
Anti Corruption Policy

PT Barito Pacific Tbk (henceforth referred to as Barito) conducts its business with fairness based on a philosophy that the Company shall demonstrate a keen sense to social responsibility and the best interests of its stakeholders in alignment with the principle of Good Corporate Governance, Barito Code of Conduct, and Stakeholders' Guidelines.

To ensure that Barito has a proper policy determining responsibility, guidelines, and regulation as a tool to prevent corruption from all business transactions, Barito has established guidelines called 'Anti-corruption Policy' in order to prudently make a decision on any course of action that could possibly lead to corruption and to serve as a guide in performing business and effectively fostering corporate sustainability.

Anti-corruption Definition

Corruption means any types of bribery; an offering, giving, promising or agreeing to give, demanding or accepting money, assets, or other inappropriate benefits to (or from) government officers, government sectors, private sectors, or responsible persons either in direct or indirect action so that such persons could proceed or disregard their function in order to acquire,

retain the business, recommend specific company to the entity, or achieve any improper benefits in a business transaction. Exception shall be applied in case of laws, regulations, customs or business traditions enable to do so.

Anti-corruption Policy

Directors, Management Team, and Barito staff are prohibited from operating or accepting every type of corruption both in direct or indirect manner covering every business and related department in every country. The Anti-corruption Policy is needed to be reviewed regularly, including with a possible revision of such policy and implementation provision in order to remain in compliance with business changes, regulations, standards, and laws.

Roles and Responsibilities

1. The Board of Directors is responsible for determining the policy, monitoring, and forming an effective system supporting Anti-corruption acts in order to affirm that the Management Team intensely concerns, emphasizes, and cultivates Anti-corruption mindset as the company's culture.
2. The Audit Committee is responsible for revision of financial and accounting reports, internal control, internal audit functions and risk management so that such operations are concise, appropriate, effective, and conform to global standards.
3. Board of Directors and Division Heads are responsible for determining Anti-corruption system, promoting, and encouraging Anti-corruption manner conveyed to all staff and related parties. This also includes reconsideration of systems or internal guidelines in order to best adjust to business changes, regulations, standards, and laws.

Anti-corruption Guidelines

1. The Board of Directors, the Management Team, and Barito Pacific staff at every level must follow Anti-corruption Policy and the Barito Code of Conduct by avoiding any course of corruption in direct or indirect manner.
2. Barito staff shall not be negligent in any probable corruption conditions involved directly with Barito. All staff must notify such act to supervisors or responsible persons and assist with investigation of transgressions. Any queries or questions may be directed to the Company Secretary who monitors the Barito Code of Conduct compliance for all employees. Barito shall provide fairness and safe guard staff who refuse participation in or inform on existence of corruption cases relating to Barito Pacific by applying Protection Policy for appellant or persons who reveal Anti-corruption information as stated in the Barito Whistleblower Policy.
3. A person who commits corruption would be deemed to have also violated the Barito Code of Conduct and would be subject to discipline, reprimand and/or dismissal as the case may require. Legal Conviction may also be applied in case such acts violate the laws.
4. Barito acknowledges the importance of dissemination, knowledge sharing, and communications with other people who involve or affect Barito so that those parties shall conform effectively to these Anti-corruption guidelines.
5. Barito strives to create and sustain organization's culture representing that corruption is unacceptable in any business transaction dealing with both public and private sectors.

Provision in Implementation

1. This Anti-corruption Policy covers the entirety of the Human Resource Management process starting from recruitment, promotion, training, evaluation, and benefits provided to staff. Every supervisor at every level must communicate to staff in order to apply these guidelines in business transactions under their responsibility and to monitor such implementation for it to be most effective.
2. Implementation of Anti-corruption Policy should be followed by guidelines in the Barito Code of Conduct, Corporate Governance guidelines, Stakeholders' Guidelines, standard, every Barito related operation manual, and additional guidelines which will be formulated afterward.

Approved by the Board of Directors at their meeting on February 5, 2021.

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