

PT SAT NUSAPERSADA Tbk
COMPANY'S CODE OF
CONDUCT

OS-SN-GEN-005(ENG) REV.03

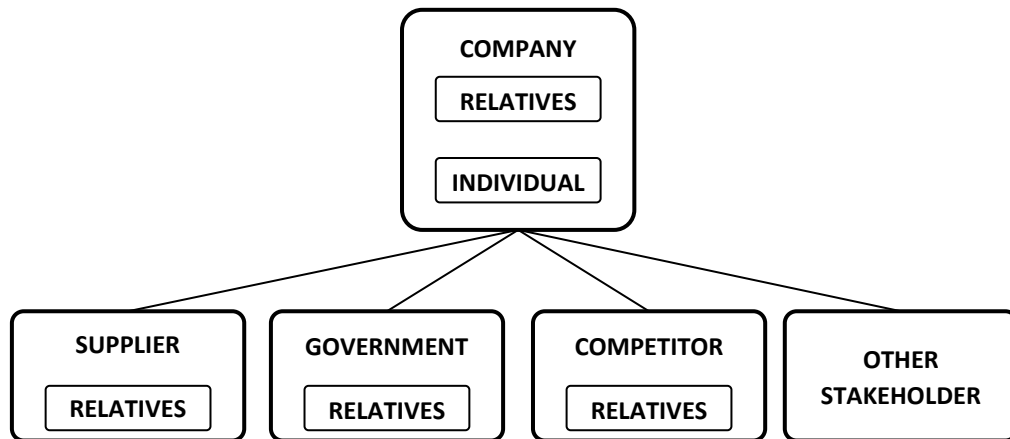
DATED 27-NOV-2020



Code of Conduct

The Company's Code of Conduct is an integral part of the Company's Regulations and applies across the enterprise environment, including the Company's subsidiaries. Code of Conduct is structured as a reference for all parties including the Company's Board of Commissioners, Board of Directors, committees owned by the Company, employees and outside parties relating to the business of the Company in performing its duties and decision-making.

The company has a code of conduct which provides guidance in everyday behaviour for every individual in the Company. The Code governs the relationship between the Board of Commissioners, Board of Directors, Employees, Companies, Customers, Suppliers, Sellers, shareholders, competitors, government and other stakeholders.



Picture 1: The Diagram Code governs the relationship

The Policy is divided into the following sections:

1. General principles
2. Professional conduct
3. Use of company property, information and resources
4. Personal conduct
5. Compliance with laws and regulations
6. Equal employment opportunity
7. Human trafficking and Slavery
8. Obligation to report breaches
9. Political activities

1. General principles

As a rule of thumb, all employees must conduct themselves in accordance with the following common sense principles:

- All the duties and responsibilities must be performed in good faith, full of responsibility, and prudence,
- All parties must act honestly and fairly in all business transactions and dealings with others.
- All parties must treat other employees, contractors, customers, competitors, and all other persons with whom they deal with at work with the utmost courtesy and respect.
- All parties must act within the best interests of the Company.
- All parties must comply with all laws and regulations applicable to the business of Company.

2. Professional Conduct**2.1. Conflicts of Interest****2.1.1. Relatives**

The Individual need report to Company, if any potential conflict of interest may occurs, when the individual has family and/or close relatives that worked in supplier, competitor, government or other stakeholder that have strategy position and/or influencer to company business.

**2.1.2. Supplier**

All parties have an obligation to avoid financial, business or other relationships, which might conflict with the legitimate business interests of the Company. All parties should avoid even the appearance of such conflict. Such conflict will exist where an individual compromises his or her ability to act with total objectivity with regard to the Company's business interests. Examples of conflicts of interest include, but are not limited to the following:

- If the individual is employed by a customer, supplier or competitor of the Company whilst employed by the Company;
- If the individual provides work or business on behalf of the Company to a business in which the individual, the individual's family or individual's close friend has a financial interest;
- If the individual, the individual's family or individual's close friend has a financial interest in a business which is a competitor, contractor or supplier to the Company;
- If the individual own the aggregate ownership is more than 5% of total shareholder from customer, supplier or competitor;
- Using the Company owned assets for matters not related the Company's

business;

- Performing duty not related to the Company's business during working hours;
- Making use of one's position in the Company for personal business affair.

All activities that have potential or actual conflicts of interests must be disclosed in writing to Top management of the Company prior to engaging in such activities. The Company reserves its right to either approve the conflict conditions, or to exclude the employee from the conflict situation. (Note: Regarding disclosed information or reporting kindly refer to below whistleblowing section)

2.1.3. Government

2.1.3.1 Commitment

The individual who appointed by company to liaise with government regarding work activity need to commit to follow this code of conduct in writing.

2.1.3.2 Facilitating Payments

Facilitating payments are small payments to a public official to expedite or secure the performance of routine, nondiscretionary government action. These types of payments are typically demanded by low level officials in exchange for providing a service to which you are entitled even without the payment. Facilitating payments are not permissible and strictly prohibited by our company except in limited circumstances (e.g., imminent threat to health or safety).



2.2. Corruption, Extortion, Bribery or Embezzlement

Corruption, extortion, bribery or embezzlement, in any form, is strictly prohibited. It may result in the immediate termination of the Company employee and/or business partners and possibly additional legal action.

Without exception, employee must conduct their activities in full compliance with the anti-corruption and anti-bribery laws of Indonesia, and International.

Employee may not, directly or indirectly through a third party, pay, offer, promise to pay, or receive bribes or kickbacks from any individual, whether that individual is a public official or a private party.

A public official is any person who is paid with government funds. This includes individuals who work for a local, state/provincial or national government, or a public international organization, as well as employees of public (government-owned or operated) schools and state-owned enterprises. Employees at such organizations are considered public officials regardless of title or position.

A private party is any person who is work for customer, supplier, competitor or other stakeholder that related to Company.

2.3. Kickbacks

Kickback is strictly prohibited in Company. A kickback is a payment or anything of value given to individuals after a transaction, typically for providing a discount or arranging high volume in a sales agreement.

2.4. Money Laundering

Employee may not engage in or assist others in concealing illicit funds or money laundering activities. The following are sample indicators of money laundering that merit further investigation of company employee:

- Attempts to make large payments in cash;
- Payments by someone who is not a party to the contract;
- Requests to pay more than provided for in the contract;
- Payments made in currencies other than those specified in the contract;
- Payments from an unusual, non-business account.



2.5. Receiving Gifts, Gratuities or Bribes

Employees are expected at all times to act in the best interests of the Company and this means obtaining the best deal for the Company in any business transaction. The Company's selection of contractors or suppliers must be based solely on the quality, price and service offered.

Any Individual must not accept **cash or cash equivalents (such as gift cards, gift certificates or "red packets" commonly offered in Asia)** and free or discounted goods or services (beyond a reasonable commercial discount or promotional items) from persons doing or seeking business with the Company, which may influence, or appear to influence a business decision unless they receive the prior written approval from Top Management.

If any such goods are received without solicitation, **the value of each gifts an employee may receive from any one gift giver cannot exceed IDR 500,000 per gift and cumulative annual value of IDR 5,000,000 with the value that defined by the employee best knowledge or market price**, must obtain approval as set out above. If approval is not given, such gifts must be returned immediately to the person who provided them.

The individual may accept meals or refreshments provided in the ordinary and

proper course of business (for example, at a business lunch), and on an infrequent basis in connection with business discussions. Every individual is personally responsible for ensuring that acceptance of such meals and refreshments are proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment.

All parties must treat all customers, suppliers, contractors, or other persons with whom they deal in the course of their employment in a non-discriminatory manner.

2.6. Offering Gifts, Gratuities or Bribes

The Company expects its employees to compete fairly and ethically for all business opportunities. Employees may provide meals, refreshments or entertainment to customers, contractors or suppliers, provided that this is done in the ordinary and proper course of business and could not reasonably be seen as bribes or improper encouragement. All such expenditures must be properly recorded within the books and records of the Company.

Employees may also provide small tokens of appreciation or gifts (such as, for example, Christmas cards) **during any calendar year to any party, but cannot equal or exceed to IDR 500,000 per gift or annual cumulative of IDR 5,000,000.** However, beyond this, employees must not offer or give gifts, commissions, gratuities, or other payments, either openly or secretly, to prospective or existing customers, contractors, or suppliers without the prior written approval of Top Management.

No gifts or business entertainment of any kind may be given to any Government Official without the prior approval of Top Management. For such approval to be given, the gift must be in compliance with this Code and not in violation of the Company's policies or Indonesia anti-corruption act.

Any employee who offers, pays, solicits or receives any form of bribe, payoff or unlawful gratuity, directly or indirectly through third parties, will be subject to appropriate disciplinary action consistent with relevant laws and regulations and, if warranted, will be reported to the appropriate authorities and / or dismissal from the company. A bribe includes any item intended to improperly obtain favorable treatment. In addition to being a violation of the Code of Conduct, such conduct may subject the Company and the involved individuals to criminal penalties.



2.7. Loans

Individual or their immediate family must not accept from a person doing or seeking business with Company any loan, guarantee of loan, or payment. The only exception to this is if the loan is from a bank or financial institution, which conducts a business of providing such loans, and is at a commercial rate on commercial terms.

Individual must not borrow money from or lend money to other employees of the Company. Individual who are in financial difficulties should discuss these difficulties with their superior or Human Resources. These discussions will be dealt confidentially.

2.8. Secret Commissions

Individual may not, in the course of their employment, receive or attempt to obtain from any customer, contractor, supplier, government official or any other person with whom they deal any secret commission or profit. Any such offers must be immediately reported to Top Management.

Individual must also not offer or give secret commissions, hidden gratuities, or confidential payments to third parties that might influence prospective customers, contractors, suppliers, government officials or any other person with whom they deal.

2.9. Fair Dealings with Third Parties

Individual involved in the negotiation of agreements and contracts on behalf of the Company must ensure that all statements, communications and representations are accurate and truthful. Individual must act honestly and fairly in all such business transactions.

3. Use of Company Property, Information and Resources General Misuse

Generally, the use of the property, information, and resources of the Company for any purposes other than the business of the Company is prohibited. Some examples of the application of this general obligation are set out below.

- Approving or making of a payment on behalf of the Company for something other than the stated purpose.
- Intentional alteration of customer or the Company data for other than legitimate business purposes.
- Using Company's photocopier or facsimile machines for personal reasons without authorization from the employee's manager.
- Using company vehicles for private purposes without express authorization



from the employee's manager.

- Claiming expenses from the Company for travel unrelated to Company' business or for something other than the stated purpose.
- Appropriating Company' stationery for personal use.

3.1. Media Comment

Employees may not make statements or comments to the media or other external bodies regarding the Company, its business dealings, financial status, customers, suppliers, competitors or shareholders unless directed or authorized by Top Management. Such authorization must come from the CEO, Board of Director, or HQ Corporate Secretary. Employees must direct all media inquiries to the Head quarter Corporate Secretary Department.

3.2. Use of Telephones

Employees may occasionally make personal phone calls provided that such calls are short and do not affect the proper performance of their duties.

3.3. Removal of Property from Premises

No property or monies of the Company is to be taken from the premises without written permission of the Top Management.

3.4. Use of Company Name and Letterhead

All parties are not authorized to use Company's name or letterhead except in the ordinary course of business and for the legitimate business of the Company.



3.5. Electronic Communication

All parties should generally only use the e-mail and computer systems of the Company for legitimate business of the Company. While incidental personal use is permissible, this usage should be minimal and should not interfere with the Company's business. The principle use of the Internet, electronic mail and other communication services must be for company's business purposes only. Under no circumstances should employees use company's email or computer systems to transmit, retrieve or store any communications which are discriminatory, are derogatory to any individual or group, for any purpose which is illegal or against the Company policy. Examples of objectionable material would include sexually explicit images and related material, material that advocates illegal activity and material that advocates intolerance for others or prejudice towards others.

3.6. Authority to Sign Documents

Employees cannot sign any documents on behalf of the Company or in any way commit the Company to any agreement unless they have been properly

authorized in writing by Top Management to do so. If you have any queries on your ability to enter into agreement, contact to top management.

3.7. Confidentiality

Over the course of employment with the Company, each individual may be exposed to confidential information regarding the Company, its customers, suppliers, contractors or employees. Each individual is required to keep any such information confidential.

All Parties and former employees of the Company may not make improper use of confidential information which they may have acquired as a result of their employment with the Company to gain directly or indirectly an advantage for themselves, or any other person, or to cause detriment to the Company or its customers, suppliers, contractors or employees.

Confidential information includes, but is not limited to, all trade secrets, intellectual property, marketing, sales and business plans, customer, supplier lists, personal customer information, including account history/activity, any information relating to any conditional access system or related software or hardware, any information relating to the technical or other means or arrangements for mounting, stamping, molding or assembling and any unauthorized access to other information concerning the organization, business, finances, transactions or affairs of the Company and its subsidiary.

Confidential information excludes any information which:

- As required by law to disclose and the individual have consulted with and have the Company's consent in writing prior to its disclosure.
- Has already lawfully in the public domain other than as a result of any disclosure by the individual.

All parties must safeguard confidential information of the Company by not transferring, publishing, using or disclosing it to third parties other than as necessary in the proper course of the employees duties or as directed or authorized by Top Management of the Company in writing.

All files of a confidential nature must at all times not be left unattended and under no circumstances whatsoever left either on or in unlocked desks (unless the offices are locked). The disposal of all confidential papers must be done by means of Company's security disposal arrangements.

Unless express permission by management is granted, Individual must not remove from the offices of the Company any documents or software connected



with the business of the Company or takes any copies of them for private use. All documents and software which have been removed from the Company's offices must be returned as soon as the authorized purpose for their removal has been fulfilled and upon termination of employment.

Unless specified otherwise by contract, all confidential information that has been entrusted to the Company by a third party (such as a customer, supplier or contractor) must be treated as though it is the Company confidential information.

It is important for all the parties to note that the obligations relating to confidentiality will remain in force for the duration of their employment and after the termination of their employment.

3.8. Intellectual Property

If at any time during the scope of their employment, an employee makes, discovers or participates in the making or discovery of any intellectual property capable of being used in the business of the company or any related company, such intellectual property is and will remain the property of the company. Employees must immediately disclose full details of any such intellectual property to the company and do all things, which may be necessary for vesting all rights in the intellectual property to the company or its nominee.



Intellectual property includes patents, trademarks, designs, copyright, inventions, drawings, computer programs, confidential information, know-how and all rights of a similar nature whether registered or not and including applications for such rights, existing anywhere in the world.

3.9. Insider Trading

All parties are not allowed to trade in, get somebody else to trade in or communicate information to anyone else who is likely to trade in the securities of the Company, while such individual possess or have access to price sensitive and relevant inside information.

All parties shall maintain the confidentiality of all Price Sensitive Information. All parties shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sales of securities.

Price Sensitive information is to be handled on a "need to know" basis. Price Sensitive Information should be disclosed only to those within the company who need the information to discharge their duty. Keep secure all files/papers

containing confidential unpublished Price Sensitive Information. Computer files must have adequate security of login and password.

3.10. Use of Documentation

It is against the Company's policy to reproduce copyright plans, software, documentation or other materials without permission. All parties must respect the intellectual property of others.

3.11. Proper Maintenance of Records

The Company's financial books, records and statements must properly document all assets and liabilities, accurately reflect all transactions of the Company, and retain in accordance with all applicable laws and regulations. These documents must not be inappropriately altered. All parties must not make false entries in the books or records of the Company for any reason.

The Company is subject to extensive and complex accounting requirements. All of the Company's books, records, accounts and financial statements are to be maintained in reasonable detail, accurately reflecting Company's transactions and are to conform both to applicable legal requirements and to Company's system of internal controls.

3.12. Fraudulent Activities

All parties must not enter into fraudulent activities. Fraudulent activities encompass an array of irregularities and illegal acts characterized by intentional deception. Fraud can be perpetrated by persons outside as well as inside the Company. No one has the authority to commit illegal acts related to the Company. Fraudulent activities include acts that are not only a detriment to the Company, but also a detriment to third parties. Engaging in any act that involves fraud, theft, embezzlement or misappropriation of any property, including that of the Company, or any of its employees, suppliers or customers is strictly prohibited.

It is the Company's policy to ensure that incidents of fraud are promptly investigated, reported and, where appropriate and authorized by applicable law, prosecuted. Some examples of fraudulent conduct are:

- Falsification of financial records such as valuation of transactions, amount of income/loss, manipulating inventory, or failure to disclose financial information;
- Acceptance or payment of bribes or kickbacks;
- Diversion of potentially profitable transactions outside the Company (to other parties);



- Claims submitted for goods or services not actually provided to Company or a third party;
- Embezzlement; and
- Intentional concealment or misrepresentation of data, records, events or information, including but not limited to, expense reimbursement and achievement against Key Performance Indicators, resulting in reward and recognition benefits.

4. Personal Conduct Smoking

Smoking is not allowed on the premises of the Company, except in areas that have been clearly designated as employee smoking areas. The employees should only smoke when they are physically located in the designated smoking area and are expected to dispose of their cigarette butts in the receptacles provided.

The Company is concerned about its employees' health and discourages smoking. Tobacco smoking has been directly linked with cancer, respiratory problems and other disorders.

4.1. Drugs and Alcohol

The consumption, distribution and/or sales of alcohol on the Company's premises or in the course of employment will not be tolerated. The only exception to this is on company sponsored occasions that have the prior approval of the Director at Interest and when entertaining customers, supplier on behalf of the Company. On these exceptional occasions employees must ensure that they drink in moderation, behave in a professional manner, and do not engage in conduct which may risk their safety or the safety of others (including driving or operating any vehicle).

At the Company's premises, consumption, distribution and/or sales of alcohol is completely banned. The use of any non-prescription drugs is strictly prohibited in any premises of the Company or in the course of employment. Any individual on prescribed drugs, which may impact on their ability to safely perform their duties, must provide their manager with a medical certificate certifying that they are fit to perform their duties.

4.2. Tidiness

Desk and working areas must be left as tidy as possible. Under no circumstances must any items of value such as cheques be left overnight either in or on desks. All confidential material must be locked in desks or filing cabinets. Personal belongings in desks should be limited and not allowed to accumulate.



4.3. Dress and Grooming Standards

It is in the company's best interests to present a professional image to its customers, suppliers and the public. Accordingly, it is expected that all parties will dress in a manner consistent with good hygiene, safety and good taste.

Employees are required to wear uniform provided by the company and must take care of their uniform and report any wear or damage to their supervisors. Employees must be suitably groomed at all times and their appearance must be clean and neat.

4.4. Obscene Language

All parties are expected not to use objectionable or obscene language at any time whilst in or on the Company's premises. Employees are expected to at all times act and behave in a business-like manner and be courteous to their fellow employees and colleagues.

4.5. Inappropriate Conduct

All parties are expected not to conduct themselves in a manner that has an adverse impact on the work environment, including at company sponsored functions. This inappropriate conduct includes threats, over consumption of alcohol, violent behaviour, the possession of weapons of any type, the use of recording devices, including web cameras, for other than management approved purposes.

4.6. Sexual Misconduct, Abuse, Harassment and Assault

The Companies does not tolerate sexual misconduct or abuse, such as sexual assault, and rape. Sexual activities include undesired sexual advances in the form of requests for sexual favors or other verbal, non-verbal or physical behavior.

5. Compliance with Laws and Regulations

All parties must comply with all laws which apply to the Company's business. It is the responsibility of each party to meet this obligation. All parties have responsibility to know what the law requires and that they understand the importance of complying with the law.

6. Equal Employment Opportunities

The Company strictly prohibits discrimination against any employee or applicant for employment because of the individual's race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, or any other characteristic. Affirmative action will be taken to ensure that all employment decisions, including but not limited to those involving recruitment, hiring,



promotion, training, compensation, benefits, transfer, discipline, and discharge, are free from unlawful discrimination.

7. Human trafficking and Slavery

The Company strictly prohibits the use of forced labor and human trafficking in all company operations and in our supply chain including slavery and abduction, forced recruitment, debt bondage and domestic workers under forced labor situations, and internal or international trafficking.

8. Political Activities

All parties to be neutral towards all political parties by:

- Not doing any form of political activity, both inside the Company's environment except running political rights as citizens.
- Not using company facilities for the benefit of a certain group/political party.
- Not carry, demonstrate, deploy, and distribute symbols, images and ornaments of political parties within the Company.

If the individual who plan to join any political party and hold a position in that political party, the Individual need to report to Management Company in writing.

9. Legal proceeding involvement

Employee who currently or previously involved in a legal proceeding or convicted guilty of violating government regulations need to report to Company's Management in writing.

10. Obligation to report breaches / whistleblowing

The individual who has violated this code of conduct can report themselves and for anyone who becomes aware of a suspected violation of the Code of Conduct, whether before or after it has occurred, must promptly report it to:

1. their manager and/or human resources department;
2. Delivering an official letter addressed to the Company by the Board of Commissioner, by hand delivery, sent by facsimile, or by post to the Company;
3. Via e-mail at: whistleblowing@satnusa.com
4. Available suggestion boxes.



COMPANY CODE OF CONDUCT

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The policies written in this Company's Code of Conduct are joint decision of Management by considering the document references as listed. And we are committed to continuously reviewing and updating this document in accordance with the latest regulations, latest events and requests from Management. This stipulated policy is effective since the signing of this code of conduct and so that everyone concerned is aware of it.

Approved by

Directors of the Company



Abidin
President Director

Bidin Yusuf
Operational Director

Kustina
Finance Director (Non Affiliated)

Reference Documents

1. UK Bribery Act 2020
2. Foreign Corrupt Practices Act
3. Indonesia Regulation No.31 year 1999 about Corruption Eradication
4. Indonesia Regulation No. 20 year 2001 about Amendments to Law No.31 year 1999 Corruption Eradication



History of Changes

REV	DATE	PAGE	CONTENT OF CHANGE	ORIGINATOR
00	6-Jan-2014	all	New document	Smailly A.
01	5-Nov-2015	2	Add general principles	Smailly A.
02	27-Feb-2020	3	Add Corruption, Extortion, Bribery /	Stanly R
		4	Embezzlement	
		5	Add Kickbacks, Facilitating Payments, Money Laundering	
03	23-Nov-2020	5	Add cumulative gift can be received and offered	Stanly R.
		3	Add Relatives, Aggregate ownership	
		4	Commitment	
		14	Reporting political activities, Legal proceeding involvement, Self report	