



## **Code of Conduct**

### **PT Astra Argo Lestari Tbk**

#### **Code of Conduct**

##### **1. Definition**

Code of conduct is a system of values derived from the corporate culture and adhered to by the company, Board of Directors, management, and all employees as a guideline for interacting with both internal and external environments.

##### **2. General**

In implementing Code of Conduct:

- a. The Company, the Board of Directors, the management, and all employees shall implement the principles of Good Corporate Governance, namely Fairness, Transparency, Accountability, and Responsibility to enhance the Company's performance.
- b. The Board of Directors and the management shall comprehend and implement the code of conduct as an exemplary employee behavior.
- c. The Company, the Board of Directors, the management, and all employees strongly and consistently emphasize the implementation of a code of conduct to foster and uphold a culture of exemplary conduct and attitude among the management and employees.
- d. The Company, the Board of Directors, the management, and all employees shall effectively implement the code of conduct to increase shareholder value and protect the rights of other stakeholders.
- e. The Company, the Board of Directors, the management, and all employees shall avoid conflicts of interest, either directly or indirectly, including but not limited to insider trading or owning personal/family land near company plantations, both core and plasma
- f. The Company, the Board of Directors, management, and all employees are strictly prohibited from giving or receiving any form of compensation from transacting or interested parties, either directly or indirectly.

- g. The Company, the Board of Directors, management, and all employees maintain security and confidentiality while restricting unauthorized access to company data and information.

### **3. Partnerships**

In fostering collaboration with business partners (distributors, bank creditors, or other business partners):

- a. The Company, the Board of Directors, the management, and all employees prioritize establishing partnerships based on equality and mutual trust grounded in fairness and social responsibility without discriminating on the basis of ethnicity, religion, race, or class.
- b. The Company, the Board of Directors, the management, and all employees adhere to prevailing laws and regulations.
- c. The Company, the Board of Directors, the management, and all employees must avoid conflicts of interest by refraining from engaging in business relationships with partners with familial ties to decision-makers.
- d. The Company, the Board of Directors, the management, and all employees are strictly prohibited from giving or receiving any form of compensation from business partners, either directly or indirectly.
- e. All agreements shall be documented in writing based on good faith and mutual benefit.
- f. Business partner selection shall be based on professionalism, alignment of values, and QCDSM (Quality, Cost, Delivery, Safety, Morale).
- g. The Company actively seeks to empower small and medium business partners.

### **4. Employees**

In implementing employee relations:

- a. The Company, the Board of Directors, the management, and all employees uphold universal human rights and employee rights and obligations based on prevailing laws and regulations.
- b. The Company, the Board of Directors, and the management provide equal opportunity to employees without any form of discrimination based on seniority, gender, ethnicity, religion, race, or class.
- c. The Company, the Board of Directors, and the management highly value employees as valuable assets, prioritizing the development of their competencies and character.

- d. The Company, the Board of Directors, and the management foster an open atmosphere and two-way communication with employees.
- e. The Company, the Board of Directors, and the management reward high-performing employees.

## **5. Customers**

In interacting with customers:

- a. The company conducts open and transparent commodity tenders involving reputable prospective customers with proven track records, ensuring accountability in the process.
- b. The Company, the Board of Directors, the management, and all employees uphold customer rights in compliance with prevailing laws and regulations.
- c. The Company, the Board of Directors, the management, and all employees consistently uphold their commitments to price, quality, delivery times, after-sales service, and product guarantees in accordance with relevant standards.
- d. The Company, the Board of Directors, the management, and all employees deliver equal service to all customers.
- e. The Company, the Board of Directors, the management, and all employees are strictly prohibited from giving or receiving any form of compensation, either directly or indirectly.
- f. The Company, the Board of Directors, the management, and all employees uphold the confidentiality of customer information.
- g. The Company, the Board of Directors, the management, and all employees adhere to publication ethics and prevailing laws and regulations.

## **6. Competitors**

In the Company's interactions with competitors (companies outside PT Astra Agro Lestari and its subsidiaries that produce and market similar or substitute goods/services as the Astra Agro Group):

- a. The Company, the Board of Directors, the management, and all employees uphold fair, healthy, and transparent competition in accordance with prevailing laws and regulations.
- b. The Company, the Board of Directors, the management, and all employees are strictly prohibited from engaging in any form of cooperation with competitors that may negatively impact customers or result in monopolistic practices.

- c. The Company, the Board of Directors, the management, and all employees are strictly prohibited from disparaging competitors in any marketing, promotional, or advertising endeavors.
- d. The Company, the Board of Directors, the management, and all employees may gather information about competitors as long as it does not violate prevailing laws and regulations.
- e. The Company, the Board of Directors, the management, and all employees are strictly prohibited from engaging in ownership or management in competing companies, either directly or indirectly.

## **7. Suppliers**

A supplier is a business partner engaged in the provision of goods and services. The terms vendor, contractor, consultant, and provider are used interchangeably with a similar meaning. In procuring goods and services:

- a. The Company conducts an open tender in a transparent and accountable manner by engaging prospective suppliers with a good reputation and track record.
- b. The Company, Board of Directors, management, and all employees shall avoid suppliers with family ties to decision-makers and/or those with conflicts of interest.
- c. The Company, Board of Directors, management, and all employees are strictly prohibited from engaging in ownership or management, either directly or indirectly.
- d. The Company documents all agreements in writing based on good faith and mutual benefit.

## **8. Shareholders**

In all forms of interaction with shareholders:

- a. The company, board of directors, management, and all employees treat shareholders in accordance with the Company's Articles of Association and prevailing laws and regulations.
- b. The company, board of directors, management, and all employees strive to provide optimal performance and maintain a good image to increase value for shareholders.
- c. The company, board of directors, management, and all employees firmly uphold the prevailing laws and regulations regarding "insider information" towards requests for access to certain sensitive and/or confidential information.

## **9. Investors**

In interacting with investors (individuals or institutions with potential for direct or indirect participation in company ownership, including analysts and fund managers):

- a. The company, board of directors, management, and all employees provide actual, accurate, and prospective information.
- b. The company, board of directors, management, and all employees apply the principle of balanced treatment in providing necessary information.
- c. The company, board of directors, management, and all employees do not directly or indirectly engage in capital market activities aimed at harming or benefiting certain investors and/or shareholders.

## **10. State Officials**

In interacting with state officials (government implementing institutions and their apparatus including legislative, executive, judicial and other institutions, both at central and regional levels):

- a. The company, board of directors, management, and all employees maintain harmonious and constructive relationships based on honesty and mutual respect.
- b. The company, board of directors, management, and all employees strive to support national or regional programs, especially in education, social, economic and cultural fields.

## **11. Community**

In interacting with the community:

- a. The company, board of directors, management, and all employees participate in maintaining a clean and healthy environment around the company.
- b. The company, board of directors, management, and all employees along with their business units wherever located, build and foster harmonious relationships and strive to provide benefits through empowerment programs, especially for communities around the company.
- c. The company, board of directors, management, and all employees respect human rights as well as social, cultural, traditional, ethical, belief, and religious aspects, especially of communities around the company.

## **12. Mass Media**

In interacting with the mass media:

- a. The company adheres to the truth and openness of information in accordance with the journalistic code of ethics and prevailing laws and regulations and can be accounted for.
- b. The company positions the mass media as an equal business partner, therefore positive cooperation based on mutual respect and benefit needs to be built.
- c. Company officials are not permitted to give or receive any form of reward, either directly or indirectly.