



PT. SAMUDRA MANDIRI SENTOSA

ANTI BRIBERY AND CORRUPTION POLICY

1. INTRODUCTION

- 1.1 The Board of Directors of PT Samudra Mandiri Sentosa has determined that PT SMS should formalize its policy on compliance with the anti-corruption laws, including the Regulation Number 31 year of 1999 that has been revised with Regulation Number 20 year of 2001 and the Criminal Code of the Republic of Indonesia
- 1.2 This Anti-Bribery & Corruption Policy (the "**Policy**") will supersede any other existing PT SMS policies relating to bribery and corruption.
- 1.3 The Compliance Officer is the Chief Financial Officer.

2. POLICY STATEMENT

- 2.1 It is PT SMS policy to conduct all of its business in an honest and ethical manner. PT SMS takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. It is the goal of PT SMS to avoid acts which might reflect adversely upon the integrity and reputation of the Company.
- 2.2 Individuals involved in corrupt activity may be fined or sentenced to imprisonment. Further, if PT SMS or any of its employees or associated persons (e.g. contractors, agents or subsidiaries) is found to have taken part in corruption, it could face serious damage to PT SMS reputation in the public markets. PT SMS therefore takes its legal responsibilities very seriously.
- 2.3 PT SMS is committed to upholding all laws relevant to countering bribery and corruption in each of the jurisdictions in which it operates.
- 2.4 The purpose of this Policy is to:
 - ✓ set out the responsibilities of PT SMS, and all individuals who work for PT SMS, in observing and upholding the Company's position on bribery and corruption; and
 - ✓ provide information and guidance to those individuals working for PT SMS on how to recognize and deal with bribery and corruption issues.
- 2.5 In this Policy, "**third party**" means any individual or organization with whom you may come into contact during the course of your work for PT SMS, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. APPLICATION OF THE POLICY

- 3.1 The Policy applies to all directors, officers, employees, family members, consultants and contractors of PT SMS. Compliance with this Policy constitutes terms of service for each director, conditions of employment for each officer and employee, and conditions of providing services to PT SMS for each consultant and contractor. Each such person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being given to them or upon notification that an updated version has been placed on PT SMS website for review.
- 3.2 This Policy extends across all of the Company's business dealings and in all countries and territories in which the Company operates. All persons covered by this Policy, in discharging their duties on behalf of PT SMS, are required to comply with the laws, rules and regulations applicable in the location in which PT SMS is performing business activities, and in particular with respect to anti-bribery and corruption laws, rules and regulations. Where uncertainty or ambiguity exists, please contact the Compliance Officer who may seek further legal advice.

4. FORMS OF BRIBERY AND CORRUPTION

- 4.1 For purposes of this Policy, each of the examples in 4.2 to 4.5 below is referred to as a "**bribery offence**".
- 4.2 **Bribes**