

# PTSN Supplier Code of Conduct

PT Sat Nusapersada Tbk. (“PTSN”) is committed to the highest standards of social and environmental responsibility and ethical conduct. PTSN’s suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for PTSN. PTSN requires its suppliers to operate in accordance with the principles and requirements, as applicable, in this PTSN Supplier Code of Conduct (“Code”) and in full compliance with all applicable laws and regulations. This code goes beyond compliance with applicable laws by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law. This Code outlines PTSN’s expectations for Supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices.

PTSN will assess its suppliers’ compliance with this Code, and any violations of this Code may jeopardize a supplier’s business relationship with PTSN, up to and including termination. This Code applies to PTSN suppliers and their subsidiaries, affiliates, and subcontractors and next-tier suppliers (each a “Supplier”) providing goods or services to PTSN, of for use in or with PTSN manufacturing process and final products.

## A. Labor

PTSN believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and PTSN suppliers shall uphold the highest standards of labor practice and human rights.

### 1. Freely Chosen Employment

Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Supplier shall not withhold workers’ original government-issued identification and travel documents and required to pay recruitment fees to obtain employment.

### 2. Child Labor Avoidance / Juvenile / Student Worker Protections

Supplier shall not employ child labor. The term “child” to any person under the age for completing compulsory education, or under the minimum age for employment in the country whichever is highest.



### **3. Working Hours**

Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest. In addition, overtime must be voluntary, and vacation, leave periods, and holidays should be rendered consistently with applicable laws and regulations.

### **4. Wages and Benefits**

Supplier shall pay at least the minimum wage in a timely manner, provides any benefits required by law and premium rate for overtime hours.

### **5. Humane Treatment**

Supplier shall commit to a workplace free of any kind of harassment and abuse.

### **6. Non-Discrimination**

Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices.

### **7. Freedom of Association**

Supplier shall freely allow workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.

## **B. Health and Safety**

Worker health, safety, and well-being is important to PTSN. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

### **1. Occupational Health and Safety Management**

Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of health & safety control hierarchy. Supplier shall follow up any injury and illness occurred in the work area, and take appropriate action to control and prevent from happening in the future. Supplier shall communicate and train all employees in their primary language.



## **2. Health and Safety Permits**

Supplier shall obtain, keep current, and comply with all required health and safety permits.

## **3. Emergency Preparedness and Response**

Supplier shall identify, assess potential emergency situations, develop and implement emergency plans.

## **4. Sanitation, Food and Housing**

Supplier shall provide workers with reasonably accessible and clean toilet facilities and potable water. Worker dormitories provided by Supplier shall be clean and safe and provide reasonable living space.

### **c. Environment**

PTSN is committed to protecting the environment, and environmental responsibility is at the core of how we operate. Supplier shall develop, implement, and maintain environmentally responsible business practices.

#### **1. Environmental Management**

Supplier shall identify, manage, reduce, and responsibly control air emissions, wastewater, greenhouse gas emissions emanating from its operations that pose a hazard to the environment.

#### **2. Environmental Permits and Reporting**

Supplier shall obtain and comply with all required environmental permits.

#### **3. Pollution Prevention and Resource Reduction**

Waste of all types, including water and energy, shall be reduced or eliminated at the source, or by proper practices.

#### **4. Hazardous and Non-Hazardous Substances / Materials Management**

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous and/or non-hazardous waste (solid waste).

Suppliers are to adhere to all applicable laws, regulations and PTSN requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.



## D. Ethics

PTSN expects the highest standards of ethical conduct in all of our endeavors. Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

### 1. Business Integrity

Supplier shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, OECD Convention on Combating Bribery of Foreign Public Officials. Suppliers shall have a policy relating to business with PTSN that prohibits the giving and acceptance of gifts.

### 2. No Improper Advantage

Supplier and its personnel shall not in any form or way bribe any personnel of PTSN. Supplier shall support PTSN in the building of trust and integrity between the parties, and shall reject any solicitation for bribes during daily business cooperation and make a complaint to Business Control department of PTSN.

### 3. Disclosure of Information

Supplier shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties and as required by law.

### 4. Intellectual Property

Supplier shall respect intellectual property rights and safeguard customer information.

### 5. Fair Business, Advertising and Competition

In terms of “Association Relationship” (means the relationship between the controlling shareholders, actual controllers, directors, supervisors, and senior executives and the enterprises directly or indirectly controlled by them, as well as other relationship that could lead to transfer of the interests), supplier shall:



- a. Report any Association Relationship with PTSN at PTSN's request and shall not conduct any associated transaction; Supplier shall not set up a company together with PTSN's personnel or his/her relatives, or let PTSN's personnel or his/her relatives take share of Supplier, for PTSN's personnel or his/her relatives to get any unfair benefits.
- b. Supplier commits, while during the bidding process, it shall initiatively report to PTSN about if there is an Association Relationship between itself and other bidder/bidders.

## **6. Responsible Sourcing of Minerals**

Suppliers shall have programs that ensure to avoid knowingly purchasing 3TG (Tantalum, Tin, Tungsten, Gold) that directly or indirectly finance armed groups from conflict affected regions.

## **7. Privacy and Confidential Information**

Supplier shall committed to protect the reasonable privacy expectations of personal information of everyone they do business with, including PTSN. Supplier shall keep all non-public information disclosed by PTSN strictly confidential and not make improper use of confidential information. Supplier shall not solicit PTSN's employee to gain directly or indirectly an advantage for themselves.

## **8. Whistleblowers or Anonymous Complaints and Protection of Identity**

Suppliers shall have programs that ensure the confidentiality and protection of all stakeholders whistleblower. Anonymous complaints with clear and specific descriptions of person/time/place/event are to be accepted and protected.

Supplier shall report any incidents that related to the business with PTSN through PTSN Complaint Channel:

E-mail : [whistleblowing@satnusa.com](mailto:whistleblowing@satnusa.com)

Phone : +62 778 570 8888

Official Letter to the Company Board of Commissioner

## **E. Management System**

PTSN believes that sound management systems and commitment are key to enriching the social and environmental well-being of our supply chain. PTSN holds its suppliers accountable to this Code and all of its standards. Supplier shall implement or maintain, as applicable, management systems that facilitate compliance with this Code and the law, identify and mitigate related operational risks, and facilitate continuous improvement.

Approved by  
**Directors of the Company**

**Abidin**

President Director

**Bidin Yusuf**

Operational Director

**Kustina**

Finance Director (Non Affiliated)