




PT MERDEKA COPPER GOLD, Tbk.

POLICY ANTI-BRIBERY POL-IR-06-00

PREPARED	CHECKED	APPROVED	
Muhammad Aditya	M Regen Pohan	Titien Supeno	Albert Saputro
IR Assistant Manager	IR Manager	HR Director	President Director
01 August 2022	01 August 2022	01 August 2022	01 August 2022

Head Office:

The Convergence Indonesia 21st floor
Jl. Epicentrum Boulevard Raya, Kawasan Epicentrum
HR Rasuna Said – Jakarta 12960
Phone : (+62-21) 2988 0399
Fax : (+62-21) 2988 0427
Website : www.merdekacoppergold.com

PT MERDEKA COPPER GOLD, Tbk.		Document number	POL-IR-06-00
	ANTI-BRIBERY	Created date	01 August 2022
		Revision to	00
		Number of page	3 of 5

1. GENERAL

The Anti-Bribery Policy 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 other parties without the practice of bribery.

2. PURPOSE

The purpose of this policy is as a guideline so that every person in charge who conducts business interactions and builds a relationship, both with the government and with the Company's partners, is carried out professionally, fairly, with high integrity and obeys the law which can ultimately prevent material and immaterial losses that can disrupt the continuity of Company operations.

3. SCOPE

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

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, ensure that subordinate staff are aware of any changes or updates or updates to the document.

PT MERDEKA COPPER GOLD, Tbk.		Document number	POL-IR-06-00
	ANTI-BRIBERY	Created date	01 August 2022
		Revision to	00
		Number of page	4 of 5

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. Bribery is an unlawful act in the form of giving or promising money or goods or in other forms to a person with the intention of persuading/influencing that person to do something or not to do something in their duties, which is contrary to their authority or obligations concerning the public interest and the Company.
4. Facilitation Payment is an unofficial payment to a government official that is directed to facilitate or speed up routine work or services carried out by the government, so that they become bound to implement them.

5.2 General Standards

1. The Company is committed to avoiding all bribery practices in all of its business interactions.
2. Every Employee is prohibited from using funds/money, Company assets, or personal for any unethical or illegal purposes and always prevents all activities, either directly or indirectly that may violate this policy or anti-bribery provisions according to the applicable laws and regulations.
3. Every act of bribery is categorized as a violation of the law and can be subject to penalties and sanctions in accordance with the applicable laws and regulations.

5.3 Giving or Accepting Bribes

1. The Company and each Employee are prohibited from paying, giving, or receiving things, as follows:
 - a. Something of value or value. Anything of value and value that is offered, promised or received and includes cash, gifts, entertainment, travel accommodation, promotional business activities, employment opportunities, contributions to charities or political parties and other similar items of high value.
 - b. For institutions or commercial entities or government officials for the sake of obtaining business benefits.
2. The Company and every employee are prohibited from giving or receiving facilitation payments.

PT MERDEKA COPPER GOLD, Tbk.		Document number	POL-IR-06-00
	ANTI-BRIBERY	Created date	01 August 2022
		Revision to	00
		Number of page	5 of 5

3. The Company and any Employee are prohibited from promising, offering, giving, requesting or receiving anything of value, which may influence or appear to affect a bona fide/good relationship between the Company or the Employee and other parties.
4. Every Employee is prohibited from giving anything of value to any Political Party for the public interest on behalf of the Company without prior written approval from the President Director.

5.4 Giving or Accepting Gifts and/or Entertainment

1. Giving or receiving gifts and/or entertainment is not categorized as bribery as long as it is within the limits of fairness as stipulated in a separate policy.
2. The gifts and/or entertainment in question include normal business meals or gifts of a certain value that are not in the form of cash.
3. The inappropriate value of a gift and/or entertainment can be categorized as a bribe and may be subject to penalties and sanctions in accordance with the applicable laws and regulations.