


	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
	Doc No.	OS-SN-GEN-004	Rev No.			
	Date	12-Aug-24	Total Page No.			
Model	-			Anita A.	Stanly Rocky	Abidin

1. DOCUMENT HISTORY

REV	DATE	CONTENT OF CHANGE	PAGE OF CHANGE	ORIGINATOR
00	14-Jul-20	New Document	All	Stanly Rocky
01	12-Aug-24	Revised document format Added definition of Supplier Added violation sanctions Change the email address whistleblowing@satnusa.com to lapor@satnusa.com Add obligation to information security system	1, 2 1 2 6 7	Anita A.

2. PURPOSE

Aims to establish ethical and behavioral guidelines for all suppliers of PT Sat Nusapersada Tbk, with the aim of ensuring compliance with applicable regulations, maintaining fair and open business relationships, and supporting social and environmental responsibility, in order to maintain the integrity and reputation of the company.

3. SCOPE





Applicable to all suppliers, business partners and third parties working with PT Sat Nusapersada Tbk, covering all aspects of business relationships from procurement of goods and services to contract execution.

4. REFERENCE DOCUMENT

- 4.1 Company's Code of Conduct
- 4.2 ISO 9001:2015, Quality Management systems
- 4.3 ISO 14001:2015, Environmental Management systems
- 4.4 ISO 45001:2018, Occupational Health and Safety Management systems
- 4.5 ISO 27001:2022, Information Security, Cybersecurity and Privacy Protection
- 4.6 TL9000:2016, Quality Management System for Telecommunication Product
- 4.7 IATF 16949:2016, Quality Management System for Automotive Product
- 4.8 RBA Code of Conduct Version 8.0

5. DEFINITION

- 5.1 Supplier is an individual or legal entity that cooperates with PT Sat Nusapersada Tbk. including all employees of the supplier, subcontractors, and other parties brought or employed by the supplier in order to fulfill the obligations of such cooperation.
- 5.2 Associated Relationships are relationships between shareholders/directors/senior executives in PTSN and companies controlled by them, as well as other similar relationships.

	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
	Doc No.	OS-SN-GEN-004	Rev No.	01		
	Date	12-Aug-24	Total Page No.	7		
Model	-			Anita A.	Stanly Rocky	Abidin



6. ABBREVIATION

6.1 PTSN: PT Sat Nusapersada Tbk.

7. STANDARD & EXPLANATION

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

PTSN will assess supplier compliance with this Code, and any violation of this Code may jeopardize the supplier's business relationship with PTSN, up to and including termination and legal action. This Code applies to suppliers of PTSN and its subsidiaries, affiliates, and subcontractors and next tier suppliers (each a “Supplier”) that provide goods or services to PTSN, for use in or with PTSN's manufacturing processes and end products.





7.1 Labor

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

7.1.1 Selected Free Occupations

Suppliers shall not traffic in persons or use any form of slavery, forced labor, bonding, involuntary contract, or prison labor. Suppliers shall not withhold original government-issued documents and travel documents and require paying recruitment fees to obtain employment.

7.1.2 Child / Youth Labor Avoidance / Student Worker Protection

	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
	Doc No.	OS-SN-GEN-004	Rev No.	01		
	Date	12-Aug-24	Total Page No.	7		
Model	-			Anita A.	Stanly Rocky	Abidin



7.1.3 Working time

Suppliers shall comply with all applicable laws and regulations with respect to working hours and rest days. In addition, overtime shall be voluntary, and holiday pay, leave periods and vacations shall be granted consistently with applicable laws and regulations.

7.1.4 Wages and benefits

Suppliers are required to pay at least the minimum wage in a timely manner, provide any benefits required by law and premium rates for overtime hours.

7.1.5 Humane treatment

Suppliers shall commit to a workplace free from any kind of harassment, abuse and torture.

7.1.6 Non-Discrimination

Suppliers shall not discriminate against workers on the basis of 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.

7.1.7 Freedom of association

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

7.2 Health & Safety


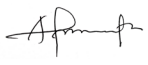


The health, safety and welfare of workers is important to PTSN. Suppliers must provide and maintain a safe working environment and integrate good health and safety management practices in their business. Workers have the right to refuse unsafe work and report unhealthy working conditions.

7.2.1 Health & Safety Management

Suppliers shall identify, evaluate, and manage occupational health and safety hazards through a process prioritized according to the health & safety hierarchy of controls. Suppliers are required to follow up on any injuries and illnesses that occur in the work area, and take appropriate action to control and prevent them from reoccurring in the future. Suppliers are required to communicate and train all employees in their primary language.

7.2.2 Health & Safety License

Suppliers shall obtain, keep up to date with, and comply with all required health

	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
	Doc No.	OS-SN-GEN-004	Rev No.	01		
	Date	12-Aug-24	Total Page No.	7		
Model	-			Anita A.	Stanly Rocky	Abidin



and safety permits.

7.2.3 Emergency readiness & response

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

7.2.4 Sanitation, Food and Housing

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

7.3 Environment

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

7.3.1 Environment Management

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

7.3.2 Environmental Reporting and Permits

Suppliers shall obtain and comply with all required environmental permits.

7.3.3 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.

7.3.4 Management of Hazardous and Non-Hazardous Substances/Materials






Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous and/or non-hazardous waste (solid waste). Suppliers shall comply with all applicable laws, regulations and PTSN requirements regarding the prohibition or restriction of certain substances in products and manufacturing processes, including labeling for recycling and disposal.

7.4 Ethics

PTSN expects the highest standards of ethical behavior in all our endeavors. Suppliers must always be ethical in every aspect of their business, including relationships, practices, sourcing and operations.

7.4.1 Business Integrity

Suppliers shall not engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Supplier shall comply with all applicable anti-corruption laws and regulations in the countries in which it operates,

	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
Doc No.	OS-SN-GEN-004	Rev No.	01			
Date	12-Aug-24	Total Page No.	7			
Model	-				Anita A.	Stanly Rocky
						Abidin

including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the OECD Convention on Combating Bribery of Foreign Public Officials. Suppliers must have a policy relating to business with PTSN that prohibits the giving and receiving of gifts.

7.4.2 No Inappropriate Advantages

Suppliers and their personnel shall not in any form or manner bribe any PTSN personnel. Supplier shall support PTSN in building trust and integrity between the parties, and shall reject requests for bribes during day-to-day business cooperation and file a complaint with PTSN's Business Control department.

7.4.3 Information disclosure

Suppliers 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.

7.4.4 Intellectual Property

Suppliers shall respect the intellectual property rights and protect the information of PTSN and PTSN's customers.

7.4.5 Business, Advertising and Fair Competition

Fair business standards, advertising and competition must be upheld. In this regard PTSN sets the rules as follows:


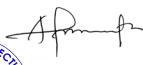



- Suppliers must report Associated Relationships to PTSN and will not conduct related transactions;
- In the bidding process at PTSN, the Supplier shall report about the Associated Relationship between himself and other bidders;
- Supplier shall not establish a company together with PTSN employees, or allow PTSN employees or their families to benefit from Supplier's transactions with PTSN.

7.4.6 Responsible Mineral Sourcing

Suppliers shall have a program in place that ensures to avoid knowingly purchasing 3TG (Tantalum, Tin, Tungsten, Gold) that directly or indirectly finance armed groups from conflict-affected areas.

7.4.7 Privacy & Confidential Information

PTSN is committed to protecting the reasonable expectation of privacy in the personal information of everyone we do business with, including suppliers, PTSN customers, consumers and employees. Suppliers are required to comply with applicable privacy and information security laws when personal information is

	Name of Document :			PREPARED BY	CHECKED BY	APPROVED BY
	Supplier's Code of Conduct					
Doc No.	OS-SN-GEN-004	Rev No.	01			
Date	12-Aug-24	Total Page No.	7			
Model	-				Anita A.	Stanly Rocky
						Abidin

collected, stored, processed, transmitted and shared.

Suppliers shall keep all non-public information disclosed by PTSN strictly confidential and not make improper use of confidential information. Suppliers will not induce PTSN employees to gain an advantage directly or indirectly for themselves.

7.4.8 Anonymous Whistleblowers or Complaints and Identity Protection

Supplier shall have a program that ensures confidentiality, protection of all stakeholder whistleblowers, Anonymous complaints with clear and specific description of person/time/place/event shall be accepted and protected.

Supplier shall report any business related incident with PTSN through PTSN Complaint Channel:

E-mail : lapor@satnusa.com

Telepon : +62 778 570 8888

Official Letter to the Board of Commissioners of the Company

7.5 Management Systems

PTSN believes that good 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 its standards.

All suppliers are required to have an information security system and comply with all information security policies and procedures that have been established by PTSN to maintain the confidentiality, integrity, and availability of information. Suppliers shall also implement or maintain, as applicable, related management systems that facilitate compliance with this Code and the law, identify and mitigate related operational risks, and facilitate continuous improvement.

8. DOCUMENTED INFORMATION / FORM

-