




PT MERDEKA COPPER GOLD, Tbk.

POLICY CONFLICT OF INTEREST POL-IR-09-00

PREPARED	CHECKED	APPROVED	
Muhammad Aditya	M Regen Pohan	Titien Supeno	Albert Saputro
IR Assistant Manager	IR Manager	HR Director	President Director
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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.merdekakoppergold.com

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		Number of page	2 of 5

DOCUMENT CHANGE STATUS

No. Revision	Division/Department	Reason For Change	Revision By	Revision Date

PT MERDEKA COPPER GOLD, Tbk.		Document number	POL-IR-9-00
	CONFLICT OF INTEREST	Created date	01 August 2022
		Revision to	00
		Number of page	3 of 5

1. GENERAL

Policy regarding Conflicts of Interest is developed, implemented, and managed for the benefit of PT Merdeka Copper Gold, Tbk. and its subsidiaries to provide boundaries for situations where conflicts of interest may arise in the Company's business activities.

2. PURPOSE

The purpose of this policy is as a guideline so that in carrying out every business activity the Company avoids conflicts of interest that may arise from any cause.

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

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. Conflict of interest is a situation when the personal, friends, or family interests of the Employee intersect with the interests of the Company and affect the way or results even appear to affect the interests of the Company.

5.2 General Standards

1. Each Employee has their respective duties and responsibilities in each of their jobs, but the Company is committed to carrying out all business activities that are legal and free from conflicts of interest.
2. Every Employee is obliged to inform his supervisors or parties appointed by the Company to obtain the necessary approval if in one or more of the Company's business activities there will be a conflict of interest or even a possible conflict of interest for himself or one or more Employees.

5.3 Avoiding Conflicts of Interest

1. Conflict of interest due to a certain position or relationship:
 - a. Everyone must avoid situations that can create a conflict of interest between his interests and the interests of the Company.
 - b. Everyone is not allowed to take advantage of his position in the Company for personal gain, friends, or family that can make it difficult to carry out work objectively and effectively, or can affect judgment during work.
 - c. Everyone should avoid running and/or doing business with other parties owned or controlled by himself, his family members, or close friends. Avoid personal relationships with other people directly or indirectly, where such relationships can cause a loss of trust and confidence in objectivity.
2. Conflict of interest of an Investment:
 - a. Everyone should avoid making personal investments in companies that are competitors or business partners of the Company, especially where such investments may result in losses for the Company.
 - b. In determining that a personal investment may cause a conflict of interest, the following matters may be considered:
 - i. There is an overlapping role between his role in the Company and the business in which he/she invests,
 - ii. The size and degree of significance of the investment,
 - iii. Percentage of ownership in investment companies,
 - iv. The level of control and control in investment companies.
3. Conflict of interest due to work activities outside the Company:
 - a. Everyone must separate their work activities for the Company from any activities outside the Company such as side work or self-employment (including consulting), bona fide charitable organizations, educational organizations, or other non-profit activities,
 - b. Activities outside the Company must not affect its performance or ability to perform its obligations to the Company.

**CONFLICT OF INTEREST**

4. Conflict of interest due to business opportunities:
 - a. Everyone should avoid taking advantage of business opportunities and competition with the Company in any way; including any business opportunity when the Company has an interest in and uses information that is not intended for the public, for personal gain, or others (including the purchase or sale of shares, etc.).
 - b. Any business opportunity found through his work that belongs to the Company unless approved by the President Director.
5. Use of Company assets:
 - a. Everyone should avoid using Company funds, facilities, equipment, methods, or personnel for other business or personal endeavors, personal gain, or the benefit of a particular party.
 - b. The use of the Company's assets outside of the Company's needs must obtain a President Director.
6. Giving or receiving benefits and/or gifts:
 - a. Everyone should avoid giving or receiving (directly or indirectly) anything of value from or to another party, especially if the purpose is (or could be perceived as) to improperly influence a business decision or relationship,
 - b. Giving or receiving unfair benefits and/or gifts can be categorized as bribery and may be subject to penalties and sanctions.