



PT MERDEKA COPPER GOLD, Tbk.

POLICY ANTI-CORRUPTION POL-IR-05-01

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DOCUMENT CHANGE STATUS

Revision No.	Division/Department	Reason For Change	Revision By	Revision Date
1	HR – Industrial Relations	<ol style="list-style-type: none">1. Adding a Company Partner falls within the scope of the policy.2. Added the definition of Company Partners.3. Some of the contents of the policy also mention Company Partners.	HR Compliance	01 November 2022

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1. GENERAL

Policy regarding Anti-Corruption is developed, implemented, and managed for the benefit of PT Merdeka Copper Gold, Tbk. and its subsidiaries in building a relationship or business interaction with Company Partners without any corrupt practices.

2. PURPOSE

The purpose of this policy is to serve as a guideline so that every person in charge who conducts business interactions and builds a relationship, both with the government and with Company Partners, is carried out in a professional, fair, and has high integrity and law-abiding manner which can ultimately prevent both material and immaterial losses that can disrupt the continuity of the Company's operations.

3. SCOPE

This policy applies to all Employees at PT Merdeka Copper Gold, Tbk. and its subsidiaries and Company Partners.

4. RESPONSIBILITY

4.1 Top Management


The Top Management must approve and sign all quality management system documents including Company Policies, Procedures, Work Instructions, Forms, and other documents.

4.2 Management Representative

The HR department must cooperate with other departments to prepare and revise all documents including Company Policies, Procedures, Work Instructions, Forms, and other documents.

4.3 Head of Department or Department Manager

The Department Head or Department Manager must review the relevant documented information, and ensure that subordinate staff is aware of any changes, or updates to the document.

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5. POLICY

5.1 Definition

1. The Company is PT Merdeka Copper Gold, Tbk. or its subsidiaries.
2. Employees are people who work at PT Merdeka Copper Gold, Tbk. or its subsidiaries.
3. Company Partner is customers, buyers, consultants, advisers, sub-contractors, vendors, suppliers, and other third parties of the Company and/or subsidiaries.
4. Corruption is an unlawful act in the form of misappropriation or misuse of Company money and/or assets for personal gain/interest or certain parties which can increase the Company's costs in conducting its business and can damage the Company's business reputation.

5.2 General Standards

1. The Company is committed to avoiding corrupt practices in building a relationship with the Government and/or business interactions carried out with Company Partner.
2. Every Employee is prohibited from using funds or money, Company assets, or personnel for any purposes that are unethical or illegal, and always prevent all activities, either directly or indirectly, that might violate this policy or anti-corruption provisions in accordance with the applicable laws and regulations.
3. Every act of corruption is categorized as a violation of law and can be subject to punishment and sanctions in accordance with the applicable laws and regulations.

5.3 Corruption Act

1. Every Employee and/or Company Partner, either individually or in groups, is prohibited from carrying out, participating or being involved in practices that are categorized as acts of corruption, as follows:
 - a. Providing assistance, opportunities, facilities, information, or conspiracy either with government officers or with other parties so that acts of corruption occur which ultimately harm the Company's or even the state's finances;
 - b. Conducting bribes with government officials or with other parties to gain profit or take personal advantage of certain parties;
 - c. Abuse of authority over the position held for personal gain or certain parties;
 - d. Committing acts of extortion by forcing someone to give something, paying or receiving payment with a discount, or doing something for himself;
 - e. Commit fraudulent acts to the detriment of the Company;

- f. Carrying out business activities that are illegal and not free from conflicts of interest;
 - g. Carrying out gratification practices.
2. Actions that are also related and can be categorized as acts of corruption, including:
- a. Obstructing/hindering the process of examining corruption matters;
 - b. Don't give information or testified not true;
 - c. Don't give a descriptive account of the perpetrator of corruption;
 - d. The Witnesses or members who do not testify truthfully or testify falsely;
 - e. People who hold official secrets and do not provide information or provide false information;
 - f. The witness who revealed the identity of the whistleblower.