



Company's Code of Ethics

PT Astra Agro Lestari Tbk





LIST OF CONTENTS

List of Contents	1
1. Introduction	2
1.1 <i>Catur Dharma</i>	4
1.2 Company Culture	4
2. Guidelines for Business Ethics and Work Ethics	6
2.1 General Provisions	7
2.2 Scope of Ethics	8
2.2.1 Business Ethics	8
2.2.2 Work Ethics	12
3. Corporate Secretary	14
4. Audit & Risk Management	16
5. Securities Dealing Rules (Securities Trading Regulations)	18
6. Conflict of Interest Guidelines	21
7. Donation Policy Guidelines	24
8. Violation Reporting System	26
9. Data Protection	28



PART 1

INTRODUCTION



CODE OF ETHICS

I. INTRODUCTION

As a corporate citizen, PT Astra Agro Lestari Tbk ("Astra Agro" or the "Company") has the determination and efforts to achieve one of its missions "To be a role model and contribute to the development and welfare of the nation". Astra Agro wants to become a business institution that brings benefits to its shareholders as well as all interested parties (stakeholders).

The Company's efforts to achieve the ideals of prosperity with the nation are only possible if the Company can live and grow in a healthy and sustainable manner. It is hoped that the Company's increasingly growing business activities will contribute to the nation's development and welfare of Indonesian people.

Astra Agro realizes that the sustainability of a company is greatly influenced by the company's behavior as a corporate citizen. Therefore, from the beginning the Company confirmed its intention to consistently be a good corporate citizen (Good Corporate Citizen) by having attitudes and behavior in line with laws, regulations and ethics, implementing an effective management system, paying attention to aspects of the Sustainable Development Goals (SDGs) as well as Environmental Social Governance (ESG) in its operational activities, is committed to implementing Diversity and Inclusion (D&I) and providing benefits to the wide community. The Company chooses and carries out its business by taking into account moral and social norms and the interests of the general public.

In order to build Astra Agro as a Good Corporate Citizen, it is necessary to prepare a code of conduct to serve as a guide for all Astra Agro personnel in having attitude and behaving appropriately, namely Astra Agro Good Corporate Governance (GCG), which includes among others, the Company's Code of Ethics. The preparation of the Astra Agro's Code of Ethics refers to the Code of Ethics of PT Astra International Tbk ("Astra") which is based on Astra's philosophy, *Catur Dharma* (Four Services), especially the first and main value, namely "Being a Beneficial Property for the Nation and State", taking into account the principles of good corporate governance.



1.1. CATUR DHARMA (Four Services)

The Company uses the basic philosophy of *Catur Dharma* to build a value system that functions as a reference source for all values, principles, ethics and policies in forming the Company's culture. The points of *Catur Dharma* are: "Become a beneficial property for the nation and state", "Providing the best service to customers", "Respecting each other and fostering collaboration" and "Striving to achieve the best".

1.2. COMPANY'S CULTURE

Catur Dharma is the Company's foundation in the formation of a solid organizational culture, namely Corporate Seven Cultures. Astra Agro's Work Culture is the values that the Company believes in as a Person of Astra Agro. This culture is contained in the Corporate Seven Cultures, i.e. consisting of seven cultures and interpreted in 28 (twenty eight) definitions.

No	Culture	Definition
1	Honest & Responsible	<ul style="list-style-type: none"> Behave and act in accordance with the values of faith and devotion Speak according to data Have a high commitment to work and work safety Become a unique & effective leader (leadership) Stay, work and live on the farm

2	Triple "S" (<i>Sebelum/Before, Selagi/While, Sesudah/After</i>)	<ul style="list-style-type: none"> • Arrive early • Start working as early as possible • Comply with established rules (SOP) for the synergy of safety aspects • Not delay in completing work • Consistent • Conduct periodical reviews • Prepare operational Analysis for synergy work with safety aspects
3	Fanatic	<ul style="list-style-type: none"> • Fanatical about technical culture • Fanatical about targets • Fanatical about work norms (activities according to competency) • Fanatical about job rotation • Fanatical about regulations (Comply) • Regulations including safety aspects)
4	Caring	<ul style="list-style-type: none"> • Fast, precise, and responsive to problems • Anticipate problems that will arise • Mitigation of business processes related to risk impacts including impacts on risk of safety aspects
5	Control	<ul style="list-style-type: none"> • Control the area and personnel and technical specifications under their responsibility • Use most of their time to check work processes in the field of synergy of safety aspects • Be brave and firm in giving sanctions for violations
6	Development & Innovation	<ul style="list-style-type: none"> • Create and maintain safe, peaceful and harmonious conditions in the farm environment • Improve employee performance capabilities in accordance with business direction requirements • Create innovations for operations including safety aspects
7	<i>Korsa</i>	<ul style="list-style-type: none"> • Proud to be farmers • Always want to be the best, including the best in terms of safety



PART 2

GUIDELINES FOR BUSINESS ETHICS AND WORK ETHICS



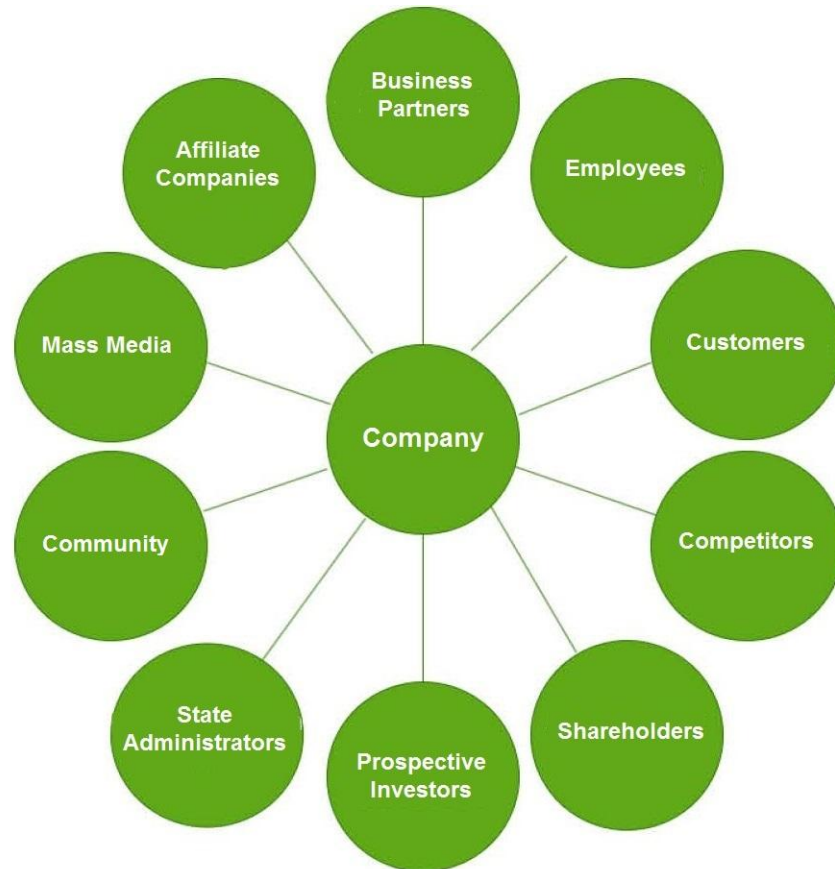
GUIDELINES FOR BUSINESS ETHICS AND WORK ETHICS

2.1 GENERAL PROVISIONS

1. The Company, Board of Directors, management and all employees implement GCG principles, namely Transparency, Accountability, Responsibility, Independence and Obligation to improve better company performance .
2. The Company, Board of Directors, management and all employees comply with applicable laws and regulations.
3. The Board of Directors and management understand and perform it as a model of behavior for employees.
4. The Company, Board of Directors, management and all employees emphasize its implementation strongly and consistently in order to form and maintain commendable management and employee behavior.
5. The Company, Board of Directors, management and all employees carry it out effectively to enhance Shareholder value and protecting other stakeholders' rights.
6. The Company, Board of Directors, management and all employees maintain security and confidentiality and limit access from unauthorized parties to Company data and information, including personal data managed by the Company.
7. The Company, Board of Directors, management and all employees avoid occurrence of conflicts of interest, either directly or indirectly, among others carrying out insider trading or possessing personal or family land around the Company's land, whether core or plasma.
8. The Company, Board of Directors, management and all employees are not permitted to give or receive (substantial) compensation or gifts that can influence decision making, either directly or indirectly, from parties making transactions or having interest.
9. The Company permits exchange of certain gifts and hospitality within professional environment if the gifts and hospitality are reasonable, according to the circumstances and justifiable and legal in the jurisdiction, and will not influence decisions related to the Company's relationships with other parties, or in any way encourage inappropriate behavior by the recipient.
10. The Company, Board of Directors, management and all employees must ensure that consider the following when giving or receiving gifts, favors, or other acts of hospitality:
 - a. There is a legitimate business interest in doing so
 - b. In accordance with Company's policy
 - c. The value is reasonable in accordance with good and widely accepted business practices as well as the timing and type of activity, such as:
 - Marriage;
 - Disaster;
 - Awards from the Company for the relevant achievements;
 - Souvenirs from other companies which value is considered reasonable and cannot influence decision making that violates existing provisions; and/or
 - Events in the Company such as office gatherings.which may not, in any way, be considered or construed as bribe or improper payment.

2.2 SCOPE OF ETHICS

The scope of Business Ethics and Work Ethics can be depicted as the diagram below:



2.2.1 BUSINESS ETHICS

Business ethics is a value system outlined from corporate culture and adhered to by the Company, Board of Directors, management and all employees as a reference for dealing with their environment, both internal and external.

1. BUSINESS PARTNER

Definition: Parties having business relationships with the Company such as distributors, suppliers, contractors, consultants, purveyors, bank creditors or others.

Principles for establishing cooperation with business partners:

- a. The Company, Board of Directors, management and all employees are based on equality, equity and mutual trust based on justice and social responsibility and do not discriminate between ethnicity, religion, race and between groups;
- b. The Company, Board of Directors, management and all employees comply with the applicable laws and regulations;
- c. The Company, Board of Directors, management and all employees are not allowed to have conflicts of interest;

- d. The Company, Board of Directors, management and all employees are not allowed to give to or receive from Business Partners, (substantial) compensation or gifts that can influence decision making;
- e. All agreements are stated in written documents prepared based on good faith and mutual benefit;
- f. Selection of Business Partners is based on professionalism, the principle of harmony of values and QCDSM (Quality, Cost, Delivery, Safety, Morale); and
- g. Striving to empower small and medium Business Partners.

2. EMPLOYEES

Definition: Individuals who work for the Company who receive pay based on their employment relation.

Principles in carrying out employment relation with employees:

- a. The Company, Board of Directors, management and all Employees respect universal Human Rights (HAM) as well as the rights and obligations of Employees based on applicable laws and regulations;
- b. The Company, Board of Directors, management give equal opportunities to Employees regardless of seniority, gender, ethnicity, religion, race and between groups by observing their performance competency;
- c. The Company, Board of Directors, and management treat Employees as valuable assets, therefore their competence and character need to be respected and improved;
- d. The Company, Board of Directors and management build an atmosphere of openness and two-way communication with employees; and
- e. The Company, Board of Directors and management give awards to outstanding Employees.

3. CUSTOMERS

Definition: Parties who are buyers or users of products or services produced and/or marketed by the Company.

Principles for interacting with customers:

- a. The Company conducts open tenders for the sale of commodities in a transparent and accountable manner by involving prospective Customers who have a good reputation and track record;
- b. The Company, Board of Directors, management and all employees respect Customers' rights in accordance with applicable laws and regulations;
- c. The Company, Board of Directors, management and all employees fulfill their commitments in terms of price, quality, delivery time, after-sales service and product guarantees in accordance with applicable standards;
- d. The Company, Board of Directors, management and all employees provide the same service to all customers;

- e. The Company, Board of Directors, management and all employees are not permitted to give or receive any form of (substantial) compensation or gifts, either directly or indirectly, which could influence decision making;
- f. The Company, Board of Directors, management and all employees maintain confidentiality of information regarding Customers; and
- g. The Company, Board of Directors, management and all employees refer to publication ethics and applicable laws and regulations.

4. COMPETITORS

Definition: Other parties who produce or market goods and/or services that are similar or substitute for goods and/or services produced or marketed by the Company.

Principles in dealing with competitors:

- a. The Company, Board of Directors, management and all employees support the creation of fair and healthy competition in accordance with applicable laws and regulations;
- b. The Company, Board of Directors, management and all employees are not allowed to develop cooperation with Competitors which could be detrimental to Customers and/or lead to monopolistic practices;
- c. The Company, Board of Directors, management and all employees are not allowed to discredit Competitors, whether in marketing, promotional or advertising activities;
- d. The Company, Board of Directors, management and all employees can search for information about Competitors as long as it does not violate applicable laws and regulations; and
- e. The Company, Board of Directors, management and all employees are not allowed to participate either directly or indirectly in the ownership and/or management of Competitors.

5. SHAREHOLDERS

Definition: Every individual or institution registered in the Company's Shareholder Register.

Principles for interacting with shareholders:

- a. The Company, Board of Directors, management and all employees treat Shareholders in a balanced manner, including providing accurate and timely information, in accordance with the Company's Articles of Association and applicable 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; and

- c. The Company, Board of Directors, management and all employees adhere strictly to the applicable laws and regulations regarding "insider information" to requests for access to certain sensitive and or confidential information.

6. PROSPECTIVE INVESTORS

Definition: Individuals or institutions who have the potential or intend to participate in the Company' shares ownership, including supporting institutions in making investments.

Principles for interacting with potential investors:

- a. The Company, Board of Directors, management and all employees provide accurate, timely and prospective information in accordance with applicable laws and regulations;
- b. The Company, Board of Directors, management and all employees apply the principles balanced treatment in providing the necessary information; and
- c. The Company, Board of Directors, management and all employees, either directly or indirectly or Indirectly, do not carry out activities in capital market which aim to harm or benefit certain investors and/or Shareholders.

7. STATE ORGANIZERS

Definition: State implementing institutions and their apparatus which include the legislative, executive, judiciary and other institutions, both at the central and regional levels.

Principles for interacting with state officials:

- a. The Company, Board of Directors, management and all employees maintain harmonious, constructive and mutually respectful relationships by observing applicable laws and regulations; and
- b. The Company, Board of Directors, management and all employees strive to support national or regional programs, especially in the fields of education, social, economy, culture, health and environment.

8. COMMUNITY

Definition: A group of people who live together in one place and have a direct or indirect relationship with the Company's activities.

Principles for interacting with the community:

- a. The Company, Board of Directors, management and all employees participate in maintaining clean and healthy living environment around the Company;
- b. The Company, Board of Directors, management and all employees and their business units wherever located, build and foster congenial and harmonious relationships and strive to provide benefits through empowerment programs, especially to the community around the Company; and

- c. The Company, Board of Directors, management and all employees respect Human Rights as well as social, cultural, customs, politeness, belief and religion aspects.

9. MASS MEDIA

Definition: An institution that includes print, electronic and online media which function to provide information, education, promotion, social control and entertainment.

Principles for interacting with mass media:

- a. The Company adheres to the truth and transparency of information in accordance with journalistic code of ethics and applicable legislation and that can be accounted for;
- b. The Company places Mass Media as an equal partner, therefore it is necessary to build positive cooperation and mutual respect; and
- c. Company officials are not allowed to give or receive any form of (substantial) compensation or gifts, either directly or indirectly, which could influence decision making.

10. AFFILIATED COMPANIES

Definition: Companies having ownership linkage with the Company, either directly or indirectly.

The principle in interacting with Affiliated companies is that together with and between Affiliated Companies, the Company builds cooperation to achieve synergy in various business and social activities both at the central and branch levels in accordance with applicable laws and regulations, including business competition regulations.

2.2.2 WORK ETHICS

Work Ethics is a value system adhered to by Company Employees in their attitude, behavior and relationships with parties within the Company.

Work ethics include:

1. Employee Attitudes in the Company
 - a. Be a good Company citizen by observing internal policies/regulations of the Company, Company Regulations and applicable laws and regulations;
 - b. Use and develop their potentials optimally for the Company's benefit; and
 - c. Help create a conducive work environment and collectively build a good culture.
2. Employee attitudes in using their authority and position in the Company
 - a. Use them with full responsibility in the Company's interests and not for personal or certain parties' interests;
 - b. Maintain and use all data, information, assets and company facilities in the Company's interests, not for personal or certain parties' interests; and

- c. Maintain the Company's good name in their attitudes and behavior, both outside and inside the Company.
 3. Employee Attitudes regarding the Company's Confidential Information
Company's Confidential Information refers to documents and/or strategic information created and/or obtained by the Company which may not be disclosed and provided to outside parties, with consideration of:
 - Maintaining the Company's competitive advantage; and/or
 - Complying with agreements or laws and regulations that require the Company to maintain the confidentiality of information.
 - a. Information included in the category of the Company's Confidential Information:
 - Financial statements and/or material transactions not yet disclosed to public;
 - The Company's strategic plans;
 - Information bound by confidentiality agreements;
 - The Company's products that are still in the development stage;
 - Technological uniqueness;
 - Material information not yet available to public;
 - Personal data information; and
 - Other information considered confidential.
 - b. All Employees are responsible for maintaining confidentiality and are prohibited from misusing the Company's Confidential Information;
 - c. The Company's Confidential Information obtained by Company Employees must remain confidential after their term of employment at the Company ends; and
 - d. Material Information is important and relevant information that can influence the price of the Company's securities/Investors' decision to buy or sell the Company's securities.
4. Employee attitudes as superiors/subordinates in the Company
 - a. Superiors act as role models, directors and mentors to their subordinates;
 - b. Subordinates proactively develop themselves and express their potentials under the direction and guidance of their superiors; and
 - c. Mutual acceptance, respect and fostering cooperation in an atmosphere of openness based on sincerity and good faith.
5. Attitude of Fellow Employees
 - a. Respect each other, encourage enthusiasm and foster cooperation in carrying out their respective duties and responsibilities; and
 - b. Improve integrity and build openness and abundance mentality in harmonious relationships as members of the Company.



PART 3

CORPORATE SECRETARY



CORPORATE SECRETARY

In accordance with the provisions of the Financial Services Authority (“OJK”), the Corporate Secretary is tasked with following Capital Market developments, especially the laws and regulations applicable in the Capital Markets sector, as well as giving inputs to the Board of Commissioners and members of the Board of Directors of Issuers or Public Companies to comply with the provisions of laws and regulations. in the Capital Markets sector.

The Corporate Secretary is also tasked with assisting the Board of Commissioners and Board of Directors in implementing governance, which includes:

- a. Information disclosure to public, including the availability of certain information on the Company's website;
- b. Submission of reports to OJK and/or the Indonesian Stock Exchange (BEI) on time;
- c. Organizing and documenting General Meetings of Shareholders (GMS);
- d. Organizing and documenting Board of Directors' Meetings and Board of Commissioners' Meetings;
- e. Implementation of orientation programs for the Board of Directors and Board of Commissioners; and
- f. Acting as a liaison between the Company and the Company's shareholders, OJK, BEI, and other stakeholders.



PART 4

AUDIT AND RISK MANAGEMENT



AUDIT & RISK MANAGEMENT

As part of the application of the Company's Good Corporate Governance policy, the Company aligns the completeness of control management tools in accordance with the provisions applicable to audit and risk management, which include:

- Audit Committee
- Internal Audit
- Risk Management
- External Auditor

1. Audit Committee

The Audit Committee is an independent committee formed by and responsible to the Board of Commissioners. The formation and duties and responsibilities of the Audit Committee refer to OJK Regulation Number 55/POJK.04/2015 concerning the Establishment and Guidelines for Implementing the Work of Audit Committee. The main function of the Audit Committee is to assist the Board of Commissioners in carrying out its supervisory responsibilities for financial reporting, risk management and internal control, audits, as well as compliance with applicable regulations and laws.

2. Internal Audit

The Company formed an Internal Audit Division based on the need for applying the process of evaluation and development of internal control that can increase the effectiveness of the Company's activities including risk management and corporate governance.

3. Risk Management

An effective risk management system is a task carried out by all management levels of the Company collectively. Each function or work unit is responsible for carrying out the process of risk governance sustainably starting from identifying, evaluating, mitigating and monitoring risks in accordance with the authority inherent in each function. The Risk Management Team facilitates the assessment of risks identified by related functions, then submits the reports of major risks to the Board of Directors and Audit Committee on a regular basis.

4. External Auditor

As a form of responsibility for the Board of Directors in running and managing the Company, the Board of Directors periodically submits financial statements in accordance with generally accepted accounting principles and practices in Indonesia. The Board of Directors is responsible for implementing good general accounting policies, to establish and maintain internal control in recording, processing, summarizing and reporting transactions that are within the Board of Directors' authority and control.

To provide adequate assurance that the Company's financial statements in all material respects have been presented fairly, the Company appointed an external auditor to conduct an audit of the Company's financial statements.



PART 5

SECURITIES DEALING RULES



SECURITIES DEALING RULES

1. INTRODUCTION

In principle, the Company encourages its employees to invest and hold securities (including shares or bonds) issued by the Company listed on the Indonesia Stock Exchange (“Issuer”), as a long-term investment and it is not speculative in nature. However, this investment must be carried out in accordance with the provisions of applicable laws and regulations.

Capital market regulations prohibit the Board of Commissioners, Board of Directors, Employees of the Issuer Company and certain other parties from buying or selling the Issuer's securities, unless they fulfill the requirements as regulated in the regulations.

To protect employees from potential violations of these statutory provisions and also from possible claims or demands for violations, these Securities Dealing Rules are applied to the Board of Commissioners, Board of Directors and Employees of the Company. These Securities Dealing Rules are prepared based on capital market regulations and are intended to provide further guidance.

2. DEFINITION

“Dealing” includes:

- Any acquisition or disposal of the Issuer's securities (or an agreement to acquire or release the same), now or at a later date, with or without conditions;
- Enter into agreements aimed at gaining profits or avoiding losses in connection with price fluctuations of the Issuer's securities; and
- Any transaction resulting in the change of share ownership in the Issuer.

“Insider Information” is information:

- Not available to public;
- Related, directly or indirectly, to the Issuer; and
- That can influence the price of the Issuer's securities.

“Blackout/Closed Period” is:

- Within 60 (sixty) days before announcement of the annual financial report by the Issuer; and
- Within 30 (thirty) days prior to announcement of the quarterly financial statement by the Issuer.

“Short Term” is a period of 12 (twelve) months or less.

“Related Parties” include:

- Husband/wife of Directors, Commissioners and Employees;
- Children of Directors, Commissioners and Employees; and



- Any individual or legal entity controlled by Directors, Commissioners and Employees, either directly or indirectly.

"Prohibited Parties" are Directors, Commissioners and Employees.

3. TERMS

1.1 Prohibited Parties and Related Parties are not permitted to carry out Dealing:

- During the Closed Period; and
- In case having Insider Information.

Prohibited Parties and Related Parties should carry out long-term dealings and not carry out Short Term Dealings.

Prohibited Parties should consider carefully whether or not they have Insider Information (or could be deemed having such information).

In case of doubt, Prohibited Parties are advised to consult the Company's Corporate Secretary or Corporate Legal before carrying out any Dealing.

1.2 Prohibited Parties and Related Parties are not allowed to invest or divest in the securities of the Issuer or other public companies in Indonesia or outside Indonesia if they are aware of the issuer's planned transactions that could affect the price of their securities.

1.3 Prohibited Parties and Related Parties having Insider Information are not permitted to:

- a. Influence other parties to buy or sell the related securities; or
- b. Provide Insider information to any party who is reasonably suspected of being able to use the information in question to purchase or sell related securities.



PART 6

GUIDELINES FOR CONFLICTS OF INTEREST



GUIDELINES FOR CONFLICTS OF INTEREST

1. GENERAL GUIDELINES

Any transactions made between:

- The Company and its Affiliates (as defined in capital market regulations); or
- Companies controlled by the Company ("Controlled Companies") with the Company Affiliates must be conducted in accordance with capital market regulations to ensure that the transactions are carried out in the Company's interests. Such transactions may be subject to various obligations under applicable laws and regulations and must therefore be carefully scrutinized.

2. MATTERS TO CONSIDER

2.1 Any planned transactions between (i) the Company or Controlled Companies and (ii) the Company's Affiliates (including updates and/or changes) must be checked first by the Company's Corporate Legal and/or the Controlled Company's Corporate Legal to ensure compliance with applicable laws and regulations.

The Controlled Company's Corporate Legal shall then be required to report each transaction plan to the Company's Corporate Legal.

2.2 Specific to transactions:

- a. Between the Company or Controlled Companies and the Company's Director/ Board of Commissioners/ Major Shareholders or their Affiliates; or
- b. In case of any difference between the Company's/ Controlled Company's economic interests and the personal economic interests of the Company's Director/ Board of Commissioners/ major shareholders.
("Conflict of Interest Transaction"), the transaction plan must be checked first by the Company's Corporate Legal to ensure compliance with applicable laws and regulations.

2.3 If based on statutory regulations, a Conflict Transaction requires approval from the Company's independent shareholders, then the plan for the Conflict Transaction must first obtain approval of the Company's Board of Commissioners.

2.4 Any Conflict of Interest Transaction must be carried out on customary terms and at a reasonable price, without causing loss to the Company. Appropriate internal control procedures must be implemented to support this.

2.5 If an Employee (including executives) has a conflict of interest with the Company or the Affiliates or other related party is in the opinion that a transaction involving an Employee has a conflict of interest with the Company or the Affiliates, then the Employee must immediately disclose the transaction in writing to the Company's Board of Directors.



- 2.6 Any Director, Board of Commissioners, employee of the Company or Controlled Company who has a conflict of interest with the Company or Controlled Company is not permitted to be involved in making decisions regarding matters having the conflict of interest.



PART 7

GUIDELINES FOR DONATION POLICY





GUIDELINES FOR DONATION POLICY

1. INTERPRETATION

Donations are the Company's contributions or participation given on the Company's own initiative or at other parties' request, in the form of funds, goods/kind, vehicles, or joint programs and given especially to the community around the Company, organizations, institutions or other parties.

2. PURPOSE

As a form of the Company's social concern and responsibility for social situations and conditions of communities that need attention and assistance.

3. PRIORITIES

Fields or activities:

- Natural disasters;
- Education;
- Health; and
- Environment.

Organizations, agencies or institutions making request:

- Communities around the Company;
- Mass media/Press;
- Educational institutions;
- Community organization;
- Reputable social institutions;
- Government Institutions; and
- Other relations.

4. CONSIDERATIONS FOR GIVING

- Must be selective and evaluated taking into account the objectives and reputation of the parties or organizations/institutions submitting the proposal;
- Must be right on target and according to needs;
- Must be coordinated and communicated with the Company Affiliates so that no duplication exists; and
- Availability of funds (according to budget).



PART 8

VIOLATION REPORTING SYSTEM





VIOLATION REPORTING SYSTEM

The Company is committed to implementing corporate governance practices through stakeholders' participation, one of which is by developing guidelines for a whistle blowing policy system. This policy is also the Company's commitment to increase integrity and transparency. Any report received will be processed confidentially, fairly, objectively and responsibly.

Whistle blowing system (“WBS”) is a guideline for stakeholders related to reporting suspected violations/fraud that are indicated to be detrimental to the Company or other things that violate the code of ethics and/or laws and regulations.

The process of handling violation reporting is carried out by the whistle blowing system management team called the WBS Committee and the Company will regulate in details a separate violation reporting policy in accordance with Company's policy.



PART 9

DATA PROTECTION





DATA PROTECTION

As time goes by, information and communication technology has become one of the things required to support business activities. In line with this, it is necessary to have a policy regulating data protection within the Company's scope.

The Company is committed to protecting all data obtained, kept and/or managed by the Company in carrying out its business activities in Indonesia in accordance with applicable laws and regulations. The data protected as referred to are data involving the Company's business activities, including personal data of employees, stakeholders and others as deemed necessary by the Company. In terms of personal data protection, the Company also maintains compliance with Law Number 27 of 2022 concerning Personal Data Protection, and its amendments.

In this regard, the Company regulates the policies regarding data protection separately in accordance with Company's policy by complying with the provisions of applicable laws and regulations.



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