personnel.
3. Expressing things that has sexual associations and SARA (ethnicity, religion, race, and inter-group relations) which is objectionable with any other ANTAM Personnel.
4. Performing violation against the labor law.
5. Refusing to cooperate with a particular individual or group because of race, religion, gender and so on.
6. Notifying ANTAM Personnel's data and information to any other person who do not have the interests of business, authority or consent of the subject concerned.

2.2.6 Inappropriate Payments

ANTAM Personnel are prohibited from offering or giving anything of value to obtain a certain advantage or preferential treatment in the conduct of the sale of goods or provision of services or perform financial transactions to government officials or parties outside ANTAM.



Inappropriate Payments Policy regulate the code of conduct and practice of ANTAM concerning specific payments, entertainment and political contributions, both to the Government officials as well as parties outside of ANTAM. ANTAM do not tolerate practices that do not meet this policy. ANTAM will process further violation of this policy in accordance with the applicable laws and regulations.



2.2.6.1 Code of Conduct

1. In any circumstances, it is strictly forbidden to give, offer or authorize supply, either directly or indirectly, anything of value (money, goods or services) to Government officials and parties outside of ANTAM to gain an inappropriate and/or preferential treatment.
2. This policy does not prohibit the granting of legal compensation, e.g. for accommodation and travel expenses incurred by the parties outside of ANTAM directly related to the promotion of products and services of ANTAM, business development process of ANTAM or the execution of a contract.
3. It is strictly forbidden to give gifts or other payments to the parties outside of ANTAM and Government officials to expedite the administrative action (facilitating payment).
4. It is strictly forbidden to donate Company funds or Company assets for political purposes both from within and outside the country and not to take advantage of the Company's name, assets and/or opportunities for political purposes.

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5. To require business partner to comply with the provisions of inappropriate payments and all laws and regulations relating to such matters.
 6. Prior to working with third parties, ANTAM should carefully inspect for compliance with such third parties on the code of conduct on inappropriate payments.
 7. To perform the procedure for payment according to applicable policies and regulations or in accordance with contract that has been agreed by both parties.
 8. Completion of the payment in accordance with the applicable policies or according to contracts agreed upon by both parties, and free from all forms of conflicts of interest.
 9. Management of the Company must take preventative measures in detecting risks that may arise in business and financial activities that can harm the Company.

2.2.6.2 Things to Consider

1. The third party who has a working relationship or representing ANTAM that:
 - a. Been accused of illegal business activities;
 - b. Been involved in cases of inappropriate payments or has a bad reputation regarding inappropriate payments;
 - c. Having relationships with the parties that can influence the consumer's or the Government's decision inappropriately;
 - d. Approaching ANTAM Personnel at the time the decision to be taken and explained that the particular third party has a special arrangement with Government official or customer;
 - e. Urgent to receive commission of payments before ANTAM do announcements about decisions taken.
2. All of fee payment or other payment which paid abroad of other place outside the company or using other person name/other institution.

3. Potency of action/activity related to Money Laundering.



QUESTION

On administration document arrangement in an institution, ANTAM asked to paying more than normal price as "lubricant money" to make the process faster. As ANTAM Personnel, What Should we do?

ANSWER

As ANTAM Personnel, we should reject that demand and follow the applicable procedure.



2.2.7 Confidentiality of Data and Information

Policy of data and information confidentiality of the Company is prepared to ensure information security and to ensure that the data and information that needs to be disclosed by ANTAM, be delivered fairly and equally to the parties concerned without any preferential treatment to certain parties in accordance with the applicable laws and regulations.



2.2.7.1 Code of Conduct

1. Management of Company provide accurate and accountable data.
2. ANTAM Personnel are prohibited to discuss "material information" about the Company to anyone. This prohibition includes the husband or wife, partner



at home, relatives, relatives of partner at home, the broker and other ANTAM Personnel (except co-workers who need to know about that matters).

3. ANTAM Personnel are not allowed to trade the Company's shares if they have information that could affect ANTAM stock price (insider trading) including the close period (i.e. the period in which people in the company are not allowed to conduct securities trading activities in the form of the company's shares).
4. For all ANTAM Personnel who are still working at ANTAM, the Company strictly prohibits the unauthorized use or disclosure of confidential data and information to external parties without the knowledge of the Corporate Secretary or authorized officials.
5. For ANTAM Personnel who no longer work at the Company, it is strictly forbidden to take confidential data and information before leaving the Company. All documents that have been made by ANTAM personnel are fully the Company's property. Before leaving the Company, ANTAM personnel are not permitted to carry any documents.
6. The company respects the rights of ownership of data and information of other companies and requires ANTAM personnel to comply all laws and regulations relating to data and information ownership rights.
7. Collecting data and information about other companies is permissible as long as the data and information is obtained from legitimate sources, such as the authorized party in the company, mass media or public information from the company.
8. The company strictly prohibits the collection of data and external information that is done illegally, such as spying, stealing data and information or by falsifying one's identity.
9. The entire Management of the Company is only allowed to make changes or deletions of data based on the authorization of the authorized official in accordance with procedures established by the Company.
10. It is not permissible to search for confidential data and information from ANTAM People who have recently moved from another company.
11. Efforts to collect data and information from other companies must be carried out with the knowledge of the relevant Division leaders.



12. ANTAM Personnel who change positions are required to submit all data to the parties holding the position.
13. For ANTAM Personnel who no longer work at the Company, ANTAM strictly prohibits identity fraud by using ANTAM's name to obtain confidential data and information from other companies.
14. If there are doubts or problems that arise in connection with the problem of Company data and information, please contact the Corporate Secretary.

2.2.7.2 Things to Consider

1. Insufficient control such as things that allow access for any other person or entity who is not authorized to the material data and information of ANTAM.
2. Submission or request of delivery of confidential data and information of ANTAM or regarding customers and suppliers of ANTAM by parties who do not have the authority to obtain such data and information.
3. Submission or reception of data and non-public information about ANTAM or any other company that may influence the decision to buy or sell shares or securities of ANTAM or that particular other company, which allegedly is inside information.
4. Dissemination of material data and information or internal documents of ANTAM by a third party who previously had cooperation with ANTAM.

2.2.8 Monitoring and Use of Assets

Code of conduct of monitoring and use of assets is intended to ensure that all physical, financial, intellectual property and other assets are optimally used and protected.

2.2.8.1 Code of Conduct

1. ANTAM adhere the accounting and reporting standards generally accepted in the recording and reporting of the Company's assets.
2. All company assets should be used effectively and efficiently to achieve Company goals

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3. ANTAM Personnel always maintain and protect all Company assets and are responsible for overseeing the use of Company assets.
 4. All of the Company's physical, financial and other assets must be protected from unauthorized uses, embezzlement and fraud, moral hazard and abuse of power.
 5. ANTAM Personnel are prohibited from using the Company's assets other than for the benefit of the Company.
 6. The Company must implement an effective and efficient control process on the use of the Company's assets to avoid losses that may occur in the future.
 7. ANTAM Personnel are obliged to report indication or occurrence of fraud in the Company at an early stage, to the immediate superior, Human Capital Management Division, Legal & Compliance Division and the parties who have been appointed by Directors or through the mechanism of Whistleblowing System.

2.2.8.2 Things to Consider

1. The use of the Company's assets other than for the benefit of the Company.
2. Physical assets or other resources are overused, transferred or written off illegally.
3. Weak control on the existing assets in the unit/business unit/project is located away from the Head Office.
4. The absence of effective controls to protect the Company's assets from risk of loss, fraud and anticipation of the extraordinary factors and other force majeure.
5. Inaccurate financial records such as miscalculation of cost of living and travel, invoices or wrong office hours.
6. Unreliable and biased assets documentation because of an inappropriate method and interpretation of policies.
7. The mechanism of the elimination of asset should be carried out according to the applicable laws and regulations.

2.2.9 Occupational Health, Safety and Environment

ANTAM is committed to achieving high standards of Occupational Health and Safety and the Environment. This is a joint responsibility of the leadership and all ANTAM Personnel.



2.2.9.1 Code of Conduct

1. To comply with all applicable laws and regulations concerning mining safety and environment, both nationally and internationally.
2. To create and maintain safe work environment and prevent accidents in the workplace.
3. To reduce waste, emissions and the use of hazardous and toxic materials (B3).
4. To eliminate unreasonable risks either from operating activities and the products being produced.
5. To address environmental pollution problems effectively and efficiently.
6. ANTAM Personnel must be trained regarding legislation and company policies regarding mining safety and environment.
7. ANTAM Personnel must understand and comply with all established procedures of mining safety and environment.
8. ANTAM Personnel must be willing to carry out a medical examination, if deemed necessary by ANTAM management.
9. ANTAM Personnel prohibited from engaging in abuse of narcotics, psychotropic substances and drugs as well as other drugs that are banned based on regulations.

2.2.9.2 Things to Consider

1. Unsafe activities or conditions namely:
 - a. Negligent use of safety devices such as safety helmets, safety shoes, safety goggles, ear plugs, life vest and so on; perlindungan pendengaran (ear plug);
 - b. Chemicals that are not labeled;
 - c. Exposed and unsafe electrical wiring;
 - d. Obstructed fire exits;
 - e. Other matters as set out in the ANTAM Internal Policy.
2. Failure to comply with the rules and procedures regarding health and safety and the environment.
3. Complaints about health and safety arising from ANTAM Personnel.
4. Abuse of narcotics, psychotropic substances and drugs as well as other drugs that are banned based on regulation when doing his duty or outside working hours so as to give rise to obstacles and interference in the work
5. Hazards or accidents and environmental damage that arises.
6. Inability to reduce the number and impact of hazardous and toxic materials (B3).
7. Update on the applicable policies and regulations used as a reference.



QUESTION

Project Head influence to applying work process which have more efficient cost and duration, but can potentially cause occupational safety risk. What should we do?

ANSWER

Never compromise to occupational safety because that is our main priority in all of company operational activity. Consulting this problem to other head or use ANTAM reporting procedure.





2.2.10 Intellectual Property Rights

Intellectual property rights (including patents, trade secrets, trademarks, copyrights, and other proprietary information owned by Company) is one of the most valuable assets for any company.

2.2.10.1 Code of Conduct

1. ANTAM Personnel must respect IPR of any other party because of any unauthorized use of IPR of others could result in ANTAM bear civil lawsuits and damages.
2. ANTAM Personnel must participate actively to protect intellectual property rights owned by ANTAM.
3. ANTAM Personnel who participated/worked in the development of a process or product that will be used by ANTAM, or ANTAM Personnel who related to the process or product as the property of ANTAM both during the work and after the ANTAM Personnel has no longer work for ANTAM
4. ANTAM Personnel must inform the work they produced both during and outside office hours, if the work is related to the business or operations ANTAM. ANTAM is entitled to all the benefits (exclusive benefits) of the patent, mining rights, and others associated with the work mentioned above.
5. ANTAM Personnel must sign a statement of confidentiality and willingness to help ANTAM in the process of obtaining intellectual property rights on behalf of ANTAM.
6. All products and works made by ANTAM's People intended for the Company become the Company's intellectual property.

2.2.10.2 Things to Consider

1. Receiving information related to intellectual property rights from outsiders, without first consulting with Legal and Compliance Division, where there are conditions of confidentiality that must be maintained.
2. Hiring someone who used to work at a competitor without providing protection and prevention so that the person does not divulge or use a competitor's proprietary information.
3. Introducing a new product or service, or the name of a new product or service, before checking the violation of patent or trademark.
4. Talking about intellectual property rights and information related to the intellectual property rights of ANTAM with customers or suppliers without going through a formal procedure which has been established by ANTAM.
5. Delivering or leaking information on new products or services before a patent application is done or the decision not to make a request is formally made by ANTAM.

2.2.11 Ethical Behavior toward Fellow Employee

ANTAM is fully committed to creating a harmonious and comfortable working atmosphere in the environment of the Company's through efforts to establish the character of ANTAM Personnel which is discipline and ethical in everyday interaction both among fellow employee as well as superior and subordinate relationships through various forms of communication, either directly or indirectly.





2.2.11.1 Code of Conduct

Fellow Employee Relationships

1. Not emphasizing or intimidating fellow colleagues, superiors or subordinate for certain interests, both personal or other parties' interests, internal or external.
2. ANTAM Personnel are not permitted to take actions or remarks which contain elements of harassment against ethnicity, religion, race, customs, gender and other things that are contrary to norms of decency and decency such as use of harsh words, condescending, and profane towards fellow employees.
3. ANTAM Personnel are prohibited from taking actions that involve physical or non-physical threats to other employees.
4. Do not commit acts of hostility or any form of provocation against coworkers, superiors and subordinates for personal interests or certain groups that are considered to be a loss for the Company.
5. Avoiding all forms of unfair competition and the use of positions for certain interests.
6. Having an open attitude and respect for the possibility of dissenting opinions in formulating a decision.
7. Maintain the honor of ANTAM Personnel inside and outside the company.
8. Building relationships between ANTAM Personnel who are constructive and benefit each other for the progress of the Company.

Superiors and Subordinates Relationships

1. Superiors and subordinates always tried to be open and establish equal and harmonious relationship based on mutual respect and appreciation.
2. Superiors are willing to give an example of a good attitude and behavior to become role models for subordinates.
3. Superiors and subordinates shall respect the ideas and different opinions being expressed.
4. Having high integrity, loyalty and dedication to the interests and improvement of the Company.

- 5. Using polite language and does not contain elements of gender discrimination and harassment of the respective ethnicity, race, religion, and belief.

2.2.11.2 Things to Consider

- 1. Interaction of fellow employee or superior-subordinate who put personal interests or a particular group above the interests of the Company.
- 2. The participation of employees in the organization or association that is not recognized by the government and embrace the values that are inconsistent with the values espoused by the Company.
- 3. Activities causing the loss of working hours and or concentration of employee and fail to prioritize duties and responsibilities as an employee.



QUESTION

A male employee telling jokes and inappropriate behaviour to female employee. That female employee feels disgraced and disturbed. What should she do?

ANSWER

That male employee behavior is one of harassment and must be reported to that female employee's head or Human Capital Division Head.



2.2.12 Social Media Usage

Social Media can be a tool for ANTAM Personnel to share information, expertise, insight to public society. ANTAM respects to ANTAM Personnel's rights to express opinions in public including in social media while still guided by the legislation.



2.2.12.1 Code of Conduct

1. ANTAM Personnel can express the opinions orally, in writing among others freely and responsibly related to prevailing your regulations.
2. ANTAM Personnel are not allowed to act on behalf of the Company to make statements in Social Media except parties who have authorities from the Company.
3. When using social media, ANTAM Personnel not express point of view, rating, and personal interest which can make a negative image to the Company;
4. Acting wisely when giving information especially concerning Company in social media.
5. ANTAM is not responsible for personal statements and opinions from ANTAM Personnel who posted in Social Media.

2.2.12.2 Things to Consider

1. Social Media usage which can potentially cause Company's risks;
2. The Impact of Social media usage for Corporate Image and reputation;
3. Potential leakage of confidentiality of data and information of the Company;

- 4. Notice of Internet usage in public area which can accessed by everybody, anywhere and every time.
- 5. Law regarding dissemination electronic information.



QUESTION

An employee posting a statement contained his dissatisfaction to the company in his social media account. Is it be permitted?

ANSWER

It is not allowed because it makes Impact to company reputation. Employee can convey his complaint using company procedure.



IMPLEMENTATION GUIDELINES





3.1 Violations

Violation is an attitude, action or behavior that deviate from the Code of Conduct. Violation include, but are not limited to:

1. Lack of discipline;
2. Embezzlement;
3. Disclosure of information, data, documents which is confidential to ANTAM to both internal and external Stakeholders;
4. Falsification of financial statements for personal use that can harm ANTAM both material and non-material;
5. Abuse of ANTAM's assets for personal, relatives and or siblings gains;
6. Abuse of Psychotropic (Narcotics) such as being drunk, drinking intoxicating liquor, selling/buying in the work environment, as well as distributing, selling/ buying, using, drugs or other drugs that are prohibited by laws and regulations in the environment/facilities of the Company;
7. Corruption;
8. Abuse of authority/position causes harm to the company;
9. All forms of deviation from Code of Conduct, ANTAM's internal policies, Collective Labor Agreement, and other fraud actions.

As for the further provisions regarding the category, the level of violation and punishment stipulated in detail in the Collective Labor Agreement (CLA) which is an internal agreement reached by ANTAM with the Union of Aneka Tambang Employees (Perpantam).

3.2 Violations Report

3.2.1 Identifying the Problems Associated with the Code of Conduct

Sometimes it is very difficult to identify when there are issues relating to the Code of Conduct. In work places where there is interaction between ANTAM Personnel, there are different perspectives and the existence of the business pressures, this can reduce the awareness and sensitivity of ANTAM Personnel on the risk of violation of ethics. Every ANTAM Personnel are responsible for behaving in accordance with the Code of Conduct. If ANTAM Personnel feel hesitant in judging whether actions or decisions will be taken in accordance with the Code of Conduct, ANTAM Personnel can ask themselves the following questions:

1. Are the actions or decisions to be taken in accordance with the established Company Values and code of conduct?
2. Could the action to be taken directly or indirectly harm or endanger the health or safety of others?
3. Does the actions or decisions to be taken not violate the relevant laws and regulations?
4. Are the actions or decisions to be taken in accordance with the procedures, management policies and guidelines for the policy of the Company?
5. Could the actions or decisions to be taken makes discomfort, uneasy or hesitant?
6. Is there comfortable feeling to tell the action or decision to colleagues, superiors, family or friends?
7. How do other people perceive the action or decision to be taken when it is posted in the newspaper or read in news on television?

If ANTAM Personnel in question still feel hesitant for actions or decisions to be taken, it is recommended for the ANTAM Personnel to discuss it with the superior or parties mentioned in this Code of Conduct.



3.2.2 Consultation and Reporting of Issues Related to the Code of Conduct

If ANTAM Personnel found that a decision or action is inconsistent with applicable regulations or do not comply with, objected to the content of Code of Conduct or ANTAM Personnel hesitated for actions or decisions to be taken or ANTAM Personnel do not know what to do in certain situations, then ANTAM Personnel shall immediately notify or consult it as soon as possible to the employee's immediate superior, and every employer is obliged to give full attention to reports of employees who are his subordinates and try to solve it completely in accordance with the provisions of the Company. If ANTAM Personnel fail to do the above, or in this case the issues being reported could lead to a conflict of interest with the immediate superior, the ANTAM Personnel can discuss it with the following parties:

1. Superior of the employee's immediate superior,
2. Division of Human Capital Management,
3. Division of Legal and Compliance,
4. Leaders of unit/business unit where the problem arises,
5. Division of Corporate Secretary.

ANTAM's personnel can also conduct Consultation and Reporting of problems which are relates to the Code of Conduct referring to the Complaints mechanism based on Collective Labor Agreement.

3.2.3 Procedures for Handling Violations Report

1. In the event of violation, every employee is entitled to submit oral or written reports to the immediate superior of the employee in question at least to the head of Division to be completed in accordance with applicable regulations.
2. If the efforts referred to in item 1 above has not reached a settlement, the employee can forward his complaint in writing to higher-level officials in this case the superior of the employee's immediate superior in question to be completed in accordance with applicable regulations.



3. If the efforts referred to in point 2 above has not reached a resolution, the employee in question may forward the employee's complaint or objection in writing to the SVP Human Capital Management to be completed.
4. If the efforts referred to in paragraph 3 has not reached a resolution, employee and immediate superior may submit a proposal to the head of the Company to resolve the violation issue by the Personnel Deliberation Team.
5. Personnel Deliberation Team is in charge of:
 - a. Performing investigation process by promoting fairness, presumption of innocence and secrecy;
 - b. During the investigation process, Personnel Deliberation Team must maintain the confidentiality of the identity of the Informant
 - c. Recommend disciplinary action to be granted if it proven true and valid that there has been a violation of the Code of Conduct. The determination of disciplinary action under the authority of Management (Board of Directors or Unit Head/SVP/VP) according to the level of violations as stated on the Collective Labour Agreement;
6. If necessary, the Personnel Deliberation Team can perform escalation of the issues involved to the Board of Directors and the Board of Commissioners to get a solution and appropriate treatment measures.

3.2.4 Whistleblowing System

1. ANTAM resolve every whistleblowing filed by Stakeholders including employees and or representatives of the Stakeholders of the Company in connection with the Code of Conduct violation.
2. Completion of whistleblowing is one form of increased protection to Stakeholders in order to guarantee the rights of Stakeholders associated with the Company.
3. Whistleblowing by Stakeholders that are not immediately followed up could potentially increase the risk of the Company's reputation.

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4. To complete the whistleblowing, the Company has established policies and written procedures which include:
 - a. Reception of whistleblowing;
 - b. Handling and resolution of whistleblowing;
 - c. Protection of complainant (whistleblower); and
 - d. Whistleblowing Report.
 5. Whistleblowing shall be submitted in writing to the Board of Commissioners to further be followed up by Whistleblowing Evaluation Team formed by the Board of Commissioners.
 6. The parties participating in the whistleblowing is entitled to the legal protection of the Company.
 7. The parties who have a role in saving the Company by disclosing adverse matters both materially and non-materially are entitled to an award from the Company.
 8. Further explanation and provisions stipulated in the Guidelines and Procedure of Whistleblowing of PT ANTAM Tbk.

3.3 Sanction for Violations



Consequences for violation of the Code of Conduct:

1. ANTAM Personnel who proven to have violated the Code of Conduct may be subject to actions in accordance with its provisions stated in ANTAM's Internal Policy and Collective Labor Agreement;
2. ANTAM's partners convicted of the violation will be sanctioned in accordance with the rules and decisions of the Company;
3. If the condition involves a violation of law, the problem can be forwarded to the authorities;
4. Nature of the disciplinary action taken will depend on the magnitude of the violation committed and the related situation.

3.4 Statement of Commitment

1. All of ANTAM Personnel must read and understand the contents of the Code of Conduct.
2. All of ANTAM Personnel are required to sign a statement of personal commitment after reading the Code of Conduct.
3. Corporate Secretary Division are required to perform administrative and supervision functions on the compliance the observance of the signing of a statement of commitment to ensure that all of ANTAM Personnel have read and understand the Code of Conduct. In its implementation, Corporate Secretary Division coordinate with the Human Capital Management working unit in each unit/business units/subsidiaries.
4. Corporate Secretary Division reports the result of signing commitment to the Human Capital Management as the personal record of each ANTAM Personnel.



3.5 Socialization

Socialization is an important stage of the implementation of the Code of Conduct. ANTAM is committed to the effective and comprehensive socialization by taking into account the following matters:

1. Building commitment for all partners associated with ANTAM;
2. Disseminating the Code of Conduct in the employee orientation program in accordance with a program organized by ANTAM and periodic refresher for all employees ANTAM and to ANTAM's business partner;
3. Associating the application of ethics as an integral part of business practices and performance appraisal of all ANTAM employees;
4. Developing a Code of Conduct and if necessary can be further elaborated in the Company's various policies and regulations;
5. Complementing the Company's regulation with sanctions for the violation occurred and establishing a system to monitor the implementation of the Code of Conduct.

3.6 Monitoring and Evaluation of Code of Conduct

ANTAM performs monitoring and evaluation for the implementation of the Code of Conduct through:

1. Measurement of understanding of Code of Conduct is conducted to determine the extent to which ANTAM Personnel has been aware of and understand the implementation of the Code of Conduct in the respective work area and how ANTAM Personnel understand the mechanisms for reporting on violation of the Code of Conduct. Since the year 2013, Measurement of Understanding of the Code of Conduct has been a part of the Key Performance Indicator (KPI) of each Division/Unit/Business Unit. The measurement results will be material to the evaluation of more intensive internalization in each work area.
2. Annual GCG Assessment. Recommendations and suggestions of the GCG Assessment results conducted by independent assessor will be an evaluation to improve the system.

STATEMENT OF COMMITMENT





Statement of Personal Commitment of ANTAM Personnel

I hereby certify that I have read and understand the contents of the book of Code of Conduct in PT ANTAM Tbk.

I understand that every ANTAM Personnel must obey and implement Code of Conduct by acting free from all conflicts of interest, committed to stay away from actions that lead to all forms fraud, including bribery and corruption and commitment to efforts of gratification control as well as to improve and maximize the results of work in order to achieve Company Vision and Mission.

If I have any problem about possible violations of the Code of Conduct as set forth in the Code of Conduct, I will communicate it in accordance with applicable regulations.

-----,-----2020

Statement Makers,

Witness,

NPP:

Statement of Personal Commitment of ANTAM Personnel



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-----,-----2020

Statement Makers,

Witness,

NPP:





Statement of Data and Information Confidentiality

I, the undersigned, hereby and truly promise and declare not to, without prior written approval from ANTAM, either directly or indirectly, verbally or in writing:

- a. Disclose Confidential Data and Information to third party except in order to carry out work from ANTAM; and
- b. Use Confidential Data and Information for any purpose and in any way, which may disserve ANTAM, ANTAM's subsidiaries and affiliates.

Whether as an ANTAM employee or after no longer work for ANTAM, I hereby acknowledge that all Confidential Data and Information are, and will remain as the property and/or under the control of ANTAM, and I shall return the Confidential Data and Information that has been documented (in written form and/or in other forms, including but not limited to, text, images, recordings, optical discs, USB Drive, Server) and obtained during my work in ANTAM, ANTAM's subsidiaries and affiliates, rightfully to ANTAM at the end of my work period.

I hereby promise not to keep a copy in any form of the documented Confidential Data and Information except for such storage or copies are in order to carry out work or on ANTAM's orders.

I hereby promise and acknowledge and accept ANTAM's right to ask for compensation, report, claim should I violate this data and information confidentiality statement.

-----,----- 2020

Statement Maker,

NPP:

Statement of Data and Information Confidentiality



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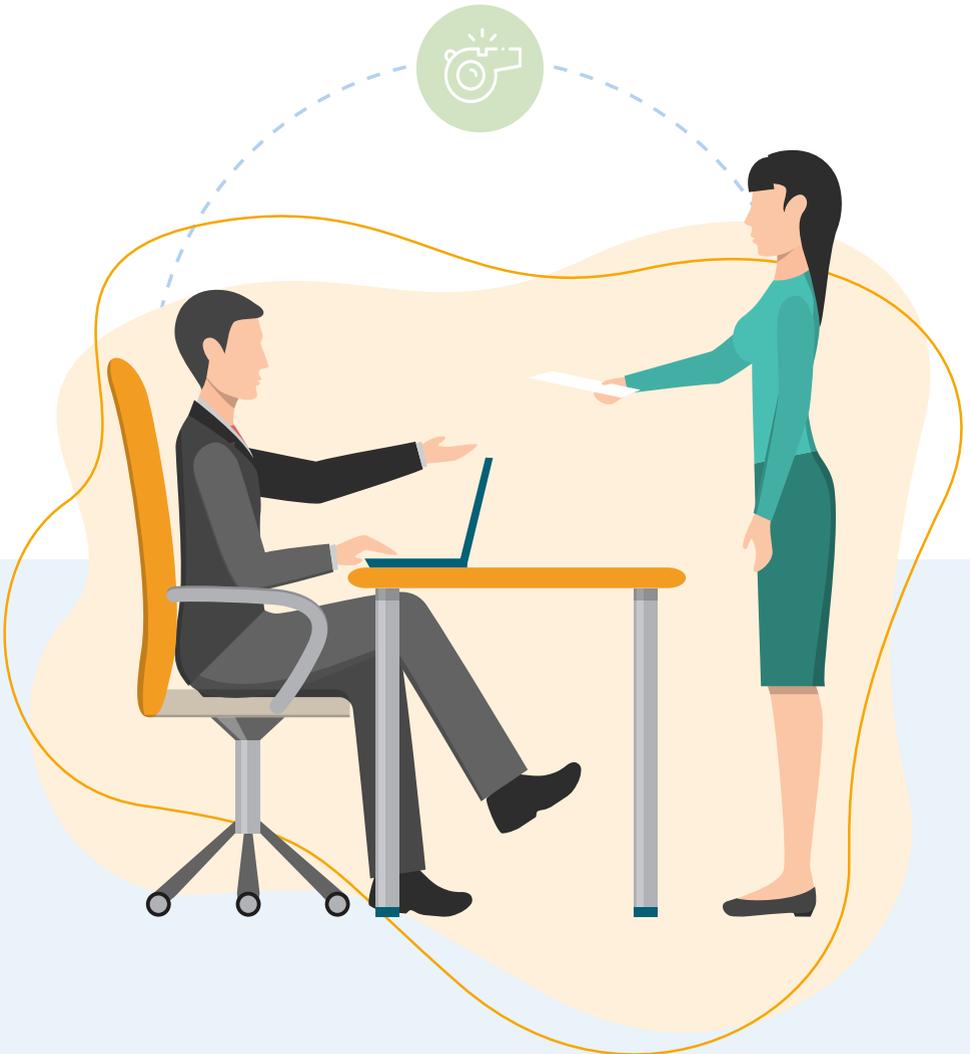
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Statement Maker,

NPP:



GUIDELINES AND PROCEDURE FOR WHISTLEBLOWING SYSTEM OF PT ANTAM Tbk





GUIDELINES AND PROCEDURE FOR WHISTLEBLOWING SYSTEM OF PT ANTAM TBK

Rationale

In an effort to implement Good Corporate Governance (GCG) properly in the Company, a strong commitment and good support of infrastructure and soft structure (work guidelines) are required. As mandated in the principles of GCG, the company in conducting its activities are always taking into account the interests of Shareholders and other Stakeholders based on the principles of fairness and equality. However, the Company realized that to be able to realize it, it needs a real effort that is not easy to implement.

In the implementation of the Company's operations, the rights of Stakeholders are often cannot be carried out properly, causing friction between the Stakeholders with the Company shown by the emergence of whistleblowing by the Stakeholders. Whistleblowing by the Stakeholders if not resolved properly will potentially harm the Stakeholders and or the Company. The lack of standard mechanism in handling of whistleblowing by Stakeholders may cause disagreement or dispute between the Stakeholders and the Company that tend to be protracted, among others, can be demonstrated by the emergence of Stakeholder's complaints in various media. The emergence of the complaints spread to the public through various media could result in declining reputation and potentially reduce public trust in the Company.

Resolution of whistleblowing by Stakeholders is one of the form of increased protection to Stakeholders to guarantee their rights in dealing with the Company. Therefore, it is necessary to arrange for the resolution of the whistleblowing for Stakeholders in the guidelines and procedures for handling of whistleblowing.

Guidelines and procedures for handling of whistleblowing is a system that can be used as media for whistleblower to convey information about the indications of violation occurring within a Company.



Information obtained from whistleblowing mechanism should get the attention and follow-up, including the imposition of appropriate penalties in order to provide a deterrent for perpetrators and also for those who intend to do so.

Thus, it is understood that ANTAM view the guidelines and procedures for handling of whistleblowing as part of the internal control system.

Purposes

1. As a basis or guideline of implementation in handling of whistleblowing by the Stakeholders.
2. Ensuring the implementation of resolution of whistleblowing mechanism effectively in a reasonable time.
3. Avoiding negative publicity against the Company.
4. Supporting the principle of fairness in the relationship between the Company as businesses with Stakeholders as the Company's partners.
5. As part of efforts to uncover the problems that exist in the organization, such as fraud, discrimination, harassment, or other irregularities that are not in accordance with the applicable Code of Conduct to the Company.

CHAPTER I General Provisions

Article 1 Definitions

- (1) The Company is a Limited Liability Company PT Aneka Tambang Tbk abbreviated as PT ANTAM Tbk.
- (2) The Board of Commissioners is the Company's organ in charged with the supervision in general and/or particular in accordance with the Articles of Association of the Company and provide advice to the Board of Directors.

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- (3) The Board of Directors is the Company's organ authorized and have full responsibility for the management of the Company for the benefit of the Company, in accordance with the aim and goals of the Company and represents the Company, both inside and outside the court in accordance with the Articles of Association of the Company.
 - (4) Company's Office is the head office, as well as unit/business unit/representative office or other office related to the Company's operations.
 - (5) Employees are people who work at the Company in an employment relationship, has been declared eligible, appointed in a certain rank and position, given the employee identity number (NPP) and received the income according to the regulations applicable to the Company.
 - (6) Recipient of whistleblowing is the Board of Commissioners registered by the Secretariat of the Board of Commissioners.
 - (7) Whistleblowing is a disclosure of violation or disclosure of unlawful acts, acts that do not meet the Code of Conduct or other actions that may be detrimental to the organization and Stakeholders, which is done by the employees or the management of the Company or the supporting bodies of the Board of Commissioners. The disclosure is generally carried out confidentially.
 - (8) Whistleblower is an employee of the organization itself (insider), but not excluding any of the whistleblower comes from outsiders (customers, suppliers, the community). Whistleblowers should provide evidence, information, or a clear indication of the occurrence of the violation being reported, so it can be traced and/or followed up. Without adequate information it would be difficult to follow up the report.
 - (9) Representative of Stakeholders are individuals, organizations or legal entities acting for and on behalf of the Stakeholders on the basis of a special power of attorney from the Stakeholders.
 - (10) Stakeholders are the parties with interest in the Company.
 - (11) Whistleblowing Evaluation Team is a team formed by the Board of Commissioners in charge to evaluate and advise follow up on whistleblowing to the Board of Commissioners, hereinafter referred to as Whistleblowing Team.



Article 2

The Company shall receive and evaluate the reporting of the offense either of the complainants who identify or not.

Article 3

- (1) The Board of Commissioners is responsible for the implementation of guidelines and procedures for handling of whistleblowing as set forth in this resolution.
- (2) The Board of Commissioners formed Whistleblowing Team consists of representatives from the Audit Committee, GCGNR Committee, and other parties necessary in accordance with their competence and expertise.
- (3) Chairman of the Whistleblowing Team is taken from Audit Committee and that is raised and dismissed by the Board of Commissioners based on the resolution of the Board of Commissioners.

CHAPTER II **Recipient of Whistleblowing**

Article 4

- (1) The whistleblowing is addressed to the Board of Commissioners of PT ANTAM Tbk and registered by the Secretariat of the Board of Commissioners.
- (2) If the recipient of the whistleblowing is not the Board of Commissioners, the recipient shall forward the whistleblowing to the Board of Commissioners.
- (3) Whistleblowing referred to in paragraph (1) of this Article shall be in writing and made within office hours.
- (4) Whistleblowing submitted must be accompanied by the data (supporting evidence).
- (5) ANTAM shall submit receipts for whistleblowing to Stakeholders and/or representatives of Stakeholders who give their identity. Evidence of receipt state the registration number, date of receipt, and the name of the recipient of complaints.



CHAPTER III

Handling and Resolution of Whistleblowing

Article 5

- (1) Whistleblowing Team receive a written report from the Secretary of the Board of Commissioners for further evaluation.
- (2) Evaluation by Whistleblowing Team include administrative, operational, and judicial aspects.
- (3) In the evaluation, Whistleblowing Team may invite speakers who are deemed competent in the aspects evaluated by Whistleblowing Team.
- (4) Based on the last evaluation, Whistleblowing Team shall make suggestions of closure/follow up on the case to the Board of Commissioners within a period of 30 (thirty) days and may be extended no longer than 14 (fourteen) days..
- (5) Whistleblowing Team shall report in writing the results referred to in paragraph (1) of this article to the Board of Commissioners.
- (6) The Board of Commissioners to evaluate the proposal from Whistleblowing Team. Cases that need follow-up shall be submitted to the Board of Directors to conduct special audit or for further investigation in accordance with existing mechanisms in the Company and to take necessary action for system improvement and enforcement.
- (7) Improvement system and/or legal action taken by the Board of Directors shall be submitted to the Board of Commissioners for registration.
- (8) In the event of complaint that can be proved concerning the members of the Board of Directors, the follow-up shall be resolved by the Board of Commissioners.
- (9) Whistleblowing Team to monitor the follow-up of resolution of the complaints.
- (10) Whistleblowing handling procedure must follow the flowchart shown on whistleblowing handling procedures.

Article 6

- (1) The Company through the Secretary of the Board of Commissioners may inform and/or provide response on the status of resolution process of whistleblowing to Stakeholders and/or representatives of Stakeholders who asked for an explanation to the Company regarding its filed whistleblowing.

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- (2) For anonymous whistleblowing, there is no obligation of the Company to respond as prescribed in paragraph (1) of this article.

CHAPTER IV

Confidentiality and Award for Whistleblower

Article 7

- (1) The Company must keep the identity of the whistleblowers and content of the report.
- (2) The Company may give the award to the whistleblowers on the violation that can be proven and able to save the Company's assets and finance.

CHAPTER V

Monitoring of Whistleblowing Follow Up

Article 8

- (1) Monitoring of whistleblowing follow-up is done by Whistleblowing Team in coordination with the Secretary of the Board of Commissioners.
- (2) The follow-up of whistleblowing including improvements to systems or enforcement needs to be done in the neighborhood management coordinated by Senior Vice President (SVP) Corporate Secretary.
- (3) Activity referred to in paragraph (2) of this article, SVP Corporate Secretary coordinate with the Secretary of The Board of Commissioners.
- (4) Whistleblowing Team shall report periodically monitoring results on a quarterly basis to the Board of Commissioners.
- (5) The report referred to in paragraph (2) of this article shall be made no later than one month after the end of the period.
- (6) In coordinating with, SVP Corporate Secretary must keep the confidentiality of the data and information as referred to in article 8 above.

Article 9

- (1) In performing the duties. Whistleblowing team need to coordinate with SVP Corporate Secretary as counterpart.
- (2) Counterpart as mentioned in paragraph (1) includes provision of information required by Whistleblowing team and serves as speakers, if necessary.

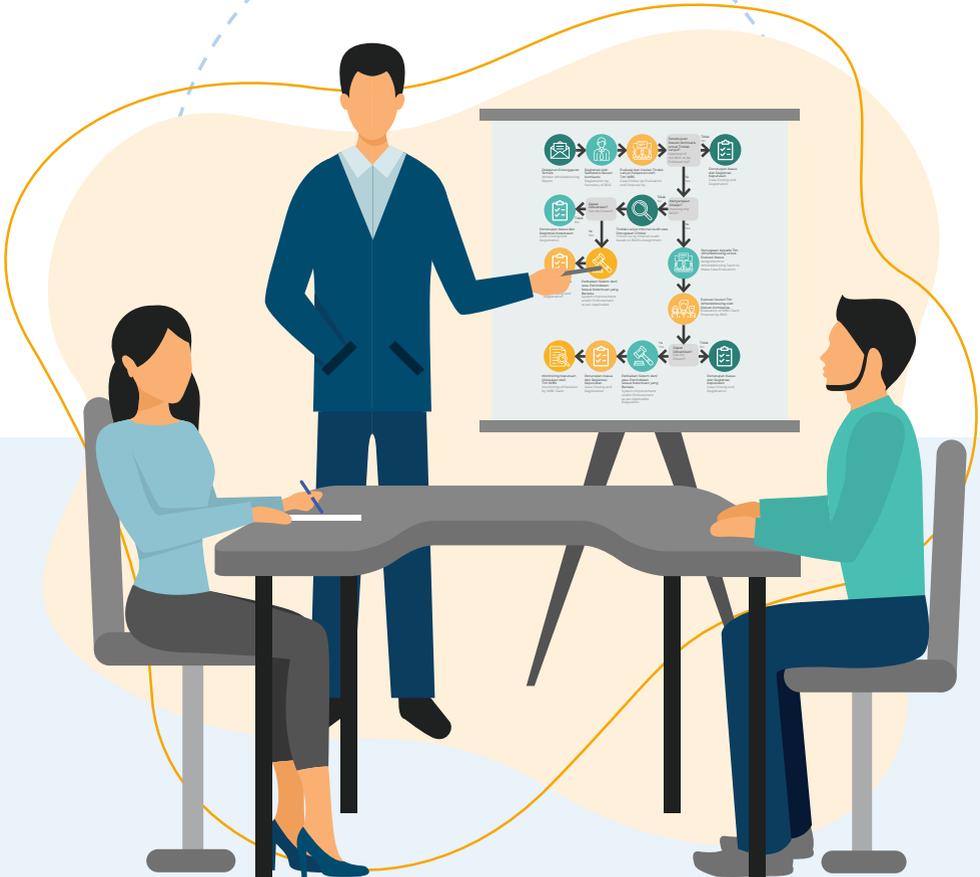


CHAPTER VI Administration of Whistleblowing

Article 10

- (1) All documentation of whistleblowing shall be properly administered by the Secretariat of the Board of Commissioners.
- (2) The Secretariat of the Board of Commissioners must hold administration of the incoming, ongoing, and followed up whistleblowing.
- (3) Record of receipt and status of whistleblowing contains at least:
 - a. Registration number;
 - b. Date of receipt;
 - c. Receiving officer;
 - d. A brief description; and
 - e. Resolution status accompanied by an explanation.

WHISTLEBLOWING MECHANISM PT ANTAM Tbk



The company always pays attention to the interests of Stakeholders based on the principles of fairness and equality. The Company is also aware that the absence of standard mechanism in the handling of whistleblowing by Stakeholders could result in declining reputation and public trust in the Company. The provisions of the guidelines and procedures for whistleblowing is one form of increased protection for Stakeholders and the protection of the image of the Company. In connection with the above, in the framework of the implementation of guidelines and procedures, the Company sees it necessary for whistleblowing mechanism to be established as described below.

Whistleblowing Procedure to the Company

1. Whistleblowing shall be made in writing:
 - a. Deliver an official letter addressed to the Company c.q the Board of Commissioners, whether delivered by hand, sent by facsimile, or by mail to the Company.
 - b. Via e-mail: whistleblowing@antam.com





c. Delivered to the official address:

PT ANTAM Tbk

Gedung Aneka Tambang Tower A

Jl. Letjen. T.B. Simatupang No. 1

Lingkar Selatan, Tanjung Barat

Jakarta 12530, Indonesia

- d. Whistleblowing in writing shall be furnished by a photocopy of identity and supporting documents such as: documents relating to the transactions performed and/or whistleblowing to be delivered.
- e. Whistleblowing in writing without identity must be furnished with photocopies of supporting documents such as: documents relating to transactions carried out and/or whistleblowing to be delivered.

2. Representative of Stakeholders

Should there be whistleblowing submitted by representatives of Stakeholders, in addition to the above documents, they should also submit other documents namely:

- a. Photocopy of proof of identity of Stakeholders and representative of Stakeholders;
- b. Power of attorney of the Stakeholders to the representative of Stakeholders stating that the Stakeholders has given the authority to act for and on behalf of the Stakeholders; and
- c. If representatives of Stakeholders is an institution or legal entity, it must be accompanied by a document stating that the party who filed the whistleblowing is authorized to represent the said institution or legal entity.

3. Recipient of whistleblowing by Company

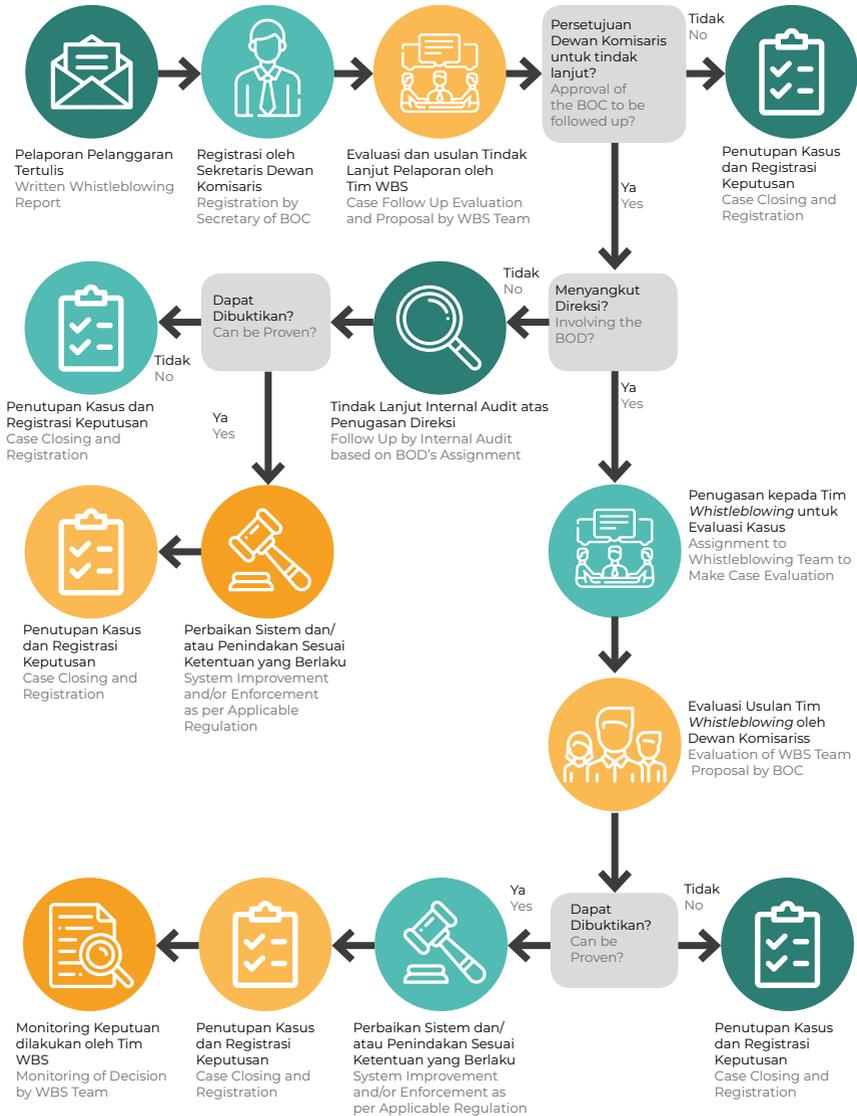
- a. The company receives each whistleblowing filed by Stakeholders and/or representatives of Stakeholders both verbally and in writing.
- b. The company provides a description of the policies and procedures for completion of whistleblowing at the time of the Stakeholders and/or representatives of the Stakeholders file the whistleblowing.
- c. The company delivers a receipt, if the whistleblowing is submitted in writing.
- d. Recipient of whistleblowing are the Board of Commissioners c.q the Secretary of the Board of Commissioners of the Company.



4. Whistleblowing mechanism shall be disseminated to all Stakeholders in the implementation of GCG in the Company.

**Further information can be seen
at the website of PT ANTAM Tbk
www.antam.com**

PROSEDUR PENANGANAN PENGADUAN WHISTLEBLOWING





VIOLATION REPORT FORM (WHISTLEBLOWING SYSTEM)

Hereby explain whereas,

Name :
Address :
Phone Number :
Fax. :
Cell Phone :
E-mail :
Name of Organization/
Institution :

Has submitted whistleblowing concerning

.....
.....
.....
.....

Jakarta,

Reporter,

Receivers,

.....

.....

2020

CODE OF CONDUCT



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Jl. Letjen. T.B. Simatupang No. 1
Lingkar Selatan, Tanjung Barat
Jakarta 12530, Indonesia
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