

Code of Conduct

The Code of Conduct forms a guideline for the Board of Directors, employees of the Company and its subsidiaries ("IndoAgri") in performing business ethics and the duties of the Board of Directors, employees of IndoAgri ("Company Members").

The Code of Conduct comprises two policies on Company Business Ethics and Working Ethics of Employees. It applies to all the Company Members, and any violation shall be considered a breach of employment contract which may result in disciplinary actions. The Code of Conduct is communicated to the Members during the Company's orientation briefings.

The policy on Company Business Ethics regulates the following:

- a. Compliance with laws and regulations,
- b. Relation with shareholders,
- c. Relation with the customers,
- d. Relation with business partners,
- e. Confidentiality of information,
- f. Corporate social responsibility,
- g. Environmental conservation,
- h. Occupational health and safety, and
- i. Fair treatment.

The policy on Working Ethics of the Company Members regulates the following:

- a. Compliance with law and regulation,
- b. Abuse of power and violence,
- c. Protection and use of tangible and intangible assets,
- d. Health and safety,
- e. Other work outside the Company,
- f. Conflict of interest and transaction with related parties,
- g. Prohibited behavior or actions,
- h. Gratification,
- i. Illegal drugs and alcoholic beverages/liquor,
- j. Gambling,
- k. Weapons,
- l. Misuse of communication and social media,
- m. Organizational/political relations,
- n. Insider trading,
- o. Family relation, and
- p. Whistleblowing system.